

**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 MOTION FOR ADDITIONAL TIME DURING HEARINGS  
AND AT TRIAL DUE TO THE DIFFERENCE IN DEFENDANT'S NATIVE  
AND ACQUIRED LANGUAGES AND HIS PRO SE STATUS**

**COMES NOW**, Defendant Marc Moszkowski, Pro-Se, and respectfully moves this Court for an order granting additional time during hearings and at trial in the above-captioned matter. In support of this motion, Defendant states as follows:

**I. INTRODUCTION**

1. Defendant is self-represented and is not a licensed attorney.

2. Defendant is a foreign national whose native language is not English, further complicating his ability to follow and respond verbally to legal arguments in real time.
3. Plaintiff is represented by Counsel who is well-versed in legal procedure, giving Plaintiff a distinct advantage in both the speed and articulation of their presentation.
4. Defendant has actively participated in this case for the past eight years and has submitted substantial pleadings in writing in an attempt to defend against the Plaintiff's claims.
5. Given the nuances of legal language and the difference in Defendant's native and acquired languages, although Defendant is reasonably at ease when reading Plaintiff's pleadings or preparing his own in writing without stringent time constraints, he has experienced a distinct disadvantage during hearings when required to present his arguments verbally within a limited timeframe.

See attached **Exhibit "AH"**, Affidavit in Support

6. Due to the language difference, the Defendant's need to process verbal legal arguments, and the necessity to carefully present the

evidence in a clear and coherent manner, additional verbal time is essential to ensure a fair trial.

## **II. LEGAL BASIS**

1. The Court has inherent authority to ensure fairness and due process for all parties.
2. Florida courts have a duty to provide a level playing field, particularly for Pro-Se litigants who face structural disadvantages in legal proceedings.
3. Providing additional time is consistent with the principles of fairness and justice, ensuring Defendant is not unfairly prejudiced during the bench trial.

## **III. REQUEST FOR RELIEF**

**WHEREFORE**, Defendant respectfully requests that this Court:

1. Grant additional time for the Defendant to present evidence verbally and respond to arguments during hearings and at trial.
2. Allow for reasonable pauses or clarifications when necessary to ensure full comprehension of the proceedings.

3. Provide any other relief the Court deems just and proper.

Respectfully submitted this 1<sup>st</sup> day of April, 2025

Marc Moszkowski, Pro Se  
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Phone: +1(850)316 8462  
Le Verdos  
83300 Châteaudouble, France

A handwritten signature in blue ink that reads "M. Moszkowski". The signature is written in a cursive, flowing style.

### **CERTIFICATE OF SERVICE**

I hereby certify that, on this 1<sup>st</sup> day of April, 2025, a copy of this motion has been furnished to Braden K. Ball, Jr., attorney for the plaintiffs, through the Florida Courts E-Filing Portal.

A handwritten signature in blue ink that reads "M. Moszkowski". The signature is written in a cursive, flowing style.

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**MARC MOSZKOWSKI'S AFFIDAVIT IN SUPPORT OF MOTION FOR  
ADDITIONAL TIME DURING HEARINGS AND AT TRIAL**

I, Marc Moszkowski, under penalty of perjury declare as follows:

1. I am the Defendant in the above-captioned case, representing myself  
Pro Se.
2. I am a foreign national and English is not my first language. I taught  
myself English in adulthood and have lived abroad most of my life.
3. While I have no difficulty reading or writing English, and my written  
pleadings span thousands of pages, I face some difficulty processing  
rapid spoken language—especially when it is idiomatic or informal.
4. I dare say that this difficulty is not due to a lack of intellect or lack of  
preparation, but stems from my lack of early-life immersion in

English-speaking environments. My own mother, who was born in Germany and spoke five languages fluently without a trace of accent, also struggled to understand informal speech in her second language, despite being able to recite Molière and Racine by heart —something I did not fully understand until experiencing it myself upon moving to the U.S.

5. I respectfully request that the Court consider this challenge when allotting oral presentation time during hearings or trial, and grant me slightly more time to process and respond appropriately.

I, Marc Moszkowski, a foreign citizen and foreign resident without access to a Notary Public, declare under penalty of perjury under the laws of the United States of America and to the best of my knowledge and belief that the foregoing is true and correct. (Florida Statutes § 92.525 (2))

Executed, this 31<sup>st</sup> day of March, 2025

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