

This Document Prepared By:
Peter M. King
King Holloway LLC
101 N. Wacker Drive, Suite 2010
Chicago, IL 60606

19

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT - CHANCERY DIVISION

GMAC Mortgage, LLC, U.S. Bank National
Association, a national banking association as
successor trustee to Bank of America, N.A., as
Trustee for Morgan Stanley Loan Trust 2006-
16AX,

Plaintiff/Counter-Defendant,

vs.

RICHARD DANIGGELIS,

Defendant/Counter-Plaintiff,

JOSEPH YOUNES; MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS,
INC., as Nominee for HLB Mortgage; Paul
Shelton, Erika Rhone and Stewart Title of
Illinois and Unknown Owners,

Defendants/Counter-Defendants.

07 CH 29738

CALENDAR 61

1720 North Sedgwick Ave.,
Chicago, Illinois

P.I.N. 14-33-324-044

MEMORANDUM OF JUDGMENT

This matter having come before the Court on Joseph Younes' Memorandum of Judgment
against Richard Daniggelis, the Court having jurisdiction and being fully advised in the
Premises, this Memorandum of Judgment hereby reflects as follows:

1. The property subject to the above-captioned litigation (the "Subject Property") is
legally described as follows:

THE EAST 66 FEET OF LOT 8 IN C.J. HULLS SUBDIVISION OF BLOCK 51
IN CANAL TRUSTEES SUBDIVISION OF SECTION 33, TOWNSHIP 40
NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN
COOK COUNTY, ILLINOIS.

P.I.N. 14-33-324-044

Commonly Known As: 1720 N. Sedgwick St., Chicago, IL 60614

2. On or about December 3, 2009, Richard Daniggelis ("Daniggelis") filed his Third Amended Counterclaim in the above-captioned matter to quiet title against Joseph Younes ("Younes"), wherein Daniggelis asserted a claim against Younes' ownership of the Subject Property. Said claim by Daniggelis constituted a cloud on the title on the Subject Property and Younes' ownership thereof.

3. On February 15, 2013 this Court entered an Order in favor of Joseph Younes for his Motion for Summary Judgment against Richard Daniggelis and finding that Joseph Younes is sole owner of the Subject Property and that Richard Daniggelis has no interest in the Subject Property. As such, the court found that there was no cloud on the title to the Subject Property and Younes' ownership thereof.

4. On June 14, 2013 this Court denied Richard Daniggelis' Motion to Reconsider this Court's Order of February 15, 2013 in its entirety. Therefore, Daniggelis' action to quiet title against Younes is insufficient as a matter of law and dismissed with prejudice.

5. Having found that Joseph Younes is the owner of the Subject Property and that Richard Daniggelis has no interest in the Subject Property, the Fraudulent Document Notice recorded by Richard Daniggelis with the Cook County Recorder of Deeds Office on April 20, 2007 and recorded as Document Number 0622826137 is hereby cancelled and held for naught.

SIGNED:


Judge Michael F. Otto

Judge Michael F. Otto

MAY 15 2014

Circuit Court - 2065

Clerk

Date

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CALENDAR: 61
PAGE 1 of 7
CIRCUIT COURT OF
COOK COUNTY, ILLINOIS
CLERK'S OFFICE
CLERK: DOROTHY BROWN

33013

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

Bank, N.A., as trustee for Morgan Stanley Loan
2006-16AX,

Plaintiff/Counter-Defendant,

vs.

RICHARD DANIGGELIS,
Defendant/Counter-claimant and
Cross-claimant,

No.: 07 CH 29738

RICHARD DANIGGELIS' RESPONSE TO PLAINTIFF'S MOTION TO DISMISS

Now comes the Defendant, Richard Daniggelis, by and through his attorney Andjelko Galic and as his Response to Plaintiff's motion to dismiss states as follows.

1. On May 15, 2014 Plaintiff presented its motion to dismiss but Plaintiff's motion is actually seeking to vacate the judgment of foreclosure entered on March 20, 2013. Plaintiff's motion fails to specify any statutory grounds for Plaintiff's motion.
2. Moreover, on May 15, 2014 Plaintiff also presented its "motion to dismiss" before Judge Kyriakopoulos and Judge Kyriakopoulos entered an order dismissing this cause without prejudice. In addition, the order entered by Judge Kyriakopoulos incorrectly indicated that there are no pending cross claims or counter claims. See attached Exhibit "A" a copy of the order entered on May 15, 2014 by Judge Kyriakopoulos.
3. In Illinois Plaintiff has the right to voluntarily dismiss its complaint. However, this right is not absolute. Section 5/2-1009 from our Code of Civil Procedure provides the requirements for a voluntary dismissal. The statute provides as follows:
 - (a) The plaintiff may, at any time before trial or hearing begins, upon notice to each party who has appeared or each such party's attorney, and upon payment of costs, dismiss his or her action or any part thereof as to any defendant, without prejudice, by order filed in the cause.
 - (b) The court may hear and decide a motion that has been filed prior to a motion filed under subsection (a) of this Section when the prior filed motion, if favorably ruled on by the court, could result in a final disposition of the cause
 - (c) After trial or hearing begins, the plaintiff may dismiss, only on terms fixed by the court (1) upon filing a stipulation to that effect signed by the Defendant, or (2) on motion specifying the ground for dismissal, which shall be supported by affidavit or other proof.

(d) A dismissal under subsection (a) of this Section does not dismiss a pending counterclaim or third party complaint. 735 ILCS 5/2-1009 (a-d) (West 2009).

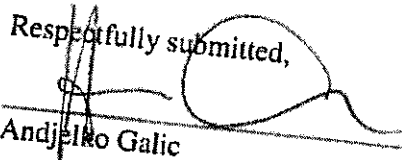
4. The Illinois Supreme Court in *Morrison v. Wagner* has further clarified that "Section 2-1009(a) of the Code of Civil Procedure, by its terms, confers on plaintiffs an 'unfettered right' to voluntarily dismiss a claim without prejudice, upon proper notice and payment of costs, 'at any time before trial or hearing begins.'" *Morrison v. Wagner*, 191 Ill.2d162, 729 N.E.2d 496, 288 (2000) This provision, the Court goes on to note, is subject to two qualifications: (1) If a previously filed defense motion could result in a final disposition of the cause of action, the court has the discretion to hear and decide that motion before ruling on the motion for voluntary dismissal. (2) If circumstances of the case are such that dismissal would directly conflict with a specific rule of the Supreme Court, the terms of the rule take precedence over the plaintiff's right to voluntarily non-suit the case. *Morrison v. Wagner*, 191 Ill.2d162, 729 N.E.2d 496, 288 (2000). The trial court in *Morrison*, basing its decision on Supreme Court Rule 219(e), denied the plaintiff's motion to voluntarily dismiss the case because the court believed the plaintiff sought to avoid compliance with discovery deadlines. *Morrison v. Wagner*, 191 Ill.2d162, 729 N.E.2d 496, 288 (2000).

5. In this case by filing its motion to dismiss Plaintiff is seeking to prevent Richard Daniggelis from appealing the order entered on February 15, 2013 and on March 20, 2013 which would be in conflict with the Supreme Court Rule 304(a) and the order entered on May 15, 2014 granting Younes' motion for adding 304(a) language to these orders.

6. If Plaintiff is seeking to dismiss the entire case and all orders entered in this case so far then Defendant, Richard Daniggelis, has no objection to Plaintiff's motion to dismiss.

7. If Plaintiff is seeking anything other than the dismissal of the entire case against all defendants Plaintiff's motion must be denied because its purpose is to mute Richard Daniggelis' right to appeal the orders entered on February 15 and on March 20, 2014.

Wherefore, Defendant Richard Daniggelis, prays for an order denying Plaintiff's motion to dismiss and/or in the alternative to grant Plaintiff's motion to dismiss if Plaintiff is seeking to dismiss this cause of action in its entirety.

Respectfully submitted,

Andjelko Galic

Law Office of Andjelko Galic
Attorney for Richard Daniggelis
134 N. LaSalle Street, Suite 1040
Chicago, IL 60602
(312) 986- 1510
Attorney No. 3301

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT - CHANCERY DIVISION

U.S. BANK NATIONAL ASSOCIATION, A
NATIONAL BANKING ASSOCIATION AS
PLAINTIFF TRUSTEE TO BANK OF AMERICA
N.A. AS TRUSTEE FOR MORGAN STANLEY LOAN
TRUST 2007-10A

PLAINTIFF

NOV. 07 AM 7:53A

1720 NORTH WELLS STREET
CHICAGO, IL 60614

JUDGE

JUDITH S. ...

MORGAN STANLEY MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC., AS NOMINEE
FOR THE MORTGAGEE RICHARD DANIGERMAN,
ORAC MORTGAGE LLC,

DEFENDANTS

ORDER OF DISMISSAL

The Court has heard the motion of the Plaintiff to dismiss the
complaint filed by the Plaintiff against the Defendant. The Court
finds that the Plaintiff has failed to establish that the Defendant
is liable for the Plaintiff's claims. Therefore, the Court grants the
motion to dismiss the complaint with prejudice.

[Handwritten signature]
MAY 15 2011
1201 AMO

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

33013

U.S. Bank, N.A., as trustee for Morgan Stanley Loan)
Trust 2006-16AX,)
Plaintiff/Counter-Defendant,)

vs.)

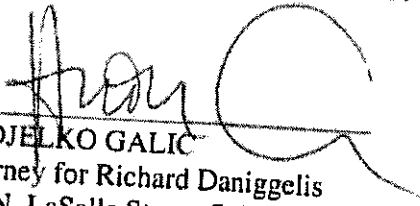
RICHARD DANIGGELIS,)
Defendant/Counter-claimant and)
Cross-claimant,)

No.: 07 CH 29738

NOTICE OF FILING

TO: See attached Service List

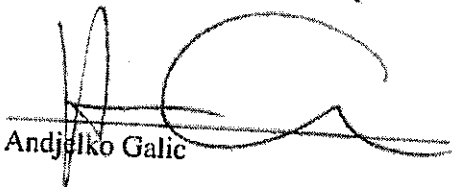
You are hereby given notice that on June 17, 2014, we electronically filed with the Clerk of the Circuit Court of Cook County our Response to Plaintiff's Motion to Dismiss, a copy of which is attached and is hereby served upon you.



ANDJELKO GALIC
Attorney for Richard Daniggelis
134 N. LaSalle Street, Suite 1040
Chicago, IL 60602
(312) 986- 1510
Attorney No. 33013

CERTIFICATE OF SERVICE

I, Andjelko Galic, an attorney, certify that I caused this Notice of Filing to be served by placing a copy of it in an envelope addressed the above party at the above address and depositing the same in the U.S. mailbox in Chicago, on June 17, 2014 with proper postage prepaid.


Andjelko Galic

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6/17/2014 5:10 PM
2007-CH-29738
PAGE 4 of 7

SERVICE LIST

Pearce and Associates, P.C.
1 N. Dearborn Street, Suite 1300
Chicago, Illinois 60602

Peter King, Esq.
King Holloway LLC
101 N Wacker Drive, Suite 2010
Chicago, IL 60606

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PAGE 5 of 7

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

33013

U.S. Bank, N.A., as trustee for Morgan Stanley Loan)
Trust 2006-16AX,)
Plaintiff/Counter-Defendant,)

vs.)

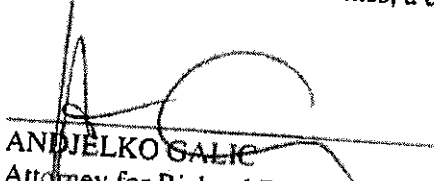
RICHARD DANIGGELIS,)
Defendant/Counter-claimant and)
Cross-claimant,)

No.: 07 CH 29738

NOTICE OF FILING


TO: See attached Service List

You are hereby given notice that on June 17, 2014, we electronically filed with the Clerk of the Circuit Court of Cook County our Response to Plaintiff's Motion to Dismiss, a copy of which is attached and is hereby served upon you.


ANDJELKO GALIC
Attorney for Richard Daniggelis
134 N. LaSalle Street, Suite 1040
Chicago, IL 60602
(312) 986- 1510
Attorney No. 33013

CERTIFICATE OF SERVICE

I, Andjelko Galic, an attorney, certify that I caused this Notice of Filing to be served by placing a copy of it in an envelope addressed the above party at the above address and depositing the same in the U.S. mailbox in Chicago, on June 17, 2014 with proper postage prepaid.


Andjelko Galic

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2007-CH-29738
PAGE 6 of 7

SERVICE LIST

Pearce and Associates, P.C.
1 N. Dearborn Street, Suite 1300
Chicago, Illinois 60602

Peter King, Esq.
King Holloway LLC
101 N Wacker Drive, Suite 2010
Chicago, IL 60606

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2007-CH-29738
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IN THE APPELLATE COURT
OF ILLINOIS
FIRST JUDICIAL DISTRICT

GMAC MORTGAGE, LLC,

Appellee,

v.

RICHARD DANIGGELIS,

Appellant.

) Appeal from the
) Circuit Court
) of Cook County
)
) No. 07 CH 29738
)
) Honorable
) Michael Otto,
) Judge Presiding.
)

ORDER

This cause coming on to be heard on Appellee's Motion for Setting of Appeal Bond, IT IS
HEREBY ORDERED:

Appellee's Motion is denied.

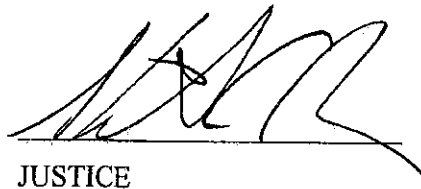
As no stay has been issued in this matter, no bond is required, and the appellee is free to pursue
the removal of the appellant from the property in the appropriate manner in the circuit court.

DATED: _____

ORDER ENTERED

MAY 29 2015

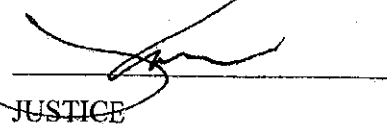
APPELLATE COURT, FIRST DISTRICT



JUSTICE



JUSTICE



JUSTICE

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CALENDAR: 61
PAGE 1 of 1
CIRCUIT COURT OF
COOK COUNTY, ILLINOIS
CHANCERY DIVISION
CLERK DOROTHY BROWN

APPEAL TO THE APPELLATE COURT OF ILLINOIS
FROM THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION/DISTRICT

Filing Fee \$110

PAGE LLC

Plaintiff/Appell

v.

GELIS

Defendant/Appell

Reviewing Court No.

Circuit Court No. 07 CH 29738

Honorable Michael F. Otto

Trial Judge

Date Notice of Appeal Filed May 6, 2015

REQUEST FOR PREPARATION OF RECORD ON APPEAL

Attorney (or Party if no attorney):

Name: Andjelko Galic

Cook County Attorney Code No. 33013 or Pro Se 99500

Address: 134 N LaSalle Street, Suite 1040

City: Chicago State: IL Zip: 60602

Telephone Number: 312 986 1510

E-mail Address (optional) agforeclosuredefense@gmail.com

Attorney for: Ricahrd Daniggelis

Name of Party

NOTICE IS HEREBY GIVEN to the Clerk of the Circuit Court of Cook County that

Andjelko Galic

requests the preparation of the Record on Appeal in the above case.

