

**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 DEFENDANT'S SUMMARY OF PROCEDURAL
RECORD**

COMES NOW Defendant, Marc Moszkowski, and gives notice that he has filed the attached "Summary of Procedural Record" in further support of Defendant's prior motions and notices regarding procedural imbalance and due process violations.

Respectfully submitted on this 2nd 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 2nd 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 Portal.

M. Maczkowski

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SUMMARY OF PROCEDURAL RECORD

Defendant has submitted 119 pleadings in this action. The Court has issued 12 rulings, regarding 15 of the pleadings—each a summary denial without engagement with the record. Plaintiff has responded to just 4 filings, plus 2 in defense of the Judge, amounting to 5% of the total. About 95% of Defendant's filings remain unrebutted, unexamined, and unacknowledged, including dispositive motions, evidence of fraud, and verified declarations. This systematic non-engagement has denied Defendant meaningful access to adjudication and is incompatible with any notion of due process.

One third of Plaintiff's responses were to protect the presiding Judge from motions for disqualification, the Plaintiff's attorney stepping forward as the Judge's de facto advocate.

MATRIX OF FILINGS AND RESPONSES

#	<i>Defendant's filing</i>	<i>Date</i>	<i>Plaintiff's response</i>	<i>Court ruling</i>
1	Response To Motion For Default By The Court	6/15/2021	No	
2	Memorandum In Support Of Defendant's Response To Motion For Default By The Court	6/16/2021	No	No
3	Motion To Strike The Complaint As A Sham	6/23/2021	Yes	Yes (one line denial on 2/25/2025 , nearly 4 years later)
4	Defendants Motion For Summary Judgment And Memorandum Of Law In Support	1/1/2025	Yes	Yes (Denied)
5	Notice Of Hearing	1/1/2025		
6	Notice Of Filing First Affidavit Of Marc Moszkowski	1/21/2025	No	No
7	Notice Of Filing Second Affidavit Of Marc Moszkowski	1/21/2025	No	No
8	Defendant's Response To Affidavit Of Rustin Howard In Support Of Plaintiffs' Motion For Summary Judgment	1/21/2025	No	No
9	Defendant's Response To Plaintiff's Statement Of Undisputed Facts	1/21/2025	No	No

#	<i>Defendant's filing</i>	<i>Date</i>	<i>Plaintiff's response</i>	<i>Court ruling</i>
10	Defendant's Response To Plaintiffs' Amended Motion For Summary Judgment	1/21/2025	No	No
11	Motion For Leave To File A Reply To Plaintiffs Responses To Defendants Motion To Strike The Complaint As A Sham And Motion For Summary Judgment	2/7/2025	No	No
12	Defendant's Answer, Affirmative Defenses, And Counter-Claim	2/20/2025	Yes	No
13	Motion For Reconsideration	3/13/2025	No	Yes (Denied)
14	Defendant's Response In Opposition To Plaintiffs' Motion To Strike Defendant's Affirmative Defenses	3/13/2025	No	No
15	Defendant's Motion For Leave To Supplement His Motion For Reconsideration With Newly Discovered Evidence	3/18/2025	No	No
16	Defendant's Response To Plaintiffs' Motion To Dismiss Counterclaim	3/24/2025	No	No

#	<i>Defendant's filing</i>	<i>Date</i>	<i>Plaintiff's response</i>	<i>Court ruling</i>
17	Defendant's Motion To Enforce By-Laws And For Relief From Mediation Costs	3/26/2025	No	No
18	Defendant's Response To Plaintiff's Motion To Require Defendant To Pay Mediation Fees	3/27/2025	No	No
19	Notice Of Hearing	3/27/2025		
20	Defendant's Motion For Additional Time During Hearings And At Trial Due To The Difference In Defendant's Native And Acquired Languages And His Pro Se Status	4/1/2025	No	No
21	Defendant's Written Statement Prior To The Case Management Conference	4/1/2025	No	No
22	Notice Of Filing Exhibits In Support Of Supplemental Declaration	4/2/2025	No	No
23	Supplemental Declaration Regarding Lack Of Board Authorization And Misrepresentation Of Corporate Authority	4/2/2025	No	No

#	<i>Defendant's filing</i>	<i>Date</i>	<i>Plaintiff's response</i>	<i>Court ruling</i>
24	Affidavit Regarding Plaintiff Toke Oil & Gas S.A.'S Lack Of Legal Existence	4/2/2025	No	No
25	Defendant's Motion To Dismiss For Fraud On The Court	4/2/2025	No	No
26	Defendant's Response In Opposition To Plaintiff's Motion For Continuance	4/3/2025	No	No
27	Defendant's Motion To Ensure Trial Fairness Through Ruling On Pending Motions, Discovery, And Due Consideration Of The Record	4/4/2025	No	No
28	Supplemental Declaration Regarding Case Management Conference	4/4/2025	No	No
29	Notice Of Filing Supplemental Declaration Of Defendant Regarding The Necessity Of Filings And Preservation Of Defenses	4/7/2025	No	No
30	Defendant's Motion To Reinstate Discovery Schedule And Reconsider Trial Timeline	4/7/2025	No	No

