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AAP
A.W.W.

APPEAL TO THE ILLINOIS DISTRICT (APPELLATE) COURT, FIRST DISTRICT
FROM THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT – CHANCERY DIVISION
MORTGAGE FORECLOSURE / MECHANICS LIEN SECTION

GMAC Mortgage, LLC aka "US Bank, N.A.,"etc.,	) Appellate Case #: _____
	) Case No. 2007-CH-29738
Plaintiff	)
	) 1720 N. Sedgwick Ave.
vs.	) Chicago, IL
	)
Atty. Joseph Younes, Esq., Mr. Richard B. Daniggelis, et al.,	) Before:
	) Hon. Michael F. Otto #2065
Defendants	) Associate Judge, Chancery

NOTICE OF APPEAL

Notice is hereby given, pursuant to Supreme Court Rule 301, that Gordon Wayne Watts appeals from the Circuit Court of Cook County's Order of December 07, 2015, which Order denied movant's Rule 329 motion to supplement the record on appeal with items which were missing solely due to the negligence of the trial court's continued documented[[**]] failures to grant a public records request – which denial delayed movant's ability to timely file a brief before the notice of appeal was executed in the above-styled case. *[[**]] For documentation of said allegations, please see movant's online docket in the front-page news of his namesake blog—which links are listed in the signature line of this notice—e.g., www.GordonWatts.com and www.GordonWayneWatts.com.* **Date of the judgment/order being appealed: December 07, 2015.** A true and correct copy of that order is attached hereto. **Watts seeks** reversal of the Circuit Court's Order, **and a Rule 329 Supplement** of the record on appeal **with the selfsame items enumerated in the Rule 321 Motion** *infra—and remand* to the Circuit Court for further proceedings consistent with this order.

NOTICE OF FILING

Pursuant to Rule 303(c)Service of Notice of Appeal: "The party filing the notice of appeal or an amendment as of right, shall, within 7 days, **file a notice of filing with the reviewing court** and serve a copy of the notice of appeal upon every other party and upon any other person or officer entitled by law to notice. Proof of service, as provided by Rule 12, shall be filed with the notice."

Dear Reviewing (appellate) court: you are so notified.

REQUEST FOR PREPARATION OF RECORD ON APPEAL

NOTICE IS HEREBY GIVEN to the Clerk of the Circuit Court of Cook County that Gordon Wayne Watts requests the preparation of the Record on Appeal in the above case, in accordance with Illinois Supreme Court Rule 321: **Rule 321. Contents of the Record on Appeal** "The record on appeal shall consist of the judgment appealed from, the notice of appeal, and the entire original common law record, unless the parties stipulate for, *or the trial court, after notice and hearing, or the reviewing court, orders less."*

Rule 321 MOTION (SUGGESTION) TO *BOTH* COURTS to "Order Less"

To make things simpler, This Court (Chancery) and/or the reviewing court (First District Appellant Court) need only include Mr. Watts' filings and the two orders directed to him-as shown below:

08/10/2015 (Sworn/Notarised AFFIDAVIT, notice of motion, motion for *Amicus*, proposed *Amicus* brief, & exhibits)

10/29/2015 INCOMING CORRESPONDENCE FILED (E.g., Letter to the judge asking him to rule on a timely-filed Rule 329 Motion to Supplement filed way back on 08/10/2015)

10/29/2015 "Time-Sensitive Judicial Notice of Adjudicative Facts – in *semi*-Emergency Fashion by OVERNIGHT FedEx" (This item was originally filed on 09/10/2015, and then lost by the trial court, but refiled and docketed on this date, 10/29/2015.)

10/29/2015 Order denying Rule 329 Motion to Supplement

11/30/2015 Motion for Rehearing (Reconsideration) (The trial court lists this as 12/2/2015, but it was actually deposited in the mail on 11/30/2015, and thus timely, as postal stamps on the movant's online docket document.)

12/07/2015 Order denying Motion for Rehearing (Reconsideration)

01/06/2016 This Notice of Appeal with various other motions appended concurrently

These should be sufficient record, but The Court & any interested parties are welcome to peruse the open-source (free) online docket provided by appellant, Watts, as listed in "front-page news" of his namesake blog: www.GordonWatts.com and www.GordonWayneWatts.com.

Rule 298. Application for Waiver of Court Fees

Applicant, Gordon Wayne Watts, qualifies for waiver of fees pursuant to 735 ILCS 5/5-105 because he is on SNAP (food stamps). See 735 ILCS 5/5-105(a)(2)(i): ""Indigent person" means any person who meets one or more of the following criteria: He or she is receiving assistance under one or more of the following public benefits programs: Supplemental Security Income (SSI), Aid to the Aged, Blind and Disabled (AABD), Temporary Assistance for Needy Families (TANF), Food Stamps, General Assistance, Transitional Assistance, or State Children and Family Assistance." (See Exhibit-B).

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

The undersigned, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above **Notice of Appeal** and all attached pleadings were delivered to the following parties as indicated – this Wednesday, the 6th day of January 2016:

1st District Appellate, Clerk's Office, 160 North LaSalle St., Chicago, IL 60601
(312) 793-5484 , Office Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays

CIVIL APPEALS DIVISION: Richard J. Daley Center, 50 West Washington St., Room 801
Chicago, IL 60602 – (312) 603-5406, Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays

Hon. Michael F. Otto, Associate, Judge, Chancery, (312) 603-3893 Chancery Div.
Daley Center, 50 W. Washington St., Room 2804, Chicago, Illinois 60602

Andjelko Galic, Esq. (atty for Defendant, Daniggelis) (Atty No.: 33013)
(Cell: 312-217-5433, FAX: 312-986-1810, PH: 312-986-1510)
Email: AndjelkoGalic@Hotmail.com ; AGForeclosureDefense@Gmail.com ;
134 N. LaSalle St., STE 1040, CHICAGO IL, 60602
*(**Note:** The Nov. 16, 2015 proposed order by Mr. Galic in the Law Division case by the same case number suggests that STE 1810 is a old address and that he is now in STE 1040.)*

Richard Indyke, Esq. (312-332-2828 Atty for LaSalle Bank Natl. Assn.),
221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305

Mr. Robert J. More (Anselm45@Gmail.com) I represent to the court that Mr. More has consented to email service and prefers this method exclusively.

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 One North LaSalle Street, Suite 3040,
Chicago, IL 60602
*(**Note:** Mr. King has informed me that the Wacker Drive address is outdated and that this address is the current service address, and his law office website, listed above, confirms this is correct.)* I represent to the court that Mr. King has graciously consented to email service, but, just to be safe, I shall attempt to effect service in all standard methods.

