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February 18, 2025

Via Email: Denise.Moffitt@FLCOURTS1.GOV
The Honorable J. Shackelford
Escambia Circuit Court Judge

Re: DeepGulf, Inc., et al v. Marc M. Moszkowski
Case No. 2018 CA 000543

Dear Judge Shackelford:

Attached please find the following three proposed Orders relative to the hearing that took place on February 10, 2025:

1. Order Denying Defendant's Motion for Summary Judgment
2. Order Denying Defendant's Motion to Strike Complaint as a Sham
3. Order Granting in Part and Denying in Part Plaintiffs' Motion for Summary Judgment

Mr. Moszkowski has no objection to the form of the first two Orders mentioned above; however, Mr. Moszkowski has made comments with regards to the proposed Order Granting in Part and Denying in Part Plaintiffs' Motion for Summary Judgment. I enclose a copy of his email for your review.

Thank you for your consideration.

Sincerely,

LITVAK BEASLEY WILSON & BALL, LLP

A blue ink handwritten signature, appearing to read 'Monica C. Andrews', with a long horizontal flourish extending to the right.

Monica C. Andrews, Paralegal to
Braden K. Ball, Jr.

enclosure

Monica Andrews

From: m.moszkowski@deepgulf.net
Sent: Saturday, February 15, 2025 11:00 AM
To: Monica Andrews
Subject: RE: DeepGulf, Inc., et al v. Marc M. Moszkowski; Case No. 2018 CA 000543

Follow Up Flag: Follow up
Flag Status: Completed

Good morning, Ms. Andrews,

I thank you for the courtesy of your message.

Find here my comments:

1. ORDER DENYING DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

No comment.

2. ORDER DENYING DEFENDANT'S MOTION TO STRIKE COMPLAINT AS A SHAM

No comment, other than I will file my responsive pleadings by February 20th, 2025

3. ORDER GRANTING IN PART AND DENYING IN PART PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

This one is utterly problematic, since the requests expressed by Mr. Ball in his Motion would be illegal to abide by and therefore impossible to enforce.

Have a good week.

Marc Moszkowski

From: Monica Andrews [mailto:mandrews@lawpensacola.com]
Sent: Thursday, February 13, 2025 11:03 AM
To: m.moszkowski@deepgulf.net
Cc: Braden Ball
Subject: DeepGulf, Inc., et al v. Marc M. Moszkowski; Case No. 2018 CA 000543

Good morning Mr. Moszkowski,

Attached please find three proposed Orders that we have prepared relative to the hearing that took place on Monday, February 10, 2025. Please advise if you are agreeable to the form of the Orders.

Thank you.

Monica C. Andrews
Paralegal for Braden K. Ball, Jr. and Paul A. Wilson
Litvak Beasley Wilson & Ball, LLP