

EXHIBIT I (WATTS et al) Cir of Cook Cty ILLINOIS

FILED  
2/27/2019 10:47 PM  
DOROTHY BROWN  
CIRCUIT CLERK  
COOK COUNTY, IL  
2007CH29738

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC ) Case No.: 2007 CH 29738  
Plaintiff, ) (Transfer to Law Division)  
) In re: 1-18-0091 (appellate file)  
vs. ) Before: Hon. DIANE M. SHELLEY,  
) Circuit Judge  
Gordon Wayne Watts, et. al., ) District: First Municipal  
Defendants. ) Calendar "W", Courtroom 1912

**Rule 321 motion to limit Contents of the Record on Appeal**

**NOTICE:** Defendant, Gordon Wayne Watts, no longer resides in Lakeland, Florida, and his new contact information is Gordon Wayne Watts, 2046 Pleasant Acre Drive, Plant City, FL 33566-7511 (H:863-687-6141, C:863-688-9880)

This Rule 321 motion comes to the court pursuant to the order of the District Court of Appeal, First District, ILLINOIS, dated, OCT 25 2018 [Exhibit-A], which directed that "Appellant must direct inquiries on the content of [the] record on appeal to [the] clerk of the circuit court of Cook County."

CAVEAT: It is on record and clearly documented that This Court has *previously* received timely motions of this type, but in violation of Federal Procedural Due Process, This Court didn't review on the merits nor rule on prior motions, such as the timely-filed motion to Intervene dated 7-7-2017 [Exhibit-F], and on file with this court, nor did it rule on the timely Rule 321 Motion Electronically-filed on "4/20/2018 6:34 PM," in this case [Exhibit-C], in the CIRCUIT COURT OF COOK COUNTY, ILLINOIS LAW DIVISION, which Defendant-Appellant filed pursuant to the ORDER ENTERED MARCH 28, 2018, Appellate Court, First District. **In refusing to rule on the 4/20/18 motion, *supra*, This Court, effectively disobeyed the appeals court, since the appeals court clearly did not ask defendant, Watts, to file a motion with the intent that it get ignored, violating Federal Procedural Due Process, as well** (not to mention something that gives This Court a bad name). Furthermore, in doing so, it's clear that the only possible motive for such extreme action would be to protect Joseph Younes, an influential local attorney, by refusing to rule against him or return Daniggelis' house to its rightful owner. But, This Court does itself no favours when it continues to protect a documented trouble-maker, who's been an embarrassment to the legal profession (and court), when local news media has continued to write about how he took the house (which he obtained via documented mortgage fraud) & attempt to **illegally demolish it** as shown in at least nine(9) recent news items [click-able *DNAinfo* links]:

[1] "'Rotted' Historic Building In Old Town Triangle Could Be Seized By City," by Ted Cox, DNAinfo, Mar 30, 2017

[2] "'Rotted' Old Town Triangle House Owner Faces Daily \$1K Fine As Charges Fly," by Ted Cox, DNAinfo, Apr 07, 2017

[3] "'Rotted' Old Town House Slated For Repairs As Fines Threatened Again," by Ted Cox, DNAinfo, Apr 28, 2017

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[4] "Owner Of 'Rotted' Old Town Home Threatened With \$150,000 Fine," by Ted Cox, DNAinfo, Jul 07, 2017

[5] "Owner Of 'Rotted' Old Town House Faces 'Significant Fines.' City Says," by Ted Cox, DNAinfo, Jul 13, 2017

[6] "'Rotted' Old Town House Cleared For Repairs," by Ted Cox, DNAinfo, Jul 20, 2017

[7] "'Rotted' Old Town House Owner Given 45 Days To Come Up With Repair Plan," by Ted Cox, DNAinfo, Sept 01, 2017

[8] "Landmarks commission still threatening fines if house in historic district isn't worked on once building permit is issued," by Ted Cox, ChicagoCityscape, Nov 09, 2017

[9] "CHICAGO, IL: Mortgage Fraud" by Gordon Wayne Watts, The Register, Fri. 14 Apr. 2017; UPDATED Sat. 05 May 2018.

Links: <https://GordonWatts.com/index.html#MortgageFraud-2017UPDATES>

and: <https://GordonWayneWatts.com/index.html#MortgageFraud-2017UPDATES>

\* **Bonus:** This doesn't even count numerous embarrassments that Defendant, Paul Shelton (who was Younes' law partner), brought the legal profession, when he lost his law license in the Lessie Towns case, for similar mortgage fraud, garnering embarrassment to both lawyers & court:

[10] "And Paul Shelton of Trust One Mortgage has agreed to a consent order that bans him for life from any work originating loans..."Lifetime bans are never issued without cause. There are always reasons for lifetime bans," said [Brent] Adams, [Illinois Department of Financial and Professional Regulation secretary]." Source: "Victory for South Side victim of mortgage fraud," *ABC Local*, WLS-TV/DT; Date: Friday, November 19, 2010, URL: <http://abclocal.go.com/story?section=news/local&id=7799653>

[11] See also: "While mom took care of others, she got taken," *Chicago Tribune*, May 10, 2009, By John Kass: URL: [http://articles.chicagotribune.com/2009-05-10/news/0905090103\\_1\\_trust-bungalow-house-payments](http://articles.chicagotribune.com/2009-05-10/news/0905090103_1_trust-bungalow-house-payments)

