

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 FIRST AFFIDAVIT OF MARC MOSZKOWSKI

COMES NOW, Marc Moszkowski and hereby gives notice that the Affidavit attached hereto, is being filed via the Courts e-filing system.

Signed, this 21st day of January, 2025

Marc Moszkowski, Pro Se
Email: m.moszkowski@deepgulf.net
Phone: +1(850)316 8462
Le Verdos
83300 Châteaudouble, France



CERTIFICATE OF SERVICE

I hereby certify that, on this 21st day of January, 2025, a copy of this motion has been furnished to Braden K. Ball, Jr., attorney for Plaintiffs, through the Florida Courts E-Filing Portal.

A handwritten signature in blue ink, appearing to read "M. Marzbowksi".

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FIRST AFFIDAVIT OF MARC MOSZKOWSKI, IN SUPPORT OF HIS
RESPONSES TO THE AFFIDAVIT OF RUSTIN HOWARD AND TO
PLAINTIFF'S STATEMENT OF UNDISPUTED FACTS

**REGARDING THE CONSIDERABLE DANGERS ENCOUNTERED IN
EAST TIMOR BETWEEN 2007 AND 2013**

The environment of East Timor, both political and operational, was remarkably dangerous during the period of Defendant's presence in the country, which required that at all time the other officer of Deepgulf, Inc. , a U.S. citizen, must always remain home in order to be able to extract Defendant in case of emergency.

1. Politically, the country was in violent turmoil ¹. An assassination

¹ Refer to online encyclopedias such as Wikipedia, under "*East Timor*", for confirmation.

attempt on both the President and the Prime Minister shortly after Defendant's first trip had left the President with two gunshot wounds in the chest and one in the stomach, and he was evacuated to the Royal Darwin Hospital in Australia, where he remained a little over two months.

Between 2007 and 2014, the Defendant met several times with the President and/or the Prime Minister ², since they were his clients, as exemplified by emails and photographs regularly sent to Plaintiff.

During Defendant's first and second stay in Dili, the capital city, tens of thousands of refugees lined the streets around his compound. Because of the ongoing violence, the United Nations Integrated Mission in East Timor maintained a peacekeeping mission from mid-2006 until the end of 2012.

2. Operationally, Toke's activities were located in extremely remote places ³ without safe means of communication or available healthcare, and Defendant was exposed to serious harm and even death (not figuratively) on repeated occasions. He sustained multiple injuries as a result of road and bridge collapse, flash flooding, violent assault by armed masked

² Although, quite understandably, meetings were hard to obtain, were regularly postponed indefinitely, and would usually require several weeks or even months of literally chasing the official around the country.

³ See Exhibit "S": Toke Oil and Gas activities in Timor-Leste, 2008 to 2012

robbers, ship grounding for 18 days (see page 8 of Exhibit "S") on a shark and saltwater crocodile ⁴ infested coral reef, and nearly drowned in heavy swells during the ship's salvage operations.

Finally, in April 2011 Defendant was hit by a lethal strain of Papua New Guinea malaria, of which the first symptoms appeared during the last leg of his trip back to Pensacola. On May 13th, in a critical state, he was taken for six days to Gulf Breeze Baptist Hospital's emergency department, but he survived, to the expressed astonishment of the medical staff.

Also, Defendant stresses that during each of his three projects in East Timor, he lost each time more than twenty pounds of body mass as a consequence of the unavailability of appropriate nourishment and healthcare.

I, Marc Moszkowski, a foreign citizen and foreign resident without access to a Notary Public, declare under penalty of perjury under the laws of the United States of America and to the best of my knowledge and belief that the foregoing is true and correct. (Florida Statutes § 92.525 (2))

⁴ *Crocodylus porosus*, the largest living reptile, can grow up to a weight of 3,300 lbs and a length of 20 ft.

Signed, this 21st day of January, 2025

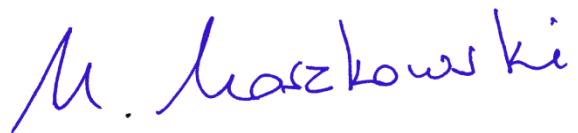
Marc Moszkowski, Pro-Se

Email: m.moszkowski@deepgulf.net

Phone: +1(850)316 8462

Le Verdos

83300 Châteaudouble, France

A handwritten signature in blue ink that reads "M. Moszkowski". The "M" is capitalized and has a small dot above it. The "M" and "M" are connected by a horizontal stroke.