Name

DESIGNATION OF RECORD

The Clerk of the Circuit Court of Cook County shall prepare the Record on Appeal in accordance with Illinois Supreme Court Rule 321. The record on Appeal shall include the common law record, which consists of trial documents filed and judgments and orders entered by the trial court and:

- All documentary exhibits entered at trial, except for those other exhibits that cannot ordinarily be included for review and are subject to motion.
- Reports of Proceedings prepared in accordance with Illinois Supreme Court Rule 323.
- Certificate in Lieu of Record on Appeal pursuant to Illinois Supreme Court Rule 325.
- Documents filed under seal on the following dates and unsealed:

A copy of the trial court Order authorizing these documents to be unsealed for the purpose of inclusion in the Record on Appeal is attached hereto or will be provided by the Appellant to the Civil Appeals Division at least 30 days in advance of the date on which the Record on Appeal is scheduled to be transmitted to the Appellate Court. Upon return of the Record on Appeal to the Circuit Court, it is the responsibility of the parties to obtain an Order resealing these records, if the records are to be resealed.

- Documents filed under seal on the following dates, which are to remain sealed:
- Please note that, pursuant to Rule 17 of Appellate Court of Illinois, "No record, exhibit, or brief may be filed under seal in the Appellate Court, unless Appellate Court has first given leave for filing under seal, notwithstanding that the material was filed under seal in the Circuit Court."

FEES

Payment may be made by Cash, Check or Money Order. Cash payments accepted for in-person payments only.

Checks or money order should be made to Clerk of the Circuit Court of Cook County. Pursuant to 705 ILCS 105/27.2a(k) and 27.2(k), the Clerk of the Circuit Court of Cook County must charge fees for Records on Appeal in advance as follows:

100 pages or less, \$110

100 - 200 pages, \$185

Each page in excess of 200, \$.30/page

Reduced fee for Local Governments and School Districts, \$50

All prescribed fees are due in advance of transmission of the Record on Appeal. It is understood and agreed that once a request for preparation of a Record on Appeal is made by submission of this form, the Appellant is responsible for the costs of preparing the Record on Appeal, regardless of whether the Appeal is successful, dismissed, the time is extended, or a party elects to not transmit the Record on Appeal to the Appellate Court. The Clerk of the Circuit Court of Cook County reserves the right to pursue a claim to recover the costs and expenses, including reasonable attorneys' fees, related to preparation of the Record on Appeal. It is also understood and agreed that Appellant is responsible for filing the Record on Appeal at the Appellate Court.

ANDJELKO GALIC

(Type or print name)

Andjelko Galic

(Signature of Appellant or Appellant's Attorney)

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

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

GMAC,)
Plaintiff,)
)
vs.) No.: 07 CH 29738
)
JOSEPH YOUNIS, et. al.,)
Defendants.)

STATUS REGARDING PENDING CLAIMS

Counter-Plaintiff, RICHARD DANIGGELIS, through his attorney, Andjelko Galic, pursuant to this court's last order submits the following as his report regarding the status of claims currently pending before this court.

Pleadings

1. GMAC filed its foreclosure complaint on October 17, 2007. This foreclosure complaint was primarily directed against Joseph Younes because Younes recorded a mortgage against this property. Richard Daniggelis was also named as defendant in this foreclosure case based on, among other things, him having possession of the property at the time the foreclosure action was filed.
2. Richard Daniggelis was represented by several attorneys including CVLS. With its Answer to Plaintiff's complaint CVLS also filed Affirmative Defenses and Counterclaims on behalf of Richard Daniggelis. The file on this case covering the time period between October of 2007 and October of 2009 is incomplete and in spite of my effort to recreate a complete copy of the file, in the past, the file was not recreated. For reasons that are not apparent on the record, Justice Delort, while he was handling this file in the Chancery Division, has kept this court file in

his chambers and in order to review this file special arrangement had to be made with his clerk and one could not have reviewed this file through regular procedure in the Clerk's office. The Clerk of the Circuit Court did not start scanning court files until sometimes in September or October of 2009 and thus this time period between October of 2007 and October of 2009 cannot be recovered through the data maintained on the computer system in the Clerk's office. This is relevant for purposes of determining what exact affirmative defenses and counterclaims may have been filed during that time period. On July 30, 2008 Richard Daniggelis filed Answer to Plaintiffs Complaint, Affirmative Defenses, Counterclaims and Cross-Claims and this filing is not in the court file. On April 13, 2009 Richard Daniggelis also filed Second Amended Answer, Affirmative Defenses ad Counterclaims and this document was also missing in the court file during my recent review of the portion of the file that was made available by the Appellate Division in the Clerk's office where they are currently preparing this record for appeal.

3. On August 07, 2014 Judge Otto entered an order dismissing the foreclosure case and transferred all other pending claims to the Law Division. The August 7, 2014 order did not specifically indicate what counts were to be transferred to the Law Division. Judge Otto was working with the latest version of the Plaintiff's Complaint and with the latest version of Richard Daniggelis' counterclaims.

4. In 2007, LaSalle Bank, the original plaintiff, filed the foreclosure action. Plaintiff's Third Amended Complaint was filed on October 7, 2011 and it was in three Counts. Count I of the Complaint was a mortgage foreclosure action, asserting that mortgagor Younes has defaulted on the July 2006 loan. Count II of the Bank's Complaint was seeking equitable subrogation to the Deutsche Bank loan which was paid off at the July 2006 closing. Count III of the Complaint

sought to recover principal and interest on the July 2006 loan based on the theory of unjust enrichment.

5. Daniggelis answered the Complaint and brought an 11- count Counterclaim. The several counts of the Counterclaim seek relief against many counter -defendants, including the Plaintiff, Joseph Younes, Erica Rhones, Paul Shelton, Stewart Tile, MERS, Trust One Mortgage, Invest One LLC, D&B Group, and others. Multiple legal theories were raised in these counterclaims.

6. Count I of Richard's Counterclaim was a Quiet Title action based on invalidity of the deed utilized to transfer Daniggelis' property to Joseph Younes. In this Count Daniggelis sought to quiet title in himself because the defendants knew or should have known that the deed had been altered on its face and no longer valid when the closing occurred. This Count I was directed against: LaSalle Bank, Joseph Younes, MERS, and against Unknown Owners and Non-Record Claimants.

7. Count II of Richard's Counterclaim was a Quiet Title action based on Invalid Power of Attorney. Here Daniggelis is to quiet title in himself, because defendants knew or should have known that Daniggelis did not consent to the closing because the power of attorney specified that it was only to be used to pay the arrearages on his house and not for any other purpose. Count II was directed against the Plaintiff, LaSalle Bank, against MERS, Joseph Younes and against Unknown Owners and Non-Record Claimants.

8. In Count III Daniggelis sought to rescind the transaction against LaSalle Bank, Paul Shelton, Erica Rhone, John LaRugue, MERS, Trust One Mortgage, Invest One LLC, D&B Group and also against Unknown Owners and Non-Record Claimants.

9. Count IV of Richard Daniggelis' Counterclaim was based on Common Law Fraud and it was directed against Paul Shelton and Erica Rhone.

10. Count V of Richard Daniggelis' counterclaim was a Quiet Title action directed against LaSalle Bank, Joseph Younes, MERS and Unknown Owners and Non-Record Claimants. This count was based on Erika Rhone and Paul Shelton's fraud.

11. Count VI of Richard's Counterclaim was an action based on Breach of Fiduciary Duty and it was directed against Erica Rhone and against Paul Shelton.

12. Count VII of Richard's Counterclaim was based on Civil Conspiracy theory and it was directed against Paul Shelton, Erica Rhone and Joseph Younes.

13. Count VIII of Richard's Counterclaim was based on theory of conversion and it was directed against Paul Shelton, Erica Rhone, John LaRogue, Trust One Mortgage, Invest One, LLC, and against D&B Group.

14. Count IX of Richard Daniggelis' Counterclaim was based on Consumer Fraud and Deceptive Practice Act and it was directed against Paul Shelton, Erica Rohne, Trust One Mortgage and against Invest One, LLC.

15. Count X of this Counterclaim was a Consumer Fraud claim directed only against Stewart Title.

16. Count XI was based on Negligence and it was also directed only against Stewart Title.

Disposition

17. Judge Otto granted Plaintiff's Motion for Summary Judgment on Counts I, II, III and V of the Counterclaim. Counts I, II, III and V have not been resolved insofar as they relate to other defendants.

18. Count IV of Richard's Counterclaim remains unresolved in its entirety.
19. Count VI remains unresolved in its entirety.
20. Count VII was resolved insofar as it relates to Joseph Younes and it remains unresolved as it relates to Paul Shelton and Erica Rhone.
21. Count VIII was resolved as against Defendant John LaRogue. This count remains unresolved as it relates to all other defendants.
22. Count IX remains unresolved in its entirety.
23. Count X was resolved in its entirety by settlement with Stewart Title.
24. Count XI was resolved in its entirety by settlement with Stewart Title.

Respectfully submitted

/s/Andjelko Galic
Attorney for Richard Daniggelis

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2007-CH-29738
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Law Firm of Andjelko Galic, Inc.
34 N. LaSalle Street
Suite 1040
Chicago, Illinois 60602
Tel. 312 986 1510
Attorney No.: 33013

Gerald S. Jones

From: Gww1210@aol.com
Sent: Tuesday, December 08, 2015 3:25 PM
To: Gerald S. Jones
Subject: Re: small Public Records Request for 7 items in

134
\$40.00

In a message dated 12/3/2015 5:30:58 P.M. Eastern Standard Time, Gww1210@
I have a Public Records Request of
<https://w3.courtlink.lexisnexis.com/cookcounty/Finddock.asp?DocketKey=CAAH02007-CH-29738>, GMAC v Daniggelis, CHANCERY for these sev

Activity Date: 5/15/2014 ✓ Participant: GMAC MORTGAGE LC

MEMORANDUM OF JUDGEMENT ENTERED

Court Room: 2804

Judge: OTTO, MICHAEL F.

Activity Date: 5/15/2014 ✓ Participant: GMAC MORTGAGE LC

VOLUNTARY DISMISSAL, NON-SUIT OR DISMISSED BY AGREEMENT

Court Room: 2810

Judge: KYRIAKOPOULOS, ANTHONY C.

Activity Date: 6/17/2014 ✓ Participant: DANIGGELIS RICHARD

ANSWER TO MOTION FILED

Attorney: GALIC ANDJELKO

Activity Date: 5/29/2015 ✓ Participant: GMAC MORTGAGE LLC

REVIEWING COURT ORDER RECEIVED

Court Room: 2403

Judge: APPELLATE COURT

Activity Date: 7/14/2015 ✓ Participant: DANIGGELIS RICHARD

REQUEST FOR PREPARATION OF RECORD

Court Fee: 110.00

Attorney: GALIC ANDJELKO

Activity Date: 7/31/2015 ? Participant: GMAC MORTGAGE LLC

CASE SCANNED

Attorney: PIERCE & ASSOCIATES

Activity Date: 11/23/2015 Participant: DANIGGELIS RICHARD

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

US Bank: N A Plaintiff

v.
RICHARD DANIGGELIS, et al. Defendant

No. 07CH29738

TRANSFER ORDER

The above-entitled and numbered cause having been previously assigned to

Judge OTTO, Chancery Calendar # 61

has been transferred to the Presiding Judge of the Chancery Division for the

- Law Division
- Law Division, (Tax Section)
- County Division
- Probate Division
- Domestic Relations Division
- Municipal Department, District 1 District 2
- District 3 District 4 District 5

115

The reason for said transfer: FORECLOSURE COUNTS DISMISSED

Judge Michael F. Otto

AUG 07 2014

Judge Circuit Court - 2065 Judge's No.

IT IS HEREBY ORDERED that the said cause be and the same is hereby transferred to

Judge _____, Presiding Judge of the _____

DATE:

FILED
JUDGE MOSHE JACOBUS-1556
 AUG 12 2014
 DOROTHY BROWN
 CLERK OF THE CIRCUIT COURT
 OF COOK COUNTY, IL
 DEPUTY CLERK

MOSHE JACOBUS
 PRESIDING JUDGE
 CHANCERY DIVISION
 No. 1556

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

STATE OF ILLINOIS

ATTY NO. 91220

COUNTY OF COOK

FILED - 3

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT - CHANCERY DIVISION

CLERK

GMAC MORTGAGE, LLC

PLAINTIFF

NO. _____ CLERK

VS

JUDGE

JOSEPH YOUNES; MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC., AS NOMINEE
FOR HLB MORTGAGE; RICHARD DANIGGELIS;
UNKNOWN HEIRS AND LEGATEES OF JOSEPH
YOUNES, IF ANY; UNKNOWN OWNERS AND NON
RECORD CLAIMANTS ;

DEFENDANTS

07CH29738

COMPLAINT TO FORECLOSE MORTGAGE

For its Complaint Plaintiff says:

1. Plaintiff files this Complaint to Foreclose the mortgage, trust deed or other conveyance in the nature of a mortgage (hereinafter called "Mortgage") hereinafter described, pursuant to 735 ILCS 5/15-1101 et. seq. of the Illinois Code of Civil Procedure, and joins persons named in the caption as "Defendants", as parties hereto.
2. Attached as "EXHIBIT A" is a true copy of the Mortgage. Attached as "EXHIBIT B" is a true copy of the Note secured thereby.
3. Information concerning said Mortgage:
 - (a) Nature of the instrument: Mortgage.
 - (b) Date of the Mortgage: July 28, 2006
 - (c) Name of the mortgagors or grantors:
JOSEPH YOUNES;
 - (d) Name of the mortgagee, trustee or grantee in the Mortgage:
M.E.R.S., INC. AS NOMINEE FOR HLB MORTGAGE
 - (e) Date of Recording or Registering: August 16, 2006
 - (f) Place of Recording or Registering:
Office of the Recorder of Deeds of Cook County, Illinois
 - (g) Identification of Recording: Document No. 0622826138

- (h) Interest Subject to the mortgage: Fee Simple.
- (i) Amount of Original Indebtedness: \$583,100.00
- (j) Capacity in which Plaintiff brings this suit: Plaintiff is the legal holder, agent or nominee of the legal holder, of the indebtedness. Plaintiff is the owner, agent or nominee of the owner, of the Mortgage given as security.
- (k) Legal description of mortgaged premises:

THE EAST 66 FEET OF LOT 8 IN C.J. HULLS SUBDIVISION OF BLOCK 51 IN CANAL TRUSTEE'S SUBDIVISION OF SECTION 33, TOWNSHIP 40 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

COMMONLY KNOWN AS:

1720 NORTH SEDGWICK STREET
CHICAGO, IL 60614

TAX ID# 14-33-324-044-0000

- (l) Statement as to amount now due: After all payments received have been applied, mortgagors are now in default for the monthly payments for June 2007 through the present; the balance due on the Note and the Mortgage is the total of the principal balance of \$579,991.10, plus interest, costs and fees, and advances if any, made by the plaintiff. The current per diem interest rate is \$139.04.
- (m) Name of present owners of said premises:
JOSEPH YOUNES;
- (n) Names of persons in addition to said owners, but excluding any non-record claimants as defined in the Illinois Mortgage and Foreclosure Act who are joined as Defendants and whose interest in, or lien on, the mortgaged real estate is sought to be terminated:

M.E.R.S., INC. AS NOMINEE FOR HLB MORTGAGE, by virtue of a mortgage executed by JOSEPH YOUNES, dated 07/28/2006 recorded/registered 08/16/2006 in the Office of the Recorder/Registrar of Deeds COOK County, Illinois, as document no. 0622826139, to secure a note in the principal sum of \$ 166,600.00; said lien is inferior to that of the Plaintiff herein.