It damages the court's reputation when it protects Younes, a man who is documented (in Judge Otto's 3-8-2013 order in this case[[\*\*]]) to have used a forgery to execute mortgage fraud theft of elderly Daniggelis' house, land, and equity, documented to be hundreds of thousands of dollars:

To show partiality in judgment is not good: Whoever says to the wicked, "You are in the right,"... Whoever says to the guilty, "You are innocent," will be cursed by peoples and denounced by the public; nations will abhor him as corrupt. [[\*\*]]Note: Otto admits (Order, p.4, top of page, [Exhibit-D]) that the July 9, 2006 warranty deed "is in most respects identical" to the May 9, 2006 warranty deed that Daniggelis signed (except, of course, for the word 'July' being hand-written in), which supports Daniggelis' claims that there was photocopy forgery of his signature, which forgery—all by itself—would void the entire illegal transfer of title.

[12] Nor does this count the illegal rulings by the reviewing court, in which it, *inter alia*, claims that it does not have Mandamus jurisdiction [Exhibit-L], in spite of the clear, plain meaning of Art.6, Sec.6, Ill.Const, and relevant case law. See September 28, 2018 order by reviewing court: "This cause coming on to be heard on the Court's Own Motion, and the Court being advised in the premises;

IT IS HEREBY ORDERED that this Cause is DISMISSED for lack of this Court's jurisdiction.

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ORDER ENTERED [ ] SEP 28 2018 [ ] APPELLATE COURT, FIRST DISTRICT

Enter:

/s/ Justice Mary Anne Mason

/s/ Justice Terrence J. Lavin

/s/ Justice Michael B. Hyman”

See: *Gassman v. THE CLERK OF THE CIRCUIT COURT OF COOK COUNTY* (1-15-1738) and *Midwest Medical v. Dorothy Brown* (1-16-3230), both of which are examples of Reviewing Court having the authority to issue Mandamus Writs, as Art.6, Sec. 6 of the ILLINOIS CONSTITUTION (sentence 3) clearly says: “The Appellate Court may exercise original jurisdiction when necessary to the complete determination of any case on review,” which, of course, includes Mandamus actions. Gross Error justifies Federal Review of this, as permitted by Rooker-Feldman, Younger Abstention, etc., to offer a check & balance against legal discord.

To assure This Court that a *pro se* (non-lawyer) appellant has enough experience to not be a waste of This Court's time: Even though Appellant, Watts, is not an attorney, he almost won the infamous Terri Schiavo case all by himself, doing even better than former Gov. Jeb Bush [Exhibit-G], and he was the only non-lawyer who one Federal Appeals court allowed to participate in the recent Gay Marriage case. [Exhibit-B] See also, his filings in *Watts v. Flannery, Shelley*, No.123481 before the Illinois Supreme Court in this matter.

[13] Nor does this count the illegal rulings by the reviewing court, in which it, *inter alia*, claims, in its May 03, 2018 ruling [Exhibit-H], that: “This court has no jurisdiction to order the Cir. Ct. to allow Watts leave to intervene, grant a fee waiver, or to prepare the record on appeal & transmit to App. Ct. in this matter (1-18-0572). Motion denied.  
IT IS SO ORDERED.

/s/ Justice Daniel J. Pierce,” in spite of the fact that Appellate Courts have Rule 321 authority to order a limited record on appeal—or to intervene, as allowable under *City of Chicago v. John Hancock Mutual Life Ins. Co.*, 127 Ill.App.3d 140, 144 (1st Dist. 1984),...not to mention that this order wrongly denies the inherent Rule Rule 301 jurisdiction of the appeals court—and as allowable under SECTION 6, ARTICLE VI, Constitution of the State of Illinois.

**In preventing appellant an opportunity to appeal the actions of the circuit court, both the Illinois circuit and appellate State judges are not protected by Federal Judicial Immunity under the highest FEDERAL standards:** “A judge thus remains unquestionably immune as long as he does not take actions that intentionally and plainly prevent further review. The duty imposed on a state-court judge, then, is only to recognize that his own decisions may sometimes be in error and to ensure that orders affecting important constitutional rights can be reviewed in another court.” [“JUDICIAL IMMUNITY VS. DUE PROCESS: WHEN SHOULD A JUDGE BE SUBJECT TO SUIT?,” by Robert Craig Waters, page 473, par.3, cl.4—5, Cato Journal, Vol.7, No.2 (Fall 1987). Copyright © Cato Institute. All rights reserved. The author is Judicial Clerk to Justice Rosemary Barkett of the Florida Supreme Court. Emphasis added in bold, underline, italics, for clarity; not in original.]