#	<i>Defendant's filing</i>	<i>Date</i>	<i>Plaintiff's response</i>	<i>Court ruling</i>
31	Notice Of Filing Supplemental Declaration Regarding Board Meeting And Email Communication	4/7/2025	No	No
32	Notice Of Filing Defendant's Timeline Of Material Events (2004–2018)	4/8/2025	No	No
33	Defendant's Consolidated Record Summary And Trial Framework	4/8/2025	No	No
34	Notice Regarding Mediation Status And Pending Motions	4/9/2025	No	No
35	Notice Of Filing Declaration Regarding Domain Name Ownership And Use	4/9/2025	No	No
36	Defendant's Motion For Reconsideration Or Clarification Of Order Compelling In-Person Trial And Mediation Attendance	4/10/2025	No	No
37	Notice Of Filing Supplemental Appendix In Support Of Defendant's Trial Framework	4/11/2025	No	No
38	Supplemental Statement Regarding Trial Access And Due Process	4/11/2025	No	No

#	<i>Defendant's filing</i>	<i>Date</i>	<i>Plaintiff's response</i>	<i>Court ruling</i>
39	Notice Of Filing Addendum A To Defendant's Trial Framework	4/14/2025	No	No
40	Notice Of Filing Supplemental Exhibit Re Jurisdictional Misrepresentation	4/14/2025	No	No
41	Notice Of Preservation Of Unrefuted Response To Plaintiff's Affidavit	4/14/2025	No	No
42	Notice Of Preservation Of Unrefuted Response To Plaintiff's Statement Of Undisputed Facts	4/14/2025	No	No
43	Notice Of Preservation Of Defendant's Written Statement For Case Management Conference	4/14/2025	No	No
44	Notice Of Filing Supplemental Notice — Medical Risk And Remote Appearance Justification	4/15/2025	No	No
45	Notice Of Filing Exhibit Regarding Plaintiff's Jurisdictional Contradictions – Federal And State Court Proceedings	4/15/2025	No	No

#	<i>Defendant's filing</i>	<i>Date</i>	<i>Plaintiff's response</i>	<i>Court ruling</i>
46	Notice Of Filing Declaration Regarding Denial Of Motion To Strike Complaint As A Sham Without Adjudication On The Merits	4/15/2025	No	No
47	Notice Of Filing Declaration Regarding Plaintiffs' Failure To Seek Costs After Final Judgment	4/15/2025	No	No
48	Notice Clarifying Mediation Deadline And Objection To Premature Sanctions Inquiry	4/15/2025	No	No
49	Notice Of Filing Clarification Regarding The Legal Purpose And Prematurity Of Court-Ordered Mediation	4/15/2025	No	No
50	Notice Of Filing Declaration Refuting Deepgulf's Fabricated Narrative Of Authorization And Support	4/16/2025	No	No
51	Notice Of Filing Observation Regarding Plaintiff's Use Of Conversational Filibustering.	4/16/2025	No	No

#	<i>Defendant's filing</i>	<i>Date</i>	<i>Plaintiff's response</i>	<i>Court ruling</i>
52	Notice Of Filing Timeline Of Investor Loyalty, Suppression, And Strategic Retaliation	4/16/2025	No	No
53	Notice Of Filing Declaration Regarding Implausibility Of Plaintiff's Assumptions About Defendant's Means And Motive	4/16/2025	No	No
54	Notice Of Filing Statement Regarding Counsel's Complicity In Procedural Misrepresentation	4/16/2025	No	No
55	Notice Of Filing Declaration Regarding Plaintiff's Procedural Disengagement And Selective Participation	4/16/2025	No	No
56	Notice Of Filing Defendant's Narrative Summary And Exhibit Az – Timeline Of Events And Summary Of Disputed Claims	4/16/2025	No	No
57	Notice Of Filing Supplemental Exhibit Ac-1 To Defendant's Affidavit Of Financial Status	4/16/2025	No	No

