

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION
IN ADMIRALTY

ODYSSEY MARINE EXPLORATION, INC.

Plaintiff,

CIVIL ACTION

v.

Case No.: 8:06-CV-01685-SDM-MAP

THE UNIDENTIFIED, SHIPWRECKED
VESSEL OR VESSELS, their apparel, tackle,
appurtenances and cargo located within
center point coordinates: 49° 25' N, 6° 00' W;
Radius: 5 nautical miles, *in rem*

Defendant(s).

PLAINTIFF'S REQUEST FOR ORAL ARGUMENT

COMES NOW the Plaintiff, Odyssey Marine Exploration, Inc. ("Odyssey"), by and through undersigned counsel, and pursuant to Local Rule 3.01(j), respectfully requests this Court to entertain oral argument of Plaintiff's Motion for Protective Order (Dkt. 38) and Claimant Kingdom of Spain's Motion to Dismiss and for Other Relief. (Dkt. 46). In support thereof, Plaintiff states:

1. Plaintiff believes that oral argument will be necessary to better assist this Court in understanding the factual and legal issues related to the parties' arguments in each of the three pending motions. Plaintiff believes oral argument would particularly assist the Court in clarifying the different circumstances and facts regarding the three salvage actions currently before the Court.

2. Plaintiff estimates the time required for argument will be one hour or less unless the hearing will be combined with released Case Nos. 8:07-CV-0614-SDM-MAP and 8:07-CV-0616-SDM-MAP, in which case Plaintiff estimates the time required would be two hours or less.

WHEREFORE, Plaintiff, Odyssey Marine Exploration, Inc., respectfully requests this Court to entertain oral argument in this matter.

Respectfully submitted,

s/ Allen von Spiegelfeld
Allen von Spiegelfeld – FBN 256803
avonsp@fowlerwhite.com
Eric C. Thiel – FBN 016267
ethiel@fowlerwhite.com
FOWLER WHITE BOGGS BANKER P.A.
P.O. Box 1438
Tampa, Florida 33601
(813) 228-7411
Facsimile: (813) 229-8313
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 22, 2007, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to James A. Goold, Covington & Burling LLP, 1201 Pennsylvania Ave., NW, Washington, DC 20004; and David C. Banker, Bush Ross P.A., 220 S. Franklin Street, P. O. Box 3913, Tampa, FL 33601, *Attorneys for Claimant, Kingdom of Spain.*

s/ Allen von Spiegel
Allen von Spiegel – FBN 256803
avonsp@fowlerwhite.com
Eric C. Thiel – FBN 016267
ethiel@fowlerwhite.com
FOWLER WHITE BOGGS BANKER P.A.
P.O. Box 1438
Tampa, Florida 33601
(813) 228-7411
Facsimile: (813) 229-8313
Attorneys for Plaintiff