Paul L. Shelton, Esq.
E-mail: PMSA136@aol.com; PLShelton@SBCGlobal.net As the court has seen fit to deem Shelton a non-party and not in need of service (see comments in the orders in question, and the service list of same), I'm not serving Mr. Shelton a hard copy, just electronic copies.

Joseph Younes Law Offices / http://ChicagoAccidentAttorney.net
166 W WASHINGTON ST, Ste. 600, Chicago, IL 60602;
Phone: (312) 372-1122 ; Fax: (312) 372-1408
Email is: RoJoe69@yahoo.com per http://www.ZoomInfo.com/p/JosephYounes/599467626

MERS (Mortgage Electronic Registration Systems, Inc.)
https://www.mersinc.org/about-us/about-us
a nominee for HLB Mortgage, Janis Smith – (703) 738-0230 – Email: JanisS@mersinc.org
Vice President, Corporate Communications, Sandra Troutman – (703) 761-1274 – Email: SandraT@mersinc.org – Director, Corporate Communications
Note: MERS is only being served electronically per above.

I, Gordon Wayne Watts, the undersigned, hereby certify under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above NOTICE OF APPEAL and all attached pleadings (in pp.1-4 *supra* & appendix *infra*) were served upon all parties listed above, this 6th day of January, 2016 by the following methods:

• United State Postal Service: I am serving the parties proper via my city's local post office on the date listed – and with proper postage. I hope to obtain certification of delivery with return receipt and signature confirmation on as many packages as I can afford. (NOTE: Only those parties whose street addresses are listed above are being served hard copies by US Postal Mail.)

• E-mail: I am contemporaneously serving all the parties listed above via email, in such cases as I have their e-mail address.

• Internet: I shall, when practically possible, post a TRUE COPY of this filing – and related filings—online at my official websites, *infra*.

Signature: Gordon Wayne Watts Date: Wed 01-06-2016
Gordon Wayne Watts, *Amicus Curiae* *
821 Alicia Road
Lakeland, FL 33801-2113
PH: (863) 688-9880
Web: www.GordonWatts.com / www.GordonWayneWatts.com
Email: Gww1210@aol.com / Gww1210@gmail.com
Date: Wednesday, 06 January 2016
* Watts, acting counsel of record, is not a lawyer. Per Local Rule 2.1, "Notice of Hearing of Motions," Watts, appearing *pro se*, is giving notice of his motion

INDEX TO THE EXHIBITS

Instrument	Docket/Tab#
12/07/2015 Order of Hon. Michael F. Otto in this case	Exhibit-A
Proof the Gordon Wayne Watts is on food stamps and thus qualifies for a Rule 298 Waiver of Fees	Exhibit-B

12/07/2015 Order of Hon. Michael F. Otto in this case **Exhibit-A**

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION
MORTGAGE FORECLOSURE/MECHANICS LIEN SECTION

U. S. BANK, N.A., *etc.*,	)	
	)	
Plaintiff,	)	**Case No. 07 CH 29738**
	)	
vs	)	**1720 N Sedgwick Ave.**
	)	**Chicago, IL**
JOSEPH YOUNES, RICHARD DANIGGELIS, *et al.*,	)	
	)	
Defendants.	)	

ORDER

The court is in receipt of two copies of a November 30, 2015 "Notice of Motion" signed by Mr. Gordon Wayne Watts, along with two copies of a "Motion for Rehearing" and Exhibits thereto. Neither the Notice nor the Motion have been filed with the Clerk of the Circuit Court, so far as the online docket reveals. Rather, both have been mailed directly to the undersigned. The Notice of Motion does not actually notify the other parties to the case of a date on which the motion will be heard, but rather states that Mr. Watts shall appear "telephonically" on whatever date the court sets for presentment of the motion. Copies of the above-referenced documents are attached to this Order as Group Exhibit 1.

Finding no necessity for oral argument, the court by this Order denies the Motion for Rehearing (Reconsideration).

I. Oral Argument is Not a Right

First, the court is well within its discretion in deciding this or any motion without oral argument. Mr. Watts in his Notice of Motion asserts that

> "This Court allows just any 'yahoo' to appear 'in person' to present motions, etc., [but] the court has denied me *my* right to appear telephonically, in the past (which seems very unfair, as well as a violation of court rules, *supra*)..." (Emphasis, punctuation, etc. as in original.) (Ex. 1, p. 1.)

In arguing that he has a right to appear by telephone to argue the merits of his motion, Mr. Watts references Illinois Supreme Court Rules 185 and 206(h). Neither supports his position. Rule 206(h) allows depositions to be conducted remotely, but says nothing whatsoever

regarding court proceedings. Rule 185 permits the circuit court to conduct motion argument by telephone (subject to local rule), but it does not require the court to allow telephonic argument, nor even to allow oral argument at all.

Illinois reviewing courts have been very clear, that the circuit court is not required to entertain oral argument on a motion. *See, e.g., Parkway Bank & Trust Co. v. Meseljevic*, 406 Ill. App. 3d 435, 441 (1st Dist. 2010) ("Oral argument in a civil proceeding tried, as here, by the court without a jury is a privilege, not a right, and is accorded to the parties by the court in its discretion.") The undersigned finds as to Mr. Watts's Motion for Rehearing (Reconsideration) that oral argument would be of no assistance, and accordingly declines to allow it. To the extent that Mr. Watts is suggesting that the court erred in failing to allow oral argument on the motions when originally presented, that argument is rejected for the same reason.

II. The Motion for Rehearing (Reconsideration) is Denied

Second, the court finds no merit to the Motion for Rehearing. As a technical point, no hearing having previously been held regarding Mr. Watts's motions, this would more properly be styled a motion for reconsideration. The court considers it on the merits as such. *See, e.g., Vanderplow v. Krych*, 332 Ill. App. 3d 51, 54 (1st 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).

The standard for a motion to reconsider is well-established: the movant must demonstrate that the court's prior ruling was erroneous, either because of (1) newly discovered evidence not previously available, (2) a subsequent change in the law, or (3) error in the court's previous application of existing law. *See Gardner v. Navistar Int'l Transp. Corp.*, 213 Ill. App. 3d 242 (1991). Mr. Watts's motion fails to satisfy any of these standards.

