

**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 ADDENDUM TO DEFENDANT'S NOTICE OF  
PROCEDURAL INCONSISTENCIES AND GOOD FAITH  
PARTICIPATION**

COMES NOW Defendant, Marc Moszkowski, and hereby files the attached Addendum to his previously submitted *Notice of Concern regarding Procedural Inconsistencies and Good Faith Participation*, filed April 21<sup>st</sup>, 2025.

The Addendum addresses a specific remark made by the Court during a recent hearing, paraphrased from memory, which Defendant believes carried implications of exclusion based on nationality and forum. The filing also highlights Defendant's long-standing confidence in the U.S. judicial system, the personal cost of being excluded from

it, and the procedural imbalance increasingly characterizing these proceedings.

Respectfully submitted this 21<sup>st</sup> day of April, 2025

Marc Moszkowski, Pro Se

Email: [m.moszkowski@deepgulf.net](mailto:m.moszkowski@deepgulf.net)

Le Verdos

83300 Châteaudouble, France



### **CERTIFICATE OF SERVICE**

I hereby certify that, on this 21<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.



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**ADDENDUM TO DEFENDANT'S NOTICE OF PROCEDURAL  
INCONSISTENCIES AND GOOD FAITH PARTICIPATION**

COMES NOW Defendant, Marc Moszkowski, and submits this Addendum to the *Notice of Concern Regarding Procedural Inconsistencies and Good Faith Participation*, previously filed on April 21<sup>st</sup>, 2025. This supplemental statement is submitted to preserve the record with respect to a remark made by the Court during a recent hearing and its broader implications for Defendant's participation in this proceeding.

**I. Jurisdictional Comment and Its Effect**

During a recent hearing, Defendant raised the concern that his pleadings appeared to be disregarded by both the Court and

opposing counsel. In response, the Court made a comment—paraphrased here from memory—that conveyed the implication that if Defendant believed French courts were better, he should pursue his case there. While Defendant cannot attest to the precise wording used, the substance and tone of the remark conveyed a clear sense of dismissal and exclusion.

Defendant wishes to clarify that he neither made such a claim nor holds such a belief. To the contrary, he has consistently expressed admiration for and confidence in the U.S. Constitution and the legal protections afforded under American law. Defendant moved to the United States in 1998 based in part on these ideals and remained lawfully present for nearly two decades. He was forced to leave in 2017 with a single bag and has since sought to continue defending his rights in this forum, despite significant hardship and increasing procedural discouragement.

## **II. Broader Implications of Procedural Alienation**

The remark in question, coupled with a pattern of orders that disregard Defendant's filings and evidence, has contributed to the perception that this Court does not view Defendant as an equal party

deserving of full and fair consideration. This is particularly distressing given Defendant's pro se status, foreign nationality and residence, and demonstrated financial and physical hardship.

Defendant further notes that while he now resides outside the United States, he previously maintained deep personal and professional ties in Pensacola, including relationships with two families whose friendship dated back to 2000 and 2003. These bonds extended beyond friendship into shared daily life and visits between families in France. Both families held stock in the company, and one individual served as a director. In 2017, those relationships were either abruptly severed or later severely degraded—not by their own choosing—but under pressure, including threats of legal action from Plaintiff's Chairman, Rustin Howard, and rising fear within their households.

The effects of this rupture were not limited to social distance. In 2019, Defendant's only son—who had close ties to these same families—ceased all communication, without explanation, and with no word since. Efforts to obtain news through Defendant's son's mother were unsuccessful. While Defendant does not speculate on private

motivations, the timing, context, and relational pressure strongly suggest that the fracture was not organic, but cultivated through years of legal aggression.

Defendant raises this not as a personal lament, but as evidence of how the procedural imbalance and unchecked tactics within this litigation have extended far beyond the courtroom—reaching into private life, community, and kinship with irreversible effect.

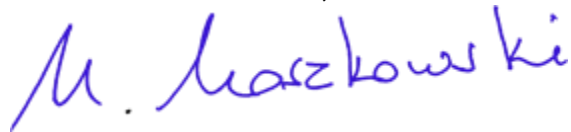
Respectfully submitted this 21<sup>st</sup> day of April, 2025

Marc Moszkowski, Pro Se

Email: [m.moszkowski@deepgulf.net](mailto:m.moszkowski@deepgulf.net)

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