Cite: <https://www.cato.org/cato-journal/fall-1987>

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File: <http://www.cato.org/sites/cato.org/files/serials/files/cato-journal/1987/11/cj7n2-13.pdf>

Cite: <https://ideas.repec.org/a/cto/journal/v7y1987i2p461-474.html>

\* [https://econpapers.repec.org/article/ctojournal/v\\_3a7\\_3ay\\_3a1987\\_3ai\\_3a2\\_3ap\\_3a461-474.htm](https://econpapers.repec.org/article/ctojournal/v_3a7_3ay_3a1987_3ai_3a2_3ap_3a461-474.htm)

Cite: <https://EconPapers.Repec.org/RePEc:cto:journal:v:7:y:1987:i:2:p:461-474>

Circuit court refused to even rule on the 7-7-17 Intervention Motion [Exhibit-F], thus preventing any review, and it also refused to allow appellant to prepare a Record on Appeal that he could afford. The Appeals Court (First District, IL) also refused to ensure that the record on appeal was prepared, even when appellant generously offered to limit the Record on Appeal to approximately twelve (12) items (see proposed Order, Exhibit-C), sufficient to review the plain—and admitted—forgery fraud. (Judge Otto's order, cited *supra*, admitted duplicate identical signatures, e.g., forgery.) Thus, as infamous vexatious litigant, Robert J. More (a party to this action, by the way) is wont to say, judges have incurred legal liability and are not protected by Judicial Immunity. (However, appellant, Watts, will strive to be polite, diplomatic, and respectful—and carefully document such strong claims. **While appellant, Gordon Wayne Watts, very strongly disagrees with actions of this court and the ones above, he realises that the judges/justices are "real people," who often have a heavy case-load, and will strive to do his part to make their jobs as easy as possible—and show honour & respect, even under duress.**)

The Movant meets all three (3) prongs for Intervention under *City of Chicago v. John Hancock Mutual Life Ins. Co.*, 127 Ill.App.3d 140, 144 (1st Dist. 1984), *timeliness, inadequacy of representation, and sufficiency of interest, and is qualified to intervene as allowable by 735 ILCS 5/2-408(a)(2) and 735 ILCS 5/2-408(a)(3), as documented in defendant's motion to intervene, dated 7-7-2017, and on file with this court.* Although defendant proved that his interests were not sufficiently represented by Mr. Galic, attorney for Defendant, Richard Daniggelis, in his 7-7-2017 filing, that is even more true now: Mr. Galic, whose motion for 'non-suit' aka voluntary dismissal, was granted by Hon. Diane Shelley, in her 12-07-2017 Order, has been AWOL and totally absent in his promise to Mr. Daniggelis to refile the case within the one-year deadline; therefore, we see that Galic has ensured total & complete "inadequacy of representation" of Watts' documented interests.

Since defendant, Watts, has previously documented that he qualifies to proceed as an indigent (Exhibit-I), he could, legally, request This Court prepare the *entire* record on appeal, and transmit it to the appellate court for review. But, in the interests of fairness to the court (humane treatment and judicial economy), Watts notes that the size of the docket in the underlying Chancery case, in this case number, is huge, and would burden This Court to prepare. Indeed, in the 10-17-2018 "Motion – *En Banc* – for Extension of Time to file Record on Appeal," which the reviewing court granted (Exhibit-J), defendant quoted Patricia O'Brien, Deputy Chief of Civil Appeals, in which she concurred and admitted, in her Oct 15, 2018 email reply, that: "as you are well aware, this case is eleven years old and was several boxes in size many years ago." Instead of asking this court to prepare the entire record, defendant instead asks This Court to prepare a Rule 321 limited record with the twelve (12) filings enumerated in the proposed order of the 4/20/2018 motion which defendant, Watts, electronically-filed, and which is on file with this court. (Exhibit-C) Defendant, Gordon Wayne Watts, makes a formal request, via this rule 321 motion, to prepare the limited record on appeal, enumerated in his 4-20-2018 filing.

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**\*\* APOLOGY and Explanation for slowness in filing \*\***

The above legal arguments seem difficult at best with their references to egregious Federal Civil Rights violations—and possibly even insulting, or disrespectful, even though Defendant, Watts, is **\*\*not\*\*** trying to insult The Court—which would, of course, be just cause to strike the brief, declare it a frivolous/vexatious filing, and of course restrict/deny Watts Redress before the court, as a restricted/denied filer. (And, of course, this would greatly decrease the chances of my motions being considered, reviewed, and relief granted—something you know I want to avoid.) **However, one “last” issue needs to be addressed, and so I will: In a break from “3rd-person” professional language in this motion (and most filings to the court), I, the undersigned Defendant-Appellant-Movant, Gordon Wayne Watts, will apologize to This Court and the appellate court above for slowness in filing this motion today.**

Now, at the circuit court, there are no “hard deadlines” to file the record on appeal (as this court has not issued any order directed to myself with deadlines—indeed, only one judge in this case, Judge Otto, issued *any* orders whatsoever directed to myself, the undersigned Movant, in his humourous Orders dated 10/29/2015 and 12/07/2015, denying my *Amicus*). However, the appellate court generously extended the deadline for filing the record to February 28, 2019 (and this was 10 more days than I had requested, looking at the 02-18-2019 date in my proposed order). Now, I am still “timely” in my filings (and not 'technically' late), as I will likely have both this motion (to the Cook County, IL circuit court) and yet another motion to extend time (to the First Appellate Court) filed by February 28, 2019. Indeed, one friend said that since I am still timely, I shouldn't even waste The Court's time with an apology, as I'm really not “late.”