Mr. Watts's motion is in the form of a fictitious appellate court opinion "reversing" (in part) this court's previous ruling. (*See* generally Ex. 1.) Although it contains many sweeping statements of law, and generous use of boldface font, italics, and underlining, it is bereft (with one exception) of citation to relevant legal authority. The sole exception is Mr. Watts's passing reference to Illinois Supreme Court Rule 329, which governs supplementation of the record before the appellate court.[1] Mr. Watts is correct that Rule 329 vests the circuit court with jurisdiction over correction or supplementation of the record. Rule 329 in no way addresses, however, whether a stranger to the case may present such a motion to the trial court. At its core,

[1] Mr. Watts also cites to various Supreme Court Rules bearing on the timeliness of his motion to reconsider, and acknowledges the Illinois Supreme Court's order in *Kinkel v. Cingular Wireless*, which lays out the standards for *amicus* briefs. The former are irrelevant because the court considers his motion on the merits, while the latter is irrelevant because Mr. Watts does not request this court to reconsider its denial of his motion for leave to file an *amicus curiae* brief (the "appellate court" "affirms" the circuit court on this issue).

Mr. Watts's argument on rehearing seems to be that because a known vexatious litigant (Robert More) appears to have filed a document in the case *before* it was appealed, Mr. Watts should similarly be permitted to inject himself in the case *after* appeal, because it was not Mr. Watts's fault that he failed to file his materials before the notice of appeal was filed. (He complains vaguely that the Clerk of the Circuit Court delayed in providing him the record.)

The argument that all strangers to a case should be allowed to engage in the tactics of a vexatious litigant is so unpersuasive as to require no further discussion. The fundamental question is, should a total stranger to a case, neither a party nor an attorney for any party, be permitted to move to supplement the record on appeal. In its initial ruling this court answered that question in the negative. Nothing in Mr. Watts's Motion for Rehearing (Reconsideration) convinces this court that it erred in so ruling.

Accordingly, the Motion for Rehearing (Reconsideration) is DENIED. (As noted in fn. 1, Mr. Watts does not challenge the denial of his motion for leave to file an *amicus curiae* brief, the "appellate court" having "affirmed" this court on that score.) Court staff will send a copy of this Order (with attachments) to Mr. Watts and parties U.S. Bank, Joseph Younes, and Richard Daniggelis (all care of counsel) on the date it is entered. Counsel for Plaintiff directed to transmit a copy of this order to any/all other parties within 5 court days of receipt.

ENTER:

Judge Michael F. Otto
DEC 07 2015
Circuit Court - 2065

Michael F. Otto #2065

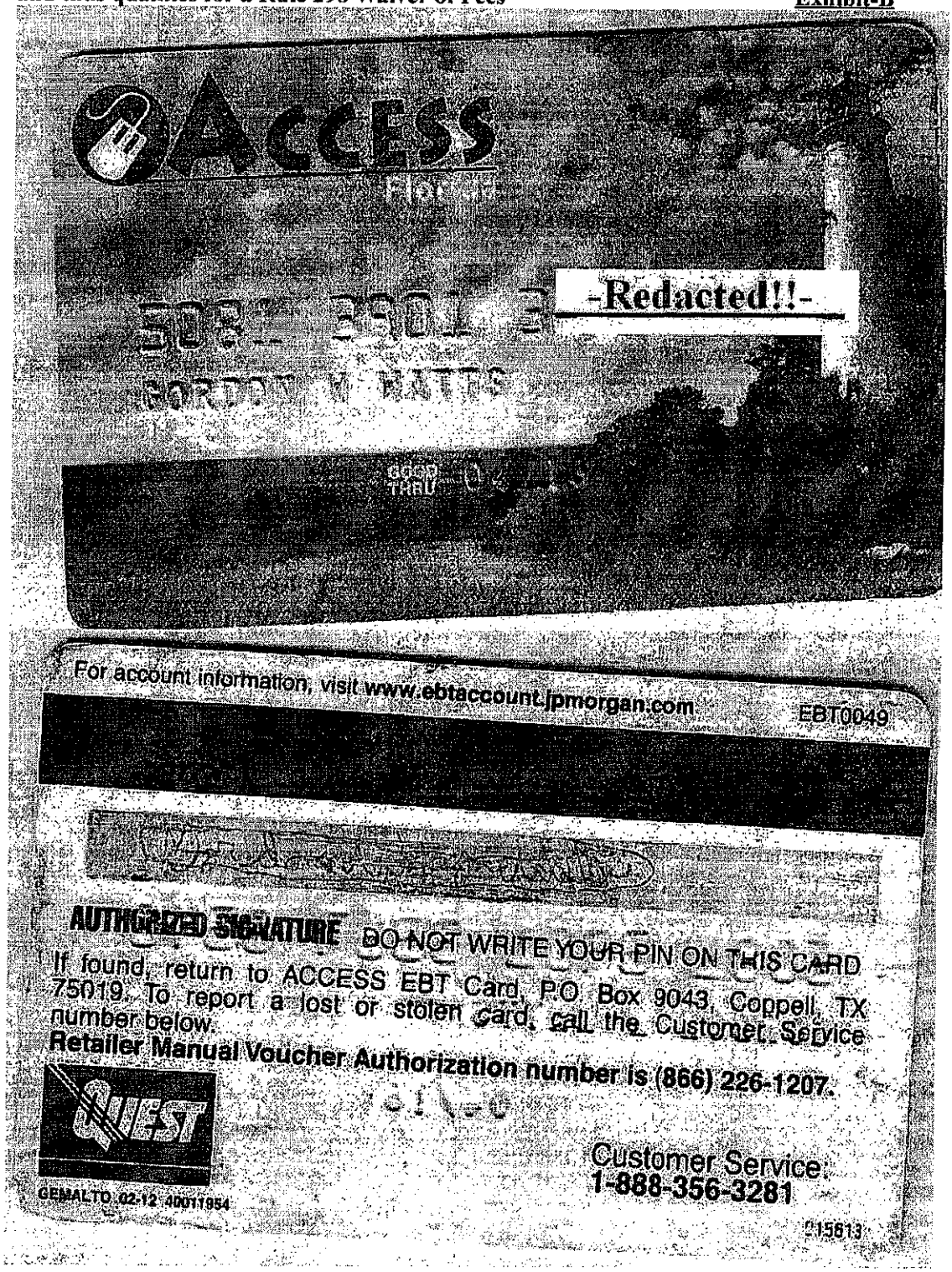
Associate Judge

This order was sent to the following on the above stamped date:

Mr. Andjelko Galic ,Esq. 134 N. LaSalle Street, Suite 1810 Chicago, IL 60602	Mr. Peter King, Esq. King Holloway LLC 101 North Wacker Drive, Suite 2010 Chicago, IL 60606
Mr. Richard Indyke, Esq. 221 N. LaSalle Street, Suite 1200 Chicago, IL 60601	Mr. Gordon Wayne Watts 821 Alicia Road Lakeland, FL 33801-2113

Proof the Gordon Wayne Watts is on food stamps and thus qualifies for a Rule 298 Waiver of Fees

