

**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"

**RENEWED MOTION FOR REMOTE APPEARANCE, TO SUSPEND
MEDIATION OBLIGATION, AND TO AVOID CONTEMPT DUE TO
IMPOSSIBILITY**

COMES NOW Defendant, MARC MOSZKOWSKI, appearing pro se, and respectfully renews his request that this Honorable Court permit remote appearance for all upcoming hearings, suspend his mediation obligation, and cancel the June 10, 2025 contempt hearing, on grounds of financial and physical impossibility. In support, Defendant states:

1. Procedural Background

- The Court previously ordered Defendant to participate in mediation scheduled for May 21, 2025, and to appear in person on June 10,

2025, for a pre-trial conference and potential contempt hearing if mediation is not attended.

- Defendant has also been ordered to appear in person for trial on June 17–18, 2025.
- A Petition for Writ of Prohibition was timely filed in the First District Court of Appeal seeking disqualification of the presiding judge; however, it was dismissed on May 16, 2025.

2. Physical and Financial Impossibility

- Defendant resides more than 5,000 miles away and suffers from two medically documented inguinal hernias, for which he cannot travel long distances or undergo surgery due to logistical and environmental hardship.
- Defendant has been medically advised not to undertake prolonged travel and remains physically incapable of appearing in court.
- In addition to this physical limitation, Defendant lacks the financial means to purchase international airfare, lodging, and associated travel expenses, which would amount to several thousand dollars—well beyond his current resources. Defendant is likewise unable to

pay the \$900 mediation fee required for participation in remote mediation.

3. Relief Requested

Defendant respectfully requests:

- That he be permitted to attend all further proceedings, including the June 10, 2025 hearing and June 17–18, 2025 trial, by remote means (e.g., Zoom);
- That the Court waive or suspend the mediation obligation and associated \$900 fee;
- That the Court cancel the June 10, 2025 contempt hearing arising from non-appearance at mediation, given that the failure would not be willful but the result of proven impossibility.

4. Good Faith and Record of Compliance

Defendant has diligently attempted to raise these concerns through proper channels, including a Petition for appellate relief. He has consistently appeared remotely when permitted and submitted extensive documentation of the impossibility of personal appearance.

Conclusion

WHEREFORE, Defendant respectfully requests that this Court grant this renewed motion, allow remote appearance, suspend mediation obligations, and cancel the contempt hearing scheduled for June 10, 2025.

Respectfully submitted on this 16th 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 16th day of May, 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.

