This form is approved by the Illinois Supreme Court and is required to be accepted in all Illinois Appellate Courts

Instructions ▼	☐ THIS APPEAL INVOLVES A MATTER SUBJECT TO EXPEDITED DISPOSITION UNDER
Check the box to the right if your case involves custody, visitation, or removal of a child.	Appellate Case No.: 1-18-0091
Enter the Appellate Court case number.	IN THE APPELLATE COURT OF E-FILED Transaction ID: 1-18-0091
Just below "In the Appellate Court of Illinois," enter the number of the appellate district where the appeal was filed,	FIRST District File Date: 1/19/2018 10:03 PM Thomas D. Palella Clerk of the Appellate Court APPELLATE COURT 1ST DISTR
If the case name in the trial court began with "In re" (for example, "In re Marriage of Jones"), enter that name. Below that, enter the names of the parties in the trial court, and check the correct boxes to show which party filed the appeal ("appellant") and which party is responding to the appeal ("appellee"). To the far right, enter the trial court county, trial court case number, and trial judge's name.	Appeal from the Circuit Court of Cook County Trial Court Case No.: 2007-CN-29738 Plaintiff(Petitioner (First, middle, last names) Appellant Appellant
In Ia, enter your full name. If you are	APPLICATION FOR WAIVER OF COURT FEES (APPELLATE COURT) 1. I am providing the following information about myself: a. Name: Gooden Wayne Wayne
completing this form on behalf of a minor or an incompetent adult, provide that person's information.	a. Name: Condon Wayne Water First Middle Last b. Year of Birth: 1966 c. Street Address: 821 Alicia Road
In 1b, only enter the year you were born.	City, State, ZIP: LAKE LAND, FLORIDA 33801-2113
DO NOT enter your entire date of birth. In 1c, enter your complete current address.	d. I cannot afford to pay the court fees in this case (\$63) 688-9880 (H) e. Email address: Gww 1210@A0-conTelephone number: (863) 409-2109 (C)
In 2, if you are currently incarcerated, attach a copy of your inmate trust fund ledger for the last 6 months or your Application will be rejected.	2. I am currently incarcerated. Yes No If yes, inmate I.D. # If yes, I am attaching a copy of my inmate trust fund ledger for the last six (6) months. **If you answered "Yes" in section 2, skip section 3, 4, and 5 and sign below.**

		Enter the Case Numb	er given by the App	pellate Court Clerk:	18-0	091
In 3a, enter the number of people age 18 and older living in your house who you support. Support means that the people rely on you financially.	a. I suppor	10	adults (n	about people who li of counting myself) who under 18 who live wit listed below in the p	o live with m	ne.
In 3b, enter the number of people under age 18 living in your house who you support.		No plemental Securit to the Aged, Blind		(Not Social Security AABD)		
In 4, check "Yes" if you have received at least 1 of the benefits listed in the past 4 weeks.	State Food	porary Assistance e Children & Fam d Stamps (SNAP) eral Assistance (ily Assistance	nilies (TANF) - Sec attacked	docum	notation
If you check "Yes" in 4, skip 5 and sign below.		sitional Assistand ed "Yes" in sect		tion 5 and sign bel	ow.**	
In 5a, check "Yes" if you have applied for at least 1 of the benefits listed in section 4.		applied for 1 or mo		iding the following tits listed in section 4		formation:
In 5b, check the box for each type of money you have received in the past month. Also enter the gross (before taxes) amount for each type.	support My e	who live with me employment: \$ d support: \$ sion: \$		th. This includes more pply) Other people's em. Social Security (no.) Unemployment:	ployment:	by people I \$ \$ \$
Include the money received by the people you support who live with you. Support means that the people rely on you financially.	☐ No i	er (list type and am ncome all money receive	ed: \$			\$
In 5c, check all of your expenses for the past month and list the monthly amounts. Include the expenses of the people you support who live with you.	people Ren Hom	support who live t: \$ ne Mortgage: \$ er Mortgage: \$ ies: \$ d: \$		below. This includes k all that apply) per month	the monthly	expenses of the
	Car Othe	Loan: \$ er (list type and amore no expenses	ount):	per month	\$	per month
In 5d, check all of the items owned by you and list the value of each item. Include the	d. I have the	with me, (check a	all that apply)	includes the belonging	gs of the pe	eople I support
items owned by the people you support who live with you.	☐ Hom	e real estate, wor The total I owe or real estate, not	rth: on my home mo	ortgage is:	\$ \$ \$	
If you own real estate, include the total you owe on any mortgage.		The total I owe of the hicle worth: \$	on my other mo		\$	/es □ No

AWA-A 1303.2

Page 2 of 5

(10/17)

	Enter the Case Number given by the Appellate Court Clerk:
	☐ 2 nd vehicle worth: \$ The 2 nd vehicle is paid ☐ Yes ☐ No ☐ Other (list items and value): \$ ☐ None of the above
Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony. The person who filled out this form must sign it. If you are completing this form on a computer, sign your name by typing it. If you are completing it by hand, sign by hand and print your name.	I certify that everything in the Application for Waiver of Court Fees (Appellate Court) is true and correct. I understand that making a false statement on this form is perjury and has penalties provided by law under 735 ILCS 5/1-109. Source Signature
If you are filling out this form for a minor or an incompetent adult, state your relationship.	
7	Prinary: Gww 12100 AOL . com Email Alternator: Gww 12100 Gmail. Com
In 1a, enter the name, mailing address, and email address of the party or lawyer to whom you sent the document.	1. I sent this document: a. To: ALL Parties in attached Service List Name:
In 1b, check the box to show how you sent the document, and fill in any other information required on the blank lines.	Address: Street, Apt # Cectoin trial cent personalle - or which the
CAUTION: If the other party does not have a lawyer, you may send the document by email only if the other party has listed their email address on a court document.	b. By: Personal hand delivery Regular, First-Class Mail, put into the U.S. Mail with postage paid at: 6000 S. Fla. Ave Lakeland FL U.S. Mistoffice Address of Post Office or Mailbox Third-party commercial carrier, with delivery paid for at:
	Name (for example, FedEx or UPS) and office address

	Enter the Case Number given by the Appellate Court Clerk: 1-18-0091
	 The court's electronic filing manager (EFM) or an approved electronic filing service provider (EFSP)
	Email (not through an EFM or EFSP)
	Mail from a prison or jail at:
	Name of prison or jail
In e, fill in the date and time that you sent the	c. On: Friday, 19 January 2018
document.	At: $\frac{11.59}{\text{Time}}$ \square a.m. \bigcirc p.m. \bigcirc E.S.T.
In 2, if you sent the document to more than	I sent this document:
1 party or lawyer, fill in a, b, and c. Otherwise	2. Foota this document.
leave 2 blank.	Name: ALL Parties who are efile
	First Middle Last
	Address: Street, Apt # City State ZIP
	Son Other I Comment
	Email address:
	N De □ Demonstration
	b. By: Personal hand delivery
	Regular, First-Class Mail, put into the U.S. Mail with postage paid at:
	Address of Post Office or Mailbox
	Third-party commercial carrier, with delivery paid for at:
	E Third party commercial carrier, with delivery parallol at.
	Name (for example, FedEx or UPS) and office address
	The court's electronic filing manager (EFM) or an approved electronic filing
	service provider (EFSP) — Ody Xsy eFileIL (Tylic Hostane)
	Mail from a prison or jail at:
	Name of prison or jail
	c. on: Friday 19 January 2010
	Date ()
	At: 11:59 Dam & p.m. F. S.T.
	Time
In 3, if you sent the	
document to more than	I sent this document:
2 parties or lawyers, fill in a, b, and c.	
Otherwise leave 3 blank.	a. To: All Parties whose e-mail address(1)]
	First Middle Can Last 1
	Address: hore - See Afflocked Service List
	Street, Apt # City State ZIP
	1
ALALA A 4000 0	Email address: Ser Service List
AWA-A 1303.2	Page 4 of 5 (10/17)