Toke Oil and Gas activities in Timor-Leste

2008 to 2012

- Timor Sea Bathymetric Survey:*.....slide 2
- Suai, Kammanasa and Beaco Surveys:*.....slide 10
- Beaco LNG Survey:*.....slide 24

Timor Sea Bathymetric Survey

March 2008 to February 2009

CLIENT: GOVERNMENT OF TIMOR-LESTE – SAMSUNG – STX
KOGAS – GS CALTEX

Contract value: \$5,200,000

The object of the project was to survey the Timor-Leste Offshore Exclusive Economic Zone plus a portion of the marine area held in common by Timor-Leste and Australia.

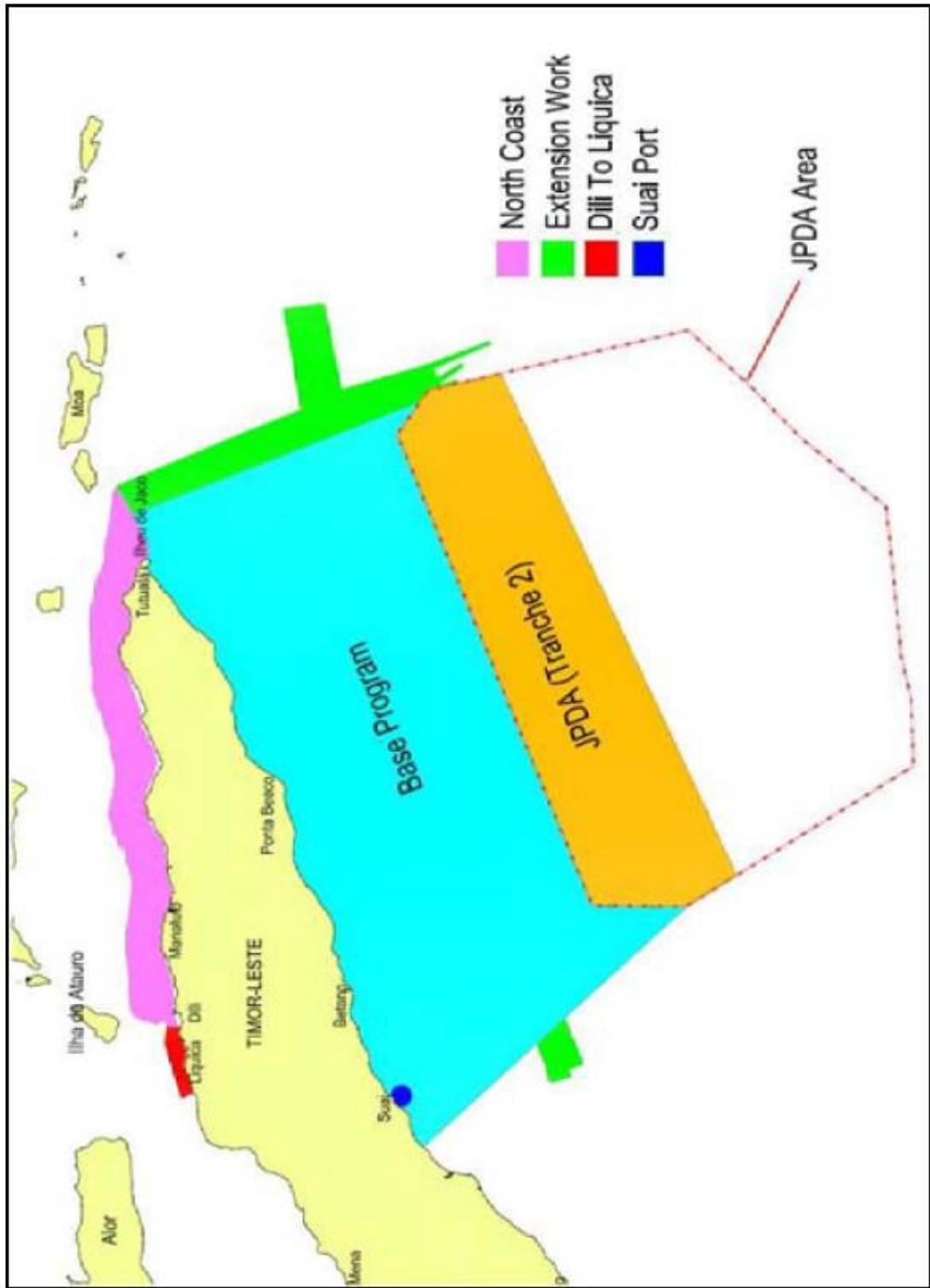
The survey was used to study the feasibility of a heavy deep pipeline across the Timor Sea.

