

**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 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:

Supplemental Statement in Support of Motion for Protective Order

for the purpose of bringing to the Court's attention relevant procedural history, factual asymmetry, and litigation conduct bearing directly upon the necessity of relief sought in Defendant's pending Motion for Protective Order.

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.



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

COMES NOW, the Defendant, MARC MOSZKOWSKI, and respectfully submits this Supplemental Statement in further support of his Motion for Protective Order, to draw the Court's attention to an extraordinary procedural asymmetry that has taken shape since remand from federal court:

1. Since remand, Defendant has filed one hundred and two (102) pleadings in this matter.
2. But for the two Motions to disqualify, Plaintiff has responded to only four (4) of those filings on the merits—the last of which was filed on March 11, 2025.

3. Since that date, Defendant has filed eighty-nine (89) additional pleadings.
4. Plaintiff has responded to only two (2) of them—both solely addressing Defendant's Motions to Disqualify the Presiding Judge, filed on May 6 and May 22, 2025, respectively.

Thus, for more than two and a half months, 100% of Plaintiff's participation has been confined to defending the sitting Judge, not addressing the claims or defenses that define this litigation. While Plaintiff has ignored eighty-seven (87) other filings during that period, it rushed to respond to the Motions to Disqualify—within hours in both instances. By contrast, it took Plaintiff three years, seven months, and two weeks to respond to Defendant's Motion to Strike the Complaint as a Sham, which was filed in June 2021 and met with silence until February 6, 2025.


The contrast is telling: when confronted with challenges to their preferred judicial officer, Plaintiff and counsel react with urgency. When confronted with challenges to the legal foundation of their own Complaint, they remain silent for years. The Judge is not their client, nor are they guardians of judicial impartiality. If Plaintiff and counsel were confident in the standing or substance of their claims—seven years into this case—the

identity of the Judge would be irrelevant. That it is not underscores the reality that their interest lies not in the merits, but in preserving a forum they perceive as advantageous.

This is not merely disrespect for the opposing party. It is a systematic refusal to litigate in good faith. Defendant respectfully submits that this behavior reinforces the urgent necessity of a Protective Order to restore balance, procedural fairness, and proper focus to these proceedings.

Respectfully submitted on this 26th day of May, 2025.

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



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