RICHARD DANIGGELIS AS DISCLOSED BY NOTICE OF FORGERY DATED 04/20/2007, AND RECORDED 04/20/2007 IN THE OFFICE OF THE RECORDER OF DEEDS, COOK COUNTY, ILLINOIS AS DOCUMENT NUMBER 0711039132. THE INTEREST OF THIS PARTY IS INFERIOR TO THE PLAINTIFF.

UNKNOWN HEIRS AND LEGATEES OF JOSEPH YOUNES, IF ANY, by virtue of the fact that, upon information and

belief, may have some interest in the subject real estate. The interest, if any, of this defendant is subordinate and inferior to the lien and interest of the plaintiff herein.

- (o) Names of persons claimed to be personally liable for deficiency unless personal liability is discharged in a Bankruptcy proceeding, or otherwise released:

JOSEPH YOUNES;

- (p) Plaintiff seeks to include in the Judgment the Plaintiff's attorneys' fees, costs and expenses.

- 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 the name and description of UNKNOWN OWNERS and NON-RECORD CLAIMANTS.

- 5. That should a deficiency result from the foreclosure sale of the subject property, Plaintiff may seek an In Personam or an In Rem deficiency judgment, unless the defendant(s) which are liable on the subject mortgage note have had personal liability on said note discharged in a Bankruptcy proceeding or if said liability has been otherwise discharged or released.
- 6. That should the subject property be vacant, the Plaintiff may seek to have the Court find that the property is abandoned pursuant to 735 ILCS 5/15-1603, Illinois Code of Civil Procedure.
- 7. That the Plaintiff may seek appointment of Mortgagee in Possession or appointment of receiver.

WHEREFORE, PLAINTIFF REQUESTS:

- 1. A Judgment of Foreclosure and Sale.
- 2. A Judgment for attorneys' fees, costs and expenses.
- 3. An Order Approving the Foreclosure Sale and an Order granting possession.
- 4. An In Personam or an In Rem Deficiency Judgment, if sought, unless defendant(s) have had personal liability on the subject mortgage note discharged in a Bankruptcy proceeding, or otherwise released.
- 5. An order granting a shortened redemption period, if

sought.

6. Appointment of Mortgagee in Possession or Receiver, if sought.
7. Such other and further relief as the Court deems just.

GMAC MORTGAGE, LLC

By: _____

Jaimee L. Ward

PIERCE & ASSOCIATES
Its Attorneys

PIERCE & ASSOCIATES, Attorneys for Plaintiff, Suite 1300,
1 North Dearborn, Chicago, Illinois 60602
TEL. (312) 346-9088, FAX (312) 346-1557, PA0715886

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
Mortgage Foreclosure/
Mechanics DEPARTMENT/ DISTRICT
Lien

GMAC Mortgage, et.al Plaintiff
v.
Joseph Younes Defendant

No. 07 CH 29738
Claimed \$: _____
Return Date: _____
Court Date: _____
Room No.: 2803 (J. DeIort)

FILED
AUG 13 2010
DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL

Address of Court District for Filing

APPEARANCE AND JURY DEMAND*

- General Appearance 0900 - Fee Paid 0909 - No Fee
- 0904 - Fee Waived 0908 - Trial Lawyers Appearance - No Fee
- Jury Demand* 1900 - Appearance and Jury Demand/Fee Paid
- 1909 - Appearance and Jury Demand/No Fee Paid

The undersigned enters the appearance of: Plaintiff Defendant

Richard Daniggelis
(Insert Litigant's Name)

Richard Daniggelis
Signature

- Initial Counsel of Record Pro Se (Self-represented)
- Additional Appearance Substitute Appearance

ATTORNEY NO.: _____ PRO SE: 99500

(Please complete the following contact information.)

Name: RICHARD DANIGGELIS
Atty. for: _____
Address: 1720 N SEDGWICK ST
City/State/Zip: CHICAGO, IL 60614
Telephone: (312) 642-0044

Important
Once this Appearance form is filed, photocopies of this form must be sent to all other parties named in this case (or to their attorneys) using either regular mail, facsimile transmission (fax) or personal delivery. (See Illinois Supreme Court Rules 11 and 13 for more information.)

*Strike demand for trial by jury if not applicable.

I certify that a copy of the within instrument was served on all parties who have appeared and have not heretofore been found by the Court to be in default for failure to plead.

Attorney for

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

Chancery DEPARTMENT/ 1 DISTRICT

LaSalle Bank

v. Plaintiff

Richard Daniggelis

Defendant

No. 07 C/H 29738

Claimed \$:

Return Date:

Court Date: 2/28

Room No.: 2803

Address of Court District for Filing

APPEARANCE AND JURY DEMAND*

General Appearance

0900 - Fee Paid

0909 - No Fee

0904 - Fee Waived

0908 - Trial Lawyers Appearance - No Fee

Jury Demand*

1900 - Appearance and Jury Demand/Fee Paid

1909 - Appearance and Jury Demand/No Fee Paid

The undersigned enters the appearance of: Plaintiff Defendant

Richard Daniggelis

(Insert Litigant's Name)

Signature

Initial Counsel of Record

Pro Se (Self-represented)

Additional Appearance

Substitute Appearance

ATTORNEY NO.: 46311

PRO SE: 99500

(Please complete the following contact information.)

Name: David Cooper

Atty. for: Daniggelis

Address: 3622 N. Fremont St. #2

City/State/Zip: Chicago, IL 60613

Telephone: 312 375 5633

*Strike demand for trial by jury if not applicable.

I certify that a copy of the within instrument was served on all parties who have appeared and have not heretofore been found by the Court to be in default for failure to plead.

Signature of Attorney for Defendant

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

Important
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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

DEPARTMENT/

DISTRICT

BANK OF AMERICA

Plaintiff

v.

Richard DANIGGELIS

Defendant

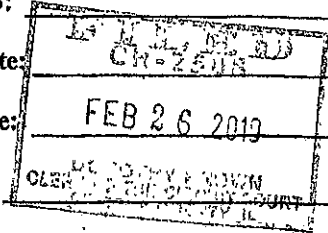
No. 07CH29738

Claimed \$:

Return Date:

Court Date:

Room No.:



Address of Court District for Filing

APPEARANCE AND JURY DEMAND*

0909

General Appearance

0900 - Fee Paid

0909 - No Fee

0904 - Fee Waived

0908 - Trial Lawyers Appearance - No Fee

Jury Demand*

1900 - Appearance and Jury Demand/Fee Paid

1909 - Appearance and Jury Demand/No Fee Paid

The undersigned enters the appearance of: Plaintiff

Defendant

Richard DANIGGELIS

(Insert Litigant's Name)

Richard Daniggelis
Signature

Initial Counsel of Record

Pro-Se (Self-represented)

Additional Appearance

Substitute Appearance

ATTORNEY NO.: 40311

PRO SE: 99500

(Please complete the following contact information.)

Name: LAW OFFICE OF DAVID COOPER

Atty. for: DEFENDANT

Address: 3688 NORTH FREMONT ST.

City/State/Zip: CHGO, IL 60618

Telephone: 312-375-5633

*Strike demand for trial by jury if not applicable.

I certify that a copy of the within instrument was served on all parties who have appeared and have not heretofore been found by the Court to be in default for failure to plead.

Attorney for

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

ORIGINAL - COURT FILE

Important
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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

JAN 19 AM 11:42
LASALLE BANK N.A. et al.,)
)
Plaintiffs,)
)
vs.)
)
RICHARD DANIGGELIS, et al.)
)
Defendants.)

Case No. **07-CH 29738**

Judge Delort

APPEARANCE

The undersigned enters a **General Appearance** on behalf of:

the COUNTER-DEFENDANTS,

PAUL L. SHELTON
TRUST ONE MORTGAGE CORPORATION
INVEST ONE, LLC

SHELTON LAW GROUP, LLC

By: Richard Gellersted
Attorneys for Defendants

Atty No 15323
Richard Gellersted
SHELTON LAW GROUP, LLC
1415 W 22nd Street – Tower east
Oak Brook, IL 60523
630-575-0575
630-575-0316 fax

I certify that a copy of the within instrument was served on all parties who have appeared and have not heretofore been found by the Court to be in default for failure to plead.

Richard Gellersted
Attorney for Defendants

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

JAN 19 AM 11:42

LASALLE BANK N.A. et al.,)

Plaintiffs,)

vs.)

RICHARD DANIGGELIS, et al.)

Defendants.)

Case No. 07-CH 29738

Judge Delort

APPEARANCE

The undersigned enters a **General Appearance** on behalf of:
the COUNTER-DEFENDANTS,

PAUL L. SHELTON
TRUST ONE MORTGAGE CORPORATION
INVEST ONE, LLC

SHELTON LAW GROUP, LLC

By: Richard Gellersted
Attorneys for Defendants

Atty No 15323
Richard Gellersted
SHELTON LAW GROUP, LLC
1415 W 22nd Street - Tower east
Oak Brook, IL 60523
630-575-0575
630-575-0316 fax

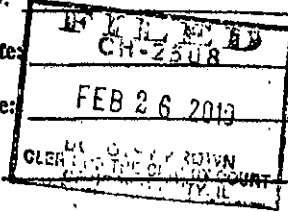
I certify that a copy of the within instrument was served on all parties who have appeared and have not heretofore been found by the Court to be in default for failure to plead.

Richard Gellersted
Attorney for Defendants

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

DEPARTMENT/ DISTRICT

BANK OF AMERICA Plaintiff
v.
RICHARD DANIGGELIS Defendant

No. 07CH29738
Claimed \$:
Return Date:
Court Date: FEB 26 2013
Room No.:


Address of Court District for Filing

APPEARANCE AND JURY DEMAND* **0909**

- General Appearance
- 0900 - Fee Paid
- 0909 - No Fee
- 0904 - Fee Waived
- 0908 - Trial Lawyers Appearance - No Fee
- Jury Demand*
- 1900 - Appearance and Jury Demand/Fee Paid
- 1909 - Appearance and Jury Demand/No Fee Paid

The undersigned enters the appearance of: Plaintiff Defendant

RICHARD DANIGGELIS
(Insert Plaintiff's Name)

Richard Daniggelis
Signature

- Initial Counsel of Record
- Pro Se (Self-represented)
- Additional Appearance
- Substitute Appearance

ATTORNEY NO.: 46311 PRO SE: 99500

(Please complete the following contact information.)
Name: LAW OFFICE OF DAVID COOPER
Atty. for: DEPENDANT
Address: 3682 NORTH FREMONT ST.
City/State/Zip: CHGO, IL 60613
Telephone: 312-375-5633

Important
Once this Appearance form is filed, photocopies of this form must be sent to all other parties named in this case (or to their attorneys) using either regular mail, facsimile transmission (fax) or personal delivery. (See Illinois Supreme Court Rules 11 and 13 for more information.)

*Strike demand for trial by jury if not applicable.

I certify that a copy of the within instrument was served on all parties who have appeared and have not heretofore been found by the Court to be in default for failure to plead.

Attorney for

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

ORIGINAL - COURT FILE

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION

LaSalle Bank, N.A.
Plaintiff

v.

Richard Daniggegi, et al.
Defendant

07CH 29738
No. 09CH 24778

APPEARANCE

- GENERAL APPEARANCE 0900 - APPEARANCE - FEE PAID; 0909 - APPEARANCE - NO FEE;
0904 - APPEARANCE FILED - FEE WAIVED
- SPECIAL AND LIMITED APPEARANCE 0905 - SPECIAL APPEARANCE - FEE PAID
0906 - SPECIAL APPEARANCE - NO FEE
- JURY DEMAND 1900 - APPEARANCE & JURY DEMAND FEE PAID; 1909 APPEARANCE & JURY DEMAND NO FEE

The undersigned enters the appearance of: Plaintiff Defendant

John LaRocque, Third Party Defendant
(INSERT LITIGANT'S NAME)

Stone McGuire & Siegel P.C. GCEP
SIGNATURE

- INITIAL COUNSEL OF RECORD PRO SE
- ADDITIONAL APPEARANCE SUBSTITUTE APPEARANCE

A copy of this appearance shall be given to all parties who have appeared and have not been found by the Court to be in default.

ATTORNEY

NAME: Stone, McGuire & Siegel, P.C.

ATTORNEY FOR: John LaRocque

ADDRESS: 801 Skokie Blvd.

CITY/STATE/ZIP: Northbrook, IL 60062

TELEPHONE: (847) 239-7555

ATTORNEY NUMBER: 42247

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

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, ██████ DIVISION
CHANCERY

LaSalle Bank, N.A.,
Plaintiff

v.

Richard Daniggelis, et al.,
Defendant

No. 07 CH 29738

Calendar: 61

APPEARANCE

- GENERAL APPEARANCE 0900 - APPEARANCE - FEE PAID; 0909 - APPEARANCE - NO FEE;
0904 - APPEARANCE FILED - FEE WAIVED
- SPECIAL AND LIMITED APPEARANCE 0905 - SPECIAL APPEARANCE - FEE PAID
0906 - SPECIAL APPEARANCE - NO FEE
- JURY DEMAND 1900 - APPEARANCE & JURY DEMAND FEE PAID; 1909 APPEARANCE & JURY DEMAND NO FEE

The undersigned enters the appearance of: Plaintiff Defendant

Stewart Title of Illinois
(INSERT LITIGANT'S NAME)


SIGNATURE

- INITIAL COUNSEL OF RECORD PRO SE
- ADDITIONAL APPEARANCE SUBSTITUTE APPEARANCE

A copy of this appearance shall be given to all parties who have appeared and have not been found by the Court to be in default.

ATTORNEY

PRO SE

NAME: Carrie A. Dolan/Cohon Raizes & Regal LLP

ATTORNEY FOR: Defendant Stewart Title of Illinois

ADDRESS: 208 S. LaSalle Street, Suite 1860

CITY/STATE/ZIP: Chicago, Illinois 60604

TELEPHONE: (312) 726-2252

INSURANCE COMPANY: _____

ATTORNEY NUMBER: 90192

NAME: _____

ADDRESS: _____

CITY/STATE/ZIP: _____

TELEPHONE: _____

INSURANCE COMPANY: _____

ATTORNEY NUMBER 99500

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT - CHANCERY DIVISION

LASALLE BANK NATIONAL)
ASSOCIATION, AS TRUSTEE FOR)
MORGAN STANLEY MORTGAGE)
LOAN TRUST 2006-16AX)
Plaintiff,)
vs.)
RICHARD DANIGGELIS)
Defendant, Counter-Plaintiff,)
Cross Plaintiff,)
JOSEPH YOUNES; MORTGAGE)
ELECTRONIC REGISTRATION)
SYSTEMS, INC. AS NOMINEE FOR HLB)
MORTGAGE UNKNOWN HERIS AND)
LEGATEES OF JOESPH YOUNES, IF)
ANY; UNKNOWN OWNERS AND NON)
RECORD CLAIMANTS,)
Defendants, Cross-)
Defendants)
PAUL SHELTON; ERIKA RHONE;)
STEWART TITLE OF ILLINOIS,)
Respondents in Discovery)
Defendants.)