		Enter the Case Number given by the Appellate Court Clerk: 1- 18-0097
	b. By:	
		Address of Post Office or Mailbox
		Third-party commercial carrier, with delivery paid for at:
		Name (for example, FedEx or UPS) and office address
		The court's electronic filing manager (EFM) or an approved electronic filing service provider (EFSP)
	~	Email (not through an EFM or EFSP)
		Mail from a prison or jail at:
		Name of prison or jail
	c. On:	Friday 19 January 2018
If you are serving more than 3 parties or lawyers, fill out and insert 1 or more Additional Proof of Service forms after this page.	AN- F	Time am. Ep.m. Es.T. Time potition I am Posting online at corden Wats, com and www. Gordon Warne Wats, com s-see "Mortgage Frand" story dated Fr. 14 April 20, 1, 800
Under the Code of	20() () (CC	5 — See "Mortgage fram" Stand Daty Fr. 14 April 2010, SA t everything in the Proof of Service is true and correct. I understand that making
Civil Procedure, <u>735</u> ILCS 5/1-109.	11 10 00 00 00 10 10 10 10 10 10 10 10 1	ement on this form is perjury and has penalties provided by law
making a statement on this form that you	under <u>735 II</u>	LCS 5/1-109.
know to be false is perjury, a Class 3 Felony.	181	and Super Long
If you are completing this form on a computer, sign your	Your Signatu	Friday, 19 January 2018
name by typing it. If you are completing it by hand, sign by hand and print your name.	Print Your Na	don Wayne Watts

ACCESS CENTRAL MAIL CENTER P.O. BOX 1770 OCALA FL 34478

Notice of Case Action State of Florida Department of Children and Families



December 7, 2017 Case: 1165166518 Phone: (407) 552-0396

GORDON W WATTS 821 ALICIA RD LAKELAND FL 33801

Dear Gordon W Watts

The following is information about your eligibility.

Food Assistance

The following is information about your Food Assistance benefits:

Your Food Assistance benefits will increase as shown below due to a change in your household's circumstances.

Household Size: 1.

Name Jan, 2018

Thru

July 31, 2018

Gordon Watts Eligible
Benefit Amount \$188.00

Did you know you now have an on-line account with us? Go to www.myflorida.com/accessflorida. You will need your case number, 1165166518, to activate your My ACCESS Account. Then you can get into your account with a user name and password of your choice.

For Food Assistance benefits, the only change you must report during your certification period is when your household's monthly gross income is more than your income limit of \$1,307.00. You must report this change within 10 days following the end of the month the change happens. If your household income was higher than this amount at the time of your last application or review, you should report changes at the next review. If you fail to report changes as required, or if the information you provide is not correct, you may have to repay any benefits you receive for which you were not eligible and you may be prosecuted for fraud. You must report other changes and your household's situation at the time of the next recertification. If you have access to a computer, you may report your changes online at the ACCESS Florida website www.myflorida.com/accessflorida. You may also report changes by calling the ACCESS Florida Customer Call Center toll free at 1-866-762-2237, or by mail to the return address at the top of this notice.

The requirement to report changes for Cash and Medicaid benefits is different. If you are receiving either of those benefits, you must still report all changes in your household's circumstances within 10 days.

AE01 FORM: CF-ES 103 03 2009





If you are currently receiving regular food assistance benefits you are not eligible for D-SNAP (Food for Florida). Do not apply online or go to the site locations. If you try to apply for D-SNAP, you will be denied because you already receive food assistance benefits from SNAP.

- maximum for September and October. The increase will bring them up to the total amount they would have received from D-SNAP, and will · Regular food assistance recipients who live in the 48 counties approved for D-SNAP will have their household allotment increased to the be credited to their EBT cards.
 - · The supplement is automatic. You do not have to do anything.
- The supplement will not be labeled in your MyACCESS Account.

Food Assistance Details-

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Head of the Household

1165166518

Case Number

GORDON W. WATTS

Food Assistance Details

ion	o)	m)	o)
nformati	click here	click here	click here
History	click here	click	click here
Date Benefit Available		12/05/2017	11,05/2017
Benefit Month		December, 2017	November, 2017
Monthly Amount	178	178	179
Begin End Date Status Date	01/01/2018 01/31/2018 OPEN	12/01/2017 12/31/2017 OPEN	11,01,2017 11,30,2017 OPEN
Payee	GORDON W. WATTS	GORDON W. WATTS	GORDON W. WATTS
Group	Б	0	М

Thursday, November 30, 2017

SERVICE LIST

- * 1st District Appellate Court, 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 [served by eFiling only, since this The Court no longer accepts paper filings]
- * 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 Attention: Deputy Chief, Patricia O'Brian, PAOBrien@CookCountyCourt.com [served by email / electronic service only, as a courtesy, since this is an appeal]
- *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 [served by email / electronic service only, as a courtesy, since this is an appeal]
- * Hon. James P. Flannery, Jr., Cir. Judge—Presiding Judge, Law Division [re: "Application for Waiver of Court Fees"] 50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343 Courtesy copy via: James.Flannery@CookCountyIL.gov [served by email / electronic service only, as a courtesy, since this is an appeal]
- * Law Division and Hon. Diane M. Shelley, Circuit Judge, [served by email / electronic service only, as a courtesy, since this is an appeal] Law@CookCountyCourt.com; ccc.LawCalendarW@CookcountyIL.gov; Diane.Shelley@CookCountyIL.gov
- * Richard B. Daniggelis [true owner of 1720] 312-774-4742, c/o John Daniggelis 773-327-7198 2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652
- * Unknown Owners/NonRecord Claimants 1720 North Sedgwick St., Chicago, IL 60614-5722
- * Andjelko Galic (Atty#:33013) Cell:312-217-5433, Fax:312-986-1810, Phone:312-986-1510 845 Sherwood Road, LaGrange Park, IL 60526-1547 (Please take note of Mr. Galic's new address) Email: AndjelkoGalic@Hotmail.com; AGForeclosureDefense@Gmail.com
- * Robert J. More (<u>Anselm45@Gmail.com</u>) [Note: More's name is <u>misspelled</u> on docket as: "MOORE ROBERT"] P.O. Box 6926, Chicago, IL, 60680-6926, PH: (708) 317-8812
- * COHON RAIZES®AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)
 Attn: Carrie A. Dolan, 208 S LASALLE#1860, CHICAGO IL, 60604 [ph:(312) 726-2252]

SERVICE LIST (continued from above)

- * MERS (Mortgage Electronic Registration Systems, Inc.) <a href="https://www.mersinc.org/about-us/about-us/about-us/about-us/about-us/about-us/about-us/about-us/about-us/about-us/about-us/a nominee for HLB Mortgage; Janis Smith, 703-738-0230, VP, Corp. Comm. is no longer with MersCorp, and Amy Moses (AmyM@MersCorp.com) has replaced her as an email contact; Sandra Troutman 703-761-1274, E: SandraT@mersinc.org Dir, Corporate Communications, 1595 Springhill road, Suite 310, Vienna, VA 22182 (703) 761-0694 / (800)-646-6377
- * Stewart Title, Attn: Leigh Curry
 http://www.Stewart.com/en/stc/chicago/contact-us/contact-us.html
 2055 W. Army Trail Rd., STE 110, Addison, IL 60101 [ph:(630) 889-4050]
- * Associated Bank, N.A., 200 North Adam Street, Green Bay, WI 54301-5142
- * Richard Indyke, Esq. Atty. No. 20584, (312-332-2828 Atty for LaSalle Bank Natl. Assn.), Email: RIndyke@SBCGlobal.net; 221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305
- * 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 or: PKing@KingHolloway.com; One North LaSalle Street, Suite 3040, Chicago, IL 60602
- * **Joe Younes:** 2625 West Farewell Avenue, Chicago, IL 60645-4522 <u>JoeYounes@SbcGlobal.net</u>
 * **Joseph Younes** (Atty#:55351) Law Offices / http://ChicagoAccidentAttorney.net
 312-635-5716, per website 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596
 Phone: 312-372-1122; 312-802-1122; Fax: 312-372-1408. Email: RoJoe69@yahoo.com
- * John P. LaRocque, 2 Orchard Place, Hinsdale, IL 60521 [Last known address]
- * Paul L. Shelton, (630) 993-9999, (630) 333-4009, (630) 286-5100, / Direct: (630) 842-0126 (Atty. #15323, disbarred per IARDC) E: PMSA136@Gmail.com; PLShelton@SBCGlobal.net http://www.il-reab.com/agents/26812-paul-l-shelton-shelton-associates-hinsdale-il-60523 c/o: Shelton Law Group, LLC, https://www.youtube.com/user/PaulSheltonLawGroup 1010 Jorie Blvd. #144, Oak Brook, IL 60523
- * Paul L. Shelton, Pro Se, 3 Grant Square, SUITE #363, Hinsdale, IL 60521-3351
- * Paul L. Shelton [PH: 630-986-5555], 10 North Adams Street, Hinsdale, IL 60521
- * Erika R. Rhone 9948 South Normal, Chicago, IL 60628-1229
- * Erika R. Rhone [ph:(773) 788-3711], 22711 Southbrook Dr., Sauk Village, IL 60411-4291