Exhibit-B



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FILED
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DOROTHY BROWN
CLERK OF CIRCUIT COURT

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

GMAC Mortgage, LLC aka "US Bank, N.A.,"*etc.*,	**) Case No. 2007-CH-29738**
	) Individual Commercial
Plaintiff	**) Calendar "W"**
	) 1720 N. Sedgwick Ave.
vs.	**) Chicago, IL**
	)
Atty. Joseph Younes, Esq., Mr. Richard B. Daniggelis, *et al.*,	**)Before:**
	)Hon. Sanjay T. Tailor #1870
Defendants	**)Associate Judge, Law Div.**

¶1 MOTION FOR REHEARING ***-concurrent with Motion for Clarification***

The undersigned (Movant, Gordon Wayne Watts) is in receipt of the 11/16/2015 Order of This Court (**Exhibit-A**), Hon. Sanjay T. Tailor, Associate Judge #1870, of the Law Division, presiding – striking and/or denying the various motions by the undersigned in the above-captioned case. **For the reasons stated below, some of This Court's orders are found to be decided** correctly – and other orders are found to be decided incorrectly. To that end, this motion seeks a rehearing of that portion of the court's orders found to be decided incorrectly as a matter of law.

There are three (3) categories of the court's order that bear relevance: (#1) Request for participation in the case; and, (#2) request for "telephone conference"; and, (#3) orders directed at other parties.

Addressing point (#3), "orders directed at other parties," I do not have standing to appeal those orders, **but they shall be discussed as they *do* have legal bearing on my person.**

Addressing point (#2), request for "telephone conference," I admit that I was in legal error to assert that this was an absolute right: Rule 206(h)(Remote Electronic Means Depositions), cited in my 'Notice of Motion' (docketed on 9/14/2015) does not address telephone conference. Also, Rule 185 (Telephone Conferences) *permits* such telephone conference, but it does not *mandate* it – and, in fact, it does *not* even require Oral Arguments at all.

Addressing point (#1), participation can be categorised into 3 subcategories: **(A)** *Amicus Curiae*; **(B)** Intervenor rights; and **(C)** participation as a matter of right, as a named defendant.

Since I concede that I was in error on point #2, *supra,* I am not filing a 'Notice of Motion' with this 'Motion for Rehearing,' because without a hearing (either in person or via telephonic conference), there *is* no need for a 'Notice' thereof. **I shall show This Court, in arguments *infra,* that it was in error on the other two points on this life-or-death[1] matter.**

[1] As explained in initial filings by the undersigned, defendant, Mr. Daniggelis, is an elderly, 76-year-old gentleman. This alone isn't sufficient justification to find in his favour; however, when he became homeless (read: 'life or death') due solely to a "mortgage fraud rescue scheme" by a

GJ

BACKGROUND

¶2 On October 17, 2007, defendant, Daniggelis, was foreclosed on, and, in a *strange* turn of events, somehow had the title transferred out of his name and into the name of another co-defendant, Atty. Joseph Younes, Esq., who, working with Atty. Paul L. Shelton, Esq., purportedly attempted to help him with his foreclosure distress –in ways that aren't clear (and not relevant to the instant ruling). At some point, Mr. Watts, an acquaintance of Daniggelis and several other parties/participants to this case (Mr. Robert J. More and Daniggelis' attorney, Andjelko Galic, at the least) became aware of Daniggelis' claims of a "mortgage fraud rescue scheme" and attempted to investigate & document *or refute* Daniggelis' claims.

¶3 On August 10, 2015, Watts filed file pleadings in both the underlying Chancery case (2007-CH-29738, *GMAC v Daniggelis* in CHANCERY, which held Daniggelis wasn't the owner of his house & property) and the sister case (2014-M1-701473, *Younes v. Daniggelis* in CIVIL, a FORCIBLE ENTRY AND DETAINER COMPLAINT case enforcing eviction from his home). On 9/14/2015, Watts also was able to file in this sister case in the LAW Division, a CONTRACT case by the same file number: 2007-CH-29738. Judge Tailor entered various orders on that date, some of which were directed against Watts, who moves for rehearing.

TIME-LIMITS FOR REHEARING

¶4 Mr. Watts, *for reasons not his fault*[2], waited until the "last minute" to file his request for a rehearing, and, because I feel that there may be some misunderstanding on this head, I address the timeliness issues today: The lower court entered a ruling on 11/16/2015. **735 ILCS 5/2-1203 gives Watts 30 days to file a motion for rehearing:**

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[1] *(continued from previous page)* known perpetrator –Atty. Paul L. Shelton– who, in 2009, became famous for doing the same thing to Ms. Lessie Towns, another elderly victim, to the point that former Gov. Pat Quinn (D-Ill.) paid Towns a personal visit to sign into law legislation addressing mortgage fraud, this placed the Judiciary in bad light in the public eye –and made an already bad situation even worse: Daniggelis, unlike Towns, wasn't tricked into signing his property away, thus he's even *more* a victim: he lost it through forgery, as the record shows, yet got no monies in return. That he received no 'consideration' for his 'sale' *alone* makes this translation illegal, but – *and more importantly* – it is unthinkable/unreasonable that someone would simply "give away" a lush property with hundreds of thousands of dollars in equity in it- as the trial court apparently claims.

[2] Neither the Law Division Clerk's Office, nor the trial court judge, Judge Sanjay Tailor, *nor the attorney proposing this motion, Atty. Andjelko Galic,* served (or ordered service to) Movant, Gordon Watts, a copy of This Court's order, which was a fundamental Due Process violation, should Movant wish to seek rehearing/reconsideration or appeal – and a major inconvenience – as Movant Watts had to purchase a copy under Public Records Law provisions, from the clerk's office. – **That being said, I (Gordon W. Watts, the Movant proper) do not seek sanctions against any Atty. Galic, whom I was told had the obligation to serve me the order – as a matter of professional courtesy (and, on moral grounds, I realise that I, too, sometimes make mistakes).** -- *This is only being mentioned to put the parties and court on notice so that we may remember, in the future, to avoid such needless delays or distractions from the actual merits of the case.*

(735 ILCS 5/2-1203) (from Ch. 110, par. 2-1203)
Sec. 2-1203. Motions after judgment in non-jury cases.
(a) In all cases tried without a jury, any party may, within 30 days after the entry of the judgment or within any further time the court may allow within the 30 days or any extensions thereof, file a motion for a rehearing, or a retrial, or modification of the judgment or to vacate the judgment or for other relief.