07 CH 29738

AMENDED APPEARANCE

The undersigned, as attorney, enters the appearance on behalf of Plaintiff

**LASALLE BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR MORGAN
STANLEY MORTGAGE LOAN TRUST 2006-16AX,**

and the law firm of Kropik, Papuga & Shaw as attorneys for said Plaintiff.

Attorneys for Plaintiff

Kropik, Papuga & Shaw
120 S. LaSalle St.
Chicago, Illinois 60603
(312) 236-6405
Attorney No. 91024

I certify that a copy of this appearance was served on all parties who have
appeared and have not been found by the Court to be in default.

Attorneys for Plaintiff

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT - CHANCERY DIVISION

LASALLE BANK NATIONAL ASSOCIATION
as Trustee for Morgan Stanley Loan Trust
2006-16AX,

plaintiff,

vs.

No. 07 CH 29738

JOSEPH YOUNES, MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC., as nominee
for HLB MORTGAGE, RICHARD DANIGGELIS,
et al.,

defendants.

07/15/07 01:59:10

ADDITIONAL
~~APPEARANCE AND JURY DEMAND~~

The undersigned, as attorney, enters the additional appearance of the plaintiff

LASALLE BANK NATIONAL ASSOCIATION,
as Trustee for Morgan Stanley Loan Trust 2006-16AX

defendant demands trial by jury, [six] [12] jurors

Name	John K. Kallman
Attorney for	Plaintiff
Address	221 North LaSalle Street, Suite 1200
City	Chicago, IL 60601
Telephone	(312) 578-1515
Facsimile	(312) 332-3920
Atty No.	25182

I certify that a copy of the within instrument was served on all parties who have appeared and have not heretofore been found by the Court to be in default for failure to plead.

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

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
CHANCERY DEPARTMENT, FIRST DISTRICT

LaSalle Bank National Association)
as trustee for Morgan Stanley Loan Trust)
2006-16AX)
Plaintiff.)

Case No. 07 CH 29738


v.)

Joseph Younes, Mortgage Electronic)
Registration Systems, Inc., as nominee for)
HLB Mortgage, Richard Daniggelis, et.al.)

AMENDED ADDITIONAL APPEARANCE


The undersigned, as attorney, enters the additional appearance of the Plaintiff

LaSalle Bank National Association as trustee for Morgan Stanley Loan Trust 2006-16AX



Name Richard Indyke
Attorney for LaSalle Bank National Association, as Trustee
Address 221 N. LaSalle St., Suite 1200
City Chicago, Illinois 60601-1305
Telephone 312-332-2828
Atty No. 20584

I certify that a copy of the within instrument was served on all parties who have appeared and have not heretofore been found by the Court to be in default for failure to plead.



Attorney for Plaintiff

CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT - CHANCERY DIVISION

GMAC MORTGAGE, LLC,)
Plaintiff,)
v.)
RICHARD DANIGGELIS)
Defendant, Counter-Plaintiff,)
Cross Plaintiff,)
JOSEPH YOUNES; MORTGAGE)
ELECTRONIC REGISTRATION)
SYSTEMS, INC. AS NOMINEE FOR HLB)
MORTGAGE UNKNOWN HERIS AND)
LEGATEES OF JOESPH YOUNES, IF)
ANY; UNKNOWN OWNERS AND NON)
RECORD CLAIMANTS,)
Defendants, Cross-)
Defendants)
PAUL SHELTON; ERIKA RHONE;)
STEWART TITLE OF ILLINOIS,)
Respondents in Discovery)
Defendants.)

07 CH 29738

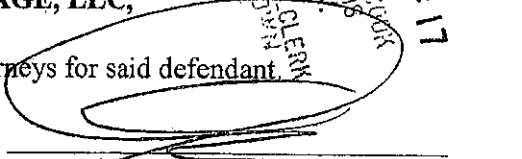
APPEARANCE

The undersigned, as attorney, enters the appearance on behalf of defendant

**MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., AS NOMINEE
FOR GMAC MORTGAGE, LLC,**

and the law firm of Kropik, Papuga & Shaw as attorneys for said defendant.

FILED
09 MAR -5 PM 4:17
CLERK
COURT
CHANCERY DIVISION
COOK COUNTY ILLINOIS
Dated this 5th day of March 2009


Attorneys for Defendant

Kropik, Papuga & Shaw
120 S. LaSalle St.
Chicago, Illinois 60603
(312) 236-6405
Attorney No. 91024

I certify that a copy of this appearance was served on all parties who have appeared and have not been found by the Court to be in default.

Attorneys for Defendant

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
CHANCERY DIVISION
COUNTY _____ DEPARTMENT/ _____ DISTRICT

GMAC MORTGAGE, LLC

Plaintiff

v.

RICHARD DANIGGELIS, ET AL.

Defendant

No. 07 CH 29738

Claimed \$: _____

Return Date: _____

Court Date: _____

Room No.: _____

Address of Court District for Filing

APPEARANCE ~~APPEARANCE~~*

- General Appearance
- ~~Jury Demand~~*
- 0900 - Fee Paid
- 0904 - Fee Waived
- 0909 - No Fee
- 0908 - Trial Lawyers Appearance - No Fee
- 1900 - Appearance and Jury Demand/Fee Paid
- 1909 - Appearance and Jury Demand/No Fee Paid

2007 SEP 25 4:10:19 PM
CLERK OF COURT
COURT DISTRICT FOR FILING

The undersigned enters the appearance of: Plaintiff Defendant

JOSEPH YOUNES

(Insert Litigant's Name)

[Handwritten Signature]
Signature

- Initial Counsel of Record
- Additional Appearance
- Pro Se (Self-represented)
- Substitute Appearance

ATTORNEY NO.: 55295 PRO SE: 99500

(Please complete the following contact information.)

Name: Craig A. Cronquist Maloney & Craven, P.C.

Atty. for: Joseph Younes

Address: 2093 Rand Road

City/State/Zip: Des Plaines, Illinois 60016

Telephone: 847-635-1341

*Strike demand for trial by jury if not applicable.

I certify that a copy of the within instrument was served on all parties who have appeared and have not heretofore been found by the Court to be in default for failure to plead.

Important
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[Handwritten Signature]
Attorney for

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

0909

0900 - Appearance Only
Appearance

(3-81) CCG-9

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION: 34

FILED
08/11/09 AM 9:34
CLERK OF THE CIRCUIT COURT
DOMESTIC RELATIONS
DOROTHY BROWN
CLERK

GMAC MORTGAGE, LLC,
Plaintiff,

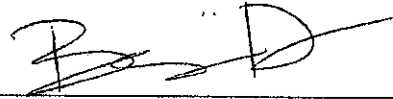
v.

JOSEPH YOUNES, ET AL.
Defendants.

07 CH 29738

APPEARANCE

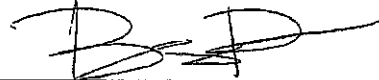
The undersigned, as attorney, enters the appearance of the defendant Richard Daniggelis.



Benji Philips

Name: Benji Philips
Firm: Chicago Volunteer Legal Services
Attorney for: Defendant Richard Daniggelis
Address: 100 N. LaSalle #900
City: Chicago, IL 60602-2405
Telephone: 312-332-7521
Atty No. 91139

I certify that a copy of the within instrument was served on all parties who have appeared and have not heretofore been found by the Court to be in default for failure to plead.



Attorney

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

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
Mortgage Foreclosure/
Mechanics DEPARTMENT/ DISTRICT
Lien

GMAC Mortgage, et. al
Plaintiff
v.
Joseph Younes
Defendant

No. 07 CH 29738
Claimed \$:
Return Date:
Court Date:
Room No.: 2803 (J. Delort)

FILED
CH.
AUG 19 2010
DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL

Address of Court District for Filing

APPEARANCE AND JURY DEMAND*

- General Appearance
- 0900 - Fee Paid
- 0909 - No Fee
- 0904 - Fee Waived
- 0908 - Trial Lawyers Appearance - No Fee
- Jury Demand*
- 1900 - Appearance and Jury Demand/Fee Paid
- 1909 - Appearance and Jury Demand/No Fee Paid

The undersigned enters the appearance of: Plaintiff Defendant

Richard Daniggelis
(Insert Litigant's Name)

Richard Daniggelis
Signature

- Initial Counsel of Record
- Pro Se (Self-represented)
- Additional Appearance
- Substitute Appearance

ATTORNEY NO.: PRO SE: 99500

(Please complete the following contact information.)

Name: RICHARD DANIGGELIS
Atty. for:
Address: 1720 N SEDGWICK ST.
City/State/Zip: CHICAGO, IL 60614
Telephone: (312) 642-0044

Important
Once this Appearance form is filed, photocopies of this form must be sent to all other parties named in this case (or to their attorneys) using either regular mail, facsimile transmission (fax) or personal delivery. (See Illinois Supreme Court Rules 11 and 13 for more information.)

*Strike demand for trial by jury if not applicable.

I certify that a copy of the within instrument was served on all parties who have appeared and have not heretofore been found by the Court to be in default for failure to plead.

Attorney for

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

CIRCUIT COURT OF COOK COUNTY
LAW DIV., RM 2003 DALEY CTR.
CHICAGO, IL. 60602

ID: LD2007CH29738 20150807400003
SHELTON AND YOUNES
120 E OGDEN AV #1918
HINSDALE IL 60521

* * * * * N O T I C E * * * * *

CASE 07-CH-29738

GMAC MORTGAGE LLC V. YOUNES JOSEPH

THIS CAUSE IS SCHEDULED TO APPEAR ON THE TRIAL CALL FOR STATUS ON
WEDNESDAY, THE 26TH DAY OF AUGUST 2015, IN ROOM 2005 AT 10:30 A.M
AT THE R.J. DALEY CENTER, 50 W WASHINGTON, CHICAGO, IL

PLEASE BE PREPARED TO REPORT REGARDING THE NATURE OF THE CASE,
THE DAMAGES, AND ANY OUTSTANDING DISCOVERY.
THE ATTORNEY REPRESENTING THE PLAINTIFF, OR THE PRO SE PLAINTIFF
MUST PROVIDE A COPY OF THE TWO MOST RECENT CASE MANAGEMENT ORDERS
FOR THE ASSIGNMENT JUDGE TO REVIEW.

BY JUDGE JAMES P. FLANNERY JR.

**** ALL ATTORNEYS OF RECORD MUST APPEAR ****

ATTENTION: EFFECTIVE JANUARY 2, 2014, PARTIES RECEIVING
POSTCARD NOTICE WILL BE CHARGED A STATUTORY FEE OF \$15.00 +
POSTAGE. TO AVOID THIS FEE REGISTER FOR ELECTRONIC COURT
NOTICE AT WWW.COOKCOUNTYCLERKOF COURT.ORG.

CIRCUIT COURT OF COOK COUNTY
LAW DIV., RM 2003 DALEY CTR.
CHICAGO, IL. 60602

ID: LD2007CH29738 20150807400004
AT: INDYKE RICHARD
TO: RINDYKE@SECGLOBAL.NET

* * * * * N O T I C E * * * * *

CASE 07-CH-29738

GNAC MORTGAGE LLC V. YOUNES JOSEPH

THIS CAUSE IS SCHEDULED TO APPEAR ON THE TRIAL CALL FOR STATUS ON
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BY JUDGE JAMES P. FLANNERY JR.

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CIRCUIT COURT OF COOK COUNTY
LAW DIV., RM 2003 DALEY CTR.
CHICAGO, IL. 60602

ID: LD2007CH29738 20150807400005
KALLMAN JOHN K
221 N LASALLE #1200
CHICAGO IL 60601

* * * * * N O T I C E * * * * *

CASE 07-CH-29738

GMAC MORTGAGE LLC V. YOUNES JOSEPH

THIS CAUSE IS SCHEDULED TO APPEAR ON THE TRIAL CALL FOR STATUS ON
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CIRCUIT COURT OF COOK COUNTY
LAW DIV., RM 2003 DALEY CTR.
CHICAGO, IL. 60602

ID: LD2007CH29738 20150807400006
GALIC ANDJELKO
134N LASALLE 1810
CHICAGO IL 60602

* * * * * N O T I C E * * * * *

CASE 07-CH-29738

GMAC MORTGAGE LLC V. YOUNES JOSEPH

THIS CAUSE IS SCHEDULED TO APPEAR ON THE TRIAL CALL FOR STATUS ON
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CIRCUIT COURT OF COOK COUNTY
LAW DIV., RM 2003 DALEY CTR.
CHICAGO, IL. 60602

ID: LD2007CH29738 20150807400007
STONE MCGUIRE SIRGEL
801 SKOKIE BLVD#200
NORTHBROOK IL 60062

* * * * * N O T I C E * * * * *

CASE D7-CH-29738

GMAC MORTGAGE LLC V. YOUNES JOSEPH

THIS CAUSE IS SCHEDULED TO APPEAR ON THE TRIAL CALL FOR STATUS ON
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BY JUDGE JAMES P. FLANNERY JR.

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CIRCUIT COURT OF COOK COUNTY
LAW DIV., RM 2003 DALEY CTR.
CHICAGO, IL. 60602

ID: LD2007CH29738 20150807400008
AT: DAVID COOPER LAW OFFICE
TO: DCCOOPER@CCOOPERLAWCHICAGO.COM

* * * * * N O T I C E * * * * *

CASE 07-CH-29738

GMAC MORTGAGE LLC V. YOUNES JOSEPH

THIS CAUSE IS SCHEDULED TO APPEAR ON THE TRIAL CALL FOR STATUS ON
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BY JUDGE JAMES P. FLANNERY JR.

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CIRCUIT COURT OF COOK COUNTY
LAW DIV., RM 2003 DALEY CTR.
CHICAGO, IL. 60602

ID: LD2007CH29738 20150807400009
AT: MALONEY EUGENE WILLIAM
TO: NOTICES@MALONEYCRAVEN.COM

* * * * * N O T I C E * * * * *

CASE 07-CH-29738

GMAC MORTGAGE LLC V. YOUNES JOSEPH

THIS CAUSE IS SCHEDULED TO APPEAR ON THE TRIAL CALL FOR STATUS ON
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BY JUDGE JAMES P. FLANNERY JR.

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CIRCUIT COURT OF COOK COUNTY
LAW DIV., RM 2003 DALEY CTR.
CHICAGO, IL. 60602

ID: LD2007CH29738 20150807400010
AT: COHON RAIZES®AL LLP
TO: DOCKETING@COHONRAIZES.COM

* * * * * N O T I C E * * * * *

CASE 07-CH-29738

GMAC MORTGAGE LLC V. YOUNES JOSEPH

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CIRCUIT COURT OF COOK COUNTY
LAW DIV., RM 2003 DALEY CTR.
CHICAGO, IL. 60602

ID: LD2007CH29738 20150807400011
AT: KROPIK PAPUGA AND SHAW
TO: KROPIK@KROPIK.NET

* * * * * N O T I C E * * * * *

CASE 07-CH-29738

GMAC MORTGAGE LLC V. YOUNES JOSEPH

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BY JUDGE JAMES P. FLANNERY JR.