Source: Page 15 of 17 – Docketing Statement: Gordon Wayne Watts, Docket Number: 1-18-0091

This form is app	proved by the illinois 3	upreme Court and	ris required to be accepted	in all lilinois Appellate Courts.
Instructions ▼		INVOLVES A MA	ATTER SUBJECT TO EX	PEDITED DISPOSITION UNDER
Check the box to the right if your case	RULE 311(a).			
involves custody,				
visitation, or removal of a child.	Aı	pellate Case No.:	1-18-0091	
Enter the Appellate Court case number.		IN THE A	PPELLATE COURT O	F
Just below "In the		III III Z	ILLINOIS	•
Appellate Court of Illinois," enter the	Fire	st		strict
number of the appellate		-		outot
district where the appeal was filed.				Appeal from the Circuit Court
If the case name in the	In re			of Cook County
trial court began with "In re" (for example,				
"In re Marriage of				Trial Court Case No.:
Jones"), enter that name. Below that, enter	GMAC Mortgage,			2007-CH-29738
the names of the parties in the trial court, and	Plaintiff/Petitione	r (First, middle, las	t names)	
check the correct boxes	Appellant	Appellee		Honorable
to show which party filed the appeal				Diane M. Shelley
("appellant") and which party is responding to	V.			Judge, Presiding
the appeal ("appellee").				
To the far right, enter the	Gordon Wayne W			
trial court county, trial court case number, and	_	ndent (First, middle,	last names)	
trial judge's name.	✓ Appellant	Appellee		
ORDER FOR WAIVER OF COURT FEES (APPELLATE COURT)				
Enter your full name	Applicant Name:	Gordon	Wayne	Watts
as "Applicant."		First	Middle	Last
		_		Court Fees hereby finds:
DO NOT check any more boxes or fill in		ualifies for a fee		
any more blanks on this form.	☐ The applicant d	oes not qualify	for a fee waiver because (must state specific reason):
The Appellate Court				
will decide if your Application for	IT IS HEREBY OR	DERED:		
Waiver of Court Fees is granted or denied	□ Application for V	Vaiver of Court Fe	ees is GRANTED. The app	licant may participate in this
and complete the rest	appeal without p	ayment of fees, c	osts, or charges.	
of this form.			ees is DENIED and:	
	Applicant n	nust pay all appli	cable fees, costs, or charg	es by: OR Date
	☐ Applicant n	nust pav all applie	cable fees, costs or charge	es as follows (describe payment plan):
		F	,	
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justice will sign and date here.	lustico		Dot	0
	Justice	B	Date	
AWA-O 1304.3		Page	e 1 of 1	(12/17)

Print Save

Reset Form

In the Appellate Court of Illinois, First District

Docket Number: 1-18-0091

GMAC Mortgage, LLC n/k/a: Bank of) Appeal from the Circuit Court of Cook County, IL
America, N.A., aka: "LaSalle Bank Nat'l) County Department, Law Division
Association," aka: "US Bank, NA," as	
trustee for Morgan Stanley Loan Trust) Circuit Court Case No.: 2007-CH-29738
2006-16AX,) (Transfer into <u>Law</u> Division from Chancery)
Plaintiff,	
vs.) Trial Judge: Hon. Diane M. Shelley (#1925)
Richard B. Daniggelis,) Notice of Appeal date: Monday, 08 January 2018
Gordon Wayne Watts, Joseph Younes,) Judgment Date: Wednesday, 07 December 2017
Paul L. Shelton, Erika R. Rhone, Robert J.) Date of Post-judgment Motion: None
More, John P. LaRocque, NON-RECORD) Order: #5
CLAIMANTS, UNKNOWN OWNERS,	
UNKNOWN HEIRS, LEGATEES, et. al.,) Supreme Court Rule(s) which confer(s) jurisdiction
Defendants.	upon the reviewing court: Ill.Sup.Ct. R.301, 303

Docketing Statement and Notice of Appearance of Counsel for Appellant (Civil)

Appellant-Defendant, Gordon Wayne Watts, acting solely in his capacity pro se, and pursuant to Supreme Court Rule 312, submits the following for his Docketing Statement in this appeal within 14 days after filing the notice of appeal. Pursuant to Illinois Appellate Court, First District, local court Rule 9, this Docketing Statement shall also serve as the appearance of the undersigned as counsel, pro se, for the Appellant. [Administrative Note: On Wednesday, 01/10/2018, at 5:02 PM (CST), I submitted my docketing statement electronically, through Odyssey eFileIL (TylerHost.net), but it was returned to me the next day (in Envelope Number: 373334) by your Court's Clerk for: "Monitoring for Transmittal from Circuit Court to gave [sic] Notice of Appeal case Number: "Therefore, the parties to this case will receive two (2) copies of my Docketing Statement, and, after minor updates to the snapshot of this case, I am resubmitting it, now that I have an Appellate Court Docket Number: 1-18-0091.]

1. Is this a cross-appeal, separate appeal, joining in a prior appeal, <u>or related to another appeal which is currently pending or which has been disposed of by this court? <u>YES</u>

If so, state the docket number(s) of the other appeal(s):</u>

```
* NO. 1-14-2751 (Trial Court No.: 2007-CH-29738 – <u>Chancery Division</u>) <u>GMAC v. Daniggelis</u>
* NO. 1-15-0662 (Trial Court No.: 2014-M1-701473 – <u>Civil Division</u>) <u>Younes v. Daniggelis</u>
```

As this court recalls, **Daniggelis** was the elderly victim of <u>documented</u> mortgage fraud, as outlined in <u>GMAC</u>, a Chancery case which was appealed to this court; however, this court <u>never</u>

reached the merits, chiefly because Atty. Andjelko Galic, the attorney for Richard Daniggelis, the elderly victim, who was temporarily made homeless & living in his rental van, as a result of the theft of his house/land, was negligent and never filed his merits brief; and, as a result, Galic was chewed out royally by This Honourable Court in its last substantive order. (See: Order of this court, date June 16, 2016, in Docket number: 1-14-2751, supra.) This Court was permitted – but not required – to accept my Amicus Curiae (aka: "Friend of the Court") briefs; and, while this court didn't break any laws in rejecting my amicus briefs in these appeals, above, it was an unwise refusal to 'make use' of proximal judicial help offered, since amici are permitted to be a "friend" to the court –and aide its appellate jurisdiction when, as in this case, counsel for both sides overlooked stuff and/or are/were negligent:

Kinkel v. Cingular Wireless, L.L.C., 223 III. 2D 1; 857 N.E.2d 250; 306 Ill.Dec. 157 (Jan. 11, 2006), holds that an Amicus needs merely offer helpful information that the parties have overlooked—which I clearly do insofar as I use several legal arguments that no lawyers on either side have used. [This holding is analogous to Rule 37.1 of the U.S. Supreme Court, which states: "1. An amicus curiae brief that brings to the attention of the Court relevant matter **not already brought to its attention by the parties** may be of considerable help to the Court." (Emphasis added in bold-faced underline for clarity; not in original)] 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; \underline{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. See e.g., NOW, et al. v. Scheidler, et al., (Nos. 99-3076, 99-3336, 99-3891 & 99-3892, 7th. **Opinion** Cir., July 31, 2000): http://media.ca7.uscourts.gov/cgi-bin/rssExec.pl? Submit=Display&Path=Y2000/D07-31/C:99-3076:J: :aut:T:op:N:0:S:0

- 2. Is any party a <u>corporation</u> or <u>association</u>? If so, please identify any affiliate, subsidiary, or parent group: <u>NO</u>
- 3.(A) Full name and complete address of appellant(s) filing this statement:

Mr. Gordon Wayne Watts, pro se

821 Alicia Road, Lakeland, FL 33801-2113

PH: (863) 688-9880 [home] or (863) 409-2109 [cell]

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

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

3.(B) Full name and complete address of appellee(s): (Use additional page for multiple appellees.) See the attached Service List, which includes all known parties – and their attorneys.

3.(C) Counsel on Appeal for appellee(s): (Use additional page for multiple appellees.)

See the attached Service List, which includes all known parties – and their attorneys.

