

**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 RECEIPT OF SUMMARY DENIALS AND  
RESERVATION OF RIGHTS**

COMES NOW the Defendant, Marc Moszkowski, appearing pro se, and respectfully provides this notice to the Court and all parties regarding a series of summary orders entered on May 21, 2025, each denying critical motions raising statutory and constitutional objections. In support thereof, Defendant states:

1. On May 21, 2025, Defendant received three orders from this Court denying the following motions:

- Defendant's Motion to Compel Inspection and Production of Corporate Records pursuant to § 607.1604, Florida Statutes,

filed May 7, 2025 (Filing #223588074);

- Defendant's Motion to Hold Trial in Abeyance Until Resolution of Threshold Issues, filed May 8, 2025 (Filing #223589279);
- Defendant's Motion for Protective Order or Relief from Enforcement of Mediation Payment Pending Trial Preparation, filed April 25, 2025 (Filing #223589366).

2. Each denial consisted of a one-page order containing no factual findings, no legal reasoning, and no acknowledgment of the arguments or statutory rights asserted—particularly Defendant's right under Florida Statutes § 607.1604 to inspect corporate records as the largest shareholder of the Plaintiff corporation, and—by Plaintiff's own characterization—a director.
3. The denial of the Motion to Compel Corporate Records is especially grave, as it enables the Plaintiff corporation, represented by a conflicted party and adversarial shareholder, to withhold financial records and internal documentation from one of its own directors and principal owners, in direct contravention of Florida corporate law.
4. These unexplained denials form part of an observable and growing pattern wherein Defendant's motions—often addressing threshold matters, statutory entitlements, or documented procedural abuse—

are rejected with no meaningful judicial analysis, while Plaintiff's litigation conduct and multi-year procedural delays remain unexamined.

5. Defendant respectfully objects to this pattern of silent rejection, which precludes meaningful appellate review, undermines procedural fairness, and gives rise to serious concerns about the impartial administration of justice in this matter.
6. Defendant expressly reserves all rights to seek interlocutory review, appellate remedy, and disqualification of the presiding judge should this pattern continue.

Respectfully submitted on this 21<sup>st</sup> 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 21<sup>st</sup> day of May, 2025, a copy of this Notice has been furnished to Braden K. Ball, Jr., attorney for the plaintiffs, through the Florida Courts E-Filing Portal.

*M. Maczkowski*