

**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 GREAT LAKES EXPLORATION'S UNOPPOSED MOTION FOR
BRIEF ENLARGEMENT OF TIME DUE TO COUNSEL'S U.S. ARMY
OBLIGATION**

Plaintiff Great Lakes Exploration respectfully moves the Court to enlarge its time for filing its Memorandum in Opposition to Intervenor's Motion to Dismiss from the current due date of Thursday, June 22, 2006 to Monday, June 26, 2006. Plaintiff makes this Motion due to orders received by counsel for Plaintiff (who is an officer in the U.S. Army Reserve), requiring that he report to Camp Atterbury, Indiana from Wednesday, June 21, 2006 through Saturday, June 24, 2006. A brief extension of time will permit Plaintiff's counsel to fulfill his duty as an officer in the U.S. Army Reserve to report to Camp Atterbury, while also fulfilling his duty as an officer of the Court to provide a zealous and informative analysis of the issues raised by Intervenor's Motion to Dismiss. Conversely, fairness to Intervenor requires that their date for filing their Reply be extended commensurately with the enlargement of Plaintiff's time, and the parties have agreed to an extension through July 10, 2006.

A proposed Order is attached. Intervenor has consented to this extension.

In further support of this Motion, Plaintiff adopts the analysis and authorities set forth in the attached Memorandum.

Respectfully submitted,

GREAT LAKES EXPLORATION

/s/ Richard T. Robol

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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of June, 2006, a copy of the foregoing was served by electronic mail via the Court's ECF system upon all counsel of record.

/s/ Richard T. Robol

Of Counsel