4. Court reporting personnel: (If more space is needed, use other side.)

As I became a "party proper" to this case after its inception (and not merely a prospective *Amicus Curiae*, as I had initially sought), I do not rightly know, but I can tell you that I have heard a report from **Mr. Daniggelis**, who is my friend, who has told me that **Andjelko Galic**, his **attorney**, has hired a court reporter and has purchased records. If you want to know about any court reporting personnel, you may ask the attorneys involved in this case and/or the Civil Appeals Division of the trial court below.

5.(A) Approximate Duration of trial court proceedings to be transcribed: <u>Unknown</u>

5.(B) Can this appeal be accelerated? Yes—on motion of the court or any party: R.311(b).

While not mandatory (e.g., as in domestic or child rearing issues), the victim of this mortgage fraud is elderly, I'm guessing about 79 or 80 years old, as I speak, and it would <u>not</u> serve the appellate jurisdiction of this court were it to purposely let all the elderly victims die of old age (or stress- from being made homeless) before the merits of this case could be reached. Therefore, this court would have my gratitude if it could fast track the case, review it on the merits (based solely on what I filed, which should be enough to justify summary judgment), and then render summary judgment in favour of **Daniggelis**, giving him back his house & land, with costs assessed for pain & suffering; damages to his house by **Joseph Younes** (as further described in **City of Chicago v. 1720 Sedgwick, Younes, et. al., 2017-M1-400775,** a Code Violation case in the Civil Division of Cook County, IL trial courts); monies lost due to having to find another place to live and/or store belongings; award for attorneys fees to his attorney, **Andjelko Galic**, – and award for monetary losses to **Watts** and **More**, who suffered various losses as a result of financial distress inflicted upon **Daniggelis** –such ruling which would <u>moot</u> **Daniggelis'** otherwise valid 'non-suit' motion to the trial court, which precipitated this appeal to this court, and with remand to the Circuit Court for further proceedings consistent with this order:

Rule 311. Accelerated Docket

(b) Discretionary Acceleration of Other Appeals. <u>Any</u> time after the docketing statement is filed in the reviewing court, the court, <u>on its own motion</u>, or on the motion of any party, <u>for good cause shown</u>, may place the case on an accelerated docket. The motion shall be supported by an affidavit stating reasons why the appeal should be expedited. If warranted by the circumstances, the court may enter an order accepting a supporting record prepared pursuant to Rule 328, consisting of those lower court pleadings, reports of proceedings or other materials that will fully present the issues. In its discretion the court may accept memoranda in lieu of formal briefs. The court may then enter an order setting forth an expedited schedule for the disposition of the appeal.

- 6. Is this appeal from a final order in a matter involving child custody or allocation of parental responsibility pursuant to Illinois Supreme Court Rule 311(a) which requires Mandatory Accelerated Disposition(*) of Child Custody or Allocation of Parental Responsibilities Appeals? NO
 - (*) If yes, this docketing statement, briefs and all other notices, motions and pleadings filed by any party shall include the following statement in bold type on the top of the front page: THIS APPEAL INVOLVES A MATTER SUBJECT TO EXPEDITED DISPOSITION UNDER RULE 311(a).
- 7.(A) State the supreme court rule, or the law, which confers jurisdiction upon the reviewing court: Ill.Sup.Ct. Rules 301 and 303 confer jurisdiction as of right for this appeal. While I was a prospective *amicus*, when *previously* filing in this court, I <u>later</u> asserted intervention in the Law Division case; and, as my name appears on docket, in the court below, this is proof of my status as a party, the court below having neither denied my motion nor given any reason to deny intervention as of right. *City of Chicago v. John Hancock Mutual Life Ins.* Co., 127 Ill.App.3d 140, 144 (1st Dist. 1984). I satisfy all 3 requirements, giving me a right to intervene under 735 ILCS 5/2-408(a)(3). Also, as I'm a food stamp recipient, I qualify for few waiver in this court *-and the court below, subject to* mandamus *proceedings, should it balk or refuse my rights to* both *sue* and *defend* in forma pauperis, as my gut feeling says it may attempt.
- **7.(B)** State the facts of the case, which bring it within this rule or other law; and, the date that the order being appealed was entered:

 The order being appealed was on December 07, 2017. I have 30 days <u>AFTER</u> the entry of the order, per Rule 303(a)(1). Also, 5 ILCS 70/1.11 confirms that "The time within which any act provided by law is to be done shall be computed by excluding the first day..." and also <u>doesn't</u> count weekends, meaning that the 30th day, which was January 06, 2018, and fell on a Saturday, rolls over to Monday, 08 January 2018, making my appeal timely. This docketing statement is due 14-days later, e.g., by Monday, 01-22-2018.
- **7.(C)** State any other facts which are necessary to demonstrate that the <u>appeal is timely</u>:

 Rule 373 allows the time-stamp of the post office or a 3rd-party carrier, such as UPS or FedEx, to count as the time of filing.

8. Nature of the Case: Mortgage Fraud / Foreclosure

Administrative Review <u>Contract</u> Estates Personal Injury

Juvenile Domestic Relations Child Custody or Support

Product Liability Forcible Entry Detainer (FED) Tort

9. Briefly describe the (A) <u>nature of the case</u>, and (B) <u>the result in the trial court</u>, and set forth (C) any <u>reasons for an expedited schedule</u>:

9. [A] Nature of the Case: provable 'Mortgage Fraud'

First off, my *Amicus Curiae* briefs, as you vividly recall, DOCUMENTED beyond any

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reasonable doubt, that there was indeed provable "mortgage fraud" which ensued when **Daniggelis** attempted to merely get 'basic' help with refinancing and/or investors, via a photocopy forgery, a felony forgery fraud, and this, combined with lack of consideration (payment), especially in light of the fact that known 'mortgage fraud' artist, **Paul Shelton** (who lost a law license over this) aided **Atty. Joseph Younes**, gave damning proof of mortgage fraud.

9. [C] Reasons for an Expedited Schedule

Before I go any further, let me remind you that the victim is elderly, and this, alone, is reasons enough for an expedited schedule [an R.311(b) Accelerated Docket], phone conferencing for myself (as I'm in Florida), and a summary Judgment, speedily rendering justice. This elderly man was made homeless, and was sleeping in his rental van for a spell, **and this is verified by my statement herein**, but if you doubt, you may ask Daniggelis, himself. He continues to suffer financial hardship as a result of having to find replacement housing for both himself and his belongings, which, *necessarily*, must be in storage somewhere, and thus not cost a small price.

9. [A] Nature of the Case: provable 'Mortgage Fraud' (continued)

However, since I last filed in your court, I discovered the most unusual thing in all of mankind's history: Judge Michael F. Otto, the judge who forcibly stripped Daniggelis' house from him, entered an Order dated March 08, 2013, in which he basically admitted fraud, and made my case stronger. Direct link for convenience (but check with trial court to verify)

* http://GordonWatts.com/MortgageFraudCourtDocs/3-8-2013-MOTION-DENIED.pdf or:

- * http://GordonWayneWatts.com/MortgageFraudCourtDocs/3-8-2013-MOTION-DENIED.pdf
- 1. Judge Otto admits (Order, p.4) 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 a photocopy forgery of his signature, which forgery -all by itself -would void the entire illegal transfer of title.
- 2. Judge Otto (Order, p.3) acknowledges (admits) that 'Exhibit L' existed, a side-agreement to limit the title transfer only for the purpose of paying the "mortgage arrearage." Judge Otto claims that this document was not properly signed, but apparently, Otto did not see the exhibits filed in Daniggelis' July 30, 2008 answer (see pages 38 and 40 of the 96-page PDF file of a public records request at this link, provided by my personal repository and online docket: http://GordonWayneWatts.com/MortgageFraudCourtDocs/07ch29738-07242015.pdf or http://GordonWatts.com/MortgageFraudCourtDocs/07ch29738-07242015.pdf where both Shelton and Rhone sign on to such statements, and Daniggelis also signs them: These contracts place limits on https://gordonWatts.com/MortgageFraudCourtDocs/07ch29738-07242015.pdf where both Shelton and Rhone sign on to such statements, and Daniggelis also signs them: These contracts place limits on https://gordonWatts.com/mortgageFraudCourtDocs/07ch29738-07242015.pdf where both Shelton and Rhone sign on to such statements, and Daniggelis also signs them: These contracts place limits on https://gordonwatts.com/mortgageFraudcourtDocs/07ch29738-07242015.pdf where both to be fraud.and purpose of the POA). So, this conclusively proves the POA to be fraud.and purpose of the POA). So, this conclusively proves the POA to be fraud.and purpose of the POA). So, this conclusively proves the POA to be fraud.and purpose of the POA). So, this conclusively proves the POA to be <a href="fraudu
- 3. There's <u>no</u> material disagreement with repeated assertions that **Richard Daniggelis** never got paid, which is a key proof of fraud that's being alleged by multiple parties. (Daniggelis would not simply give away the farm, for free. Moreover, even *had* he done so, Watts' case law

shows that a sale is void *ab initio* if it lacks consideration.) My filings have repeatedly accused the other parties of failing to pay Daniggelis any consideration, and <u>no one</u> has contested this claim. Per 735 ILCS 5/15-1506(a), that which the other parties to this case don't deny is admitted, and, as such, it's plain that **Daniggelis <u>didn't</u> get paid for his house**, which is documented to have had hundreds of thousands of dollars equity, and which equity (and house and land) were taken without any consideration (payment), **thus <u>voiding</u> any purported sale**. But even if you think my case law, here, is "outdated," the fact Daniggelis didn't get paid shows he had NO motive to give away—for free—the house **and all its equity**, thus the transfer of title was <u>not</u> authorised by Daniggelis, <u>and is therefore NOT legal or valid</u>. At all. Period.