Since 5 ILCS 70/1.11 states that "The time within which any act provided by law is to be done shall be computed by excluding the first day and including the last...," this permits Watts until Wednesday, 12/16/2015. However, this doesn't address mailing delays, which the Illinois Supreme Court Rules *does*.

Rule 373. Date of Filing Papers in Reviewing Court; Certificate or Affidavit of Mailing
Unless received after the due date, the time of filing records, briefs or other papers required to be filed within a specified time will be the date on which they are actually received by the clerk of the reviewing court. If received after the due date, the time of mailing, or the time of delivery to a third-party commercial carrier for delivery to the clerk within three business days, shall be deemed the time of filing. Proof of mailing or delivery to a third-party commercial carrier shall be as provided in Rule 12(b)(3). This rule also applies to a motion directed against the judgment and to the notice of appeal filed in the trial court.

Rule 12. Proof of Service in the Trial and Reviewing Courts; Effective Date of Service
(b) Manner of Proof. Service is proved:(1) by written acknowledgment signed by the person served;
(3) in case of service by mail or by delivery to a third-party commercial carrier, by certificate of the attorney, or affidavit of a person other than the attorney, who deposited the document in the mail or delivered the document to a third-party commercial carrier, stating the time and place of mailing or delivery, the complete address which appeared on the envelope or package, and the fact that proper postage or the delivery charge was prepaid; or...

Rule 373 states, in relevant part, that this standard also applies to a motion directed against a judgment in the trial court – *which is the case here*, in Watts' motions. Originally, this rule provided that the time of mailing might be evidenced by the post mark affixed by a US Post Office. Because of problems with legibility of post marks, the rule was amended in 1981 to provide for the use of Rule 12 affidavits. So, Watts has an obligation, under the rules of this court, to complete, mail, and certify his motion for rehearing by 11:59:59 P.M. this Wednesday the 16th of December 2015. *(However, given the delay chronicled in Note 2 above, the portion of 735 ILCS 5/2-1203 which reads "or within any further time the court may allow within the 30 days or any extensions thereof" should be considered – and applied – if reasonably needed, to extend time, effect justice, and otherwise "level the playing field ")*

¶5 Illinois courts clearly lay out the correct standards, referring to *Kinkel v. Cingular Wireless, L L C.*, 223 Ill. 2d 1; 857 N.E.2d 250; 306 Ill.Dec. 157 (Jan. 11, 2006), basically stating that an *Amicus* needs **only** to offer helpful information that the parties have overlooked. Illinois Courts also adopt a 7th Cir. Federal Court standard in which ((#1)) a party is not represented at all; ((#2)) the 'direct interest' test; **or,** ((#3)) the same test as above: Helpful info overlooked by the parties. NOTE: The 7th Circuit test uses the key operator "or," meaning that any one *"or"* the other of the three tests need apply. *(Contrary to the trial court's implications, the inclusion of the extra options of the 7th Cir Test make the standard lower and easier, not higher, to meet: one need only meet one 'or' the other test)*

¶6 Obviously, This Court, Hon. Sanjay T. Tailor, presiding, disagrees that Watts' *Amicus* passes these tests. If This Court can show Movant, Gordon W. Watts, that he is in error – and clarify why (e.g., "Motion for Clarification"), then Movant will admit error and withdraw his motion. **However, the trial court is in clear error on this point of law: Watts raises several points that were overlooked by Daniggelis' attorneys – one of them being "damning evidence" aka 'smoking gun' evidence:**

Two arguments, at least, raised by Watts [proof of a photocopied signature, Arg.IV.A, and the fact that 2 versions of the POA (Power of Attorney) exist, Arg.IV.G., suggesting it was notarised after the fact] were not – to this writer's review – ever mentioned by any of Daniggelis' attorneys. Unless Shelton had a photocopy machine right handy at the Starbuck's where the signature took place, there is no way a version ***without*** a notary seal could have made it into the court's record. This fact, added to Daniggelis' claims that Shelton was not present when he signed on POA, add to the already strong criminal case against Shelton and Younes.

Also, since the trial court found in favour of Younes, this implies that the trial court was alleging that *both* Warranty Deeds were valid. But, since no mere mortal can sign his/her name exactly the same twice in a row, then this means that the latter Warranty Deed was **an obvious photocopy forgery,** thus annulling any claim Younes might have to the subject property, and making Watts' submissions 'determinative' to the outcome of the case. {{In fact, even *without* Watts' legal arguments, we don't see how any reasonable reader could conclude that Daniggelis would just sign away his property to Younes 'for free,' e.g., "give away the farm" and lose **hundreds of thousands** of dollars of equity in the house and property without *any* consideration (payment) whatsoever.}}

Watts, on page 6 of his proposed *Amicus*, states that: 'One does not need to be a "handwriting expert" [to see the obvious forgery on Daniggelis' signature].' Because this may be a sticky point, I write to address this point: If, for example, one was comparing two *different* handwriting samples, and trying to determine whether they were written by the same person, then, yes, a "handwriting expert" would clearly be needed. However, we see two signatures on two (2) different Warranty Deeds, but they are, clearly, identical: obviously the latter one is a photocopy of the former, thus making the latter Warranty Deed null and void *ab initio*

The attorneys for Daniggelis alleged that the signature was a forgery and offered scant "white-out" arguments, but neither the court itself, *nor attorneys for either side,* addressed the

"identical signature" issue Watts raises, and, for that reason alone, I would grant his motion for leave to file as *Amicus Curiae* in the case at bar.

Intervenor rights

¶7 This point is interesting, insofar as Watts has never met Daniggelis; however, we can all concede that were Watts the son (or grandson) of Daniggelis, Intervenor rights would be accorded without question, *could we not?*

On page 5 of Watts' "Time-Sensitive Judicial Notice of Adjudicative Facts – in *semi*-Emergency Fashion by OVERNIGHT FedEx," he states that: "The defendant, a friend of mine, promised, if he was able, to give me an unspecified amount of assistance for the advancement of certain shared causes and beliefs."

Clearly, Watts views Daniggelis as a friend, a father-figure or grandfather-figure, but a friend of some great sort, to go to this trouble to go to bat for him in court. Clearly, Watts would suffer emotional and psychological tort if Daniggelis were to die, homeless on the streets due to a miscarriage of justice, in-the-which courts "muscle through" a forcible enforcement of the ' mortgage rescue scheme,' that is obvious on its face.

Thus, Watts has *some* "financial interests" and much "emotional interests" in this case, and, like a blood relative – or a business partner – should be allowed to intervene.