The total surface area of the survey exceeded 43,000 sq. km (17,000 sq. mi.), making it one of the largest such survey to date. Water depths reached 3,300 m (11,000 ft).

Three survey ships were used, S/V's Ridley Thomas, Northern Light and Northern Prince.

A total of about 35 workers were present at any given time.

Bathymetric Survey Scope of Works



S/V Ridley Thomas, used from June to July 2008

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S/V Northern Light, used from July to August 2008

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S/V Northern Prince, used from October 2008 to February 2009

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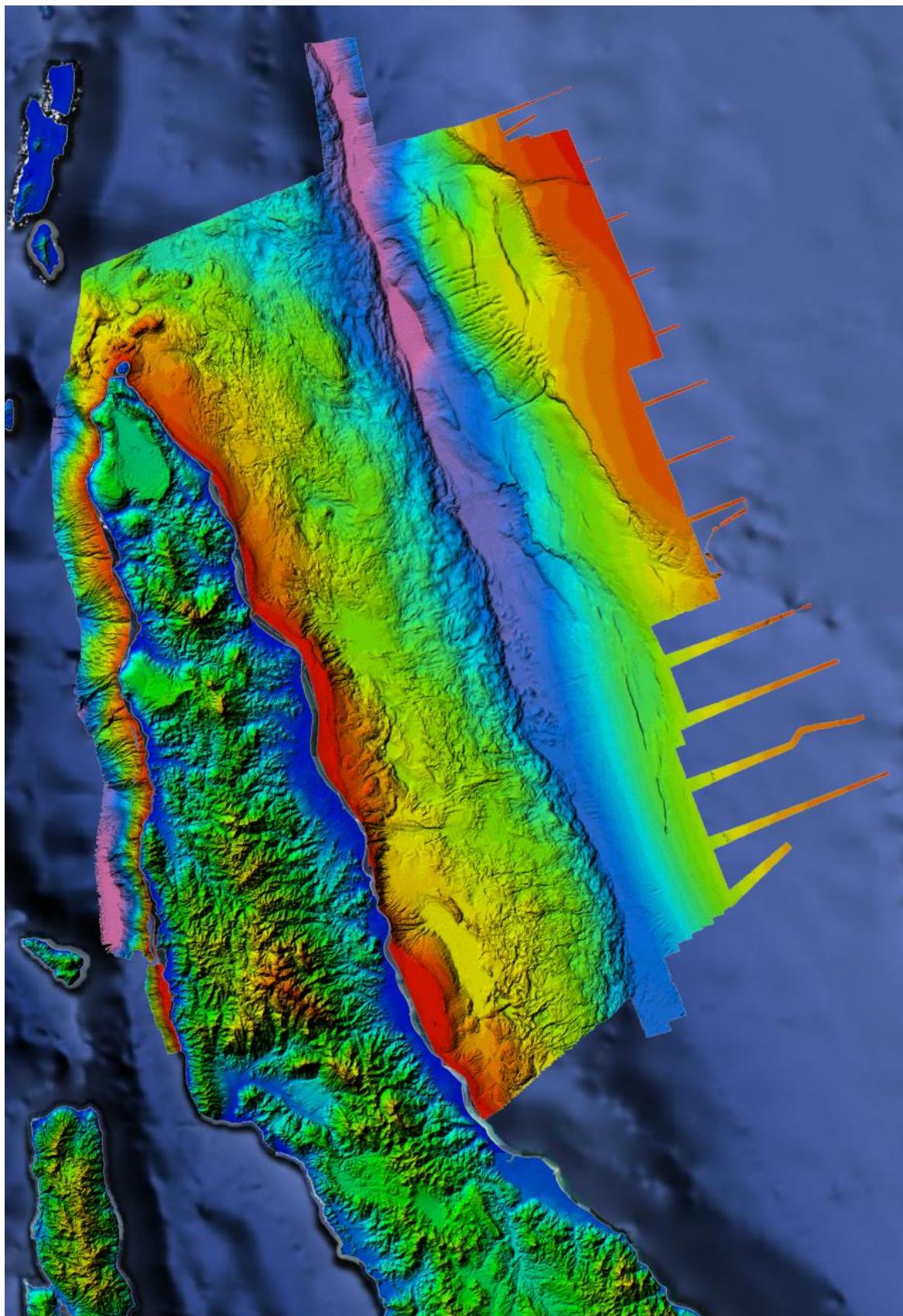