4. On page 7 of Judge Otto's ORDER, he claims that the 'difficulty' for Daniggelis is that, even assuming the signature to be altered (forgery by photocopy), Otto claims that **Daniggelis** "provides no factual or legal basis support for his assertion that, assuming the signature to have been altered, the Bank therefore "knew or should have known that the deed ... was no longer valid when the closing occurred." **This argument by Judge Otto is totally ridiculous:**

Let's say, for example, that a group of thieves steal **Daniggelis' vehicle**, and then sell it on the Black Market to a Bank (or take a loan out on it, using as collateral for a mortgage). When the police finally catch the thieves, do you really think, for one second, that the Bank will be allowed to keep the hot (stolen) property, simply because they didn't have "notice" that the property was stolen? Certainly not, and may God forbid! If Otto's logic seems crazy when we use a stolen vehicle, then it's just as crazy with the stolen house. Otto's claim that the bank needed 'notice' is ridiculous on its face, and invites the federal courts to investigate him for civil rights violations, under the color of law. However, the bank certainly did get notice: **Daniggelis** recording a statement of forgery in the recorder's office: Indeed, Otto admits (Order, p.4) that: "In April 2007, Daniggelis filed a Notice of Forgery with the Recorder of Deeds, stating that the deed filed in August 2006 [i.e., the one dated "July 9, 2006"] was a forgery." Moreover, the Bank was also notified of this fraud by voluminous and lengthy litigation which ensued. [Thus, Otto's claim that the bank wasn't notified is contradicted by himself, no less.] However, moreimportant than the fact Otto's claims were in contradiction to himself is the fact his ridiculous argument is in direct contradiction to absolute truth and common sense, and that this trial court judge used said 'nonsense' argument as an excuse to "rubber stamp" plain & obvious fraud. Otto further admits (Order, p.4) that: "Daniggelis contends that the deed he signed in May 2006 was intended to take effect only if the property was sold on or before May 31, 2006. He claims that the July 2006 closing took place without his awareness or consent," and the Record on Appeal clearly supports Daniggelis' valid claim, which Otto acknowledges, but thereafter ignores. Judge Otto's 'arguments' (particularly, #4, supra) are totally ridiculous.

Because numerous courts & judges repeatedly continue to ignore Jospeh Younes' clear fraud, he's been allowed to gut, damage, & destroy Daniggelis' house, as explicated in <u>City of Chicago v. 1720 N. Sedgwick, Joseph Younes, et. al.</u>, case number 2017-M1-400775, in the Civil Division, a case, overseen by Judge Patrice Ball-Reed, and which case has been featured numerous times in *DNAinfo*, my blog, *The Register*, and more recently, *ChicagoCityScape*: https://blog.ChicagoCityScape.com/landmarks-commission-still-threatening-fines-if-house-in-historic-district-isnt-worked-on-once-390f052a2ab2

9. (B) The Result in the Trial Court(s)

[[#1—First]] In the underlying Chancery Division case, which stretched on for almost a decade, numerous judges kept ignoring the clear fraud which I've documented above (and in both my filings, and the exhibits to said filings, which reference documentary evidence from the record). [[#2—Secondly]] Then, based on the illegal transfer of title, which was permitted by the ruling in Chancery, the Civil Division, in a FED (Forcible Entry Detainer aka eviction) case, kicked Daniggelis out of his own home. [[#3—Lastly]] Finally, I affirm, by means of this filing, than Daniggelis told me, on one occasion, that when all seemed lost, he jumped up in court, in Chancery, before Judge Otto, and exclaimed that if he weren't right as a matter of law, then why would Stewart Title have settled for a large sum of monies, at which time, he reported to me that Judge Otto suddenly, and unexpectedly, responded by directing that this case must be transferred to the Law Division, from which it is presently being appealed by the undersigned appellant. [Note: The Law Division transfer, in #3, may have happened before the Civil Division conclusion, in #2, above, but the Law division case is, indeed, the last —and only remaining—case—based on the underlying mortgage fraud/foreclosure issues, common to all three (3) cases.]

[[#4—Overtime]] Initially, there were questions about whether the <u>Law</u> Division case could over-rule the various Orders issued in the <u>Chancery</u> case, handing title to **Younes**, and, many legal scholars, even the famous Wikipedia – https://en.wikipedia.org/wiki/Circuit_Court_of_Cook_County#Law_Division – insisted that the Law Division could only do A. P. and C. but no mention of vacating or over ruling a had

Law Division could only do A-B-and-C, but no mention of vacating or over-ruling a bad Chancery ruling.

However, in spite of numerous "urban legends" that claim that the Law Division is unable to do anything other than limited monetary torts, the undersigned appellant did diligent research into this matter: See the "9/11/2017" motion by Defendant, Gordon Wayne Watts, filed before Hon. DIANE M. SHELLEY, in the Law Division case sub judice, documenting that the local rules of the Cook County circuit courts, specifically GENERAL ORDER NO. 1.2,2.1 -County Department, place no limitations or restriction prohibiting a Law Division judge (particularly, a senior or circuit judge, such as Judge Shelley) from reversing an incorrect titletransfer ruling by a Chancery Division judge (such as junior or Associate Judge Michael F. Otto, who entered the erroneous order in question on May 15, 2014, thereby proving Watts' claim that The IL Supreme Court is correct when it states that Circuit Judges, such as Judge case." (Emphasis Shellev. "can hear any circuit court added for clarify) http://www.IllinoisCourts.gov/CircuitCourt/CCInfoDefault.asp

Source:

http://www.CookCountyCourt.org/Manage/DivisionOrders/ViewDivisionOrder/tabid/298/Article Id/188/GENERAL-ORDER-NO-1-2-2-1-County-Department.aspx

Defendant-Appellant, Watts, showed Judge Shelley (viz Watts' "9/11/2017" motion) that she had the authority to vacate the incorrect Chancery rulings, but Judge Shelley, presiding over this Law Division case being appealed, chose not to, for reasons known only to her and The Almighty. For that reason, the undersigned now appeals to this reviewing court.

This 4-prong summary, is the "result in the Trial Court" in this matter.

- 10 . Briefly state the <u>general issues</u> proposed to be raised (failure to include an issue in this statement will not result in the waiver of the issue on appeal):
- 1. Issue of Law: Whether, as a matter of law, the CIRCUIT COURT'S Law Division is permitted plenary authority to rule on or vacate 'all' orders arising from the Chancery Division, as was argued in the 9-11-2017 motion, and summarised above. (Standard of Review: *de novo*, as this court has just as good a grasp on the law as the trial courts)
- **2.** Whether it's finally clear that Daniggelis is the victim of mortgage fraud, which even Judge Otto's March 08, 2013 Order admits:
- **A. Issue of Fact** as raised regarding **Otto's** false claims that documents weren't signed, even the the record says otherwise. **The standard of review** here "Clearly Erroneous" (aka: Plain Error aka Manifest Error).
- **B. Issues of Law** (which are reviewed *de novo*, as this court has as good a grasp on law as trial courts), regarding forgery & fraud. Here, the courts below *again* made "clear error," "plain error," "manifest error," or even "plainly nonsense," depending on your verbiage.
- 3.(A) Issue of Law: Whether the ILLINOIS RULES OF PROFESSIONAL CONDUCT definition of a lawyer, as an officer of the court, is sufficient to sustain an "ineffective counsel" argument, in "civil appeal" cases, such as how Galic is documented to have continually failed Daniggelis. (Since Illinois recognises attorneys as 'Officers of the Court', and not merely private citizens, then Galic's failure is legally equivalent to a failure of the Judicial Branch, and thus Daniggelis' **Due Process** was denied, and no further legal argument is needed to advance an 'Ineffective Counsel' defense... *or is it*? This court reviews my legal claim *de novo*.)

