

**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 SEVENTY-THREE UNADDRESSED
SUBMISSIONS AND ONGOING PROCEDURAL DISPARITY**

Defendant, Marc Moszkowski, hereby submits this Notice to document for the record the extraordinary imbalance in the treatment of party filings in this matter, and to respectfully preserve objection to the ongoing failure of the Court to address Defendant's numerous pending submissions.

1. As of May 7, 2025, Defendant has filed a total of **eighty-six (86)** pleadings in this action. These include motions to dismiss, motions to compel, notices of jurisdictional defects, evidentiary declarations, factual timelines, and numerous filings essential to the determination of this case.

2. Of these eighty-six submissions, **no fewer than seventy-three (73)** remain unaddressed by the Court and by the Plaintiffs. They have not been ruled on, dismissed, acknowledged, or referenced in any docketed order. All were filed between January 21 and May 7, 2025, covering a wide range of substantive and procedural issues.
3. In stark contrast, Plaintiff's comparatively few filings have consistently received near-immediate attention from the Court, often resulting in orders within days. In each such case, Defendant has also submitted prompt, comprehensive written responses.
4. This procedural asymmetry—in which one party is consistently heard and the other is systematically ignored—has now reached a point where it is incompatible with the foundational principles of due process and equal treatment before the Court.
5. Defendant files this Notice not as argument but as preservation: to ensure the record reflects the present condition of the proceedings and to object on record to the Court's continued silence in the face of substantial un rebutted and unresolved filings.
6. In this action, initiated in April 2018, it is increasingly difficult to overlook the procedural irony: of the two parties, one — bearing the title "Esquire" — has repeatedly submitted vague, unsupported, and

occasionally fabricated assertions. The other — an alien and exiled Defendant proceeding "Pro-Se" — has demonstrated consistent, disciplined professionalism, substantiating each pleading with detailed evidence, contemporaneous records, and statutory grounding. One party defeated the Complaint in Federal Court, where facts prevailed over form, before the matter was remanded to this forum under reasoning that remains, at best, debatable. The distinction between amateur and professional, between form and substance, has long since inverted.

7. Defendant respectfully requests that the Court take judicial notice of this imbalance, and that it clarify the status of Defendant's pending motions, including those previously documented in Defendant's Motion for Ruling on Pending Motions filed May 7, 2025.

Respectfully submitted on this 8th 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 8th 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.

M. Maszkowski