

**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 SECOND SUPPLEMENTAL STATEMENT IN
SUPPORT OF MOTION FOR PROTECTIVE ORDER**

COMES NOW, the Defendant, MARC MOSZKOWSKI, and hereby gives notice that he has filed the attached:

**Second Supplemental Statement in Support of Motion for
Protective Order**

to draw the Court's attention to Plaintiff's failure to engage with Defendant's Motion to Enforce By-Laws and for Relief from Mediation Costs, despite requesting additional time to brief and argue the matter.

This continued pattern of non-responsiveness and procedural delay underscores the need for the protective relief sought.

Respectfully submitted on this 26th 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 26th day of May, 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.



**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"

**SECOND SUPPLEMENTAL STATEMENT IN SUPPORT OF MOTION
FOR PROTECTIVE ORDER**

COMES NOW, the Defendant, MARC MOSZKOWSKI, and submits this Second Supplemental Statement in further support of his Motion for Protective Order, to bring to the Court's attention another example of Plaintiff's ongoing strategy of procedural evasion and avoidance of substantive engagement:

1. On March 26, 2025, Defendant filed his **Motion to Enforce By-Laws and for Relief from Mediation Costs**, raising issues that have been consistently presented to Plaintiff and to the Court for over seven years, including DeepGulf, Inc.'s obligation to advance litigation expenses under its corporate By-Laws.

2. Plaintiff did not file a response addressing the merits of the Motion.
3. Instead, on April 2, 2025, Plaintiff filed a Motion for Continuance of Hearing on Defendant's Motion to Enforce By-Laws, stating:

"Plaintiffs' counsel is happy to have a discussion regarding the Motion to Enforce Bylaws; however, to the extent that the Court desires to rule on such a Motion, the undersigned would like more time to fully research, brief, and have sufficient hearing time to give each party the opportunity to properly present its arguments."

4. No such briefing has been filed. No discussion ever took place. And no argument was ever presented. Despite seeking additional time, Plaintiff has continued to avoid addressing the Motion in any form.
5. Given that the Defendant's claims under the By-Laws have been raised repeatedly for seven years since 2018, Plaintiff's failure to articulate a single line of defense, even after requesting more time to do so, strongly suggests that no such defense exists. The Motion remains un rebutted because it is, substantively, unanswerable.
6. This is not an isolated event, but part of a broader pattern: Plaintiff uses procedural filings to create the illusion of engagement while

continuing to withhold substantive responses. When cornered, Plaintiff requests time; when given time, Plaintiff disappears.

Defendant respectfully submits that this conduct further confirms the need for a Protective Order—not merely to shield against harassment, but to compel fairness and real participation in a proceeding that has otherwise devolved into unilateral obstruction.

Respectfully submitted on this 26th 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 26th day of May, 2025, a copy of this Statement has been furnished to Braden K. Ball, Jr., attorney for the plaintiffs, through the Florida Courts E-Filing Portal.