ARTICLE VIII. ILLINOIS RULES OF PROFESSIONAL CONDUCT OF 2010, Preamble: a Lawyer's Responsibilities reads: "[1] A lawyer, as a member of the legal profession, is a representative of clients, **an officer of the legal system** and a public citizen having special responsibility for the quality of justice." Cite: http://www.IllinoisCourts.gov/supremecourt/rules/art_viii/artviii_new.htm

- <u>3.(B)</u> Issue of Law—Constitutionality & other standards: Whether this court will refuse to hear the merits of this case and deny Daniggelis **Due Process** because of ineffective counsel. This may not be <u>illegal</u> (yet... see 3.A., above) but it certainly runs afoul of the other three major standards:
- I. <u>Unconstitutionally</u> denying Daniggelis his **Federal Due Process** rights to have a fair day in court—as codified in **Rule 10-100(a)** (Illinois Supreme Court Commission on Access to Justice), which states: "The Illinois Supreme Court Commission on Access to Justice is established to promote, facilitate, and enhance equal access to justice with an emphasis on access to the Illinois civil courts and administrative agencies for all people, particularly the poor and vulnerable." *Cite:* http://www.IllinoisCourts.gov/SupremeCourt/Rules/Art_X/Art_X.htm
 - II. Immoral, as his house was stolen, and he wasn't paid a dime, and was made

homeless, sleeping in his rental van, there for a spell, and stressed out, as he is elderly. Do morals matter anymore?

- III. <u>Impractical</u>: While this court was not bound by law to accept my *amicus curiae* briefs, it only delayed the inevitable to refuse to review them with scrutiny: This caused additional delays and headaches for *all* parties both the litigants (victims) and the court.
- 4.(A) Issue of Law: Whether a trial (circuit) court's refusal to rule on a motion (and issue a responsive motion) constitutes a denial of First Amendment Redress and Due **Process.** – This issue is raised because appellant notices a pattern of silence in the trial courts, particularly touching pro se litigants (which also implicates **Equal Protection**). Appellant is not suggesting that a trial court must "rule on" all motions, as some motions are clearly erroneous, nor should a clearly vexatious litigant be acknowledged. However, if, as in the appeal, sub judice, a litigant moves to Intervene, and carefully documents the costs and interests—as the July 7, 2017 motion to intervene, by Intervenor, Gordon Wayne Watts, and no explicit ruling issues, this leaves litigants and court officials confused. PROOF: Appellant-Defendant, Watts, represents to This Court that Deputy Chief, Patricia O'Brian, in the Civil Appeals Division, is very intelligent, and also dedicated in answering technical questions about appeals, but even she was negatively influenced by a lack of an explicit ruling on the 7-7-2017 motion supra: She insisted, in a recent phone conversation, that the undersigned defendant, whose name appears on docket, was not a "party" to this case, and not qualified for a Fee Waiver, and that any appeal of that could not proceed without payment of the fee for which the applicant is exempt. (The undersigned is a food stamp recipient, and can **barely** pay printing & mailing costs.)
- 4.(B) Issue of Law: Whether <u>inability to appeal</u> a denial of Application for Fee Waiver unless fees are paid constitutes a "catch-22" denial of Due Process: can't appeal without paying huge fees, and can't pay huge fees without winning appeal if waiver is denied in circuit court. [Note: If Mandamus is a proper remedy for wrongly denial of fee waiver, as hinted supra, then this issue is a moot question, and may be safely ignored.]
- 4.(C) Issue of Law: Whether one's name appearing on docket is sufficient indication of party status, as defendant, Watts, alleges, or insufficient, as O'Brian claimed. [Hint: Since a person may bring suit *de novo* to sue Joseph Younes, and thus make one plaintiff and a party, thus this cross-complaint against Younes is legally indistinguishable, making me a party.] The concern, here, is that trial courts may "abuse their discretion" & prevent a person from being a party in order to slow or stop their appeal of a bad ruling, thus impeding their Due Process.
- 5. Issue of Law: Whether all parties to a case must be served when making motions to the court. This seems like a "no brainer," and a waste of This Court's time; however, even a cursory review of the court below shows that many litigants often serve just 1 or 2 parties, and FAIL to serve all the parties, proper. As this is endemic and common practice, but a clear violation of the most basic professional legal standards, this matter must be addressed already. This Court can clearly see, in my Certificate of Service, that the undersigned is respectful to the other parties, and serves ALL parties ((#1)) hard copies by mail; ((#2)) via e-mail when possible; ((#3)) by e-File, when it became available; and, lastly, ((#4)) My online docket, which all may view for free, has not just 'docket entries,' but the filings themselves, for download/viewing.

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- <u>6.((A))</u> Issue of Law: Whether the <u>trial court's repeated delays in preparing the Record</u> on Appeal, in at least 1 of the 2 prior related appeals, implicates <u>Due Process</u>. While it is without dispute that **Galic**, as attorney for Daniggelis, was <u>negligent</u> in moving for "extension of time" in such cases, the court (and not the parties) prepares the **Record on Appeal.** (And, now with new <u>electronic standards</u>, the court also *transmits* the Record to the Reviewing Court—instead of having the appellant do so, as in the the recent past.)
- **6.((B)) Issue of Law:** Whether this reviewing court can consider the merits of the 2 other related cases (even though those appeals have expired), which are the **same** issues raised in the case at bar being appealed, here e.g., <u>this</u> case *sub judice*. [Hint: Since the merits were never reached, there wouldn't be violation of *Res Adjudicata*, nor would any issues be collaterally estopped. I will argue that this reviewing court can consider the case *sub judice*, rule on it, and dispose of all issued raised in the 2 related cases.]
- 7. Issue of Law: Whether the trial courts, below, committed Manifest Error in applying the "Burden of Proof" <u>backwards</u> regarding ownership of 1720 N. Sedgwick (house & property, which has hundreds of thousands of dollars of equity, as many of us have documented in our past filings, below). [Daniggelis was forced to prove that his house was his, beyond all reasonable doubt, even though the circuit court should clearly have demanded that Younes and Shelton be the ones to meet this threshold before just snatching house, land, & equity.]
- **8.** Issue of Law: Whether ((a)) Younes' admission of a conspiracy (see *infra*), from which he later profits & benefits; or ((b)) Judge Otto's admission of facts supporting & documenting fraud claims (see *supra*); or, ((c)) Younes' repeated attempts to gut, demolish, and destroy Daniggelis' house (see recent *DNAinfo* stories, as cited in various filings by Appellant, or see the *City of Chicago v. Younes, et. al.* case in Civil: 2014-M1-400775) are **individually or collectively sufficient** for this court to make a referral to the IARDC for discipline against Younes, for unprofessional conduct, not unlike the recent IARDC action against **Younes' former law partner, Paul Shelton, who lost both his broker's license, and then his law license.**
- <u>* Documentation that Shelton was Younes' former law partner:</u> March 21, 2011 complaint against Atty. Paul L. Shelton, by the IARDC Administrator, Commission No. 09-CH-58: http://www.iardc.org/rd_database/rulesdecisions.html (Look up case by entering 'Younes')
- <u>*</u> Documentation that Younes admitted conspiracy, and then benefited from it, thus implicating himself: EXHIBIT-Exhibit-D(2.) "Younes complaints to OAG about Linda Green conspiracy: Feb 06, 2013" an exhibit in the "04/21/2017" motion filed by "pro se" (e.g., appellant, Gordon Wayne Watts), which is a Public Records document that the Office of Attorney General released, showing a complaint that Younes had made against DocX, U.S. BanCorp, Nationwide Title Clearing, and Bank of America, N.A., regarding the infamous "Linda Green" fraud assignments.
- **9. Issue of Law:** Whether appellant has to document <u>all</u> of his 'interests' under Intervention case law (and 735 ILCS 5/2-408(a)(3)) to make a full claim, or whether some (which is hard to document) can safely be estimated, <u>CoC v. Hancock Mutual</u>, **127 Ill.App.3d 140, 144 (1st Dist. 1984)**, which **This Court** decided regarding Intervention.