Intervention as a matter of right

¶8 Mr. Robert J. More, a party to this case, who is discussed in Watts' *Amicus*, raised a novel legal argument in his recent "Notice of Intervention by right...," dated 10/13/2015: Mr. More notes the The 'COMPLAINT TO FORECLOSE MORTGAGE' filed on 10/17/2007, by Plaintiff, GMAC MORTGAGE LLC, states, in point 4. of its complaint, that Plaintiff acknowledges the existence of other unknown own interested parties, and hereby includes them in its lawsuit, *naming them as defendants* Quoting GMAC, they admit as follows:

> "4. Plaintiff alleges that in addition to persons designated by name herein and the Unknown Defendants referred to above, there are other persons, and/or non-record claimants who are interested in this action and who have or claim some right, title, interest or lien in, to or upon the real estate, or some part thereof, in this Complaint described, including but not limited to the following:
>
> UNKNOWN OWNERS AND NON RECORD CLAIMANTS, IF ANY.
>
> That the name of each of such persons is unknown to the plaintiff and on diligent inquiry cannot be ascertained, **and all such persons are therefore *made party defendants* to this action** by name and description of UNKNOWN OWNERS and NON RECORD CLAIMANTS."

For this reason *alone*, Watts does not need to seek leave to file an *Amicus* brief: he is *already* a named party – a defendant – (should he so desire to exercise this right). **The trial**

court, therefore, erred in denying Watts' right of participation. (And, of course, the court *also* erred in denying More participation, and for the same legal bases.)

Addressing the 'Mercy Killing' misperceptions

¶9 Lastly, I must address the obvious perception by some that stealing Daniggelis' house, and giving it to Younes, would be a 'mercy killing' of this case: Many would no doubt claim that Daniggelis "would doubtless lose his house anyway." This is factually incorrect: In fact, Watts has stated *(and is formally stating, for the record, in this motion for rehearing)* that he knew of plans for Daniggelis to obtain investors and/or renters, and had some lined up when his dog got sick, and he had to cancel the appointment. Watts' filings clearly lay out how Shelton and Younes 'stepped in' to replace the previous investors, and – had Shelton/Younes not been dishonest – Daniggelis would have likely worked up a deal to save the house. (But, even assuming *arguendo* Daniggelis was negligent and was going to lose the house anyhow, this is not legal grounds to steal it from him: Two wrongs don't make a right, and fraud is still fraud.)

¶10 Motion for Clarification

In the court's order, dated 11/16/2015, Atty. Andjelko Galic, representing Defendant Richard B. Daniggelis, asks This Court for four (4) things:
(1) Permission to file a report; (2) Denial of Watts' and More' request to intervene and/or file an *Amicus* brief; (3) Affirmation that there are no pending claims against GMAC, the original plaintiff; and (4) a continuance.

It is noted that Watts and Galic are both fighting "for" Daniggelis, and so Watts, in moving for rehearing/clarification, is puzzled and confused as to why Galic would *oppose* assistance. But Watts states for the record that Galic told him in private communications that, while Watts may have good intentions, Galic believes his filings are not helpful.

Watts moves This Court for clarification on that portion of point (2) in This Court's 11/16/2015 order as to why participation as an *Amicus* is unwelcome.

Watts is not seeking monetary damages – as yet anyhow – even tho he has suffered great financial losses (printing, mailing court pleadings, time lost from work, etc.) and emotional stress. All he is seeking is a review and consideration of his *Amicus Curiae* and other filings regarding the fraud that Atty. Andjelko Galic and Atty. Benji Phillips (Daniggelis' attorneys) have alleged.

¶11 Misc. Motion

While Daniggelis is happy – and grateful – to have Galic represent him *pro bono*, and try real hard to get justice, Movant, Gordon W. Watts, represents to This Court that Daniggelis feels that the court does *not* comprehend his grievances, redresses, and pain – and has told Watts countless times that he wishes to address This Court himself, verbally, vocally, and aurally *en persona*

THEREFORE: **Watts respectfully moves This Court, Hon. Sanjay T. Tailor presiding, to enter an order deposing defendant, Richard Daniggelis, to hear *his* side of the story, as he is "the principal" in this case – a fact which Daniggelis has told Watts countless times.**

¶12 Conclusion

Mr. Watts may be almost as 'annoying' as the infamous Mr. Robert J. More; however, Watts is merely attempting to help this court sort through a notoriously-difficult case. (And help save his friend's life, even at high cost to print and mail copious pleadings with little or no hope of reimbursement.) Must we rebuff a 'Good Samaritan' as we have continued to do up until now? Oh, really?.. Why did ye become judges if not to afford justice to the oppressed and weak?

Yet rather than comply with our own court's rules, and apply reason and common sense, the Court ***regularly*** looks the other way as yet another Trial Court Judge casts aside state laws without making any effort to preserve justice or equity. This acquiescence may well be seen as a signal of the Court's intended resolution to turn a blind eye to justice if the litigant is not "rich and connected." This is not the proper way to discharge our Article III responsibilities. And, it is indecorous for this Court to pretend that it is.

¶13 In fact, Mr. Watts was permitted to participate by a Federal Appeals Court – and, apparently, was the only non-lawyer permitted to proceed *Pro Se* and file *Amici* briefs. **(Exhibit-B)** This in addition to the fact he nearly won as 'next friend' of Terri Schiavo – all by himself. **(Exhibit-C)** Contrary to come claims, Watts' filings in the internationally-famous 'Terri Schiavo' case were reviewed on the merits: his request for a rehearing got past the clerk (who would have stricken it had it not met technical requirements) and was reviewed on the merits by the full Florida Supreme Court, eventually denying his request in a 4-3 split decision, which was better than all other parties on the losing side – *combined*. **Thus, Watts is no legal dummy, and his *Amicus*, etc. should be accepted by This Court, just as the Federal Appeals Court accepted it.**

Even assuming *arguendo* that Watts *was* a "legal dummy," this would not necessarily mean that he was 'helpless' to help This Court in legal matters – an important fact which this court seems to overlook. Take, for example, a citizen calling in to an 'Anonymous Tip Line' for the local Police Department (or perhaps the State's attorney general fraud line, which many states have). Suppose, further, that Watts knew of some fact or legal angle that was overlooked. Would you expect the police to say "shut up: you're not a cop" or "you're not a lawyer: what would you know?" – Of course not! The police would check out *any and all* leads – as would the fraud line – and follow-up on it as needed. Are we any less professional *or more proud* than our colleagues in the police and fraud units?

God forbid, and certainly not! But that is what we end up doing when we tell Watts (and countless other prospective *Amici Curiae*) to 'shut up and go away' in response to his providing us with key insight to solve a potentially life-threatening legal mystery.

***Specific* Prayer for relief – of Gordon Wayne Watts:**

Seeing as This Court has already reviewed them anyhow, and they were considered and weighed, I ask only that my additional points of law be given formal recognition that they deserve, which, in my view, would give This Court additional legal insight to more-easily dispose of this case.