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CIRCUIT COURT OF COOK COUNTY
LAW DIV., RM 2003 DALEY CTR.
CHICAGO, IL. 60602

ID: LD2007CH29738 20150807400012
CHICAGO VOLUNTEER LEGAL SERV
33 N DEARBORN 400
CHICAGO IL 60602

* * * * * N O T I C E * * * * *

CASE 07-CH-29738

GMAC MORTGAGE LLC V. YOUNES JOSEPH

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CIRCUIT COURT OF COOK COUNTY
LAW DIV., RM 2003 DALEY CTR.
CHICAGO, IL. 60602

ID: LD2007CH29738 20150807400013
AT: PIERCE & ASSOCIATES
TO: CMCNOTICES@PIERCESERVICES.COM

* * * * * N O T I C E * * * * *

CASE 07-CH-29738

GNAC MORTGAGE LLC V. YOUNES JOSEPH

THIS CAUSE IS SCHEDULED TO APPEAR ON THE TRIAL CALL FOR STATUS ON
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BY JUDGE JAMES P. FLANNERY JR.

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10305/1

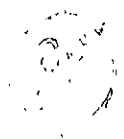
IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

GMAC

v

Yarnes

)
)
)
)
)
)
)



No. 07CH29738

ORDER

This case coming to be heard for status, and the Court determining that this case is appropriate for assignment to an (Please Circle):

Individual Commercial (Motion) (Individual Tax and Misc. Remedies) calendar

4418-8282-1870

IT IS HEREBY ORDERED that this case is assigned, pursuant to a random/prior computer assignment, to Judge Taylor

Calendar w, for case management. 4619

This case is set for case management on September 2, 2015

at 9:30 am/pm in Courtroom 1912

Name:
Atty. No:
Atty. For:
Address:
City:
Telephone:

Judge James P. Flannery, Jr.

AUG 26 2015

Circuit Court - 1505

ENTER:

JUDGE

CLERK OF THE CIRCUIT COURT OF COOK COUNTY

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

GMAC

v

Younes

No. 07 ch 29738

ORDER

Neither party having appeared, on the Court's own motion, this case is continued to 9-14-15 at 9:20 AM for status.

Failure to appear may result in the case being dismissed for want of prosecution.


4323

Atty No.
Atty Name:
Attorney for:
Address:
City:
Phone:

ENTERED
JUDGE SANJAY TAILOR-1870
SEP 2 2015
DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL
DEPUTY CLERK

CC
B.W.

Enter:



Dorothy Brown, Clerk of the Circuit Court of Cook County, Illinois

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

GMAC

v

Younes

No. 07 ch 29738

ORDER

Neither party having appeared, on the Court's own motion, this case is continued to 9-14-15 at 9:20 am for status.

Failure to appear may result in the case being dismissed for want of prosecution.

(Bw)

4217

ENTERED
JUDGE SANJAY TAILOR-1870
SEP 2 2015
DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, ILL.
DEPUTY CLERK

CC
B.W.

Atty No.
Atty Name:
Attorney for:
Address:
City:
Phone:

Enter:

Dorothy Brown, Clerk of the Circuit Court of Cook County, Illinois

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

GMAC

vs.

Younes

No. 07 CH 29738

CC MOD

CASE MANAGEMENT ORDER

This case is before the court for initial ___ subsequent status, or motion, counsel for ___ plaintiff, defendant, ___ third party defendant present, it is hereby ordered:
 Richard Damiguelis

- 4296 1. Non-opinion written discovery to be completed by _____
- 4218 2. Non-opinion oral discovery to be completed by _____
- 4296 3. _____ shall complete outstanding written discovery by _____
- 4218 4. _____ shall be presented for deposition by _____
- 4253 5. Plaintiff shall serve Rule 213 f (2) and (3) disclosures by _____
- 4253 6. Defendant shall serve Rule 213 f (2) and (3) disclosures by _____
- 4218 7. Plaintiff's 213 f (2) and (3) witnesses to be deposed by _____
- 4218 8. Defendant's 213 f (2) and (3) witnesses to be deposed by _____
- 4295 9. All discovery to be completed by _____
- 4231 10. All dispositive motions shall be filed and noticed no later than _____
- 4619 11. This matter is continued to _____ at _____ for:

(check one or more)

- | | | |
|--|--|---|
| <input type="checkbox"/> Service Status | <input type="checkbox"/> Pleadings Status | <input type="checkbox"/> Written Discovery Status |
| <input type="checkbox"/> Compliance Status | <input type="checkbox"/> Settlement Status | <input type="checkbox"/> Oral Discovery Status |
| <input type="checkbox"/> Default / Prove Up | <input type="checkbox"/> Final Pretrial | <input type="checkbox"/> Expert Discovery Status |
| <input type="checkbox"/> Pretrial (parties must be present unless excused by order of Court) | | |
| <input type="checkbox"/> Other _____ | | |

4482 12. Jury/Bench trial is set to begin on _____ at 10:30 a.m.

It is further ordered: This matter is continued for 4619
 further status on 10-7-2015 at 9:20 AM.

ENTERED
 JUDGE SANJAY TAILOR-1870
 SEP 14 2015
 DOROTHY BROWN
 CLERK OF THE CIRCUIT COURT
 OF COOK COUNTY, IL
 DEPUTY CLERK

Atty No. 33013
 Atty Name: ANDERKO SAUC
 Attorney for: Richard Damiguelis
 Address: 134 N. La Salle St. #1040
 City: CHICAGO, IL 60602
 Phone: 312 486-1510

[Signature]

Judge Sanjay T. Tailor No. 1870

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

GMAC Mortgage, LLC n/k/a: Bank of America, N.A.)	
aka: "LaSalle Bank National Association." aka "US Bank,)	Case No.: 2007 CH 29738
NA," as trustee for Morgan Stanley Loan Trust 2006-16AX,)	
Plaintiff)	Before:
vs.)	Hon. Sanjay T. Tailor,
)	Presiding Judge assigned –
Richard B. Daniggelis,)	or whichever other judge
Defendant)	may so preside in Law Div.

2900

AFFIDAVIT OF GORDON WAYNE WATTS

STATE OF FLORIDA
COUNTY OF POLK

FILED
Law Div.
SEP 14 2015
DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, ILL.

Before me, the undersigned Notary, on this 8th day of September, 2015, personally appeared Gordon Wayne Watts, known to me to be a credible person and of lawful age, who first being duly sworn, upon his oath, deposes and says:

AFFIANT STATEMENT:

I, Gordon Wayne Watts, declare (certify, verify, and state) under penalty of perjury under the laws of the United States of America and the States of Florida and Illinois that the following statement is true and correct to the best of my knowledge:

I personally know Richard B. Daniggelis, who is the defendant in the above-captioned case, and who was named as a defendant in at least four (4) cases related to the same subject matter: Deutsch Bank v. Daniggelis, et al. (2004-CH-10851 – in CHANCERY), GMAC Mortgage, et al. v. Daniggelis, et al. (2007-CH-29738 – in CHANCERY), and Younes v. Daniggelis (2014-MI-701473 – in CIVIL) – and **this** case, GMAC Mortgage, et al. v. Daniggelis, et al. (2007-CH-29738 – in the LAW DIVISION). Mr. Daniggelis made me aware of mortgage fraud, but while I believed him, I had no proof of it. However, when I later obtained proof of fraud (via a Public Records request to This Court), I then discovered that This Court had not been made aware of much of the proof that I found through my own private research. So, I felt a moral obligation to bring to the attention of This Court said proof, and am doing so via this communication: Statements of Facts, Documentation to Verify, and Arguments at law –whereof.

FURTHER AFFIANT SAYETH:

(1) I met Mr. Daniggelis when Robert. J. More, who was his tenant from about Jan 2011 until about Oct 2013, called me from Daniggelis' home phone (312-642-0044), exposing the number via caller-ID. I have known Mr. Daniggelis for several years, but only via phone conversation; I have not met him in person.

(2) Two of these cases have been appealed to the First District Appellate Court, where Mr.

Daniggelis is being represented *pro bono* by Attorney Andjelko Galic, another good friend of mine. At last check, the record on appeal was not timely submitted by Atty. Galic, in either appeals case (probably due to his heavy workload), and both of Daniggelis' appeals are (I'm guessing) in jeopardy of being dismissed for want of prosecution. [[Update: Since my earlier affidavit in the sister cases, I was informed by the First Appellate Court that one of the appeals, 1-15-0662, Younes v. Daniggelis, was indeed dismissed for want of prosecution, as I had feared. That case is still in grave jeopardy as I speak –and pending on motion for reinstatement by Daniggelis' attorney of record, Mr. Galic. My request to intervene as both an *Amicus Curiae* and also an interested party (non-record claimant prospective / heir-legatee), was time-stamped earlier than the dismissal, and my motions are also being reviewed; however my motions, being *nunc pro tunc*, due to the time-stamp, as guaranteed by Illinois Supreme Court Rule 373 (Date of Filing Papers in Reviewing Court; Certificate or Affidavit of Mailing) are timely, and not late as with Mr. Galic's filings.]]

(3) I rarely litigate (since I'm not a lawyer), but I feel that This Honourable Court should probably know about one case in which I participated, because it is relevant to my credibility to make legal arguments in Daniggelis' case:

* 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>

* 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>

* 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>

(4) As shown above, I almost won 'the' "Terri Schiavo" case – all by myself – and on the merits (it got past the clerk, who rules on technical issues, and was presented to the full court on the merits). I almost won, doing better than all others on our side combined. I am not mentioning this to brag[**], but rather merely to assure This Court that, while I am not a lawyer, I do know something of law, and thus "may be of considerable help to the Court," as R.37.1 of the U.S. Supreme Court states regarding *Amicus Curiae* briefs. [**] *This was a double miracle: not only my skill but even more-so my faith or courage to proceed against impossible odds and strong opposition in a highly controversial public case.*

(5) **My Interests:** Not only is Daniggelis a personal friend of mine, but moreover, even were he a total stranger, I would be outraged at the injustices here, once I realised what happened. I am only one person (and thereby limited in all respects), but I feel that one person can make a difference.

(6) I am the sole author of this affidavit, the accompanying proposed *Amicus Curiae* brief, and the related motion for leave to file and notice thereof.

(7) The following chronology of the facts is true and correct to the best of my knowledge, based on both lengthy conversations I've had with Daniggelis, and also based on my own research (Public Records requests from your court, etc.) to verify his assertions of fact:

The property which is the subject of all this litigation, 1720 N. Sedgwick St., Chicago IL 60614, is a house and land which was in Daniggelis' family for many years, and, at some point, passed down to him, with him as the sole owner. **[[Correction and/or clarification:** In an earlier version of this affidavit, which I had filed in the Chancery case, bearing the same case-file number, I used the phrase "passed down to him, with him as the sole owner," as you see above. While this over-broad "passed down to him" language seemed technically correct to me, given that I did not know the details of how it was "passed down" (inheritance, gift, purchase, buyout, etc.?), when speaking with Mr. Daniggelis by phone recently, he said this was imprecise and an inaccurate description: He claims that he bought out the shares of other relatives, thus gaining ownership of his house. I shall leave the original language in for purposes of consistency with my prior filing –and transparency, admitting my grammatical snafu here; however: Let this notice serve as a correction to all prior versions filed in both the 2007-CH-29738 Chancery "sister case" and the other related case, 2014-M1-701473, *Younes v. Daniggelis*. – My apologies for any distractions that may dilute from my affidavit regarding these very grave injustices.]]

At some later point, Daniggelis became overwhelmed with the combined financial burden of the upkeep and, particularly, the payments, since it is an expensive house, and he was the sole owner. Subsequently, he put an ad in the paper to seek help, either for refinancing, investors, tenets, and/or repairs in exchange for reduced rent. (The details and timing of his requests are of

no import: The only thing that matters is who responded and what transpired.) On 7/8/2004, the bank filed a complaint (*Deutsch Bank v. Daniggelis, et al. 2004-CH-10851*) against him for mortgage foreclosure. After proceeding *pro se* for a while, he retained Attorney Joseph Younes to represent him [*see note of possible scrivener's error, below*] against the bank. On 8/9/2006, the bank moved This Court to dismiss, claiming, *inter alia*, that Daniggelis paid off the subject loan, and Judge Robert Quinn granted and dismissed. **That case is not being appealed.**

[[NOTE: I referred to Joseph Younes as having represented Daniggelis as his lawyer in prior versions of this affidavit, whose language I am keeping, above. This claim was based on the "NOTICE OF MOTION," docketed on June 23, 2006 in *Deutch Bank Nat'l v. Daniggelis*, NO. 04-CH-10851, wherein Younes entered an appearance for Daniggelis. However, when I recently spoke by phone with Daniggelis, he complained that my statement on that head was an "inaccuracy," and was very angry with me insofar as he claimed that Younes was **never** his lawyer. For the purposes of verification, I, Gordon Wayne Watts, now state, assert, and certify under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109 (Sec. 1-109. Verification by certification.), that Richard Daniggelis, the defendant in this case, did indeed tell me this. THEREFORE, I may, possibly, have made a 'Scrivener's Error' in my claims that Younes was Daniggelis' lawyer. I do not know what actually transpired; I only know what I see in Younes' Notice and what Daniggelis told me, and I suspect that there was either an honest misunderstanding on the part of both men –or, in the alternative, perhaps Younes entered an appearance without Daniggelis' authorisation and permission. **But, I presume both men to be innocent until proven guilty, and infer an honest understanding** here. Nonetheless, I feel this should be "looked into" further, and therefore am mentioning it now.]]

On 10/17/2007, GMAC Mortgage filed a complaint (GMAC Mortgage, et al. v. Daniggelis, et al. 2007-CH-29738) against Daniggelis to foreclose, apparently a result of subsequent financial distress, and apparently, US BANK NATIONAL ASSN subsequently purchased the loan and sought to continue to pursue foreclosure under subrogation. Robert J. More, an acquaintance of mine, was staying with Daniggelis from about Jan 2011 until about Oct 2013, for little or no rent, and he did light chores and research to help Daniggelis. (Mr. More introduced Mr. Daniggelis to both myself and Attorney Andjelko Galic, who currently represents Daniggelis. It is my understanding that, although More stayed with him, nonetheless, Mr. Daniggelis was unable to attract any "regular" paying tenants, due to the dark cloud that hung over the title, and the foreclosure proceedings –*and* the subsequent mortgage fraud, described elsewhere, which instability probably scared off prospective paying tenants.) When Plaintiffs named defendants, they included Mr. More, apparently in response to More's filing numerous pleadings in this case, starting with the 6/21/2013 "INCOMING CORRESPONDENCE FILED," which he filed *pro se*. More's name is misspelled on the docket as 'Moore,' but the correct spelling is 'More.' Robert J. More is also trespassed from this Court House, and must have an escort to conduct business. Moreover, he is a restricted filer in this *and other* courts, based on allegations of being a vexatious litigant. However, More has told me that he has a legal right to intervene in this case, as he has an interest that is not being represented by any of the parties, since, according to More, Mr. Daniggelis may owe him some consideration for his research assistance *and* for putting him in touch with Atty. Galic. Because of this, and his prior presence on the service list in this case (2007-CH-29738), I am including him on the service list today. Lastly, while More probably does warrant censure of vexatious litigant restrictions (due to the

incoherence in his filings), I will go on record as stating that More is a legal genius, a virtual walking case-law Encyclopædia, a savant on the order of "Rain man," the famous 1988 movie starring American actor, Dustin Hoffman. Thus, I feel that Mr. More may have something to offer This Court in the way of legal analyses.