S/V Northern Prince, grounded on Suai reef between July 31 and August 17, 2008

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Bathymetric Survey



3D Visualization of part of the Bathymetric Survey

Suai, Kammassa and Beaco Geophysical and Geotechnical Survey

November 2009 to March 2010

CLIENT: GOVERNMENT OF TIMOR-LESTE

Contract value: \$3,000,000

The purpose of the survey was to study the feasibility of ports in three locations, Suai, Kammanasa and Beaco.

9 land boreholes and 8 marine boreholes were drilled to 200 ft depth.

Two mobile drilling rigs were used onshore and a jack-up barge offshore, together with two assistance boats. Two LCT ships were used for transportation.

A total of 75 workers were present at any given time.



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Suai: Marine Boreholes (MBH) and Land Boreholes (LBH)

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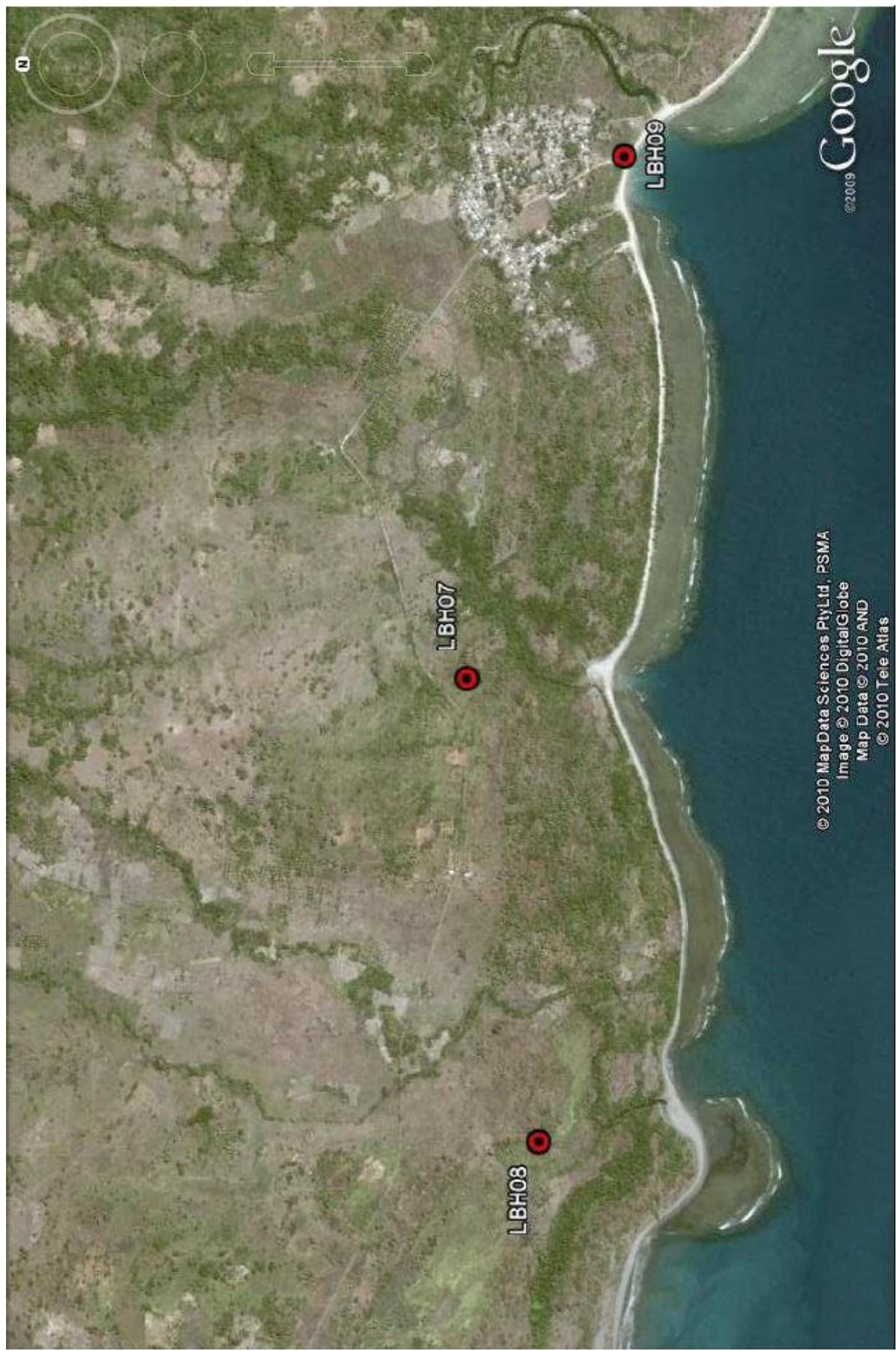
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Kammanasa: Marine Boreholes (MBH) and Land Boreholes (LBH)