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10. Issue of Law: Whether the Application for Fee Waiver in this appellate court must be served upon all parties; or, rather, can it be served *ex parte*, as the Circuit Court's "approved form" allows? This is a matter of Equal Protection (litigants in this court have a higher standard), as well as Due Process (financially indigent litigants—like the undersigned appellant—are struggling to just print and mail the service copies in question). If Due Process is not offended by the court *below* allowing a Fee Waiver application to be served *ex parte*, on the court alone, then why must indigent applicants, to this court, serve all the parties extra paperwork that costs to print and mail? And—which paperwork the other litigants probably don't care to read? [[Side-note: While this appellant is not ashamed to release his financial statements or admit financial poverty, some litigants may feel this is 'private' information, not appropriate to share with other parties in a case. *However*, if a Fee Waiver application is served on all parties at the same time as the Docketing Statement, as the rules require, then the extra costs would probably add little—if any—costs to postage, and only require printing of additional paperwork, which could be double-sided to save paper.]]

Miscellaneous Court issues implicating Due Process

11.(A) Issue of Law: Did Judge Sanjay T. Tailor's January 17, 2017 order, in the case *sub judice*, offend **Due Process** when the judge threatened to dismiss the case (punish the victim, Mr. Daniggelis) for the failure of the Sheriff's Department to serve a party a subpoena (a "body attachment," as the order describes)?

11.(B) Issue of Law: Is issue 11.(A), *supra*, a moot point, in light of the fact that Daniggelis had a compelling case for summary judgment, and did not need to issue a subpoena? [Hint: The July 24, 2012 Order, by then-Judge Mathias W. DeLort, now a member of This Honourable Court, royally chews out Daniggelis' attorney, Andjelko Galic, for focusing too much on invalidating the actual underlying foreclosure suit by questioning ownership based on the infamous "Linda Green" assignment fraud issues –instead of focusing on the actual mortgage fraud in question, which, of course, was the illegal transfer of title from Daniggelis to Younes, without any payment to Daniggelis, and by clear & obvious used of a "photocopy forgery-fraud" signature, and for purposes other than the mere refinancing for which Daniggelis initial sought help—which we now know is even documented and supported by a 2013 ruling by Judge Otto.]

11.(C) Issue of Law: Does it offend Due Process for the trial court to enter a ruling, but refuse to provide the litigant with a copy of the ruling, making it impossible to appeal said ruling? Clarification: I know this seems "trivial," and, really, it is (in most cases), but a **very** common practice of the circuit court (Chancery, Law, and Civil Divisions, at the least) is to usually no provide a copy (either mailed or electronic, e.g., a scanned image from the docket) to a litigant whose motion is denied. In those cases where the litigant can not afford to make a "Public Records" request, and lives too far from the courthouse to physically pick up a copy, he/she is prevented from appealing any order (Due Process issue) is the court doesn't (at the least) email him/her a scanned image (and they usually don't). Again, apologies, for a possibly "de minimus" waste of the precious time of the reviewing court justices, but, as some litigants (including the undersigned) occasionally find themselves in this situation, I would argue that the court must provide the litigants or movants with copies of orders (as most courts do),

even if only via email of an image. **STANDARD OF REVIEW:** Constitutional issues – This is *de novo*, as I'm sure no one has ever asked this question before, **but** <u>I</u> **am**, *as it affects a lot of litigants too "weak" to ask for themselves (as the undersigned is asking in the case at bar).*

Certification of Appellant

the <u>8th</u> day	of <u>January</u> , 2018, I <i>asked</i> / <u>mad</u> re the record on appeal, and on <u>No</u>	e appellant, I hereby certify that on Monday le a written request to the clerk of the circuit O_ day of any month, 2018, did I make prepare the transcript(s). – See the 'Exhibit,
jetow –		/s/ Gordon Wayne Watts (Electronic Signature)
Date	Appellant's Attorney	Pro Se Appellant, Gordon Wayne Watts

In lieu of court reporting personnel's signature I have attached the written request to the circuit court below (Civil Appeals Division) to prepare any "Reports of Proceedings prepared in accordance with Illinois Supreme Court Rule 323" – by checking the appropriate box in my "Request for Preparation of Record on Appeal." – *See the 'Exhibit,' below* –

/s/ Gordon Wayne Watts

		(Electronic Signature)
Date	Appellant's Attorney	Pro Se Appellant, Gordon Wayne Watts
I hereby ackr	nowledge receipt of an order for the pr	reparation of a report of the proceedings.
Date	Court Reporte	er or Supervisor

In the Appellate Court of Illinois, First District

Docket Number: 1-18-0091

GMAC Mortgage, LLC n/k/a: Bank of) Appeal from the Circuit Court of Cook County, IL
America, N.A., aka: "LaSalle Bank Nat'l) County Department, Law Division
Association," aka: "US Bank, NA," as	
trustee for Morgan Stanley Loan Trust) Circuit Court Case No.: 2007-CH-29738
2006-16AX,) (Transfer into <u>Law</u> Division from Chancery)
Plaintiff,)
vs.) Trial Judge: Hon. Diane M. Shelley (#1925)
Richard B. Daniggelis,) Notice of Appeal date: Monday, 08 January 2018
Gordon Wayne Watts, Joseph Younes,) Judgment Date: Wednesday, 07 December 2017
Paul L. Shelton, Erika R. Rhone, Robert J.) Date of Post-judgment Motion: None
More, John P. LaRocque, NON-RECORD) Order: #5
CLAIMANTS, UNKNOWN OWNERS,	
UNKNOWN HEIRS, LEGATEES, et. al.,) Supreme Court Rule(s) which confer(s) jurisdiction
Defendants.	_) upon the reviewing court: Ill.Sup.Ct. R.301, 303

NOTICE OF FILING

To: See attached Service List

PLEASE TAKE NOTICE that today, Friday, 19 January 2018, I am causing to be filed with the <u>ILLINOIS 1st Appellate Court</u> my <u>Docketing Statement and Notice of Appearance of Counsel for Appellant</u>, this <u>Notice of Filing</u>, an <u>Updated and Corrected "Service List"</u> of parties, and my <u>Request for Preparation of the Record on Appeal</u>, copies of which <u>are attached hereto</u> and herewith served upon you.

Gordon Wayne Watts	Gordon Wayne Watts	
(Actual Signature, if served upon clerk)	(Electronic Signature)	
	/s/ Gordon Wayne Watts	
	Respectfully submitted,	

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

821 Alicia Road, Lakeland, FL 33801-2113

PH: (863) 688-9880 [home] or (863) 409-2109 [cell]

Web: http://www.GordonWatts.com / <a href="ht

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

SERVICE LIST

- * 1st District Appellate Court, 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 [served by eFiling only, since this The Court no longer accepts paper filings]
- * 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 Attention: Deputy Chief, Patricia O'Brian, PAOBrien@CookCountyCourt.com [served by email / electronic service only, as a courtesy, since this is an appeal]
- *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 [served by email / electronic service only, as a courtesy, since this is an appeal]
- * Hon. James P. Flannery, Jr., Cir. Judge—Presiding Judge, Law Division [re: "Application for Waiver of Court Fees"] 50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343 Courtesy copy via: James.Flannery@CookCountyIL.gov [served by email / electronic service only, as a courtesy, since this is an appeal]
- * Law Division and Hon. Diane M. Shelley, Circuit Judge, [served by email / electronic service only, as a courtesy, since this is an appeal] Law@CookCountyCourt.com; ccc.LawCalendarW@CookcountyIL.gov; Diane.Shelley@CookCountyIL.gov
- * Richard B. Daniggelis [true owner of 1720] 312-774-4742, c/o John Daniggelis 773-327-7198 2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652
- * Unknown Owners/NonRecord Claimants 1720 North Sedgwick St., Chicago, IL 60614-5722
- * Andjelko Galic (Atty#:33013) Cell:312-217-5433, Fax:312-986-1810, Phone:312-986-1510 845 Sherwood Road, LaGrange Park, IL 60526-1547 (Please take note of Mr. Galic's new address) Email: AndjelkoGalic@Hotmail.com; AGForeclosureDefense@Gmail.com
- * Robert J. More (<u>Anselm45@Gmail.com</u>) [Note: More's name is <u>misspelled</u> on docket as: "MOORE ROBERT"] P.O. Box 6926, Chicago, IL, 60680-6926, PH: (708) 317-8812
- * COHON RAIZES®AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)
 Attn: Carrie A. Dolan, 208 S LASALLE#1860, CHICAGO IL, 60604 [ph:(312) 726-2252]

