

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

In re:

RMS TITANIC, INC. *et al.*,<sup>1</sup>

Debtors

Case No. 3:16-bk-02230-PMG  
Chapter 11 (Jointly Administered)

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RMS TITANIC, INC.

Plaintiff,

vs.

Adv. Pro. No. 3:16-ap-00183-PMG

FRENCH REPUBLIC,  
a/k/a REPUBLIC OF FRANCE

Defendant.

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**RMS TITANIC, INC.’S WITHDRAWAL OF OBJECTION TO THE OFFICIAL  
COMMITTEE OF EQUITY SECURITY HOLDERS OF PREMIER  
EXHIBITIONS, INC.’S MOTION TO INTERVENE AS A PARTY PLAINTIFF**

RMS Titanic, Inc., (“RMST” or “Debtor” and together with its affiliated debtors listed in footnote 1, the “Debtors”) by undersigned counsel, hereby files this withdrawal of its objection [D.E. 21] to the *Motion of the Official Committee of Equity Security Holders of Premier Exhibitions, Inc. to Intervene as a Party Plaintiff* (the “Motion to Intervene”) filed by the Official Committee of Equity Security Holders of

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<sup>1</sup> The Debtors in the chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number include: RMS Titanic, Inc. (3162); Premier Exhibitions, Inc. (4922); Premier Exhibitions Management, LLC (3101); Arts and Exhibitions International, LLC (3101); Premier Exhibitions International, LLC (5075); Premier Exhibitions NYC, Inc. (9246); Premier Merchandising, LLC (3867); and Dinosaurs Unearthed Corp. (7309). The Debtors’ service address is 3045 Kingston Court, Suite I, Peachtree Corners, Georgia 30071.

Premier Exhibitions, Inc. (the “Equity Committee”) on November 21, 2016 [D.E. 19] in the above-captioned adversary proceeding (the “Adversary Proceeding”). Subject to entry of an agreed order (the “Agreed Order”) in the form attached hereto as Exhibit “A”, RMST hereby withdraws its previously filed objection to the Motion to Intervene. The Equity Committee consents to the entry of the Agreed Order.

NELSON MULLINS RILEY  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF on December 16, 2016. I also certify that the foregoing document is being served this day on the following counsel of record via transmission of Electronic Filing generated by CM/ECF:

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**Via U.S. Mail**

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/s/ Daniel F. Blanks

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# **EXHIBIT A**

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
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In re:

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Debtors.

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RMS TITANIC, INC.,

Plaintiff,

Adv. Pro. No. 3:16-ap-00183-PMG

vs.

FRENCH REPUBLIC  
a/k/a REPUBLIC OF FRANCE,

Defendant.

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**ORDER GRANTING THE OFFICIAL COMMITTEE OF EQUITY  
SECURITY HOLDERS OF PREMIER EXHIBITIONS, INC.'S  
MOTION TO INTERVENE AS A PARTY PLAINTIFF**

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<sup>1</sup> The Debtors in the chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number include: RMS Titanic, Inc. (3162); Premier Exhibitions, Inc. (4922); Premier Exhibitions Management, LLC (3101); Arts and Exhibitions International, LLC (3101); Premier Exhibitions International, LLC (5075); Premier Exhibitions NYC, Inc. (9246); Premier Merchandising, LLC (3867), and Dinosaurs Unearthed Corp. (7309). The Debtors' service address is 3045 Kingston Court, Suite I, Peachtree Corners, Georgia 30071.

THIS PROCEEDING came before the Court upon the Motion (the "Motion")<sup>2</sup> of the Official Committee of Equity Security Holders of Premier Exhibitions, Inc. (the "Equity Committee"), authorizing the Equity Committee to Intervene as a Party Plaintiff in this Adversary Proceeding [D.E. 19]. Objections having been filed by RMS Titanic, Inc. (the "Debtor") and by the Official Committee of Unsecured Creditors (the "Creditors' Committee", and with the Debtor, the "Objecting Parties"), the Equity Committee and the Objecting Parties having met and conferred and reached agreement for entry of an agreed order substantially in the form hereof, based upon agreement among the Parties, the Debtor and the Creditors Committee have withdrawn their respective objections subject to entry of this order, proper notice to interested parties having been made of the Motion pursuant to Local Bankruptcy Rule 2002-4 and FLMB-2014-10 Administrative Order Prescribing Procedures for Adversary Proceedings on November 14, 2016, it is

**ORDERED:**

1. The Motion is GRANTED under the terms set forth herein.
2. The Equity Committee is authorized to intervene in this Adversary Proceeding as a Party.
3. The Equity Committee is deemed to have appeared as a Party in the Adversary Proceeding.

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<sup>2</sup> Defined terms from the Motion are incorporated by reference herein.

4. As a Party the Equity Committee shall have the right (i) to raise issues and be heard in the Adversary Proceeding, (ii) to monitor the case and participate generally as a party to the proceeding, including participation in settlement discussions among parties to the adversary proceeding, (iii) to receive discovery requests and responses and to examine witnesses at depositions or at court proceedings, (iv) to receive all notices in the proceeding, (v) to file its own papers, (vi) to argue and respond to arguments in court, and (vii) to raise matters of concern by motion.

5. Notwithstanding the foregoing, the Equity Committee shall not (i) file a complaint or amended complaint or answer, (ii) initiate settlement discussions, (iii) initiate discovery, or (iv) act independently of the Debtor in respect of prosecution of the estate's claims or settlement of the estate's claims without the prior written consent of the Debtor or further order of the Court.

6. Entry of this order is without prejudice to the Creditors' Committee's right to hereafter move to intervene in this adversary proceeding.

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Attorney Jacob A. Brown is directed to serve a copy of this Order on interested parties who are non-CM/ECF users and file a proof of service within 3 days of entry of the Order.