Beaco: Land Boreholes (LBH)

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Crane on LCT ship helps assemble Jack-Up Barge



Jack-Up Barge used to drill marine boreholes

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Jack-Up Barge used to drill marine boreholes

19/42

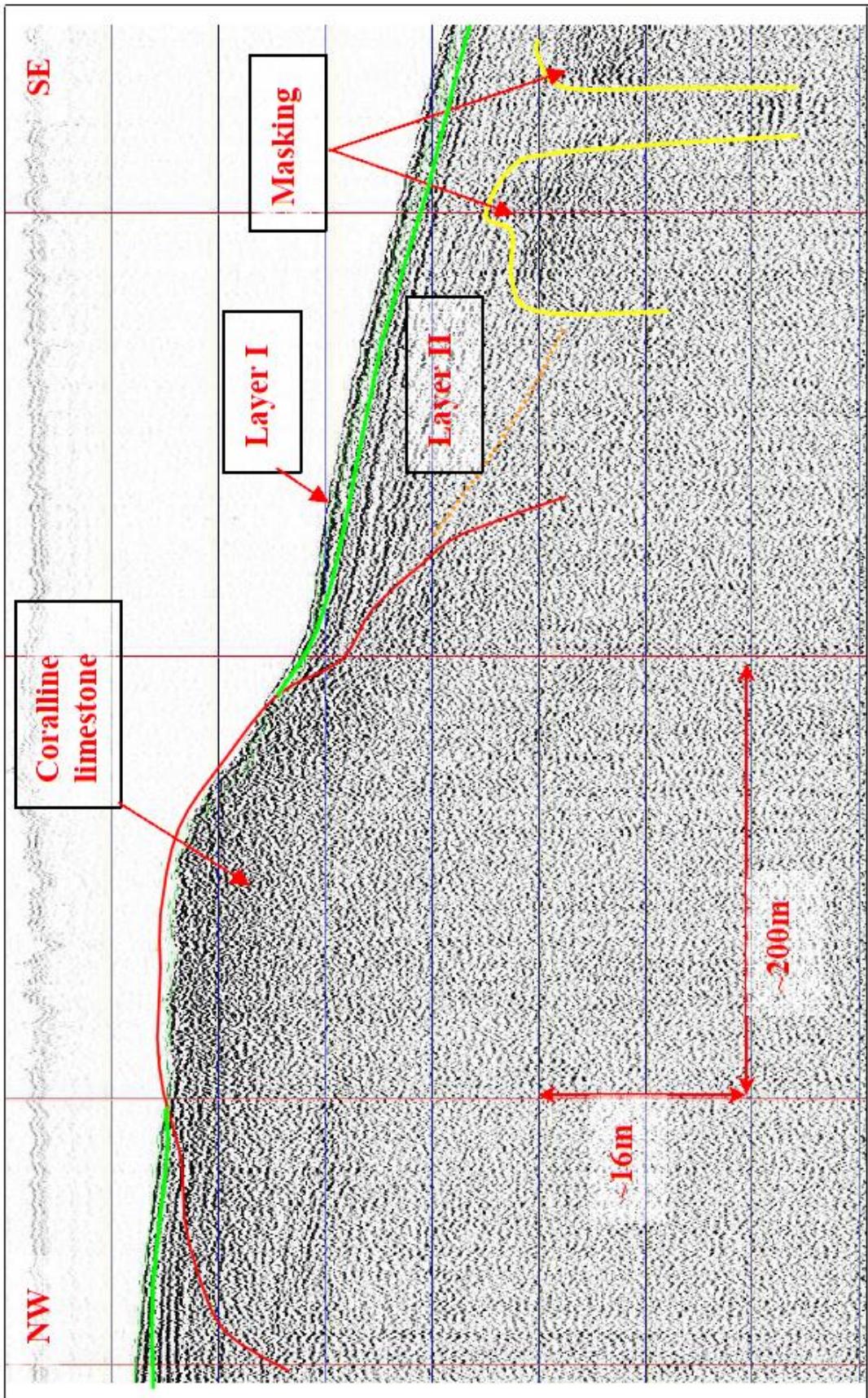




A mobile land drill rig

A sample of the seismic investigation offshore Suai

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Earth works in Suai



Loading an LCT ship in Suai



Loading an LCT ship in Suai



Beaco LNG Geophysical, Geotechnical and Metocean Survey

November 2010 to June 2012

CLIENT: GOVERNMENT OF TIMOR-LESTE

Contract value: \$6,700,000

