

STATE OF MICHIGAN
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May 16, 2006

Susan Driscoll Bourque
Case Manager
Clerk, U.S. District Court
602 Federal Courthouse
Grand Rapids, MI 49503-2363

Dear Ms. Bourque:

RE: *Great Lakes Exploration Group LLC v Unidentified, Wrecked Sailing Vessel*
Civil Action No. 1:04-CV-375

On October 25, 2005, at the request of the Plaintiff and the Intervenors, the court signed an order holding this matter in abeyance for 30 thirty days to allow the present parties to investigate the terms and conditions of undertaking a cooperative investigation concerning whether the target was the Griffon. Intervenors filed their Renewed Motion to Dismiss on November 17. Plaintiff did not reply as required by the local court rule.

On February 13, 2006, the parties reported that they continued discussions and represented that they would report to the court by April 17, 2006. Plaintiff represented his plan to file a memorandum in opposition to the motion to dismiss if the discussions were not successful.

On April 17, 2006, Mr. Robol reported continuing progress but acknowledged that issues remained.

This letter is to report that the discussions did not allow the parties to agree upon terms and conditions that make a cooperative investigation possible. The Intervenors continue to lack information on which to base responsible participation in a cooperative investigation or to authorize further investigations by the claimant.

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In light of Plaintiff's apparent resolve to proceed with its investigations, the Intervenors request the court, at its earliest convenience, to address their outstanding Renewed Motion to Dismiss. It focuses upon the Petitioner's refusal to specify the location of a defendant, despite this Court's order, and its failure to state any lien by virtue of legal salvage, and upon the fact that the putative defendant is in Michigan's actual possession, embedded in its bottomlands, not subject to, and immune from admiralty jurisdiction.

Sincerely yours,

/s/

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JRP:sjb

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s:nrd/ac/cases/open/great lakes exploration 04ag/letter bourque case manager status