

**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- Right Purposes), Abandoned Sailing Vessel, etc.)	HON. ROBERT HOLMES BELL
Defendant, et al.)	

**PLAINTIFF'S RENEWED MOTION TO FILE
SECOND AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 15(a), Plaintiff Great Lakes Exploration respectfully moves the Court to file the Second Amended Complaint attached as Exhibit A. The Second Amended Complaint (1) identifies the *in rem* Defendant by name, (2) provides the location of the Defendant within an area of approximately 3 square nautical miles, and (3) provides the greatest degree of particularity practicable. In support of this Motion, Plaintiff adopts the analysis and authorities in its Memorandum and Affidavit of Steven Libert filed herewith, and hereby made part of this Motion.

Accordingly, Great Lakes Exploration prays the Court to file its Second Amended Complaint.

Respectfully submitted,
GREAT LAKES EXPLORATION GROUP LLC

By: //s// Richard T. Robol
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ATTORNEYS FOR PLAINTIFFS

CERTIFICATION OF CONSULTATION AND DENIAL OF CONSENT

Pursuant to L. Civ. R. 7.1(d), counsel for Plaintiff certifies that he has requested consent to the filing of the Second Amended Complaint by counsel for Intervenors, and counsel for Intervenors has refused to grant consent.

//s// Richard T. Robol
Of Counsel

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of September, 2005, a copy of the foregoing was served by the Court's ECF system, via electronic mail upon all counsel of record.

//s// Richard T. Robol
Of Counsel