

IN THE CIRCUIT COURT IN AND FOR ESCAMBIA COUNTY, FLORIDA

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

Plaintiffs,

Case No.: 2018 CA 000543

vs.

Division:

MARC M. MOSZKOWSKI and

HOSTGATOR.COM, LLC,
a Florida Limited Liability Company,
Defendant

RESPONSE TO MOTION FOR DEFAULT BY THE COURT

Pro-Se Defendant Marc Moszkowski responds to the Plaintiff's Motion for Default by the Court as follows:

On June 3rd, 2021, Defendant MOSZKOWSKI received electronic notice through the Florida Courts E-Filing Portal that the Complaint which had been remanded to this Court by the United States District Court for the Northern District of Florida, Pensacola Division, had been refiled by Plaintiff.

No other document or scheduling order was on the docket that would have instructed MOSZKOWSKI on a deadline for answering the complaint.

Not receiving any summons either, and after much research, Pro-Se Defendant MOSZKOWSKI understood that Florida Rule of Civil Procedure 1.140 gave him 20 days to answer. He has been actively preparing his answer since June 3rd and intended to file it by June 23rd.

The Defendant prays that the Court will trust his good faith in the matter and, if Rule 1.190 should have applied in this instance, he respectfully request an enlargement of time of 10 days until June 23rd, the date on which he had intended to be ready to file his answer.

Signed, this 15th day of June, 2021

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CERTIFICATE OF SERVICE

I hereby certify that, on this 15th day of June, 2021, a copy of this motion has been furnished to Braden K. Ball, Jr., attorney for the plaintiffs, through the Florida Courts E-Filing Portal.

M. Maszkowski