

**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"

**NOTICE OF FILING: INTERRELATED MOTIONS CONCERNING TRIAL
POSTPONEMENT AND JURISDICTIONAL STAY**

COMES NOW Defendant, Marc Moszkowski, and respectfully notifies the Court and opposing counsel of the filing of two interrelated motions addressing the necessity of delaying trial and all related proceedings in the above-captioned matter:

1. Motion to Continue Trial and to Require Adjudication of Outstanding Evidentiary Motions (Filed: May 27, 2025);
2. Renewed Motion to Stay Trial and Pretrial Proceedings (Filed: May 28, 2025).

These filings address two independent but complementary bases for

halting proceedings:

- The first motion argues that trial cannot proceed without prior adjudication of pending motions regarding alleged fabrication of evidence and foundational admissibility challenges;
- The second motion seeks a stay under Florida law while Defendant's appeal of the Court's order denying disqualification remains unresolved, raising jurisdictional concerns about further proceedings before the disqualification question is resolved.

Defendant respectfully submits that either motion, if granted, would require immediate continuance of the current trial setting and all pretrial deadlines.

Respectfully submitted on this 28th day of May, 2025.

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CERTIFICATE OF SERVICE

I hereby certify that, on this 28th 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