On 7/16/2008, Chicago Volunteer Legal Service entered an appearance for Daniggelis, but did not represent Daniggelis' claims after 1/20/2010. **Plaintiffs filed multiple motions for This Court to dismiss, and said motions were eventually granted.** On April 20, 2007, Daniggelis executed a Fraudulent Document Notice to both the Cook County Recorder's office (doc number: 0711039132, on 4/20/2007) and to This Court (exhibit 'F' of the July 30, 2008 filing by Atty. Benji Philips) that the July 09, 2006 Warranty Deed (doc no: 0622826137 at the Recorder's Office, on 8/16/2006) was a forgery. **Daniggelis made this declaration (thereby placing a cloud on the title), but did not offer substantive proof (duplicate signatures, etc.)** as I am doing now. On 4/8/2011, Atty. Galic entered an appearance for Daniggelis, apparently to replace Chicago Volunteer Legal Service. On 02/15/2013, Judge Michael F. Otto, in this case (*GMAC, et al., vs. Daniggelis, et al., 2007-CH-29738*), in the CHANCERY DIVISION (not this LAW DIVISION case), entered an order in favour of Younes upon his Motion for Summary Judgment and held, as a finding of law, that Younes was sole owner of the property in question and that Daniggelis had no legal interest in said property, thereby clearing the cloud that was on the title. For reasons that are not clear to me, on 8/12/2014, Judge Moshe Jacobius entered an order transferring this case to the Law Division (this case, that is). Galic made a late appeal to the First Appellate Court, of the CHANCERY DIVISION case with this same case number --which appeal was denied, but appealed to the Illinois Supreme Court, which, on 03/25/2015, entered the

following order: "In the exercise of this Court's supervisory authority, the Appellate Court, First District, is directed to vacate its order in GMAC Mortgage, LLC v. Daniggelis, case No. 1-14-2751 (09/24/14), denying Richard Daniggelis leave to file a late notice of appeal. The appellate court is instructed to allow Richard Daniggelis to file a late notice of appeal and hear the case." (27 N.E.3d 610 (2015)) **That case is pending before the appeals court in case #:1-14-2751. (This case, in the LAW DIVISION, so far as I see, however, has not been appealed.)**

On 01/22/2014, Attorney Joseph Younes, who had previously represented Daniggelis in the 2004 foreclosure case, *supra*, filed a F.E.D. (FORCIBLE ENTRY AND DETAINER) case against Daniggelis in the Civil Division (Younes vs. Daniggelis, 2014-M1-701473). This was well before the 08/12/2014 order of Judge Moshe Jacobius, transferring this case to the Law Division.

On 01/27/2015, and after much litigation that did not include key findings of fact which I found (detailed in the attached Amicus Curiae brief), Judge George Scully entered an ORDER FOR POSSESSION in Younes vs. Daniggelis, 2014-M1-701473 – apparently in response to Judge Otto's 02/15/2013 finding in GMAC, et al., vs. Daniggelis, et al., 2007-CH-29738 that Younes was sole owner. On 2/26/2015, Galic filed a notice of appeal to the First Appellate Court in Younes v. Daniggelis, case No. 1-15-0662, and the appeal is pending filing of the record. On 7/2/2015, Judge Diane Rosario entered an order extending the time for enforcement of Judge Scully's order. The Sheriff's Department served an eviction notice to enforce Scully's order, and, at last check, when completing the prior versions of this affidavit, Daniggelis was in the process of removing his belongings with the help of some employees of Younes.

Subsequent to the prior affidavit I filed in the related cases, Daniggelis was evicted, and,


at last check, Daniggelis, an elderly seventy-six (76) year-old man, was homeless and living on the streets, except on some occasions where he was able to afford a rental van, into the which he slept, according to conversations I have had with him, tho I do not know specific details.

Since I filed the earlier versions of this affidavit of fact, besides the homelessness jeopardy mentioned above, three (3) other key developments have transpired: First, This Court lost or otherwise misplaced my request to supplement the record on appeal, even tho FedEx shows it was received and signed for by the same person who received the earlier items on docket in the sister cases. Secondly, after I heard reports from Daniggelis of a possible attempt by Younes to destroy the house (and thus "moot" the appeal), I made contact with a professional photographer in Chicago, and he took photos documenting a Stop Work order by City Code, which I am sure would not be necessary had no illegal demolition or construction been going on. (I am not accusing Younes of anything intentional or malicious, but it is what it is, and I document my strong claims.) Thirdly, and lastly, after all was said and done, I was made aware of the presence of case number: GMAC v. Daniggelis, 2007-CH-29738 in this LAW DIVISION as being a separate and distinct case --different from the case in CHANCERY by the same case number and style.

Since I fear for the life and health of my homeless, elderly friend, Mr. Daniggelis, and am certain that forgery fraud was committed (after seeing two identical signatures, "damning proof" of a photocopy of signature forgery), then I felt a moral (and legal) obligation to update my affidavit and submit it --along with arguments at law, and documents to verify --to This Honourable Court, and hope that my plebeian status {{as a "non-lawyer" who is not rich, and who is out-of-state --and thus unable to attend any court hearing, 'in-person,' to present any

motions}} would not be used as an 'excuse' to abrogate or deny justice, Equal Protection, Due Process, or an otherwise fair review of my concerns that laws were egregiously, and intentionally, broken.

FURTHER AFFIANT SAYETH NAUGHT.


Gordon Wayne Watts, Affiant

**STATE OF FLORIDA
COUNTY OF POLK**


The foregoing instrument was acknowledged, subscribed, and sworn before me this 8th day of September, 2015, by GORDON WAYNE WATTS, Affiant, who (is / is not) personally known to me, who (did / did not) produce identification as shown below, and who (did / did not) take an oath.

IDENTIFICATION TYPE: X FL Drivers License

IDENTIFICATION NUMBER: (*) X 176-0

(*) In compliance with Rule 138, ILLINOIS SUPREME COURT RULES, "Personal Identity Information" (b)(2), "driver's license numbers," I am not including my full Driver's License Number. However, in accordance with Rule 138 (c)(2), "A redacted filing of personal identity information for the public record is permissible and shall only include: **the last four digits** of the driver's license number." Therefore, I am asking This Notary to use only the last 4 digits.

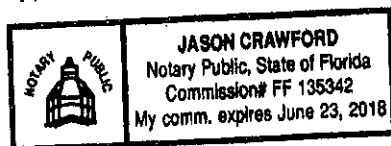
See: http://www.IllinoisCourts.gov/supremecourt/rules/art_ii/artii.htm

Notary Public: 

Date: 9/8/15

(Notary Stamp)

My Commission Expires: 6/23/18



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

GMAC Mortgage, LLC n/k/a: Bank of America, N.A.
aka: "LaSalle Bank National Association," aka "US Bank,
NA," as trustee for Morgan Stanley Loan Trust 2006-16AX,
Plaintiff
vs.
Richard B. Daniggelis,
Defendant

) Case No.: 2007 CH 29738
)
) Before:
) Hon. Sanjay T. Tailor,
) Presiding Judge assigned –
) or whichever other judge
) may ~~so~~ preside in Law Div.
Law Div.

SEP 14 2015
DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL

3307

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 Monday, 09/14/2015, at 09:20am CST (10:20am EST), when you have your Case Management Conference, I shall[[**]], via Teleconference, as the Supreme Court Rules allow, appear "telephonically" before any judge sitting assigned to this case and present the attached "**Motion for leave to file *Amicus Curiae* brief,**" with supporting Exhibits and an Index of said Exhibits. Barring that, on such day and time: from today, Wed. 09 Sept 2015, until Mon. 01 Jan. 2017, as This Court deems appropriate, I shall so appear.

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 and all attached pleadings were delivered to the following parties as indicated:

Dorothy Brown, Clerk of the Circuit Court, Richard J. Daley Center, Room 1001, 50 West Washington Street, Chicago, Illinois 60602, PH: 312-603-5031 (5133: Chancery / 5116: Civil / 6930, 5426: Law), Hours: 8:30am—4:30pm (CST)

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)

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

PIERCE & ASSOCIATES (Atty. for GMAC) (PA0715886) PH: (312) 346-9088
URL: http://www.Atty-Pierce.com/index.php?option=com_content&view=article&id=223&Itemid=112
Attn: Joseph J. Knopic, II, Esq., 1 North Dearborn St., STE #1300 CHICAGO IL, 60602

Richard Indyke, Esq. (312-332-2828 Atty for LaSalle Bank Natl Assn),
John K. Kallman, Esq. (312-578-1515, atty for STG: atty no: 25182)
221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305

STONE MCGUIRE SIEGEL, P.C. (Atty for JOHN LAROCQUE) PH: (847) 239-7555
Attn: Carlo E. Poli, Esq., 801 SKOKIE BLVD, STE #200, NORTHBROOK IL, 60062

KROPIK PAPUGA AND SHAW (Atty for 'MERS' aka Mortgage Electronic Registration Systems, Inc.) Attn: Charanne M. Papuga, <http://Kropik.net/contact.html> / Kropik@Kropik.net
120 South LaSalle Street #1500, CHICAGO IL, 60603, PH: (312) 236-6405

COHON RAIIZES@AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)
Attn: Carrie A. Dolan, 208 S LASALLE#1860, CHICAGO IL, 60604, PH: (312) 726-2252

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

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, Pro Se
3 Grant Square, SUITE.#363
Hinsdale, IL 60521-3351
address per: <http://www.iardc.org/ans13pr0039.pdf>
and: <http://www.avvo.com/attorneys/60521-il-paul-shelton-1115009.html>
and: <http://www.martindale.com/Paul-Leslie-Shelton/941051-lawyer.htm>
and: <http://www.lawyer.com/paul-leslie-shelton.html>
and: <http://www.lawyer.com/paul-shelton-il.html>
and: <http://www.lawyer.com/firm/shelton-law-group.html>

Paul L. Shelton
10 North Adams Street
Hinsdale, IL 60521
PH: 630-986-5555
-address per: <https://www.idfpr.com/banks/resfin/discipline/LO2009/2009-LO-26.pdf>
and: <https://www.idfpr.com/News/newsrsls/05072009SheltonOrder.pdf>
and: <https://www.idfpr.com/banks/resfin/discipline/2009/MBR-128-bandLO-26-b.pdf>
and per: http://chicago.blockshopper.com/property/09-02-422-012/10_n_adams
and: <http://www.whitepages.com/search/FindNearby?utf8=✓&street=10+N+Adams+St&where=Hinsdale,+IL>
and: <http://www.whitepages.com/name/Mike-Shelton/Hinsdale-IL/6y8peee>

David J. Cooper
3622 N. Fremont St.
Chicago, IL 60613

MERS (Mortgage Electronic Registration Systems, Inc.)

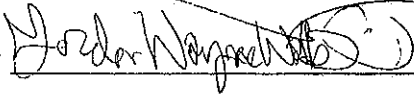
<https://www.mersinc.org/about-us/about-us>

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
1595 Springhill Rd., STE 310, Vienna VA 22182, PH: (703) 761-0694 / (800)-646-6377

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 (Affidavit of Gordon Wayne Watts, Notice of Motion, Motion for leave to file *Amicus Curiae* brief, *Amicus Curiae* of Gordon Wayne Watts in the above-captioned case, and related exhibits – with an Appendix of Exhibits) were served upon all parties listed above, this 9th day of September, 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.
- See e.g., <http://GordonWatts.com/MortgageFraud-Court-Filings/> or <http://GordonWayneWatts.com/MortgageFraud-Court-Filings/> for FedEx and USPS receipts of past, present, and future filings in this cause.
- **United State Postal Service:** The party with a PO Box, Mr. More, was served by USPS.
- **Internet:** I shall, when practically possible, post a TRUE COPY of this filing – and related filings – online at my official websites, *infra*.

Signature: _____



Date: Wed. 9-9-2015

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, 09 September 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

99500

FILED
Law Div.
SEP 14 2015
DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL

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

GMAC Mortgage, LLC n/k/a: Bank of America, N.A.)	
aka: "LaSalle Bank National Association," aka "US Bank,)	Case No.: 2007 CH 29738
NA," as trustee for Morgan Stanley Loan Trust 2006-16AX,)	
)	Before:
Plaintiff)	Hon. Sanjay T. Tailor,
vs.)	Presiding Judge assigned –
)	or whichever other judge
Richard B. Daniggelis,)	may so preside in Law Div.
Defendant)	

Motion for leave to file Amicus Curiae brief

I'm not a lawyer, either by trade or by education, thus don't often file pleadings, *much less* pleadings in cases "foreign" to myself (such as this case). Moreover, I understand that, in Cook County, IL, for whatever reasons, friend of the court briefs are rarely filed, much less addressed in the Local Rules of This Court. However, I heard of certain fraud in a case involving a personal friend of mine, and upon summoning Public Records, which This Court graciously provided me, I confirmed the rumours of a signature being photocopied (and thus forged). Since This Honourable Court doesn't have a local rule addressing *Amici*, I will "dip into" the Rules of the United States Supreme Court for an analogous rule: Rule 37.1 of the U.S. Supreme Court 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) After reviewing the records further, I realised that a good number of other fraudulent actions occurred, but weren't (so far as I could see) brought to the attention of This Court by any of the parties. Thus, Rule 37.1's common sense guidelines, which are good enough for the US Sup Ct, are surely good guidelines for This Court. Therefore, I respectfully request This Court grant leave to file the attached *Amicus* brief, *infra*. [Note: references to the record in 2007-CH-29738 refer to the CH case, not Law Division.]

3390
3004

**AMICUS CURIAE BRIEF OF GORDON WAYNE WATTS
IN SUPPORT OF DEFENDANT / APPELLANT, RICHARD B. DANIGGELIS**

I. Introduction

Richard B. Daniggelis, who is the defendant in this case, was named as a defendant in at least four (4) cases related to the same subject matter: Deutsch Bank v. Daniggelis, et al. (2004-CH-10851), GMAC Mortgage, et al. v. Daniggelis, et al. (2007-CH-29738: Both this case and the one in CHANCERY), and Younes v. Daniggelis (2014-M1-701473: in the CIVIL Division).

Page 1 of Gordon Wayne Watts filings: Motion, Amicus, & Exhibits w/ Appendix

Two of these cases have been appealed to the First District Appellate Court, where Mr. Daniggelis is being represented *pro bono* by Attorney Andjelko Galic, another good friend of Mr. Watts. At last check, the record on appeal was **not** timely submitted by Atty. Galic *in either appeals case* (apparently due to his heavy workload), and both of Daniggelis' appeals are likely in jeopardy of being dismissed for want of prosecution (as clarified in the attached affidavit). As stated earlier, Watts rarely litigates (since he is not a lawyer), but This Honourable Court should probably know about one case in which he participated:

* *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>

* *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>

* *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>

Mr. Watts almost won 'the' "Terri Schiavo" case – all by himself – and on the merits (it got past the clerk, who rules on technical issues, and was presented to the full court on the merits). He almost won, doing better than **all** others on his side **combined**. This *Amicus Curiae* brief does not mention this to brag^[**], but rather merely to assure This Court that, while Watts is not a lawyer, he does know something of law, and thus "may be of considerable help to the Court," as R.37.1 *supra* states.

[**] *This was a double miracle: not only Watts' skill, but even more-so his 'faith' or*

Page 2 of Gordon Wayne Watts filings: Motion, Amicus, & Exhibits w/ Appendix

'courage' to proceed against impossible odds and strong opposition in a highly controversial public case.

II. Interests of the Amicus

Not only is Daniggelis a personal friend of Watts, but moreover, even were he a total stranger, Mr. Watts would be outraged at the injustices here, once he realised what happened. He feels that while he is only one person (and thereby limited in all respects), nonetheless, one person can make a difference.

