

**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 FILING SUMMARY COMPARISON OF  
PLAINTIFFS' AND DEFENDANT'S POSTURE AND FILINGS**

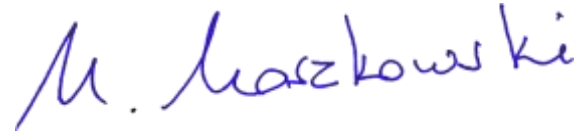
COMES NOW Defendant, Marc Moszkowski, pro se, and hereby gives notice of filing the attached document titled:

**"SUMMARY COMPARISON OF PLAINTIFFS' AND DEFENDANT'S  
POSTURE AND FILINGS"**

This document is submitted for the Court's consideration in anticipation of trial and in further support of Defendant's prior motions and memoranda.

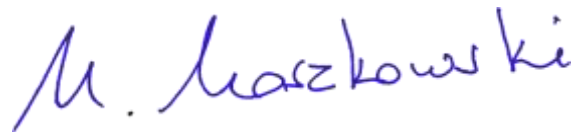
Respectfully submitted on this 10<sup>th</sup> day of June, 2025.

Marc Moszkowski, Pro Se  
Email: m.moszkowski@deepgulf.net  
Le Verdos  
83300 Châteaudouble, France



### **CERTIFICATE OF SERVICE**

I hereby certify that, on this 10<sup>th</sup> day of June, 2025, a copy of this Notice has been furnished to Braden K. Ball, Jr., attorney for the plaintiffs, through the Florida Courts E-Filing Port



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**SUMMARY COMPARISON OF PLAINTIFFS' AND DEFENDANT'S  
POSTURE AND FILINGS**

COMES NOW Defendant, Marc Moszkowski, pro se, and respectfully states as follows:

This case presents an almost comical contrast in posture, discipline, and integrity between the parties.

While Defendant would have greatly preferred to describe this case in a nutshell, that has proven impossible—not because the case is complex, for it is in fact disarmingly simple despite the exoticism of its context, but because the list of procedural abuses, factual distortions, and outright misdeeds by Plaintiffs is seemingly endless. What should have been a

straightforward matter has instead been transformed into a tangle of fabrications, contradictions, and improvised narratives that demand a comprehensive rebuttal.

## **SUMMARY COMPARISON**

### **PLAINTIFFS**

1. A narrative so absurd and invented as to be laughable, with no historical grounding.
2. A core allegation of a "stolen opportunity" that is nowhere defined or described.
3. Claims that DeepGulf should have received its "pro rata portion" of profits from Toke Oil & Gas, based on the allegation that Moszkowski "led the board to believe" he held shares for DeepGulf's benefit.
4. In reality, Moszkowski's 33.33% share—granted personally by the East Timorese founders—was held for DeepGulf indeed and was later transferred to the company without consideration.
5. Despite being due only 33.33% of net profit, DeepGulf received 50.3% of all company cash flow.
6. Recurrent reliance on forged or backdated documents, to the exclusion of any genuine incriminating evidence.

7. Plaintiffs never rebutted any of Defendant's detailed objections or proofs, repeating the same script verbatim and ad nauseam like a young child caught in a lie.
8. Crucially, they often unwittingly provide in their own pleadings conclusive proof that the faults they attribute to Defendant were in fact their own. They were so sure Defendant would not respond that they did not pay attention to the details.
9. Plaintiffs demand that this Florida Court give them property which irrefutably belonged to foreign nationals in sovereign East Timor, half a world away, offering neither evidence nor legal reasoning.
10. Conspiracy between at least two shareholders to defraud Defendant of his government-guaranteed salary and replace it with debt at usurious interest, even while Defendant was returning twice the amount by bestowing his independently earned income to DeepGulf.
11. Howard committed gross perjury during deposition by claiming not to recall the court in which a particular case occurred—despite having himself initiated that very case in Federal Court in 2011, before the same judge, in the same district courthouse as the current lawsuit, just two city blocks from where the deposition was being taken. Either

he was lying, or his memory and the legitimacy of his legal actions cannot be trusted.

12. The lawsuit was initiated without proper board authorization, in direct violation of corporate governance.

## **DEFENDANT**

1. Historically verified and document-supported narrative, consistent with all known facts.
2. Detailed preservation of records since 2004.
3. Careful, logically constructed pleadings backed by incontrovertible evidence.
4. Specific rebuttals to each and every allegation, with sourced references.
5. Proof of Plaintiffs' internal contradictions, procedural violations, and reliance on forged or backdated documents.
6. Full respect for sworn declarations and due process.
7. Demonstrated procedural precision, and a meticulous, multi-year evidentiary record.
8. Unlike Plaintiffs, Defendant actually defined and substantiated every claim made.

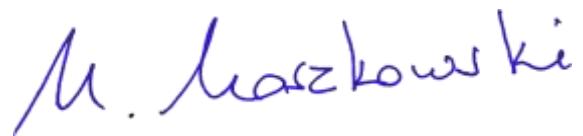
9. Plaintiffs' rhetorical strategy—unchanged repetition of disproven allegations—is exposed and refuted with detailed factual rebuttals.

10. Defendant's pleadings consistently disprove every claim with impeccable and detailed evidence, which Plaintiffs never even attempt to rebut.

The contrast could not be starker: on one side, incoherence, falsity, and bad faith; on the other, a full evidentiary and procedural record deserving of fair adjudication.

Respectfully submitted on this 10<sup>th</sup> day of June, 2025.

Marc Moszkowski, Pro Se  
Email: m.moszkowski@deepgulf.net  
Le Verdos  
83300 Châteaudouble, France



## **CERTIFICATE OF SERVICE**

I hereby certify that, on this 10<sup>th</sup> day of June, 2025, a copy of this Summary Comparison has been furnished to Braden K. Ball, Jr., attorney for the plaintiffs, through the Florida Courts E-Filing Port

*M. Maczkowski*