**However, my slowness in getting back in touch with your court, and making (yet another) request for the record on appeal puts the appeals court at a major inconvenience –and means that your actions will have to be “faster” to make up for my slowness: I “waited until the last minute,” something that (ideally) should have been avoided. So, morally (even if not legally) I owe This Court (and the appeals court) an explanation: As the court has been told before, my father just died, (Exhibit-K), and about a month later, I nearly died from a bad reaction to OTC medication (Exhibit-E). Moreover, after we were evicted (Exhibit-M), the landlady demolished her house, and (of course) forced us to move to the new address. However, the house was in disrepair, and both electric and pump well were not working properly, and we could not take showers, do laundry, flush the lavatory, or get well-water for drinking, because the first (1<sup>st</sup>) and original pump (Exhibit-N) had been vandalised and damaged before we arrived. So, we purchased a second (2<sup>nd</sup>) pump on 10-03-2018 for \$3,114.80 (Exhibit-O), just before our eviction (in preparation for moving in the new house), but it failed and was replaced. It was under warranty, but we had to pay \$375.00 in labour on 01-19-2019 (Exhibit-P), and we got a third (3<sup>rd</sup>) pump, which was NOT under warranty, since it was burnt up by a voltage problem: It pump failed, we discovered, because the electric ground was not sufficiently grounded, and TECO (Tampa Electric Company) was honest enough (Exhibit-N) to warranty the damaged pump, and paid for a fourth (4<sup>th</sup>) pump to be put in (Exhibit-Q), actually paying for both pumps they damaged. (But the inconvenience of being unable to take a shower, flush lavatory toilets, have drinking water, do laundry, etc., plus TIME LOST in these ventures, slowed me down, and impeded my attempts to file in This Court earlier.) Furthermore, my computer (the thing that lets**

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me get online and type of a coherent motion or brief) was packed away, and, for months on end, unavailable, and covered beneath piles of a lifetime of belongings. And, even when I could finally get it unpacked, the Internet out here in the country (all we can currently afford) is even slower than dial-up speed. (Exhibit-R) Besides weeks (if not months) of lack of 'basic' things like lavatory toilet, shower, Internet, and computer, I'm still on food stamps, and barely able to keep up with the most basic bills (gas, food, car insurance, rent & utilities, etc.), both financially, and even more-so, from a time-management standpoint.

My filings in this court (and the appeals court above), in which I compete against “rich and powerful” attorneys—*whom this court had adamantly and repeatedly protected, after they took my friend's house, and didn't pay him a dime for it, taking hundreds of thousands in documented equity, as well*—takes huge amounts of my precious time (that I could, theoretically, spend working a job—if one were to be found in my area).

This “last” issue should be addressed before I make my conclusion: I apologize to This Court (and the appeals court, who will be reviewing this filing and any motion to extend deadlines), for my slowness, but it is all I can do to barely hold-even against the tide. (I will be lucky to file this in time for you to respond before my 02-28-2019 deadline expires, meaning, even if you respond today, you will still have to compile and transmit the record on appeal, necessitating another Order to Extend Time, no matter what occurs, here today.) That being said, I point out the Electric Company (Exhibit-D), which paid for their damage: They didn't hesitate to pay for what they damaged, and I firmly believe that the judges of This Court are at least as honest and sincere. Indeed, I vividly recall Daniggelis telling me, on several occasions, that Judge Diane M. Shelley was careful to warn his attorney, Andjelko Galic, that she might not be in this division next year should he refile this case after her Order granting his “Non-Suit” aka “Voluntary Dismissal” motion, which clearly shows that she cared for him, as a person, and did not, merely, view Daniggelis & his attorney “as a number.” And, Justice Daniel J. Pierce, on the appellate court, could easily have denied any or all of my motions to extend time; And, whatever other egregious complaints I might have with his court or yours, I am firmly certain that he—like most judges and justices—are sincere and want to “do the right thing” as we saw the electric company do.

So, I am apologizing much for making mistakes or being slow on a few, recent occasions—when it was mostly out of my control. And, yet, This Court is NOT apologizing (or making good), at all, for denial of my fair day in court on many occasions, repeatedly. That contrast is a key difference in how different parties are carrying their end of the burden.

But, in spite of the court's obvious slackness in doing it's part, I know that 2 wrongs do not make a right, **and I am genuinely sorry for what little I have done to impede the wheels of justice.** That is why I go to lengths to make a personal, and detailed, apology.

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### CONCLUSION

Since this court never ruled on defendant's 7-7-2017 Motion to Intervene, procedural due process is implicated. In light of Judge Flanney's complaint (see **Exhibit-S**, his March 01, 2018 order) that this court never granted leave to intervene (participate, his words), it is therefore appropriate for this court to review on the merits—and rule on—the following three (3) legal questions:

- 1) 735 ILCS 5/2-408(a)(2) and 735 ILCS 5/2-408(a)(3) Intervention [my 7-7-2017 motion, **Exhibit-F**]
- 2) Rule 298 Application for Waiver of Court Fees [see my ELECTRONICALLY FILED, 1/22/2018 6:33 PM, 2007-CH-29738, **Exhibit-I**]
- 3) This Rule 321 motion to limit Contents of the Record on Appeal [the instant motion]

As Judge Michael F. Otto delineates in his December 07, 2015 Order in the Chancery case by the same case number, which underlies this case, this court considers motions on the merits, not its title or caption, citing *Vanderplow v. Krych*, 332 Ill. App. 3d. 51, 54 (1<sup>st</sup> Dist. 2002) (“the nature of a motion is determined by its substance rather than its caption... and a court should not blindly adhere to nomenclature at the expense of reality”) (citations and punctuation omitted). Since the elderly Daniggelis was made homeless, this is not unlike a 911 situation, and I remind the court and clerks: What if **\*\*you\*\*** called 911, and the the 911 dispatcher—instead of giving you needed service—rather, asked you to provide “boxes and boxes” (see Patricia O'Brien's email, above) of paperwork, which he knew you couldn't afford. While the court is not a police station, the analogy is comparable, because both acts (or lack) could put lives of elderly people in jeopardy. This case has dragged on, unnecessarily delayed years (if not decades) by a court-system which refuses to afford either **Procedural Due Process or Substantive Due Process**, to both elderly Rich Daniggelis, or appellant Watts.