#	<i>Defendant's filing</i>	<i>Date</i>	<i>Plaintiff's response</i>	<i>Court ruling</i>
58	Notice Of Filing Declaration Regarding Actual Condition And Value Of Defendant's French Property	4/17/2025	No	No
59	Defendant's Response To Plaintiff's Motion For The Court To Enter An Order To Show Cause	4/17/2025	No	Yes (Denied)
60	Defendant's Motion For Reconsideration Of April 17, 2025 Order	4/18/2025	No	Yes (Denied)
61	Notice Of Preservation Of Unrefuted Affidavits Filed January 21, 2025	4/21/2025	No	No
62	Notice Of Filing Defendant's Notice Regarding Procedural Inconsistencies And Good Faith Participation	4/21/2025	No	No
63	Notice Of Filing Addendum To Defendant's Notice Of Procedural Inconsistencies And Good Faith Participation	4/21/2025	No	No
64	Defendant's Notice For The Record Regarding Contradictory Assertions Of Director Status And Resulting Fraud On The Court	4/21/2025	No	No

#	<i>Defendant's filing</i>	<i>Date</i>	<i>Plaintiff's response</i>	<i>Court ruling</i>
65	Formal Demand For Advancement Of Litigation Expenses	4/21/2025	No	No
66	Formal Demand For Inspection And Electronic Delivery Of Corporate Records	4/21/2025	No	No
67	Defendant's Notice Regarding Plaintiff's Failure To Describe The Alleged \$1,304,764.22 "Business Opportunity"	4/22/2025	No	No
68	Notice Of Filing Defendant's Objection To Order Imposing Mediation Fee	4/24/2025	No	No
69	<i>Letter To Mediator</i>	4/24/2025	No	No
70	Notice Of Filing Defendant's Motion For Protective Order Or Relief From Enforcement Of Mediation Payment Pending Trial Preparation	4/25/2025	No	Yes (Denied)
71	Defendant's Notice Of Record Silence And Request For Judicial Clarification	5/1/2025	No	No
72	<i>Letter To Braden K. Ball</i>	5/5/2025	No	No
73	Defendant's Notice Regarding Jurisdictional Manipulation And The Destruction Of Diversity	5/5/2025	No	No

#	<i>Defendant's filing</i>	<i>Date</i>	<i>Plaintiff's response</i>	<i>Court ruling</i>
74	Defendant's Notice Of Filing Declaration In Support Of Filing Exhibit Bb	5/5/2025	No	No
75	Defendant's Notice Of Filing Defendant's Declaration For The Record Regarding Jurisdiction, Domicile, And Standing	5/5/2025	No	No
76	Defendant's Motion To Disqualify Presiding Judge And For Reassignment To A Different Division	5/5/2025	Yes	Yes (Denied)
77	Defendant's Notice Of Filing Supporting Documents To Motion To Disqualify Presiding Judge	5/5/2025	No	No
78	Defendant's Motion For Equitable Relief To Lift Fraudulent Lien And For Judicial Finding Of Abuse Of Process	5/6/2025	No	Yes (Denied)
79	Defendant's Notice Of Concern Regarding Opposing Counsel's Communication With Judicial Assistant In Matter Of Judicial Disqualification	5/6/2025	No	No

#	<i>Defendant's filing</i>	<i>Date</i>	<i>Plaintiff's response</i>	<i>Court ruling</i>
80	Defendant's Notice Of Filing Defendant's Supplement To Motion To Disqualify	5/6/2025	Yes	Yes (Denied)
81	Defendant's Reply To Plaintiff's Opposition To Motion To Disqualify Presiding Judge	5/6/2025	No	Yes (Denied)
82	Defendant's Motion To Compel Inspection And Production Of Corporate Records Pursuant To § 607.1604, Florida Statutes	5/7/2025	No	Yes (Denied)
83	Defendant's Motion For Ruling On Pending Motions And Clarification Of Record Status	5/7/2025	No	No
84	Declaration Of Impossibility And Procedural Injustice In Anticipation Of Constructive Termination	5/8/2025	No	No
85	Defendant's Notice Of Seventy- Three Unaddressed Submissions And Ongoing Procedural Disparity	5/8/2025	No	No
86	Defendant's Notice Of Plaintiff's Failure To Define The Alleged Business Opportunity Central To Its Claims	5/8/2025	No	No

#	<i>Defendant's filing</i>	<i>Date</i>	<i>Plaintiff's response</i>	<i>Court ruling</i>
87	Defendant's Motion To Hold Trial In Abeyance Until Resolution Of Threshold Issues	5/8/2025	No	Yes (Denied)
88	Notice Of Filing Declaration Regarding Constitutional Standing And Defendant's Moral Allegiance To First Amendment Principles	5/8/2025	No	No
89	Court Of Appeal	5/12/2025	No	
90	Renewed Motion For Remote Appearance, To Suspend Mediation Obligation, And To Avoid Contempt Due To Impossibility	5/16/2025	No	Yes (Denied)
91	Motion To Preserve For Appellate Review The Summary Denial Of Defendant's Renewed Motion For Remote Appearance And Relief From Impossibility	5/18/2025	No	No
92	Defendant's Notice Of Filing Statement Of Impossibility And Good Faith Effort In Response To Order To Show Cause	5/19/2025	No	No