III. Summary of the Case File / Subsequent Statement of Facts

The statements and affirmations of fact contained in the Affidavit of *Amicus*, Gordon Wayne Watts, filed in the above-captioned case, are incorporated by reference herein as if fully set forth herein.

IV. Argument

Both Atty. Benji Philips (Chicago Volunteer Legal Service) and Atty. Andjelko Galic[*-*] did excellent jobs of defending Richard Daniggelis against mortgage fraud; however, with all due respect to both attorneys, they failed to advance key arguments that showed clear fraud. Moreover, while Daniggelis knew of these facts, and he repeatedly attempted to make This Court aware of them, he was not allowed to speak (or so Watts vividly recalls him repeatedly telling him), and, since Daniggelis is not a lawyer, he didn't know the proper protocol and procedure to communicate with This Court (*as Watts, who is more skilled in this area, is doing today*). [*-*] Galic is to be especially commended: he is representing Daniggelis pro bono, at high financial and personal costs to himself, since Daniggelis, unable to access any equity in his home, which was taken in mortgage fraud, can not afford a 'Big Law' attorney, here.

Since Daniggelis wasn't afforded a fair hearing due to failure to introduce key evidence, Watts' *Amicus Curiae* brief must invoke an "ineffective counsel" defense (as much as it is unpleasant to state against these two fine attorneys—one of whom is a personal friend of Watts).

NOTE: Since Illinois, like Florida, recognises attorneys as 'Officers of the Court' (and not *merely* private citizens), then Galic's failure was 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! (But we will anyhow. See *infra*.)

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

This, of course, implicates Fundamental Due Process. Florida case law, which is persuasive (even if not binding) is clear on this point:

"When facts are to be considered and determined in the administration of statutes, there must be provisions prescribed for due notice to interested parties as to time and place of hearings with appropriate opportunity to be heard in orderly procedure sufficient to afford due process and equal protection of the laws..."

Declaration of Rights, §§ 1,12. *McRae v. Robbins*, 9 So.2d 284, 151 Fla. 109. (Fla. 1942)

However, since Fla. case law is supported by Federal Law (and Art. VIII. Illinois R.Prof. Conduct—2010, *supra*), then the Supremacy Clause (and Illinois State Law) controls, and is binding upon all Illinois state courts too. While Substantive Due Process (SDP) is the standard for courts to enforce limits on legislative and executive powers (for example, over-broad or oppressive laws which have erroneous deprivations of liberty), Daniggelis' deprivation was a violation of Procedural Due Process (PDP), which guarantees a party the "right to be heard" and the "opportunity to meet it" in such proceedings (which didn't happen for Daniggelis), with

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courts basing their decision solely on the law and evidence adduced:

“The essence of due process is the requirement that “a person in jeopardy of serious loss [be given] notice of the case against him and opportunity to meet it.” Joint Anti-Fascist Comm. v. McGrath, 341 U.S. at 341 U. S. 171-172 (Frankfurter, J., concurring).” Mathews v. Eldridge, 424 U.S. 319, at 348 (1976)

This may be a case of sub-prime or predatory lending, but that's moot in light of the newly discovered fraud. **Without any further ado, here is the fraud which was not already brought to This Court's attention by all the parties in these three (3) cases:**

IV. Argument – A. Photocopied (forged) signature

First off, if you look closely at the May 09, 2006 Warranty Deed (See Exhibit Watts-A), you will see that the signature on it is exactly identical to the signature on the July 09, 2006 Warranty Deed. (See Exhibit Watts-B) No mere mortal can sign his or her name exactly the same twice in a row: the latter signature is obviously a forgery. Now, in all fairness to Daniggelis' attorneys, the 07/30/2008 filing by Atty. Benji Philips, in No. 07-CH-29738, did (at point 45 on page 6) mention that the word 'July' was hand written over an obvious “white out.” That should have raised red flags because the date, “09,” was type-written, meaning the month should have been too. (The month is more easily known in advance than the day, and if either was going to be a blank, it would have been the date, where a white-out could correct a typo.)

In all fairness to This Noble Court, since neither Philips nor Galic mentioned the duplicate (photocopied, forged) signature, then This Court might rightly have assumed that the date was a mere typo –and in need of “whiting-out” & correction.

However, this new piece of evidence, all by itself, establishes proof of fraud, and this alone is sufficient to bring criminal charges against some or all parties involved (and, of course, put a halt to and/or reverse any and all transfer of the title out of Daniggelis' name).

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Before moving on to the next point, it bears mention that, after thorough review of the record, it would appear that there is no docket entry showing where Attorneys Paul Shelton or Joseph Younes complied with the lawful requests for depositions. This implies that they knew of the duplicate signatures, and were trying to avoid being forced to turn on one another. **They are all innocent until proven guilty, but someone is guilty: the duplicate signature didn't just sign itself.** Therefore, this *Amicus* feels that all parties (including Erika Rhone) should be called to testify against one another and do some explaining.

PROOF: A copy of the "May 09" deed is found as 'Exhibit C' of the 07/30/2008 Exhibits filed by Chicago Volunteer Legal Services. A copy of the "July 09" deed – with an exactly (and impossibly) identical signature – is found as 'Exhibit E' of same. (One does not need to be a "handwriting expert" to see the exactness. Look, in particular, to the way that the first cursive 'g' of 'Daniggelis' crosses the 'IS' of the printed name immediately below.)

IV. Argument – B. "Whited-out" (forged) date

This was already known to The Court, but it is being included in this enumeration to be complete.

IV. Argument – C. Lack of consideration (payment)

The 07/30/2008 filing by Philips, in No. 07-CH-29738, did (point 50, p.6) mention Daniggelis never cashed a check for \$5,000.00, **which hinted Daniggelis never received any payment for the property.** It is well-settled case-law that no contract is valid if it lacks consideration: Sometimes consideration is "nominal," meaning it was stated for form only, such as "for and in consideration of TEN and NO/100ths Dollars (\$10.00) and other good and valuable consideration in hand paid," (as was done on these Warranty Deeds) –and sometimes used to

hide the true amount being paid. But it is also not disputed that Consideration must be of value (at least to the parties), and is exchanged for the performance or promise of performance by the other party. This, alone, might void the Warranty Deed: *Stilk v. Myrick*, 170 Eng. Rep. 1168, 1168 (1809) (L.R.C.P) (Ellenborough, L) (holding a renegotiated contract void due to lack of consideration). **However, the more relevant fact was never clearly declared to This Honourable Court:** While Daniggelis was, indeed, offered a small check, **he never cashed it.** (If you doubt this argument, check the record: No record exists of a Mr. Richard B. Daniggelis ever having accepted any payment whatsoever for his house and land.) While Arguments 'A' and 'B' above show *Mens Rea* (criminal intent) on the part of whomever forged the signature, Argument 'C' here (by contrast) clearly shows that Daniggelis' "intent," if you will, was not to sell his house, but merely to seek refinancing. (Put another way, no person in his right mind would simply "give away" an homestead that has been in the family for ages!) Even a blind man could see that A and B prove forgery (fraud), and even a lowly plebeian can see that 'C' here, shows Daniggelis' intent was never to merely "give away" his house (as the trial courts implied by their respective rulings in both the 2007 Chancery and 2014 M1 Civil cases).

IV. Argument – D. Missing Funds (fraud)

Since the house was, *de facto*, "given away," that begs a deeper question: what happened to the equity? In fact, the 07/30/2008 filing by Philips, in No. 07-CH-29738, did (at point 42 on page 5) mention that the total of the mortgages was \$714,009.29, but inquired about "[t]wo additional payoffs totaling more than \$100,000 [] made to unspecified recipients." While this is not a "new" point (something an *Amicus* is supposed to bring), the fact of the matter is that the "missing funds" issue, here, was never really addressed. The question was asked, but nobody

bothered to follow-up on it and answer: *"Where did all the equity go?"* Missing funds here, not accounted-for, constitute fraud. This, alone, is probably sufficient to stop all transfer of title, and invoke a criminal investigation. (With the house partly paid-off, possessing great equity, a "give away" is nothing short of theft.)

IV. Argument – E. Predatory (sub-prime) lending

Richard Daniggelis clearly told *Amicus*, Gordon W. Watts, on several occasions that Joe Younes wanted to "go after" the bank, back when he was representing Daniggelis. [[Note: Here, Watts refers to Joseph Younes as having represented Daniggelis as his lawyer. This claim was based on the "NOTICE OF MOTION," docketed on June 23, 2006 in *Deutch Bank Nat'l v. Daniggelis*, NO. 04-CH-10851, wherein Younes entered an appearance for Daniggelis. However, when Watts recently spoke by phone with Daniggelis, he complained that Watts' statement, in prior filings, on that head was an "inaccuracy," and was very angry with Watts insofar as Daniggelis claimed that Younes was never his lawyer. For the purposes of verification, Gordon Wayne Watts, as stated in the attached affidavit, certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109 (Sec. 1-109. Verification by certification.), that Richard Daniggelis, the defendant in this case, did indeed tell him this. THEREFORE, Watts may, possibly, have made a 'Scrivener's Error' in his claims that Younes was Daniggelis' lawyer. He does not know what actually transpired; Watts only knows what he saw in Younes' Notice and what Daniggelis told him, and suspects that there was either an honest misunderstanding on the part of both men –or, in the alternative, that perhaps Younes entered an appearance without Daniggelis' authorisation and permission. **But, we must presume both men to be innocent until proven guilty, and infer an honest understanding** here. Nonetheless, Watts feels this

should be “looked into” further, *perhaps with additional deposition*, and therefore is including this in both his affidavit and these arguments, here.]]

While neither Daniggelis nor Watts ever figured out what made Younes so sure that he had a case, the only thing that seems a likely tort for which Younes might sue (back before all the mortgage fraud and theft of house, of course) was a possibly excessive or illegal interest scheme. The fact that Daniggelis often complained about the interest and/or fees, lent Amicus' theory credence. Watts was not sure if laws were broken in this regard, but as it seemed credible at the time, this *Amicus* brief is now mentioning this so that it can be investigated by those more expert than Watts in the areas of Predatory and Sub-prime lending—strongly implying that a loan mod (refinancing aka: modification) was (is) possible to avoid foreclose—meaning that a “loan mod” should have been (should be) pursued—and not mortgage fraud, as has occurred, here.

IV. Argument – F. The 'Unclean Hands' problem

This home, according to the Cook County Recorder's office (See Exhibits Watts-C, D, and E), is still in William D. and Linda D. Gerould's name, Linda being the sister of Richard. (This, of course, means that even Daniggelis might get into trouble for doing business on it – unless he can show that it was transferred back to him but not recorded.) More importantly, though, it means that Younes and Shelton, who, apparently, had NO RECORD of the home being transferred out of Gerould's name, could not legally take possession of it: They have “unclean hands,” as they did business with a person who is not the legal owner. (Look at the Cook County Recorder's records if you do not believe me.) This fact alone is sufficient to halt all transfer to a third-party until it is resolved. (Of course, as none of the parties informed This Noble Court, it was never addressed, and thus never resolved.)

IV. Argument – G. Forged POA (Power of Attorney) – PROOF:

Here's something else that Philips & Galic missed: If you look at Exhibit 'D' of the 07/30/2008 filing by Philips, the “Limited Power Of Attorney” signed by “Richard Daniggelis” (See Exhibit Watts-F) you'll notice that the place for a notary public is left blank. **This alone invalidates this article.** That was never really “fleshed out” in the trial courts. However, there's something even more sinister. A copy of this document, which Watts obtained from Daniggelis (apparently a 4/16/2015 exhibit filed in 2014-M1-701473) proves that Shelton did, subsequently, notarise this POA. (See Exhibit Watts-G) Shelton should testify about this, but since he surely testified previously that he & Daniggelis were present together when Daniggelis signed this doc, perhaps the “notarised” version Watts obtained from Daniggelis isn't needed to prove that Shelton claims he witnessed the signature.) **Bottom line: Shelton is, on one hand, saying[[**]] he witnessed Daniggelis sign this doc, and relying upon said POA, but on the other hand, the record clearly shows that he did not actually sign or witness it until “after the fact.” – This is clear fraud, and this alone shows sufficient additional Mens rea (criminal intent) to invoke a State Atty. or Atty. General criminal investigation. [[**]]** *Even though this Amicus admits that he can't find where Shelton 'explicitly' testified to this effect, Shelton's claims that he witnessed Daniggelis sign it are implicit, since he is relying upon the authenticity of this POA: since Shelton probably never testified, and continued to evade deposition on this head, he (and all others) should probably be compelled to testify about this fraud here, too.*

IV. Argument – H. Linda Green

Looking at the “Lost Assignment Affidavit” that was submitted as 'Exhibit B' of Galic's 11/21/2011 “Motion for Ruling...” in 2007-CH-39738, we see a familiar name: “Linda Green,”

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the infamous robo-signer. However, what is really troubling is that Joseph Younes' name was named in the document. In all fairness to This Court, *Amicus* must admit that Galic did address this matter in points 9—10 (comparing it, in point 11, with 'Exhibit C,' another 'Assignment' doc, showing clear fraud on the part of those invoking Linda Green's authorisation of reassignment!). While *Amicus* must admit that Galic did, in fact, address this matter in points 9—12 of said motion, this brief is including it (again) merely to be complete in the assessment (argument) of ascertaining whether there was, in fact, a bunch of fraud. (*Besides: Ms. Linda Green was too good to pass up without at least cursory mention.*)

IV. Argument – I. Civil Damages

While Younes complains he could not collect rent while a cloud hung over the title, likewise Daniggelis was also unable to collect rent “of any substance” –or attract any actual ‘regular’ renter willing to pay any “substantial” amount: The spectre of eviction that hung over the property “like a dark cloud” scared off any prospective renters (besides an occasional freeloader or transient) who were looking for a stable place to live. This constitutes punitive and/or civil damages for Daniggelis. Of course, civil damages are only payable to Daniggelis if he is, in fact, found to be a victim of fraud, but, since a number of these issues (which all parties failed to address to This Court) constitute criminal charges, all this together probably constitutes R.I.C.O. - Racketeering Influenced Corrupt Organisation - if collusion among the parties to commit forgery, etc., can be shown. “It’s a racket” –literally. And that off-centre and without honour. (Multiple forgery was proved *supra*, but collusion, e.g., R.I.C.O., so far, has not been proved: That’s why witnesses need to be deposed to testify against one another as to whose hand was in the til –and who knew what, *when*.)

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IV. Argument – J. RICO

Since Stewart Title also has more or less admitted some level of mortgage fraud (insofar as this *Amicus* has it on information that they settled with Daniggelis for a huge settlement), this is *yet another* reason that R.I.C.O. would be worth pursuing and possibly useful in compelling depositions and testimony to clarify the roles and relationship of the parties, as to who was guilty of what.