I MOVE THIS COURT to for leave to directly intervene –or, at the least, that I be allowed to proceed as *Amicus Curiae*, as the FEDERAL Appeals Court (*see:* Apendix-B) has previously allowed me.

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

The undersigned, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above motion and all attached pleadings were delivered to the following parties as indicated – **this Wednesday, the 16th day of December 2015:**

Clerk of the Circuit Court: LAW DIVISION PH: 312-603-6930, 312-603-5426, Chief Dep Clerk, Sherry Chatz; Asst Chief Dep Clerk, Iris Reynolds, 50 West Washington Street, Room 801, Chicago , IL 60602

Hon. Sanjay T. Tailor, Associate Judge, Law Division, Daley Center, 50 W. Washington St., Rm. 1912, Chicago, Illinois 60602, (312) 603-5940

Andjelko Galic, Esq. (atty for Defendant, Daniggelis) (Atty No.: 33013)
(Cell: 312-217-5433, FAX: 312-986-1810, PH: 312-986-1510)
Email: AndjelkoGalic@Hotmail.com ; AGForeclosureDefense@Gmail.com ;
134 N. LaSalle St., STE 1810, CHICAGO IL, 60602

Richard Indyke, Esq. (312-332-2828 Atty for LaSalle Bank Natl Assn),
221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305 (Rindyke@SBCGlobal.net)

Mr. Robert J. More (Anselm45@Gmail.com) I represent to the court that Mr. More has consented to email service and prefers this method exclusively.

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 One North LaSalle Street, Suite 3040, Chicago, IL 60602
I represent to the court that Mr. King has graciously consented to email service, but, just to be safe, I shall attempt to effect service in all standard methods. I also represent to this court that Mr. King (when I asked if he could provide me a copy of this court's 11/16/2015 Order, as the clerks instructed me to ask) claims that he has not entered an appearance for Younes in this case in LAW, only in CHANCERY and CIVIL – but am inclusive of him in this service list as a professional courtesy.

Paul L. Shelton, Esq.
E-mail: PMSA136@aol.com; PLShelton@SBCGlobal.net As the court has seen fit to deem Shelton a non-party and not in need of service (see comments in the orders in question, and the service list of same), I'm not serving Mr. Shelton a hard copy, just electronic copies.

Joseph Younes Law Offices / http://ChicagoAccidentAttorney.net
166 W WASHINGTON ST, Ste. 600, Chicago, IL 60602;
Phone: (312) 372-1122 ; Fax: (312) 372-1408
Email is: RoJoe69@yahoo.com per http://www.ZoomInfo.com/p/JosephYounes/599467626

MERS (Mortgage Electronic Registration Systems, Inc.)
https://www.mersinc.org/about-us/about-us
a nominee for HLB Mortgage, Janis Smith – (703) 738-0230 – Email: JanisS@mersinc.org
Vice President, Corporate Communications, Sandra Troutman – (703) 761-1274 – Email: SandraT@mersinc.org – Director, Corporate Communications
Note: MERS is only being served electronically per above.

I, Gordon Wayne Watts, the undersigned, hereby certify under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above motion and all attached pleadings (Motion for Rehearing and the Notice of Motion) were served upon all parties listed above, this **16th** day of **December**, 2015 by the following methods:

• United State Postal Service: I am serving the parties proper via my city's local post office on the date listed – and with proper postage. I hope to obtain certification of delivery with return receipt and signature confirmation on as many packages as I can afford. (NOTE: Only those parties whose street addresses are listed above are being served hard copies by US Postal Mail.)

• E-mail: I am contemporaneously serving all the parties listed above via email, in such cases as I have their e-mail address.

• Internet: I shall, when practically possible, post a TRUE COPY of this filing – and related filings – online at my official websites, *infra.*

Signature: _____ Date: _____
Gordon Wayne Watts, *Amicus Curiae**
821 Alicia Road
Lakeland, FL 33801-2113
PH: (863) 688-9880
Web: www.GordonWatts.com / www.GordonWayneWatts.com
Email: Gww1210@aol.com / Gww1210@gmail.com
Date: Wednesday, 16 December 2015
* Watts, acting counsel of record, is not a lawyer. Per Local Rule 2.1, "Notice of Hearing of Motions," Watts, appearing *pro se,* is giving notice of his motion

INDEX TO THE EXHIBITS

Instrument	Docket/Tab#
11/16/2015 Order of Hon. Sanjay T. Tailor in this case	Exhibit-A
January 06, 2015 Order of Hon. Beverly B. Martin, Federal Cir. Judge granting Mr. Gordon Wayne Watts' (*Pro Se*) motion for leave to file an amended *Amicus Curiae* brief and denying Mr. Anthony Clare Citro's (*Pro Se*) motions for leave to file out of time and for leave to file as *Amicus Curiae*	Exhibit-B
Comparative case-law holdings w/ citations in the internationally-famous 'Terri Schiavo' case: Mr. Watts ; former Fla. Gov. Jeb Bush ; Schiavo's blood family	Exhibit-C

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

GMAC Mortgage, LLC aka "US Bank, N.A.,"*etc.*,	**) Case No. 2007-CH-29738**
	) Individual Commercial
Plaintiff	**) Calendar "W"**
	) 1720 N. Sedgwick Ave.
vs.	**) Chicago, IL**
	)
Atty. Joseph Younes, Esq., Mr. Richard B. Daniggelis, *et al.*,	**)Before:**
	)Hon. Sanjay T. Tailor #1870
Defendants	**)Associate Judge, Law Div.**

ORDER

This matter comes before the court on motion of prospective intervenor, Gordon Wayne Watts, and the court being fully advised on the matter, it is hereby ordered:

5) Gordon Wayne Watts' motion for leave to file an *amicus curiae* brief with all exhibits (affidavit and all of what is already on file from him) is **GRANTED.**
6) The motions to intervene of Robert J. More and Gordon Wayne Watts are **GRANTED.**
7) The attorneys for plaintiff, defendant, **and all parties of record** are ordered to file a response to Mr. More's and Mr. Watts' motions/filings in 7 days and serve all parties a copy of such responses, addressing the legal points More and Watts raise.
8) Mr. More's and Mr. Watts' motions to participate via telephonic conference are **DENIED.**

ENTERED:

DATED:

JUDGE:

Gordon Wayne Watts, *Pro Se*
821 Alicia Road
Lakeland, FL 33801-2113
PH: (863) 688-9880
Web: www.GordonWatts.com / www.GordonWayneWatts.com
Email: Gww1210@aol.com / Gww1210@gmail.com
Date: Wednesday, 16 December 2015