The object of the Beaco project was to investigate the feasibility of a Liquefied Natural Gas (LNG) plant.

The scope of work included a large geotechnical survey, the drilling of 30 land boreholes and CPT's (Cone Penetration Testing) and 24 marine boreholes and CPT's, a complete geophysical investigation and an extensive Metocean (meteorological and oceanographic) survey.

Marine operations were conducted using a 4 points anchored ship and 4 assistance boats. Land operations used 3 mobile drilling rigs and a 20 tons CPT laboratory truck. In addition, a nearshore drilling jack-up platform was used on the reefs.

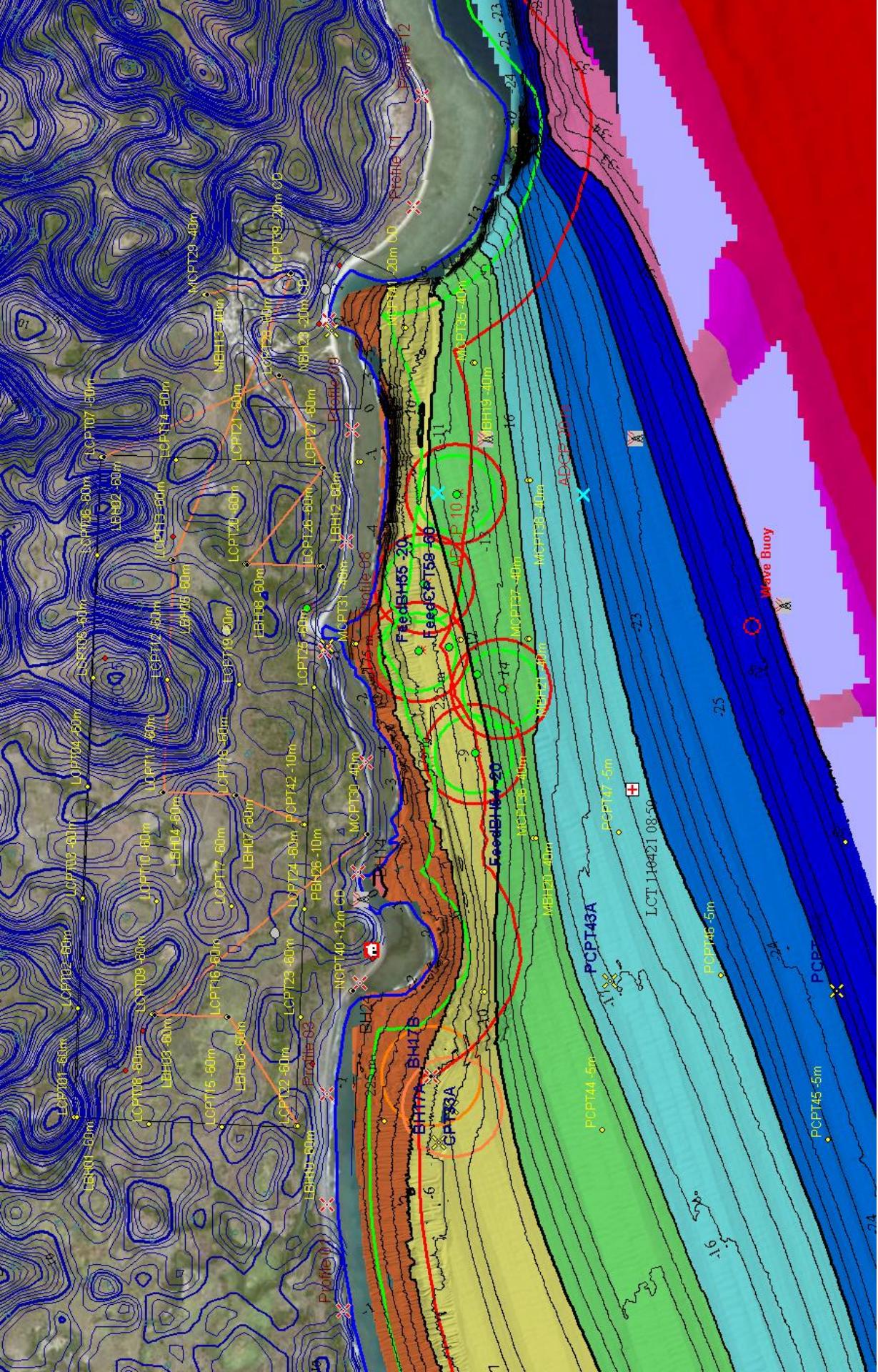
A total of 150 workers were present on the project at any given time.