SERVICE LIST (continued from above)

- * MERS (Mortgage Electronic Registration Systems, Inc.) <a href="https://www.mersinc.org/about-us/about-us/about-us/about-us/about-us/about-us/about-us/about-us/about-us/about-us/about-us/a nominee for HLB Mortgage; Janis Smith, 703-738-0230, VP, Corp. Comm. is no longer with MersCorp, and Amy Moses (AmyM@MersCorp.com) has replaced her as an email contact; Sandra Troutman 703-761-1274, E: SandraT@mersinc.org Dir, Corporate Communications, 1595 Springhill road, Suite 310, Vienna, VA 22182 (703) 761-0694 / (800)-646-6377
- * Stewart Title, Attn: Leigh Curry
 http://www.Stewart.com/en/stc/chicago/contact-us/contact-us.html
 2055 W. Army Trail Rd., STE 110, Addison, IL 60101 [ph:(630) 889-4050]
- * Associated Bank, N.A., 200 North Adam Street, Green Bay, WI 54301-5142
- * Richard Indyke, Esq. Atty. No. 20584, (312-332-2828 Atty for LaSalle Bank Natl. Assn.), Email: RIndyke@SBCGlobal.net; 221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305
- * 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 or: PKing@KingHolloway.com; One North LaSalle Street, Suite 3040, Chicago, IL 60602
- * **Joe Younes:** 2625 West Farewell Avenue, Chicago, IL 60645-4522 <u>JoeYounes@SbcGlobal.net</u>
 * **Joseph Younes** (Atty#:55351) Law Offices / http://ChicagoAccidentAttorney.net
 312-635-5716, per website 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596
 Phone: 312-372-1122; 312-802-1122; Fax: 312-372-1408. Email: RoJoe69@yahoo.com
- * John P. LaRocque, 2 Orchard Place, Hinsdale, IL 60521 [Last known address]
- * Paul L. Shelton, (630) 993-9999, (630) 333-4009, (630) 286-5100, / Direct: (630) 842-0126 (Atty. #15323, disbarred per IARDC) E: PMSA136@Gmail.com; PLShelton@SBCGlobal.net http://www.il-reab.com/agents/26812-paul-l-shelton-associates-hinsdale-il-60523 c/o: Shelton Law Group, LLC, https://www.youtube.com/user/PaulSheltonLawGroup 1010 Jorie Blvd. #144, Oak Brook, IL 60523
- * Paul L. Shelton, Pro Se, 3 Grant Square, SUITE #363, Hinsdale, IL 60521-3351
- * Paul L. Shelton [PH: 630-986-5555], 10 North Adams Street, Hinsdale, IL 60521
- * Erika R. Rhone 9948 South Normal, Chicago, IL 60628-1229
- * Erika R. Rhone [ph:(773) 788-3711], 22711 Southbrook Dr., Sauk Village, IL 60411-4291

In the Appellate Court of Illinois, First District

Docket Number: 1-18-0091

) Appeal from the Circuit Court of Cook County, IL
) County Department, Law Division
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)
) Trial Judge: Hon. Diane M. Shelley (#1925)
) Notice of Appeal date: Monday, 08 January 2018
) Judgment Date: Wednesday, 07 December 2017
) Date of Post-judgment Motion: None
) Order: #5
)
) Supreme Court Rule(s) which confer(s) jurisdiction
) upon the reviewing court: Ill.Sup.Ct. R.301, 303

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 **Docketing Statement and Notice of Appearance of Counsel for Appellant; Notice of Filing;** an **Updated and Corrected "Service List"** of parties; —and, my **Request for Preparation of the Record on Appeal**, as an attached **Exhibit "B**," copies of which are attached hereto are being herewith served upon you—and upon the parties listed in the attached Service List, above this **Friday**, **19 January 2018**, via **the Odyssey eFileIL (TylerHost.net) Electronic Filing system** if they're e-file registered.
- * I'm concurrently serving <u>all</u> parties via <u>First Class U.S. Postal Mail</u> except The Appeals Court (which only accepts eFiling), or as otherwise indicted in the Service List.
- * Additionally, I shall, when practically possible, post a TRUE COPY of this filing –and related filings <u>—online at my official websites, *infra*</u> —linked at the "Mortgage Fraud" story, dated Fri. 14 April 2017.

* Lastly, I may, later, cc all parties via <u>e-mail</u>, if I am able. Respectfully submitted,

(Actual Signature, if served upon clerk)

Gordon Wayne Watts

(Electronic Signature)

Gordon Wayne Watts

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

821 Alicia Road, Lakeland, FL 33801-2113

PH: (863) 688-9880 [home] or (863) 409-2109 [cell]

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

Email: <u>Gww1210@aol.com</u> / <u>Gww1210@gmail.com</u>

Request for Preparation of Record on Appeal	EXHIBIT	<u>B</u>		(Rev. 8/28/08) CCA 0025
	TO THE APPELLATE C			
COUNTY	PARTMENT. LAW DI	VISION, Firs	t Municip:	al District, Calendar "W"
GMAC, et. al., Plaintiffs / Appellees		Reviewing Cou	t No.	
Plainti	ff/Appell	Circuit Court N	2007 - 0	:H - 29738
Daniggelis, Watts,	>	Circuit Court N	o. M. Ch	allow Circuit Indee
Younes, et. al., Defendants	Annellanta	Honorable	arre W. Srr	elley, Circuit Judge
Touries, et. al., Deferidants		ate Notice of Appea	Filed MOI	Trial Judge nday, 08 January 2018
REQU	EST FOR PREPARATION	OF RECORD ON	APPEAL	
httorney (or Party if no anorney):	6.16		00500	
Name: Mr. Gordon Wayne Watts Address: 821 Alicia Road,		ttorney Code No		orida zip: 33801-2113
elephone Number: H: 863-688-9880 / C: 863		Lakeland	State: FI	Orida Zip: 33801-2113
Attorney for: Pro Se	E-mail Address (optio			/ Gww1210@Gmail.com
Name of I SOTICE IS HEREBY GIVEN to the Clerk of the Circ			atts.com	GordonWayneWatts.com
Mr. Gordon Wayne Watt			ingelou - Pak - V	
Name	-	requests the prepa	tration of the f	Record on Appeal in the above case.
DESIGNATION OF RECORD				
The Clerk of the Circuit Court of Cook County shall print Appeal shall include the common law record, which	consists of trial documents (iled and judgment	s and orders en	tered by the trial court and:
All documentary exhibits entered at trial, exce subject to motion. Reports of Proceedings prepared in accordance			ly be included	for review and are
Certificate in Lieu of Record on Appeal pursus	ant to Illinois Supreme Cour			
Documents filed under seal on the following da A copy of the trial court Order authorizing thes	ites and unscaled:			-
or will be provided by the Appellant to the Civ scheduled to be transmitted to the Appellate C	il Appeals Division at least : ourt. Upon return of the Ro	of days in advance cord on Appeal to	of the date on	which the Record on Appeal is
parties to obtain an Order rescaling these reco Documents filed under scal on the following da				
Please note that, pursuant to Rule 17 of Appell Court, unless Appellate Court has first given le	ate Court of Illinois, "No re	cord, exhibit, or br	ief may be filed the material w	under seal in the Appellate as filed under seal in the Circuit
Court."				
EES		2-120		
Payment may be made by Cash, Check or Money Order Thecks or money order should be made to Clerk of the Circuit Court of Cook County must charge lees for Rec	Circuit Court of Cook Count	Pursuant to 705		a(k) and 27.2(k), the Clerk of the
	100 pages or less, 5			
	100 - 200 pages, S			
Padurad fe	Each page in excess of 200 e for Local Governments a		***	
Il prescribed fees are due <u>in advance</u> of transmission of ecord on Appeal is made by submission of this form thether the Appeal is successful, dismissed, the time is lerk of the Circuit Court of Cook County reserves the elated to preparation of the Record on Appeal.	i, the Appellant is responsi- extended, or a party elects	ble for the costs of to not transmit th	preparing the Record on A	Record on Appeal, regardless of
Mr. Gordon Wayne Watts	X	KARAA	Nalla	PLATINA
(Type or print name)	1/	(Signature	of Appellant	or Appellant's Attorney
90. 5. * 0000000*****************************				Mompay.
DOROTHY BROWN, CLER	K OF THE CIRCUIT C	OURT OF COOL	COUNTY,	ILLINOIS 08 January 2015