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

GMAC Mortgage, LLC aka "US Bank, N.A.,"*etc.*,	**) Case No. 2007-CH-29738**
	) Individual Commercial
Plaintiff	**) Calendar "W"**
	) 1720 N. Sedgwick Ave.
vs.	**) Chicago, IL**
	)
Atty. Joseph Younes, Esq., Mr. Richard B. Daniggelis, *et al.*,	**)Before:**
	)Hon. Sanjay T. Tailor #1870
Defendants	**)Associate Judge, Law Div.**

ORDER

This matter comes before the court on motion of prospective intervenor, Gordon Wayne Watts, and the court being fully advised on the matter, it is hereby ordered:

1) Gordon Wayne Watts' motion for leave to file an *amicus curiae* brief with all exhibits (affidavit and all of what is already on file from him) is **GRANTED.**
2) The motions to intervene of Robert J. More and Gordon Wayne Watts are **GRANTED.**
3) The attorneys for plaintiff, defendant, **and all parties of record** are ordered to file a response to Mr. More's and Mr. Watts' motions/filings in 7 days and serve all parties a copy of such responses, addressing the legal points More and Watts raise.
4) Mr. More's and Mr. Watts' motions to participate via telephonic conference are **DENIED.**

ENTERED:

DATED:

JUDGE:

Gordon Wayne Watts, *Pro Se*
821 Alicia Road
Lakeland, FL 33801-2113
PH: (863) 688-9880
Web: www.GordonWatts.com / www.GordonWayneWatts.com
Email: Gww1210@aol.com / Gww1210@gmail.com
Date: Wednesday, 16 December 2015

11/16/2015 Order of Hon. Sanjay T. Tailor in this case **Exhibit-A**

LINEEH9

Order (2/24/05) CCG N002

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

GMAC Plaintiff

v.

No. 07 CH29738

YOUNES Defendant

ORDER

This matter coming before this court on status call and the court being advised on the matter IT IS HEREBY ORDERED:

TT 11-23-15 9231 1. ANDJELKA GAVIC, the attorney for Ridwal Damiggelo, is ordered to file a report regarding the status of the pleadings in 7 days.

2. Gordon Watson's motion to file amicus curiae brief is denied and Robert Mo[illegible]s motion to TT 5231 intervene is denied. In addition Gordon Watt's request to participate via phone is also denied.

3. Defendant's counsel represents that there are no pending claims against GMAC.

4. This matter is continued for status on 11-25-15 at 9:30 AM.

Atty. No.: 33013

Name: ANDJELKA GAVIC

Atty. for: Ridwal Damiggelo

Address: 134 N. LaSalle St. #1240

City/State/Zip: CHICAGO, IL. 60602

Telephone: 312 986-1510

ENTERED:

Dated: 11/16/15

Judge

ENTERED Judge's No.
JUDGE SANJAY TAILOR - 1870
NOV 16 2015
DOROTHY BROWN
CLERK OF CIRCUIT COURT OF COOK COUNTY, IL
DEPUTY CLERK

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

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January 06, 2015 Order of Hon. Beverly B. Martin, Federal Cir. Judge granting Mr. Gordon Wayne Watts' (*Pro Se*) motion for leave to file an amended *Amicus Curiae* brief and denying Mr. Anthony Clare Citro's (*Pro Se*) motions for leave to file out of time and for leave to file as *Amicus Curiae* Exhibit-B

IN THE UNITED STATES COURT OF APPEALS

FOR THE ELEVENTH CIRCUIT

No. 14-14061-AA

JAMES DOMER BRENNER, *et al.*

Plaintiffs-Appellees,

versus

JOHN H. ARMSTRONG, *et al.*

Defendants-Appellants.

No. 14-14066-AA

SLOAN GRIMSLEY, *et al.*

Plaintiffs-Appellees,

versus

JOHN H. ARMSTRONG, *et al.*

Defendants-Appellants.

Appeals from the United States District Court
for the Northern District of Florida

ORDER:

Clare Anthony Citro's motions for leave to file out of time and for leave to file a brief as *amicus curiae* are DENIED.

Gordon Wayne Watts's motion for leave to file an amended *amicus curiae* brief is GRANTED.

Barrett B. Martin

UNITED STATES CIRCUIT JUDGE

UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

ELBERT PARR TUTTLE COURT OF APPEALS BUILDING
56 Forsyth Street, N.W.
Atlanta, Georgia 30303

John Ley
Clerk of Court

For rules and forms visit
www.call.uscourts.gov

January 06, 2015

Anthony Citro
254 SW 7TH ST
DANIA, FL 33004-3948

Gordon Wayne Watts
821 ALICIA RD
LAKELAND, FL 33801-2113

Appeal Number: 14-14061-AA ; 14-14066 -AA
Case Style: James Brenner, et al v. John Armstrong, et al
District Court Docket No: 4:14-cv-00107-RH-CAS

This Court requires all counsel to file documents electronically using the Electronic Case Files ("ECF") system, unless exempted for good cause.

The enclosed order has been ENTERED.

Sincerely,

JOHN LEY, Clerk of Court

Reply to: David L. Thomas, AA/rvg
Phone #: (404) 335-6169

MOT-2 Notice of Court Action

Comparative case-law holdings w/ citations in the internationally-famous 'Terri Schiavo' case: Mr. Watts ; former Fla. Gov. Jeb Bush ; Schiavo's blood family Exhibit-C

[1] ***In Re: GORDON WAYNE WATTS (as next friend of THERESA MARIE 'TERRI' SCHIAVO)***,
No. SC03-2420 (Fla. Feb.23, 2005), denied 4-3 on rehearing. (Watts got 42.7% of his panel)
http://www.floridasupremecourt.org/clerk/dispositions/2005/2/03-2420reh.pdf

[2] ***In Re: JEB BUSH, GOVERNOR OF FLORIDA, ET AL. v. MICHAEL SCHIAVO, GUARDIAN: THERESA SCHIAVO***, No. SC04-925 (Fla. Oct.21, 2004), denied 7-0 on rehearing.
(Bush got 0.0% of his panel before the same court)
http://www.floridasupremecourt.org/clerk/dispositions/2004/10/04-925reh.pdf

[3] ***Schiavo ex rel. Schindler v. Schiavo ex rel. Schiavo***, 403 F.3d 1223, 2005 WL 648897 (11th Cir. Mar.23, 2005), denied 2-1 on appeal. (Terri Schiavo's own blood family only got 33.3% of their panel on the Federal Appeals level)
http://media.ca11.uscourts.gov/opinions/pub/files/200511556.pdf