

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
Northern Division**

GREAT LAKES EXPLORATION)	
GROUP LLC)	
Plaintiff,)	
v.)	Civil Action No. 1:04-CV-375
)	
The Unidentified, Wrecked and (For Salvage-)	HON. ROBERT HOLMES BELL
Right Purposes), Abandoned Sailing Vessel, etc.)	
Defendant, et al.)	

**PLAINTIFF GREAT LAKES EXPLORATION GROUP'S BRIEF IN SUPPORT OF
MOTION FOR PROTECTIVE ORDER**

Pursuant to the Court's Order dated May 10, 2005, Plaintiff Great Lakes Exploration Group and the Field Museum of Chicago have assembled, and are prepared to provide the Intervenor detailed information regarding the shipwreck. The documents and information to be provided to Intervenor include significant trade secrets and confidential information.

These have been developed at an expense of hundreds of thousands of dollars, utilizing hundreds of hours of research and development, hard work, investigation, and analysis. The trade secrets have consistently been treated as confidential, and are valuable and could be used by others to damage Great Lakes Exploration and the Field Museum in their efforts and business. In addition, disclosure could result in damage to the shipwreck site which is the subject of this proceeding.

Over the course of more than a month, Great Lakes Exploration has proposed to Intervenor several drafts of a Protective Order in an effort to obtain Intervenor's consent to an agreed Protective Order with the following key features:

- (a) permitting the prompt disclosure of such information to the Court and to Intervenor;

(b) preventing Intervenor from misappropriating and using such trade secrets for their own purposes (or for those of any third party), other than in connection with the pending Motion to Dismiss;

(c) ensuring effective, enforceable, safeguards to prevent fraudulent claims of “independent” development of such trade secrets; and

(d) providing for sanctions, including contempt and liquidated damages, in the event that Intervenor decide to violate the Protective Order at some time in the future.

As of the date of this Motion, Plaintiff has been unable to obtain consent to obtain an Agreed Protective Order. Plaintiff has attached a proposed Protective Order as an Exhibit to its Motion.

CONCLUSION

For these reasons, the Court should enter a Protective Order in a form as attached as Exhibit 1.

Respectfully submitted,
GREAT LAKES EXPLORATION GROUP LLC

By: //s// Richard T. Robol
Of Counsel
Richard T. Robol (OH- 0064345)
ROBOL & WINKLER LLC
555 City Park Avenue
Columbus, OH 43215
Telephone: (614) 559-3839
Facsimile: (614) 559-3846
rrobol@columbuscounsel.com

//s// Roger Boer
Of Counsel
Roger Boer, Esq.
161 Ottawa Avenue N.W.
Suite 600
Grand Rapids, MI 49503
Telephone. (616) 233-5136
Facsimile: (616) 459-5102

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of June, 2005, a copy of the foregoing was served by the Court's ECF service upon all counsel of record.

//s// Richard T. Robol