

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

GREAT LAKES EXPLORATION
GROUP LLC

Plaintiff

Civil Action No. 1:04-CV-375

v.

HON. ROBERT HOLMES BELL

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.

and

MICHIGAN DEPARTMENT OF HISTORY,
ARTS AND LIBRARIES AND MICHIGAN
DEPARTMENT OF ENVIRONMENTAL
QUALITY,

Intervenors.

INTERVENORS' REQUEST TO PRODUCE TO
PLAINTIFF GREAT LAKES EXPLORATION GROUP LLC

Now come Intervenors, Michigan Department of History, Arts and Libraries and
Michigan Department of Environmental Quality, pursuant to FR Civ P R 26(b) and R 34, and
requests Plaintiff to produce the following documents and things to their attorneys at their

attorney's office in Lansing, Michigan during ordinary business hours within 30-days of service of this request.

REQUEST TO PRODUCE 1:

Provide logs and any other records and documentation relating to the operation described in paragraph 2 of the verified amended complaint.

ANSWER

REQUEST TO PRODUCE 2:

Produce all correspondence, including e-mail communications, reports, photographs, proposals, between the Plaintiff, its principals, and the Field Museum and staff of the Field Museum relating to the activity described in paragraph 3 of the complaint.

ANSWER

REQUEST TO PRODUCE 3:

Provide the express written permission referred to in paragraph 4 of the verified amended complaint.

ANSWER

REQUEST TO PRODUCE 4:

Provide all documents in your possession and under your control relating to the information and belief referred to in paragraph 5 of the verified amended complaint.

ANSWER

REQUEST TO PRODUCE 5:

Provide logs, and any other records and documentations of the actions constituting dominion and control of the alleged shipwreck as salvor-in-possession, as declared in paragraph 16 of the verified amended complaint.

ANSWER

REQUEST TO PRODUCE 6:

Provide logs and any other records, including documentation and reports, of the research, search, survey and other salvage operations referred to in paragraph 19 of the verified amended complaint including materials relating to all potential candidates for the site(s) within the designated area, and all side scan sonar imagery, magnetic data, GPS positioning, research vessel logs and archaeological field notes and descriptions of salvage operations.

ANSWER

REQUEST TO PRODUCE 7:

Provide all photos and other records documenting the alleged marine peril referred to in paragraph 20 of the verified amended complaint.

ANSWER

REQUEST TO PRODUCE 8:

Provide all logs, records, side scan sonar imagery, GPS location data and other documentation and reports that relate to the location of a wrecked and abandoned sailing vessel, her tackle, apparel, appurtenances, cargo, etc., as described in paragraph 2 of the verified amended complaint.

ANSWER

REQUEST TO PRODUCE 9:

Provide the articles of incorporation and all annual reports of the Plaintiff.

ANSWER

REQUEST TO PRODUCE 10:

Provide all contracts, agreement, articles of incorporation, shares and any other documents that describe the relationship between the Plaintiff and Steven Libert.

ANSWER

REQUEST TO PRODUCE 11:

Provide the contract, record of transfer, or other agreement or transaction relating to Plaintiff's interest in investigation activities conducted by Mr. Libert alleged in paragraph 2 of the complaint.

ANSWER

REQUEST TO PRODUCE 12:

Provide copies of the resume of Scott J. Demel, including his academic credentials, professional memberships and descriptions of his work experience with other maritime and underwater archaeological investigations, and all publications of Scott J. Demel, including any relating to marine and underwater archaeology.

ANSWER

REQUEST TO PRODUCE 13:

Produce the communications and input referred to on page 2 of the Affidavit of Steven Libert.

ANSWER

REQUEST TO PRODUCE 14:

Provide all records and materials, including side scan sonar and magnetic data, unedited photos used to establish a mosaic, a scaled site map and field notes generated to date in the process of creating a photomosaic and of mapping of the entire debris field of the shipwreck, as referred to in the Affidavit of Steven Libert, page 4.

ANSWER

REQUEST TO PRODUCE 15:

Provide any documents in your possession or under your control that set forth the "good and standard under water archaeological practices" described in the Affidavit of Mr. Scott Demel.

ANSWER

REQUEST TO PRODUCE 16:

Provide all records and any other documentation of the "investment" relating to time and to money, referred to in paragraph 10 of the verified amended complaint.

ANSWER

REQUEST TO PRODUCE 17:

Provide all artifacts recovered or removed from the wreck site alleged in the complaint, and all descriptions of such artifacts, descriptions of the exact provenience of artifacts, and all plans for the handling, sampling, conservation and curation of such artifacts..

ANSWER

REQUEST TO PRODUCE 18:

Provide any map(s) of the 3½ mile radius wreck site, and of any and of any parts of that area developed to date.

ANSWER

REQUEST TO PRODUCE 19:

Provide any map(s) and documentation of artifacts lying within the 3½ mile radius area identified in the complaint.

ANSWER

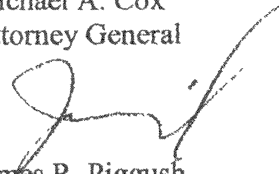
REQUEST TO PRODUCE 20:

Provide reports of any radio carbon dating relating to the alleged wreck and of any samplings for radio carbon dating of materials within the 3½ mile radius area alleged in the complaint.

ANSWER

Respectfully submitted,

Michael A. Cox
Attorney General

A handwritten signature in black ink, appearing to read "James R. Piggush", written over a horizontal line.

James R. Piggush
Assistant Attorney General
Environment, Natural Resources,
and Agriculture Division
P.O. Box 30755
Lansing, MI 48909
517/373-7540
Attorneys for Intervenors

Dated: April 7, 2005

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