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2009

Beaco Survey Area and Scope of Works

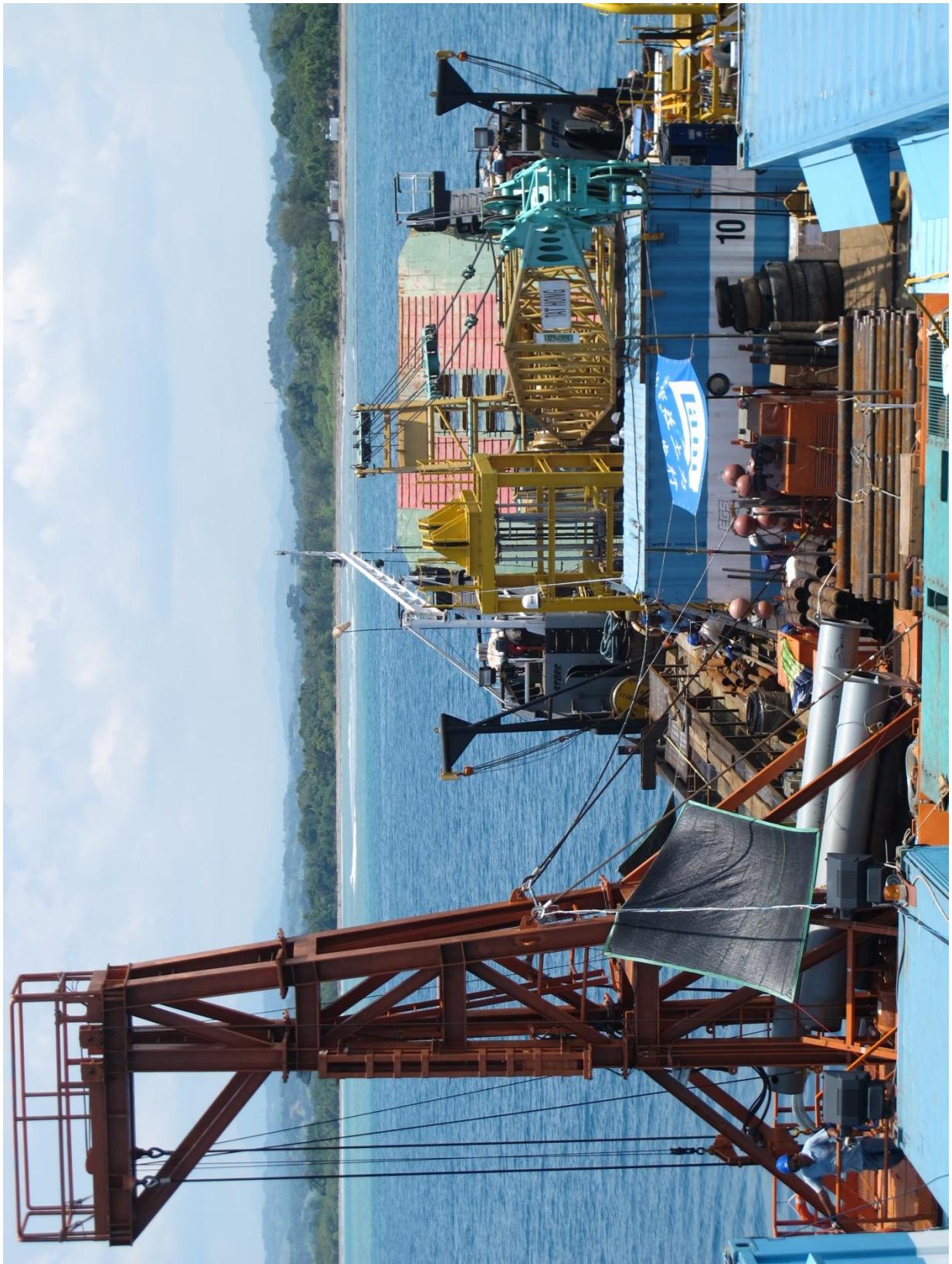


4 Points Mooring Drill-CPT Ship



Drilling Tower (left) and CPT System (yellow) with 80 ton crane

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CPT System (yellow) and Drilling Tower (orange)

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Deck of Drillship at dawn

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Land Drilling Rig in Beaco



