

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

In re:

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

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

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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**PLAINTIFF'S UNOPPOSED MOTION TO CONTINUE HEARING ON  
PLAINTIFF'S (I) MOTION FOR ENTRY OF DEFAULT BY CLERK  
AGAINST DEFENDANT FRENCH REPUBLIC A/K/A REPUBLIC OF  
FRANCE AND (II) MOTION FOR DEFAULT JUDGMENT AGAINST  
DEFENDANT FRENCH REPUBLIC A/K/A REPUBLIC OF FRANCE**

Plaintiff RMS Titanic, Inc. ("Plaintiff") moves this Court to continue the hearing on Plaintiff's Motion for Entry of Default by Clerk Against Defendant French Republic a/k/a Republic of France [D.E. 10] and Motion for Default Judgment Against

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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.

Defendant French Republic a/k/a Republic of France [D.E. 11] scheduled for January 23, 2017 at 1:30 p.m. [D.E. 13, 14], and states as follows:

1. On November 4, 2016, Plaintiff filed its Motion for Entry of Default by Clerk Against Defendant French Republic a/k/a Republic of France [D.E. 10] and Motion for Default Judgment Against Defendant French Republic a/k/a Republic of France [D.E. 11] (collectively, the “Motions”).

2. The Court set a hearing on the Motions for January 23, 2017 at 1:30 p.m. [D.E. 13, 14].

3. Pursuant to Local Rule 5071-1, a party may move for a continuance for good cause. Here, the Plaintiff is in communications with counsel for the Republic of France regarding the subject matter of this Adversary Proceeding, and does not believe it would be appropriate to proceed with the Motions at this time. In addition, on January 20, 2017, a letter was docketed from Judge Marie-Laurence Navarri addressing certain issues in the Adversary Proceeding [D.E. 34]. While the Plaintiff strongly disagrees with the substantive arguments and contentions contained in the letter, the Plaintiff wants to ensure that the Republic of France has every opportunity to participate in this Adversary Proceeding. Accordingly, for these reasons, Plaintiff requests a thirty (30) day continuance of the January 23, 2017 hearing in order to resolve the issues raised in the Motions.

4. Plaintiff has contacted counsel for intervening party the Official Committee of Equity Security Holders of Premier Exhibitions, Inc. regarding this Motion, and it does not oppose the relief requested in this Motion.



**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 January 20, 2017. 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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