The “proposed order” in this motion is “light-weight,” and not heavy at all: It simply requests a VERY SMALL quantity of material be compiled into a 'limited' Record on Appeal (not very costly to this court) and, I'm very aware of the financial strains under-which ILLINOIS has recently found itself, and am confident that this matter will not burden you much—and can probably be easily & quickly prepared in a few days or weeks. Therefore, defendant-appellant Watts asks this court to consider this “Rule 321 motion” on the merits of all three (3) legal questions above, and issue a ruling on all three legal questions: Movant asks this court, after having granted technical motions 1 and 2 above, to speedily order the Civil Appeals Division to prepare the limited record enumerated in the proposed order of the 4/20/2018 motion, and speedily transmit it to the IL First Appellate Court, in appellate file number 1-18-0091.

*Respectfully submitted,*

*/s/Gordon Wayne Watts*

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
 2046 Pleasant Acre Drive, Plant City, FL 33566-7511  
 PH: (863) 687-6141 [home] or (863) 688-9880 [cell]  
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**Verification by Certification**

I, Gordon Wayne Watts, the undersigned Movant, under penalties as provided by law pursuant to 735 ILCS 5/1-109, Section 1-109 of the ILLINOIS Code of Civil Procedure, hereby certify that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and, as to such matters, the undersigned certifies as aforesaid that he verily believes the same to be true: "Any pleading, affidavit or other document certified in accordance with this Section may be used in the same manner and with the same force and effect as though subscribed and sworn to under oath." Source: 735 ILCS 5/1-109: <http://www.ILGA.gov/legislation/ilcs/documents/073500050K1-109.htm>

**Nonetheless, This Court has on record several of my sworn, witnessed, and notarised affidavits, just to remove any and all doubt hereto.**

Date: Wednesday, 27 February 2018

/s/Gordon Wayne Watts  
Gordon Wayne Watts

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC	)	Case No.: 2007 CH 29738
<b>Plaintiff,</b>	)	(Transfer to Law Division)
	)	<b>In re: 1-18-0091 (appellate file)</b>
vs.	)	Before: Hon. DIANE M. SHELLEY,
	)	Circuit Judge
Gordon Wayne Watts, et. al.,	)	District: First Municipal
<b>Defendants.</b>	)	Calendar "W", Courtroom 1912

**ORDER**

This matter coming on to be heard on the motion of Movant, Gordon Wayne Watts, for the instant **Rule 321 motion to limit Contents of the Record on Appeal**, and, notice having been given, and the Court being fully advised in the premises. **IT IS HEREBY ORDERED that:**

**Application for fee wavier by Defendant, Gordon Wayne Watts, is hereby granted, and this court grants leave to intervene and participate in this case, but only for the purpose of preparation of a limited record on appeal, with the items enumerated below:**

- All lower court pleadings – and related “exhibits” – filed by Gordon Wayne Watts
- The 10/17/2007 Complaint to Foreclose Mortgage filed by GMAC
- The July 16, 2008 Motion for Extension of Time filed by CVLS for Daniggelis
- The July 30, 2008 Answer filed by CVLS on behalf of Daniggelis
- Two (2) “Answer” briefs, filed by Defendant, Joseph Younes, dated Oct 24, 2008
- The 2/15/2013 Answer filed by Atty. Galic on behalf of Daniggelis
- The 2/15/2013 and 3/8/2013 ORDERS by Judge Michael F. Otto
- The 5/6/2015 Supervisory ORDER by the IL Supreme Court, in the instant case [No. 118434, (27 N.E.3d 610 (2015))]
- The 8/8/2017 Motion to Reconsider filed by Atty. Galic for Daniggelis
- The 12/06/2017 Motion to Comply filed by Robert J. More
- The 12/07/2017 ORDERS by Judge Diane M. Shelley, from which Watts appeals

The Clerk of the Circuit Court of Cook County (via the Civil Appeals Division) shall prepare the following limited record of appeal, without cost, to appellant, Gordon Wayne Watts, and transmit it to the IL First Appellate Court, **in case number 1-18-0091.**

ENTERED: \_\_\_\_\_  
Judge Diane M. Shelley, #1925  
Date: \_\_\_\_\_

Prepared by:  
Gordon Wayne Watts  
2046 Pleasant Acre Drive  
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(863) 687-6141, (863) 688-9880

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC	)	Case No.: 2007 CH 29738
<b>Plaintiff,</b>	)	(Transfer to Law Division)
	)	<b>In re: 1-18-0091 (appellate file)</b>
vs.	)	Before: Hon. DIANE M. SHELLEY,
	)	Circuit Judge
Gordon Wayne Watts, et. al.,	)	District: First Municipal
<u><b>Defendants.</b></u>	)	Calendar "W", Courtroom 1912

