

## EXHIBIT 2

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

GREAT LAKES EXPLORATION )  
GROUP LLC )  
) )  
Plaintiff, )  
) )  
v. )  
) )  
The Unidentified, Wrecked and (For )  
Salvage-Right Purposes), Abandoned )  
Sailing Vessel, her tackle, )  
apparel, appurtenances, cargo, etc. )  
located within a circle having )  
a radius of 3.5 statute miles, whose )  
center point is at coordinates )  
45° 32.8' North latitude and 86° 41.5' )  
West longitude, )  
) )  
*In Rem* )  
) )  
Defendant. )

Civil Action No. 1:04-CV-375

HON. ROBERT HOLMES BELL

Dept. of Attorney General  
**RECEIVED**

MAY 12 2005

NATURAL RESOURCES  
DIVISION

**PLAINTIFF GREAT LAKES EXPLORATION'S RESPONSES TO  
INTERVENORS' REQUEST TO PRODUCE**

Plaintiff Great Lakes Exploration, by counsel, respectfully responds to Intervenor Request for Production of Documents as follows:

**REQUEST NO. 1.**

Plaintiff objects to this Request as overbroad, ambiguous and unduly burdensome, and as calling for the production of trade secrets and documents falling within the work product privileges. Without waiving its objection, Plaintiff will produce non-privileged documents pertaining to the operation, which do not compromise the shipwreck

coordinates, upon entry of a Protective Order and upon reciprocal agreement with Intervenor regarding relevance.

**REQUEST NO. 2.**

Plaintiff objects to this Request as overbroad, ambiguous and unduly burdensome, and as calling for the production of trade secrets and documents falling within the work product privileges. Without waiving its objection, Plaintiff will produce non-privileged documents pertaining to the communications which do not compromise the coordinates of the shipwreck upon entry of a Protective Order and upon reciprocal agreement with Intervenor regarding relevance.

**REQUEST NO. 3.**

Plaintiff objects to this Request as calling for the production of trade secrets and/or confidential information. Without waiving its objection, Plaintiff will produce non-privileged documents upon entry of a Protective Order.

**REQUEST NO. 4.**

Plaintiff objects to this Request as overbroad, ambiguous and unduly burdensome, and as calling for the production of trade secrets and documents falling within the work product privileges. Without waiving its objection, Plaintiff will produce non-privileged documents which do not compromise the coordinates of the shipwreck upon entry of a Protective Order.

**REQUEST NO. 5**

Plaintiff objects to this Request as overbroad, ambiguous and unduly burdensome, and as calling for the production of trade secrets and documents falling within the work product privileges. Without waiving its objection, Plaintiff will produce non-privileged documents which do not compromise the coordinates of the shipwreck upon entry of a Protective Order.

**REQUEST NO. 6.**

Plaintiff objects to this Request as overbroad, ambiguous and unduly burdensome, and as calling for the production of trade secrets and documents falling within the work product privileges. Without waiving its objection, Plaintiff will produce non-privileged documents which do not compromise the coordinates of the shipwreck upon entry of a Protective Order and upon reciprocal agreement with Intervenor regarding relevance.

**REQUEST NO. 7.**

Plaintiff objects to this Request as overbroad, ambiguous and unduly burdensome, and as calling for the production of trade secrets and documents falling within the work product privileges. Without waiving its objection, Plaintiff will produce non-privileged documents which do not compromise the coordinates of the shipwreck upon entry of a Protective Order.

**REQUEST NO. 8.**

Plaintiff objects to this Request as overbroad, ambiguous and unduly burdensome, and as calling for the production of trade secrets and documents falling within the work product privileges. Without waiving its objection, Plaintiff will produce non-privileged documents which do not compromise the coordinates of the shipwreck upon entry of a Protective Order and upon reciprocal agreement with Intervenors regarding relevance.

**REQUEST NO. 9.**

Plaintiff agrees to produce such documents.

**REQUEST NO. 10.**

Plaintiff agrees produce such documents.

**REQUEST NO. 11.**

Plaintiff objects to this Request as ambiguous, and Plaintiff is unable to determine what documents the Request covers. Upon clarification by Intervenors as to the nature of the Request, Plaintiff will respond.

**REQUEST NO. 12.**

Plaintiff agrees to produce such documents.

**REQUEST NO. 13.**

Plaintiff objects to this Request as overbroad, ambiguous and unduly burdensome, and as calling for the production of trade secrets and documents falling within the work product privileges. Without waiving its objection, Plaintiff will produce all non-privileged documents which do not compromise the coordinates of the shipwreck upon entry of a Protective Order and upon reciprocal agreement with Intervenor regarding relevance.

**REQUEST NO. 14.**

Plaintiff objects to this Request as overbroad, ambiguous and unduly burdensome, and as calling for the production of trade secrets and documents falling within the work product privileges. Without waiving its objection, Plaintiff will produce all non-privileged documents which do not compromise the coordinates of the shipwreck upon entry of a Protective Order and upon reciprocal agreement with Intervenor regarding relevance.

**REQUEST NO. 15.**

Plaintiff agrees to produce such documents.

**REQUEST NO. 16.**

Plaintiff objects to this Request as overbroad, ambiguous and unduly burdensome. Without waiving its objection, Plaintiff will produce all non-privileged documents which do not compromise the coordinates of the shipwreck upon entry of a Protective Order and upon reciprocal agreement with Intervenor regarding relevance.

**REQUEST NO. 17.**

Plaintiff objects to this Request as overbroad, ambiguous and unduly burdensome, including its assumption that an appropriate plan can be prepared without further investigation of the shipwreck site. Without waiving its objection, Plaintiff will produce all non-privileged documents which do not compromise the coordinates of the shipwreck upon entry of a Protective Order and upon reciprocal agreement with Intervenors regarding relevance.

**REQUEST NO. 18.**

Plaintiff objects to this Request as overbroad, ambiguous and unduly burdensome, and as calling for the production of trade secrets and documents falling within the work product privileges. Without waiving its objection, Plaintiff will produce all non-privileged documents pertaining which do not compromise the coordinates of the shipwreck upon entry of a Protective Order and upon reciprocal agreement with Intervenors regarding relevance.

**REQUEST NO. 19.**

Plaintiff objects to this Request as overbroad, ambiguous and unduly burdensome, and as calling for the production of trade secrets and documents falling within the work product privileges. Without waiving its objection, Plaintiff will produce all non-privileged documents which do not compromise the coordinates of the shipwreck upon entry of a Protective Order and upon reciprocal agreement with Intervenors regarding relevance.

**REQUEST NO. 20.**

Plaintiff objects to this Request as overbroad, ambiguous and unduly burdensome, and as calling for the production of trade secrets and documents falling within the work product privileges. Without waiving its objection, Plaintiff will produce all non-privileged documents which do not compromise the coordinates of the shipwreck upon entry of a Protective Order and upon reciprocal agreement with Intervenor regarding relevance.

Respectfully submitted,  
GREAT LAKES EXPLORATION GROUP LLC

By: 

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