

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

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|------------------------------------------------------------------------------------------------|---|------------------------------|
| 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 MEMORANDUM IN SUPPORT
OF UNOPPOSED MOTION FOR BRIEF ENLARGEMENT OF TIME DUE TO
COUNSEL'S U.S. ARMY OBLIGATION**

Plaintiff's counsel has been ordered to report to Camp Atterbury, Indiana from Tuesday, June 21, 2006 through Saturday, June 24, 2006. Great Lakes Exploration's date for filing its Memorandum in Opposition to Intervenors' Motion to Dismiss is currently set for Thursday, June 22, 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 Defendant's Motion to Dismiss. Conversely, fairness to Intervenors requires that their date for filing their Reply be extended commensurately with the enlargement of Plaintiff's time. Intervenors have agreed to this extension of time.

Accordingly, Plaintiff Great Lakes Exploration respectfully moves the Court (1) to enlarge Plaintiff's time for filing its Memorandum in Opposition from the current due date of Thursday, June 22, 2006 to Monday, June 26, 2006, and (2) to enlarge Intervenors' time for filing their Reply to Monday, July 10, 2006.

Respectfully submitted,
GREAT LAKES EXPLORATION

/s/ Richard T. Robol

Richard T. Robol - 0064345

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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