NOTICE OF FILING

To: See attached Service List

**PLEASE TAKE NOTICE** that today, Wednesday 27 February 2019, I am causing to be filed with the Clerk of the Court of Cook County, Illinois, my **Rule 321 motion to limit Contents of the Record on Appeal**, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,

\_\_\_\_\_  
(Actual Signature, if served upon clerk)  
**Gordon Wayne Watts**

/s/ Gordon Wayne Watts  
(Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
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**SERVICE LIST**

\* **CIVIL APPEALS DIVISION: Cook County, IL Circuit Court**, 312-603-5406, Richard J. Daley Center, 50 West Washington St., Room 801, Chicago, IL 60602 – Attention: Deputy Chief, Patricia O'Brien, [PAOBrien@CookCountyCourt.com](mailto:PAOBrien@CookCountyCourt.com) Hours: 8:30a-4:30p, Mon-Fri, Excl. Holidays Cc: [CivilAppeals@CookCountyCourt.com](mailto:CivilAppeals@CookCountyCourt.com)

\* **Hon. Timothy C. Evans**, Chief Judge (Ph 312-603-6000, 4299, 4259 TTY: 6673) Circuit Court of Cook County, 50 W. Washington St., Room 2600, Richard J. Daley Center Chicago, IL 60602, Courtesy copy via: [Timothy.Evans@CookCountyIL.gov](mailto:Timothy.Evans@CookCountyIL.gov) **[served, as a courtesy, since he is not a party proper]**

\* **Hon. James P. Flannery, Jr.**, Circuit Judge–Presiding Judge, Law Division 50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343, Courtesy copy via: [James.Flannery@CookCountyIL.gov](mailto:James.Flannery@CookCountyIL.gov) **[served, as Judge Flannery is a defendant in the Mandamus proceedings]**

\* **Law Division and Hon. Diane M. Shelley, Circuit Judge, Daley Center, 50 W. Washington St., Rm. 1912, Chicago, Illinois 60602** [Law@CookCountyCourt.com](mailto:Law@CookCountyCourt.com) ; [ccc.LawCalendarW@CookcountyIL.gov](mailto:ccc.LawCalendarW@CookcountyIL.gov) ; [Diane.Shelley@CookCountyIL.gov](mailto:Diane.Shelley@CookCountyIL.gov) **[served, as Judge Shelley is a defendant in the Mandamus proceedings]** Cc: [Michael.Otto@CookCountyIL.gov](mailto:Michael.Otto@CookCountyIL.gov) as a courtesy since he made key rulings in the underlying Chancery case, by the same case number—two of which were directed to defendant, Watts

\* **Richard B. Daniggelis** [true owner of 1720] 312-774-4742, c/o John Daniggelis, 2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652 **[Not served, as Mr. Daniggelis has asked that service copies not be sent to him, which is permissible, since he has an attorney of record.]**

\* **Richard B. Daniggelis** (who receives mail, via USPS mail-forwarding at his old address) 1720 North Sedgwick St., Chicago, IL 60614-5722 **[Not served, as Mr. Daniggelis has asked that service copies not be sent to him, which is permissible, since he has an attorney of record.]**

\* **Andjelko Galic** (Atty. for Richard B. Daniggelis) (Atty#:33013) C:312-217-5433, Fx:312-986-1810, Ph:312-986-1510, [AGForeclosureDefense@Gmail.com](mailto:AGForeclosureDefense@Gmail.com) ; [AndjelkoGalic@Hotmail.com](mailto:AndjelkoGalic@Hotmail.com) 845 Sherwood Road, LaGrange Park, IL 60526-1547

\* **Joe Younes**: 2625 West Farewell Avenue, Chicago, IL 60645-4522 [JoeYounes@SbcGlobal.net](mailto:JoeYounes@SbcGlobal.net)

\* **Joseph Younes** (Atty#:55351) Law Offices / <http://ChicagoAccidentAttorney.net> 312-635-5716, per website, Ph: 312-372-1122 ; 312-802-1122 ; Fax: 312-372-1408 E: [RoJoe69@yahoo.com](mailto:RoJoe69@yahoo.com) 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596

*GMAC v. Watts, 2007 CH 29738 (Law Div.), 1st App.Ct. No: 1-18-0091, Wednesday, 02-27-2019*

**SERVICE LIST (continued)**

\* **Peter King (Atty. for Joseph Younes)** (Atty. No.: 48761)  
(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221  
<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com) or:  
[PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

\* **Paul L. Shelton, Pro Se**, (Atty. #15323, disbarred per IARDC) E: [PMSA136@Gmail.com](mailto:PMSA136@Gmail.com) ;  
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\* **Erika R. Rhone** 22711 Southbrook Dr., Sauk Village, IL 60411-4291, last known emails (see **Exhibit-G**) are as follows: [ERRegi@mail2.tread.net](mailto:ERRegi@mail2.tread.net), [Erika.Rhone@SbcGlobal.net](mailto:Erika.Rhone@SbcGlobal.net),  
[Erhone@Mindspring.com](mailto:Erhone@Mindspring.com), [Erika@GrandKahn.com](mailto:Erika@GrandKahn.com), [ErikaRhone@sbcglobal.net](mailto:ErikaRhone@sbcglobal.net),  
[ER5526199@aol.com](mailto:ER5526199@aol.com) and per: [https://www.FastPeopleSearch.com/ms-erika-r-rhone\\_id\\_G-5317261083665188477](https://www.FastPeopleSearch.com/ms-erika-r-rhone_id_G-5317261083665188477)

