

**IN THE CIRCUIT COURT IN AND FOR ESCAMBIA COUNTY,
FLORIDA**

DEEPGULF, INC. and
TOKE OIL AND GAS, S.A.

Plaintiffs,

vs.

MARC M. MOSZKOWSKI

Defendant.

Case No.: 2018 CA 000543

Division: "E"

**DEFENDANT’S NOTICE OF FILING DECLARATION ON GOOD FAITH,
JURISDICTIONAL ENGAGEMENT, AND THE CONSEQUENCES OF
PROCEDURAL DISREGARD**

COMES NOW the Defendant, Marc Moszkowski, and hereby gives notice of the filing of the attached document titled:

**“Declaration on Good Faith, Jurisdictional Engagement, and the
Consequences of Procedural Disregard”**

Defendant respectfully submits the attached Declaration to document his sustained engagement with this Court despite overwhelming logistical, medical, and financial barriers, and to correct any misperception of bad faith.

Respectfully submitted this 19th day of May, 2025

Marc Moszkowski, Petitioner, Pro Se
Email: m.moszkowski@deepgulf.net
Le Verdos
83300 Châteaudouble, France



CERTIFICATE OF SERVICE

I hereby certify that, on this 19th day of May, 2025, a copy of this Notice has been furnished to Braden K. Ball, Jr., attorney for the Respondents, through the Florida Courts E-Filing Portal.



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FLORIDA**

DEEPGULF, INC. and
TOKE OIL AND GAS, S.A.

Plaintiffs,

vs.

MARC M. MOSZKOWSKI

Defendant.

Case No.: 2018 CA 000543

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**DECLARATION ON GOOD FAITH, JURISDICTIONAL ENGAGEMENT,
AND THE CONSEQUENCES OF PROCEDURAL DISREGARD**

COMES NOW the Defendant, Marc Moszkowski, and submits this Declaration to document the reality of his jurisdictional engagement with this Court and to correct the apparent misperception of bad faith on his part, in light of sustained and voluntary participation in these proceedings over the course of eight years.

Defendant is a French citizen residing in France. He has no assets in the United States, no residence, and no family on U.S. soil. Under international law, Defendant could have ignored these civil proceedings entirely. Any resulting U.S. judgment would have had virtually no enforceability beyond U.S. borders without substantial legal challenge.

Instead, Defendant chose the more difficult path: he answered every U.S. court summons, filed extensive pleadings, supported all arguments with documentation, and even defended the matter in federal court and on appeal. He did so out of good faith, principle, and respect for the American judicial system.

Had Defendant defaulted, he would have preserved more than \$90,000—ample funds to resist any foreign enforcement action. He could have followed the path of passive evasion. He did not. He engaged.

Despite this, Defendant has been met not with recognition of his efforts, but with procedural hostility. The Court has repeatedly ignored Defendant's filings, denied accommodations necessary for medical and financial survival, and treated impossibility as evasion. Most recently, Defendant's renewed motion for remote appearance and suspension of mediation was denied summarily—before docketing, before opposing counsel could respond, and without any analysis of the facts or legal standards raised.

This is not the conduct of a party seeking to avoid responsibility. It is the conduct of a man defending his name, reputation, and factual integrity under impossible odds. The implication that Defendant is litigating in bad

faith is not only untrue—it is reversed. The bad faith lies in the refusal to engage with his truth.

WHEREFORE, the Defendant respectfully submits that this ruling constitutes a denial not only of relief, but of engagement with the record, and requests that this Statement be included in the record for purposes of appellate review.

Respectfully submitted on this 19th day of May, 2025.

Marc Moszkowski, Pro Se
Email: m.moszkowski@deepgulf.net
Le Verdos
83300 Châteaudouble, France



CERTIFICATE OF SERVICE

I hereby certify that, on this 19th day of May, 2025, a copy of this Declaration has been furnished to Braden K. Ball, Jr., attorney for the plaintiffs, through the Florida Courts E-Filing Portal.

