

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT – FIRST DISTRICT**

Joseph Younes,)	
Plaintiff)	
vs.)	Case No.: 2014-M1-701473
)	
Richard B. Daniggelis,)	
Defendant)	
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Notice of Motion

To: This Honourable Court and all parties being served (see attached service list, below)
From: Mr. Gordon Wayne Watts, LAKELAND, Fla. (full contact data, below)
Notice Proper: On such day and time as This Court deems appropriate, I shall[[**]] appear “telephonically” before any judge sitting assigned to this case and present the attached “**Motion for leave to file Supplemental Record,**” with supporting Exhibits and an Index of said Exhibits.

My appearance, if it is required (it may not be[[***]]) may not be in person, due to the fact that I reside in Lakeland, FL, which is too distant for me to reasonably travel from Lakeland (between Tampa & Orlando) to Cook County, IL.

[[**]] I shall, to the best of my ability, make myself available to This Court by telephone, email, and standard postal mail, and will do so, barring an Act of God or other unpreventable disaster. *See Art. II, Rule 185 (Telephone Conferences), R.Civ. Proceedings in the Trial Court, Rule 206(h)(Remote Electronic Means Depositions), etc.*

[[***]] While I would like to appear “in person,” as is usually done in cases like this, I can not; however, many motions are considered by printed form only, so I trust that my travel handicap should not impair the wheels of justice or frustrate Due Process.

Prayer for Relief: Please review and rule on the motions even in my absence (both that described in this notice and those which I filed earlier in this case).

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 Motion** was delivered to the following parties as indicated:

Dorothy Brown, Clerk of the Circuit Court (CourtClerk@CookCountyCourt.com)
Richard J. Daley Center, Room 1001, 50 West Washington Street, Chicago, Illinois 60602
PH: 312-603-5031 (ext. 5133: Chancery / ext. 5116: Civil)

Andjelko Galic, Esq. (atty for Defendant, Daniggelis) (Atty No.: 33013)
134 N. LaSalle St., STE 1040 – Email: AndjelkoGalic@Hotmail.com
CHICAGO IL, 60602 (Cell: 312-217-5433, FAX: 312-986-1810, PH: 312-986-1510)

Richard B. Daniggelis (Defendant), 1720 N. Sedgwick, Chicago, IL 60614-5722

William D. and Linda D. Gerould, (Owners of record of subject property, according to <http://CookRecorder.com>) 49 Lorelei Lane, Menlo Park, CA 94025-1715

Mr. Robert J. More (Anselm45@Gmail.com) (Former tenant of Daniggelis)
P.O. Box 6926, Chicago, IL, 60680-6926 ; PH: (608) 445-5181

KING HOLLOWAY LLC (Atty. for Joseph Younes) <http://www.KingHolloway.com/contact.htm>
Attn: Peter M. King, Esq. PKing@khl-law.com
One North LaSalle Street, Suite 3040, Chicago, IL 60602
(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221

Peter King (Atty. for Joseph Younes) (Atty. No.: 48761)
c/o: King Holloway LLC, 101 N. Wacker Dr., STE 2010 ; Chicago, IL 60606

Perry Perelman (Atty no: 57398) (PPerelman@PerelmanDorf.com) (Atty. for Joseph Younes)
PERELMAN | DORF, LLC <http://PerelmanDorf.com/contact/> Email: Info@PerelmanDorf.com
2059 W. Chicago Ave., Chicago, IL 60622 ; PH: (312) 888-9608 / FAX: +1-312-674-7644

Joseph Younes Law Offices / <http://ChicagoAccidentAttorney.net>
120 W Madison St Ste 1405, Chicago, IL 60602-4128 ; Phone: (312) 372-1122 ; Fax: (312) 372-1408, Email is thought to be: RoJoe69@yahoo.com per <http://www.ZoomInfo.com/p/Joseph-Younes/599467626>

Craig A. Cronquist, Esq., c/o: Maloney & Craven, P.C. (Attys. for Joseph Younes)
2093 Rand Road, DesPlaines, IL 60016

Paul L. Shelton, Shelton Law Group, LLC, 700 E. Ogden Ave., STE 101, Oak Brook, IL 69559

Paul L. Shelton (PLShelton@SBCGlobal.net) (PMSA136@aol.com)
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c/o: Shelton Law Group, LLC, <https://www.youtube.com/user/PaulSheltonLawGroup>
1010 Jorie Blvd. #144, Oak Brook, IL 60523 ; (630) 993-9999, (630) 333-4009, (630) 286-5100

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 and all attached pleadings (the attached “**Motion for leave to file Supplemental Record,**” with supporting Exhibits and an Index of said Exhibits) were served upon all parties listed above, this 16th day of August, 2015 by the following methods:

- **FedEx 3rd-party commercial Carrier:** Every party was served by FedEx [[with delivery confirmation and tracking, should it be necessary to verify service]] excepting the cases of a PO Box, which are not serviced by FedEx –and Mr. Daniggelis who is not always home to receive a FedEx delivery, since he was evicted.

- **United State Postal Service:** Those parties with PO Boxes were served by USPS, **as was** Mr. Daniggelis.
- **Facsimile:** I am not serving any parties by FAX. [[I am neither willing nor able to receive FAX transmissions.]]
- **Electronic Mail:** In every case where I could obtain an email address (see above) for a party, I am effecting service by email, and attaching said documents in PDF form. [[I consent to service by email at the email addresses listed below.]]
- **Electronic Filing:** If I am able to successfully register an account with the Cook County, IL Clerk of the Circuit Court, I shall effect service electronically therewith.
- **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*

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Lakeland, FL 33801-2113

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Web: www.GordonWatts.com / www.GordonWayneWatts.com

Email: Gww1210@aol.com / Gww1210@gmail.com

Date: Sunday, 16 August 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