\* **Rosa M. Tumialán** ([RTumialan@Dykema.com](mailto:RTumialan@Dykema.com)) (312) 876-1700, DYKEMA GOSSETT PLLC, 10 South Wacker Drive, Suite 2300 Chicago, IL 60606-7407 [Attorney for Appellee, GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX]

\* **Dawn Williams** ([DWilliams@Dykema.com](mailto:DWilliams@Dykema.com)) ([DPeacock@KentLaw.iit.edu](mailto:DPeacock@KentLaw.iit.edu)) Note: Served to work address, as she has NOT been excused by Court as an attorney of record—but not served to personal email, as a courtesy, as she claims, via auto-responder email, to no longer work at DYKEMA. Phone: 616-776-7518, DYKEMA GOSSETT PLLC, 300 Ottawa Ave., N.W., Suite 700, Grand Rapids, MI 49503-2306 [Attorney for Appellee, GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX]

\* **Atty. Justine A. Lewis, Esq.** ([JLewis@Dykema.com](mailto:JLewis@Dykema.com)), Senior Manager, Recruiting and Professional Development \*\* Note: Now included on service list per official email from Dykema – see **Exhibit-H**. Phone: 312-876-1700, FAX: 866-771-2154 or 312-876-1155, DYKEMA GOSSETT PLLC, 10 South Wacker Drive, Suite 2300, Chicago, IL 60606-7407 [Attorney for Appellee, GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX] Chicago office address per: <https://www.Dykema.com/www.dykema.com/careers-associates-opportunities.html>

\* **Robert J. More** ([Anselm45@Gmail.com](mailto:Anselm45@Gmail.com)) [Note: **More's** name is **misspelled** on docket as: “**MOORE ROBERT**”] P.O. Box 6926, Chicago, IL, 60680-6926, PH: (708) 317-8812 [[**Mr. More has made a formal request by email to receive service solely by email, and waives hard-copy service.**]]

*GMAC v. Watts, 2007 CH 29738 (Law Div.), 1st App.Ct. No: 1-18-0091, Wednesday, 02-27-2019*

**SERVICE LIST (continued)**

\* **Associated Bank, N.A.**, 200 North Adams Street, Green Bay, WI 54301-5142

Web: <https://www.AssociatedBank.com/about-us> PH: (920)433-3200, (800)236-8866, or (800)682-4989, Email address: [WeCare@associatedbank.com](mailto:WeCare@associatedbank.com) per: view-source:<https://www.AssociatedBank.com/contact> and: [ShareHolders@AssociatedBank.com](mailto:ShareHolders@AssociatedBank.com) per: <http://Investors.EquityApartments.com/drip.aspx?iid=100135> and [ColleagueCare@AssociatedBank.com](mailto:ColleagueCare@AssociatedBank.com) per: <https://AllHispanicJobs.com/s/find-associated-bank-jobs-in-usa>

\* **MERS (Mortgage Electronic Registration Systems, Inc.)** <https://www.MersInc.org/about-us/about-us> a nominee for HLB Mortgage, (703) 761-0694 / (800)-646-MERS (6377) / 888-679-MERS (6377) ATTN: Sharon McGann Horstkamp, Esq., Corporate Counsel, Mortgagee: <https://www.MersInc.org/component/content/article/8-about-us/401-sharon-horstkamp> Senior Vice President, Chief Legal and Legislative Officer, and Corporate Secretary for MERSCORP Holdings, Inc. – PH: (703) 761-1270, FAX: (703) 748-0183, [SharonH@MersInc.org](mailto:SharonH@MersInc.org) ; [SharonH@MersCorp.com](mailto:SharonH@MersCorp.com) Cc: Janis Smith, 703-738-0230, VP, Corp. Comm. is no longer with MersCorp, and Amy Moses ([AmyM@MersCorp.com](mailto:AmyM@MersCorp.com) ; [AmyM@MersInc.org](mailto:AmyM@MersInc.org)) has replaced her as an email contact; Sandra Troutman 703-761-1274, E: [SandraT@MersInc.org](mailto:SandraT@MersInc.org) ; [SandraT@MersCorp.com](mailto:SandraT@MersCorp.com)) Dir, Corporate Communications, Karmela Lejarde, Communications Manager, Tel~ 703-761-1274, Mobile: 703-772-7156, Email: [KarmelaL@MersInc.org](mailto:KarmelaL@MersInc.org) ; [KarmelaL@MersCorp.com](mailto:KarmelaL@MersCorp.com) C/o: **MERS (Mortgage Electronic Registration Systems, Inc.), 1901 East Vorhees Street, Suite 'C', Danville, IL 61834-4512**

\* **COHON RAIZES@AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)**

Removed from service list, and not served, as the court excused them as parties: “As a result of the dismissal of Counts X and XI, Third party Stewart Title of Illinois n/k/a Stewart Title Company is no longer a party to this litigation.” [See the 11/09/2012 ORDER for Voluntary Dismissal by Agreement in *GMAC v. Daniggelis*, 2007-CH-29738, the Chancery case underlying this case]

\* **Stewart Title, Attn: Leigh Curry**

Removed from service list, and not served, as the court excused them as parties—see above.