#	<i>Defendant's filing</i>	<i>Date</i>	<i>Plaintiff's response</i>	<i>Court ruling</i>
93	Defendant's Notice Of Filing Supplemental Statement On The Record Of Constructive Exclusion And Tactical Evasion	5/19/2025	No	No
94	Defendant's Notice Of Filing Statement Regarding The Court's Summary Denial Of Defendant's Motion To Strike Complaint As A Sham	5/19/2025	No	No
95	Motion To Reconsider Or Certify For Appellate Record The Denial Of Defendant's Motion To Strike Complaint As A Sham	5/19/2025	No	No
96	Supplemental Motion For Appellate Preservation: Denial Of Leave To Reply And Summary Rejection Of Defendant's Motion To Strike Complaint As A Sham	5/19/2025	No	No
97	Defendant's Notice Of Filing Request For Clarification Regarding Mediation And Trial Attendance Requirements	5/19/2025	No	No

#	<i>Defendant's filing</i>	<i>Date</i>	<i>Plaintiff's response</i>	<i>Court ruling</i>
98	Defendant's Notice Of Filing Statement On Structural Imbalance And Functional Representation By The Court	5/19/2025	No	No
99	Defendant's Notice Of Filing Declaration On Good Faith, Jurisdictional Engagement, And The Consequences Of Procedural Disregard	5/19/2025	No	No
100	Defendant's Notice Of Filing Statement Regarding Mediator's Non-Response And Defendant's Good Faith Effort To Comply	5/20/2025	No	No
101	Defendant's Notice Regarding Impropriety Of Ordered Mediation And Demand For Clarification	5/20/2025	No	No
102	Defendant's Emergency Motion To Stay Enforcement Of Mediation Fee Pending Ruling On Objection And Notice Of Prejudice	5/20/2025	No	No
103	Corrective Notice Regarding Filing Category	5/20/2025	No	No

#	<i>Defendant's filing</i>	<i>Date</i>	<i>Plaintiff's response</i>	<i>Court ruling</i>
104	Defendant's Motion To Dismiss For Procedural Abuse, Jurisdictional Manipulation, And Judicial Estoppel, With Supporting Memorandum Of Law	5/21/2025	No	No
105	Defendant's Notice Of Receipt Of Summary Denials And Reservation Of Rights	5/21/2025	No	No
106	Defendant's Second Motion To Disqualify Judge For Appearance Of Impropriety, Pattern Of Non-Engagement, And Denial Of Due Process	5/22/2025	Yes	Yes (Denied)
107	Defendant's Reply To Plaintiff's Response To Second Motion To Disqualify	5/22/2025	No	Yes (Denied)
108	Defendant's Motion In Limine To Preclude Plaintiffs From Asserting Ownership Of Domain Names Absent Evidentiary Foundation	5/23/2025	No	No
109	Notice Of Filing Supplemental Statement In Support Of Motion For Protective Order	5/26/2025	No	No

#	<i>Defendant's filing</i>	<i>Date</i>	<i>Plaintiff's response</i>	<i>Court ruling</i>
110	Notice Of Filing Second Supplemental Statement In Support Of Motion For Protective Order	5/26/2025	No	No
111	Notice Of Filing Supplemental Declaration In Support Of Motion To Disqualify Presiding Judge	5/26/2025	No	No
112	Defendant's Motion For Protective Order	5/26/2025	No	No
113	Motion To Continue Trial And To Require Adjudication Of Outstanding Evidentiary Motions	5/27/2025	No	No
114	Notice Of Clarification And Objection Regarding Mischaracterization Of Mediation	5/27/2025	No	No
115	Renewed Motion To Stay Trial And Pretrial Proceedings	5/28/2025	No	No
116	Notice Of Filing: Interrelated Motions Concerning Trial Postponement And Jurisdictional Stay	5/28/2025	No	No
117	Notice Of Readiness For Appellate Relief	5/28/2025	No	No
118	Notice Of Supplemental Authority And Material Post-Filing Development	5/28/2025	No	No

#	<i>Defendant's filing</i>	<i>Date</i>	<i>Plaintiff's response</i>	<i>Court ruling</i>
119	Notice Of Supplemental Medical Evidence	5/28/2025	No	No

Respectfully submitted on this 2nd day of June, 2025.

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

M. Moszkowski

CERTIFICATE OF SERVICE

I hereby certify that, on this 2nd day of June, 2025, a copy of this Summary has been furnished to Braden K. Ball, Jr., attorney for the plaintiffs, through the Florida Courts E-Filing Portal.

M. Moszkowski