CPT Truck



Metocean station

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3 of the 4 Assistance Boats and Metocean Deployment Unit

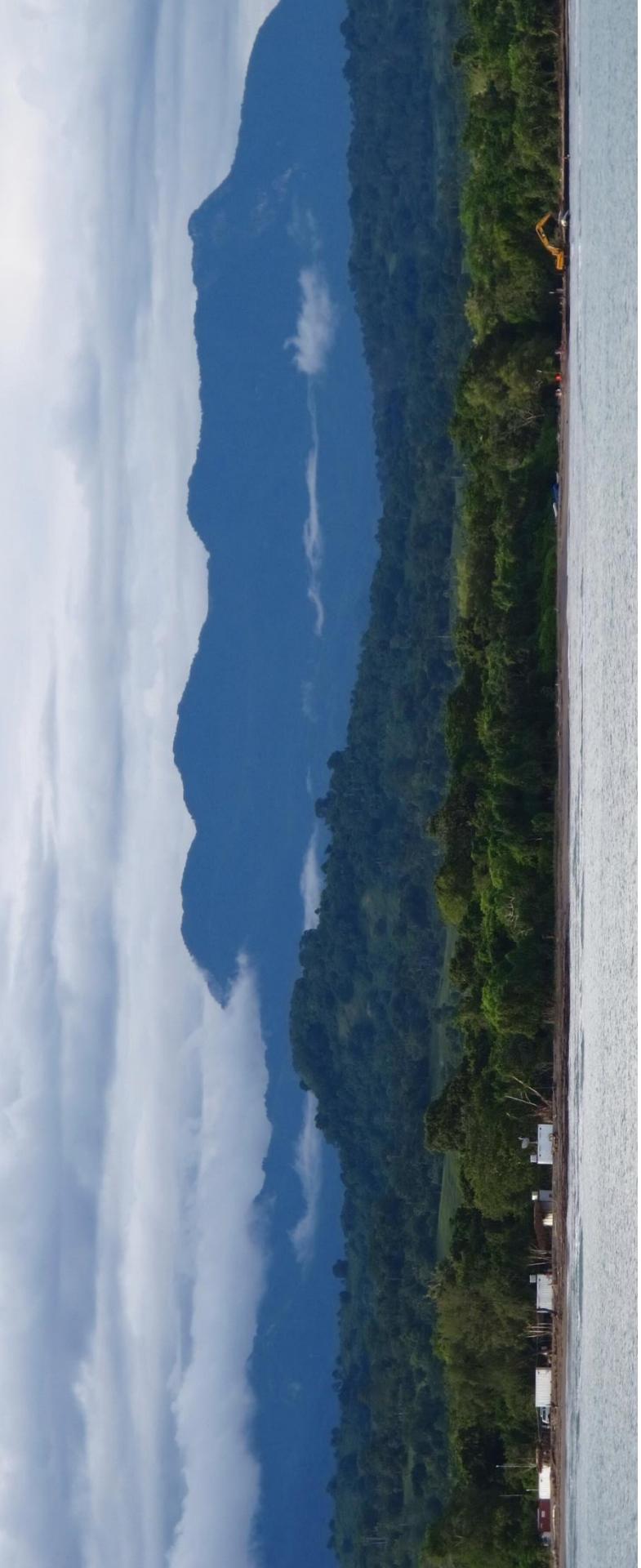


Nearshore Drilling Jack-up Platform on reef



Base Camp and Boat Launch Area

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Management cabin

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S/V Amertha used to conduct geophysical activities

Deployment of Metocean Equipment

An early visitor (*Crocodylus porosus*)