\* **Richard Indyke, Esq.** Atty. No. 20584, ([RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net) ; 312-332-2828 ; 773-593-1915 most recent “Attorney of record” for LaSalle Bank Natl. Assn.), 111 South Washington Ave., Suite 105, Park Ridge, IL 60068-4292 [[Mr. Indyke claims to not represent any party in the instant appeal, but the undersigned can not find any more recent atty of record for defendant, LaSalle Bank, and reluctantly will keep Mr. Indyke on the service list, unless excused by The Court.]]

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC	)	
<b>Plaintiff,</b>	)	Case No.: 2007 CH 29738
	)	(Transfer to Law Division)
vs.	)	Before: Hon. DIANE M. SHELLEY,
	)	Circuit Judge
Gordon Wayne Watts, et. al.,	)	District: First Municipal
<b>Defendants.</b>	)	Calendar "W", Courtroom 1912

**CERTIFICATE AND AFFIDAVIT OF DELIVERY (aka: Certificate of Service)**

\* The undersigned **Defendant-Appellant, Gordon Wayne Watts**, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above **Rule 321 motion to limit Contents of the Record on Appeal, Index to exhibits, Proposed Order, NOTICE OF FILING, an updated/corrected SERVICE LIST, and this Certificate of Service, and attached EXHIBITS**, copies of which are attached hereto are being herewith served upon you—and upon the parties listed in the attached Service List, above – **today, this Wednesday, 27 February 2019**, via **the Odyssey eFileIL (TylerHost.net) Electronic Filing system** if they're e-file registered.

\* I am NOT serving any parties via **First Class U.S. Postal Mail** –*as I customarily do (due to financial constraints), as Rule 11 does not require hard-copy service if email is used.*

\* Additionally, I shall, when practically possible, post a TRUE COPY of this filing –and related filings –**online at my official websites, infra** –linked at the “Mortgage Fraud” story, dated Fri. 14 April 2017—see e.g., the “Open Source Docket” link in said news item.[see EXHIBIT-C]

\* Lastly, I'm concurrently effecting service via **e-mail**.

\_\_\_\_\_  
(Actual Signature, if served upon clerk)  
**Gordon Wayne Watts**

*Respectfully submitted,*  
*/s/ Gordon Wayne Watts*  
(Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
2046 Pleasant Acre Drive, Plant City, FL 33566-7511  
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
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FILED DATE: 2/27/2019 10:47 PM 2007CH29738

RAN out of paper  
 RAN out of PAPER re Watts et al.  
 Cir-Ct  
 Cook Cty  
 ILLINOIS

GMAC v. Watts, 2007 CH 29738 (Law Div.), 1st App.Ct. No: 1-18-0091, Wednesday, 02-27-2019

**INDEX TO THE EXHIBITS**

<b><u>Instrument</u></b>	<b><u>Docket/Tab#</u></b>
Thr 25 Oct 2018 ORDER (1-18-0091) Mot Ext Time: GRANTED	Exhibit-A
Federal Appeals Court Order allowing Defendant, Watts, Amicus status	Exhibit-B
Fri 20 Apr 2018 Motion Clarification (07CH29738: Law Div)	Exhibit-C
3-8-2013 ORDER by Hon. Michael F. Otto in this case	Exhibit-D
Medical Documentation of defendant, Watts, nearly dying (hardship)	Exhibit-E
Timely 7-7-2017 Motion for Intervention	Exhibit-F
Citations showing Defendant, Watts nearly won Schiavo case – all by himself, doing even better than former Florida Gov. John Ellis “Jeb” Bush before the same panel of FLORIDA SUPREME COURT Justices	Exhibit-G
Thr 03 May 2018 ORDER Lack Jurisdiction (1-18-0572)	Exhibit-H
Timely STAMPED Fri 19 Jan 2018 Fee Waiver App (07CH29738 Law Div)	Exhibit-I
Wed 17 Oct 2018 Mot Ext Time (01-18-0091)	Exhibit-J
Obituary & Death Certificate for Bobby Watts (Defendant's father; Hardship)	Exhibit-K
Fri 28 Sept 2018 ORDER Dismissed Lack Jurisdiction (1-18-0538)	Exhibit-L
Eviction Notice (Hardship)	Exhibit-M
TECO (Tampa Electric Company) complain cover letter	Exhibit-N
10-03-2018 receipt for second (2nd) pump put in for \$3,114.80	Exhibit-O
01-09-2019 receipt for third (3rd) pump put in for \$375.00, labour only	Exhibit-P
Quote for fourth (4th) well-water pump, for parts only, for \$1,620.85	Exhibit-Q
Documentation of defendant, Watts' Internet (dial-up speeds – Hardship)	Exhibit-R
3-1-2018 Order by Hon. James P. Flannery, wrongly denying Fee Waiver App	Exhibit-S

Go online to  
 WATTS'  
 docket -  
 or let me file  
 CM / ECF.  
 // Gordon Wayne Watts  
 Gordon Wayne Watts  
 Mon 08 April 2019  
 W

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