

**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 SUPPLEMENTAL DECLARATION
REGARDING PROCEDURAL COLLUSION AND CROSS-BORDER
TIMING**

COMES NOW Defendant, Marc Moszkowski, and files the attached document in support of the Court's full understanding of Defendant's position and the factual context of his prior motions: "*Supplemental Declaration Regarding Procedural Collusion and Cross-Border Timing*".

This supplemental declaration provides additional context for the Court's Order of May 21, 2025, and specifically addresses a pattern of transnational procedural coordination, including:

(1) the denial of Defendant's motion to lift a fraudulent lien,

(2) a subsequent notification of judicial auction of Defendant's only residence in France, and

(3) evidence of retaliatory timing following Defendant's April 17, 2025 declaration regarding the property's actual condition and diminished value.

Respectfully submitted on this 3rd 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 3rd 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.



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**DEFENDANT'S SUPPLEMENTAL DECLARATION REGARDING
PROCEDURAL COLLUSION AND CROSS-BORDER TIMING**

COMES NOW Defendant, Marc Moszkowski, and files this Supplemental Declaration in support of previously submitted motions, drawing the Court's attention to an alarming sequence of events suggesting procedural collusion and cross-jurisdictional coordination prejudicing Defendant's rights:

1. On May 21, 2025, this Court issued five simultaneous summary denials, including one denying "Defendant's Motion for Equitable Relief to Lift Fraudulent Lien and for Judicial Finding of Abuse of Process". This particular motion directly addressed a lien placed

on Defendant's only residence, located in France, arising from a judgment obtained by default by an associate and shareholder of Plaintiff.

2. That lien has been repeatedly and consistently challenged by Defendant since 2019 in motions, memoranda, and affidavits—most recently in the detailed Second Affidavit filed on January 21, 2025. That affidavit included documentary evidence showing that the debt claimed by Plaintiff's associate and shareholder, David Rumsey, was in fact satisfied by Rus Howard as salary owed to Defendant. Despite the seriousness of the allegations and the consistency of the claims across years of filings, Plaintiff has never responded to or rebutted the substance. In any reasonable forum, such persistent silence would amount to tacit admission.
3. Just days after the Court's denial, the French bailiff ("*huissier*") notified Defendant of the impending judicial sale of that same property—the only asset preventing Defendant's complete destitution.
4. It is difficult to view this timing as coincidental. The denial came after months of silence on a fully supported factual challenge, yet mere days before the lien was activated in France. Of all pending

motions, the one that might have disrupted the transnational enforcement apparatus was the one most swiftly denied.

5. This sequence raises a serious concern that decisions affecting Defendant's rights may have been made without full consideration of the record, and that parallel procedural developments in two jurisdictions may reflect more than mere coincidence. Whether due to inadvertence or lack of access to critical context, the result is that Defendant has been left without meaningful remedy.
6. The effect is to strip Defendant of any practical recourse—both in Florida and abroad—by cementing the outcome of a fraudulent lien procured through misrepresentation, while foreclosing all avenues to contest it. This results in procedural foreclosure rather than adjudication, contrary to basic norms of due process.
7. Further compounding the appearance of coordination, Defendant filed a detailed declaration on April 17, 2025, demonstrating that the subject property is environmentally damaged, legally uninhabitable, and practically worthless—a claim supported by scientific data and photographic evidence. The auction threat in France came only weeks later, and mere days after this Court's denial of the relevant motion. The coincidence of timing strongly

supports the inference of procedural manipulation and retaliation in both jurisdictions.

WHEREFORE, Defendant respectfully requests that the Court reconsider its Order of May 21, 2025, or in the alternative, issue a formal explanation of the basis for denial of the above-captioned motion.

Respectfully submitted on this 3rd 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 3rd day of June, 2025, a copy of this Supplemental Declaration has been furnished to Braden K. Ball, Jr., attorney for the plaintiffs, through the Florida Courts E-Filing Portal.