IV. Argument – K. Time-barred

The closing was outside the time frame of the May 09, 2006 Warranty Deed. (Remember: The July 09, 2006 deed was shown to be a forgery, in Arguments IV-A and IV-B, *supra*, so we may only consider the May 9 deed.) Looking at 'Exhibit C' that Philips filed, she, in fact, addresses this matter in point 31 of page 4 in her 07/30/2008 Answer: The May 09 deed was only to be used to close the contract “on or about” May 12th, 2006. However, more importantly, if the closing did not occur before May 19, 2006, that contract is “null and void” *ab initio*. This *Amicus Curiae* brief freely admits and acknowledges that this contract also called for a \$10,000.00 payment of damages to Younes if the closing did not occur before May 19th, 2006; and, in fact, Daniggelis might be bound by this contract. However **2 legally-mitigating factors** come into play: **The first factor** is “coercion,” to sign a contract, which also implies elder abuse, since Daniggelis was relying upon a professional: Shelton was an attorney, and possibly apparently (at that time) also a realtor, a professional, who used his credentials to mislead Daniggelis into plainly giving away the family house:

Apparently, Shelton was a realtor at that time, as the State of Illinois indicates that a “PAUL L SHELTON” had an active license, number: TA.16.1601271, from 05/29/2003 until

06/16/2009, which then expired, but which is presently in "Application Inactive" status due to a reason of "Withdrawn.") Sources – Lookup: <http://www.obrelookupclear.state.il.us/default.asp>

Result: <http://www.obrelookupclear.state.il.us/SearchDetail.asp?>

[DivisionIdnt=3&ProfessionIdnt=null&Idnt=150319](http://www.obrelookupclear.state.il.us/SearchDetail.asp?DivisionIdnt=3&ProfessionIdnt=null&Idnt=150319)

As This Court knows, duress or coercion is intimidation of a victim to compel the individual to do some act against his or her will by the use of psychological pressure, physical force, or threats – as in “we need you to sign this Warranty Deed in order to renegotiate your loan.”

The second factor is the “unclean hands” doctrine: Even if Shelton and Younes otherwise might have a right to the enforcement of a contract, all parties inducing Daniggelis to sign over his property “for free” had unclean hands:

unclean hands – n. a legal doctrine which is a defense to a complaint, which states that a party who is asking for a judgment cannot have the help of the court if he/she has done anything unethical in relation to the subject of the lawsuit. Thus, if a defendant can show the plaintiff had "unclean hands," the plaintiff's complaint will be dismissed or the plaintiff will be denied judgment.

Source: <http://legal-dictionary.thefreedictionary.com/unclean+hands>

(Besides: Even assuming *arguendo* that Shelton *could* collect the 10 Grand, nonetheless, the torts committed by those who forged numerous docs *supra* far outweigh the mere \$10,000.00 tort that Shelton might hope to collect, and so in the balance of equities, Shelton and company would come up in a **huge** net deficit – especially considering both various criminal frauds *as well as* civil damages: “more than \$100,000 [] made to unspecified recipients” in equity theft, *supra* – **and** any rent earning which Daniggelis lost.)

IV. Argument – L. Conflict of Interest

The record is clear Attorney Joseph Younes was Daniggelis' attorney in 2004-CH-10851 (*Deutsche Bank v Daniggelis*), but then he gained privileged information as his attorney. His legal obligation was to safeguard his client's financial interests, not to use privileged information to enrich himself. In all fairness, Galic did finally get around to mentioning, in point 18 of his 10/29/2014 Answer in case# 2014-M1-701473, that both of Daniggelis' attorneys took advantage of an "elderly person," but the fact that these two attorneys (Shelton and Younes) committed "triple" fraud in a case where multiple forgeries have just been discovered (in the instant *Amicus* brief, here) –and given the gravity of the crimes committed – this point must be clarified to distinguish the various frauds committed. **First fraud:** elder abuse. **Second fraud:** use of privileged information for pecuniary gain: Conflict of interest. **Third fraud:** abuse of position of power/authority by attorneys in order to effect duress or coercion.

IV. Argument – M. *Res Adjudicata*

In his 10/29/2014 Answer, in file# 2014-M1-701473, Galic argues that Younes is barred by *Res Adjudicata* on the possession claim, due to the fact that the foreclosure suit, heard in Chancery in file#: 2007-CH-29738, considered this issue, and further argues that the date of Younes' motion is relevant. Galic's 06/18/2014 Response, in file# 2014-M1-701473, argues at point 10 that Younes can not rely upon Otto's ruling, since said ruling was not final at that time, as a timely motion to reconsider had been filed. However, as apparently Otto subsequently denied Galic's motion, Daniggelis, himself, would be barred by *Res Adjudicata*. But it is well-settled at common law that an affirmative defense against *Res Adjudicata* can be successfully raised on either changed policy or changed **factual circumstances** (the latter is the case here,

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since this *Amicus* brings to The Court's attention **previously unknown fact**). Intentional fraud (as discovered in the case at bar) may also be an affirmative defense. Also, since Federal Due Process trumps state via the Supremacy Clause, Daniggelis' lack of Procedural Due Process, *supra*, controls, and *Res Adjudicata* may then be overcome. (*Galic* also addresses claim-splitting, but this point is omitted as moot.)

IV. Argument – N. Subrogation

Galic addresses subrogation (substitution) of one prospective mortgage-holder in place of another, arguing (in his July 27, 2011 “Reply to the Response...” case#: 2007-CH-29738, points 6-24) that the new plaintiff can't substitute itself as mortgage holder by merely paying the debt unless it has legal obligation to do so. When the plaintiff proceeded with foreclosure against Daniggelis, *Galic* relied on the apparently(*) defective chain of assignments of the mortgage in arguing that the plaintiff lacked required standing. (*-“Apparently”: *Amicus, Gordon Watts, is not sure of the actual facts.*) However, there's persuasive case law that missing or defective Mortgage assignments can be cured. On July 30, 2013, Ohio's 10th Dist. Appellate Court applied this doctrine in *U.S. Bank Natl. Assn. V. Gray*, 2013-Ohio-3340. The court held that where a promissory note is secured by a mortgage, the note is evidence of the debt & the mortgage is a mere incident of the debt. Therefore, proper transfer of a note operates as an equitable assignment of the mortgage, even if the mortgage isn't assigned or delivered. In other words, the mortgage follows the note, meaning that the new plaintiff probably has standing to pursue foreclosure against Daniggelis. (While this is not binding upon Illinois, it makes sense, since otherwise the payment of the note would be in vain: In other words, someone could get a free house, due to a simple paperwork mistake, which would be an absurd result!) The court, in *Gray*

supra, thus answered a question that the legal community has been pondering since the *Fed. Home Loan Mtge. Corp. v. Schwartzwald*, 2012-Ohio-5017 holding that had language which stated “note or mortgage” (emphasis added), which **implied** that either the note or the mortgage was sufficient to have standing to pursue foreclosure. Thus, the *Gray* decision clarified this “gray area of case law” (pun intended) by essentially stating that 'or' means 'or,' and therefore, an interest in the note alone is sufficient to establish standing to pursue foreclosure. Again, Ohio's case law isn't binding upon Illinois, but these common sense guidelines might be helpful to Illinois Courts. Nonetheless, in the case at bar, all this is moot since fraud uncovered in of mammoth proportions overwhelms and makes moot **any** standard of law on standing.

V. *Ante Conclusion*

It is well-known that Paul Shelton has a history of serious corruption: “And Paul Shelton of Trust One Mortgage has agreed to a consent order that bans him for life from any work originating loans...” “Lifetime bans are never issued without cause. There are always reasons for lifetime bans,” said [Brent] Adams, [Illinois Department of Financial and Professional Regulation secretary].” Source: “Victory for South Side victim of mortgage fraud,” ABC Local, WLS-TV/DT; Date: Friday, November 19, 2010, URL: <http://abclocal.go.com/story?section=news/local&id=7799653> See also: “While mom took care of others, she got taken,” Chicago Tribune, May 10, 2009, By John Kass URL: http://articles.chicagotribune.com/2009-05-10/news/0905090103_1_trust-bungalow-house-payments

Here, we see something familiar: ““Mr. Shelton was essentially coordinating a mortgage-rescue scheme, whereby he would be conceiving home owners to eventually sign over their homes,” said Brent Adams, Illinois Department of Financial and Professional Regulation

secretary. "Those homes would be sold to a straw buyer and effectively flipped at a higher appraised value." *Source: ABC Local, Ibid.*

Now, it must be emphasised that all parties are innocent until proven guilty. However, the record in the above-captioned cases clearly demonstrates and proves that someone (possibly several parties) are guilty: the fake signature sure didn't "sign itself," nor did the POA erase its own Notary Public stamp. And the parties who willfully stole hundreds of thousands of dollars in equity – never to be found – or accounted for – again, all the while the title was still in Gerould's name (the sister of Daniggelis) did not do so because they were forced: they did so willingly. While Daniggelis told *Amicus*, G.W. Watts, that Younes lied about him on one occasion (claiming that Daniggelis had a bad back, and could not make it to a hearing), and while Younes is clearly profiting from these fraudulent transactions, **this *Amicus Curiae* must be honest and share the positives about Younes as well:** Daniggelis has told *Amicus*, Watts, that Younes was very patient in his eviction, even supplying men to help remove his belongings. Moreover, Daniggelis has related to Watts that on several occasions **he has had positive and friendly discussions about religion** with Younes (since Younes, who is Jewish and Daniggelis, who is a Greek Orthodox Christian, have similar roots in their religion). This leads this *Amicus* to believe that Younes may not have committed fraud, *himself*, and may merely *suspect* that there is fraud. Whether Younes is totally guilty of collusion, or merely partly guilty of "keeping bad company" and thereby benefiting from the crimes of shady business partners, *Amicus* is very sad that his brief, here, will most likely cause Younes huge grief. In fact, *Amicus* isn't happy or eager even to cause grief or pain to the actual guilty party (whomever it may be: Shelton is the "likely suspect," given his record, but he, along with the rest, is innocent until proven guilty).

VI. Conclusion

For the foregoing reasons, based both on previously-known fraud and newly-discovered fraud, This Court should probably depose all the parties who had the ability to effect the various fraud in question, and compel them to testify against one another and do some explaining to get to the bottom of all this. (In fact, the lack of such cross-examination in prior proceedings on these and other points was a fundamental violation of Due Process, not only of Daniggelis, but also all parties so involved.) In the mean time, This Court should issue a stay on the order of possession pending further review, since Daniggelis is likely to succeed on the merits – either at trial or on appeal, and, moreover, he is prejudiced greatly by the execution of the misplaced and unjustified order of possession. Also, a stay is needed to secure a fair chance at preserving the appeal, since, of course, the landlord may rent or sell the property, or otherwise muddy the waters – thus making the appeal (even if meritorious) a moot appeal, thus frustrating Due Process and Equity. **This Court would have the community's gratitude to closely review this *Amicus Curiae* brief –and all documents on record –and effect justice. A fair and honest ruling would also set precedent to avoid future injustices: How many other people will have their houses and land stolen from them, thus making them homeless?**

Daniggelis, 76 years old, and elderly, is homeless and living on the street.

Thus, I respectfully suggest, as a good Friend of the Court, that it serves the cause of Justice to seek and enforce actual justice when true fraud is discovered, and to change course if a prior course was erroneous –and thereby enter such orders as is necessary to permit Daniggelis to remain on his own property pending litigation, appeal, and/or additional deposition and testimony sufficient to “get hold” of the truth.

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:

Dorothy Brown, Clerk of the Circuit Court, Richard J. Daley Center, Room 1001, 50 West Washington Street, Chicago, Illinois 60602, PH: 312-603-5031 (5133: Chancery / 5116: Civil / 6930, 5426: Law), Hours: 8:30am—4:30pm (CST)

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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)
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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, Pro Se
3 Grant Square, SUITE #363
Hinsdale, IL 60521-3351
address per: <http://www.iardc.org/ans13pr0039.pdf>
and: <http://www.avvo.com/attorneys/60521-il-paul-shelton-1115009.html>
and: <http://www.martindale.com/Paul-Leslie-Shelton/941051-lawyer.htm>
and: <http://www.lawyer.com/paul-leslie-shelton.html>
and: <http://www.lawyer.com/paul-shelton-il.html>
and: <http://www.lawyer.com/firm/shelton-law-group.html>

Paul L. Shelton
10 North Adams Street
Hinsdale, IL 60521
PH: 630-986-5555
-address per: <https://www.idfpr.com/banks/resfin/discipline/LO2009/2009-LO-26.pdf>
and: <https://www.idfpr.com/News/newsrsls/05072009SheltonOrder.pdf>
and: <https://www.idfpr.com/banks/resfin/discipline/2009/MBR-128-bandLO-26-b.pdf>
and per: http://chicago.blockshopper.com/property/09-02-422-012/10_n_adams
and: [http://www.whitepages.com/search/FindNearby?
utf8=✓&street=10+N+Adams+St&where=Hinsdale,+IL](http://www.whitepages.com/search/FindNearby?utf8=✓&street=10+N+Adams+St&where=Hinsdale,+IL)
and: <http://www.whitepages.com/name/Mike-Shelton/Hinsdale-IL/6y8peee>

David J. Cooper, 3622 N. Fremont St., Chicago, IL 60613

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:

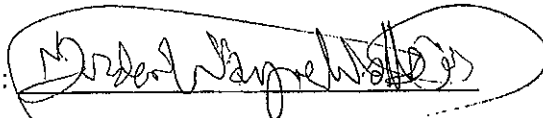
SandraT@mersinc.org – Director, Corporate Communications

1595 Springhill Rd., STE 310, Vienna VA 22182, PH: (703) 761-0694 / (800)-646-6377

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 (Affidavit of Gordon Wayne Watts, Notice of Motion, Motion for leave to file *Amicus Curiae* brief, *Amicus Curiae* of Gordon Wayne Watts in the above-captioned case, and related exhibits – with an Appendix of Exhibits) were served upon all parties listed above, this 9th day of September, 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.
- See e.g., <http://GordonWatts.com/MortgageFraud-Court-Filings/> or <http://GordonWayneWatts.com/MortgageFraud-Court-Filings/> for FedEx and USPS receipts of past, present, and future filings in this cause.
- **United State Postal Service:** The party with a PO Box, Mr. More, was served by USPS.
- **Internet:** I shall, when practically possible, post a TRUE COPY of this filing – and related filings – online at my official websites, *infra*.

Signature:



Date: Wed. 9-9-2015

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, 09 September 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

Note: These exhibits are genuine and not forged or altered; however, I, Gordon Wayne Watts, am supplying these merely as a convenience, and not as 'official' documents. To verify that these are accurate, I refer you to the official sources, namely the Cook County Clerk's Office and the Cook County Recorder's Office. ~Gordon Wayne Watts

Instrument

Docket/Tab#

May 09, 2006 Warranty Deed

Exhibit Watts-A

July 09, 2006 Warranty Deed

Exhibit Watts-B

Cook County Recorder of Deeds screenshot

Exhibit Watts-C

Assignment of Rents to Wm & Linda Gerould

Exhibit Watts-D

Wm & Linda Gerould's PAO (Power of Attorney)

Exhibit Watts-E

"Limited Power Of Attorney" (but not notarised)

Exhibit Watts-F

"Limited Power Of Attorney" (which was later notarised)

Exhibit Watts-G

This instrument prepared by
(and after recording return to)

Paul L. Shelton
SHELTON LAW GROUP, LLC
1010 Jorie Blvd #144
Oak Brook, IL 60523
(630) 993-9999

MAY 9?

WARRANTY DEED
Individual to Individual

THE GRANTOR, RICHARD DANIGGELIS, a single person, of the City of Chicago, County of Cook, State of Illinois, for and in consideration of TEN and NO/100ths Dollars (\$10.00), and other good and valuable consideration in hand paid, does sell, grant, convey and warrant unto the GRANTEE: JOSEPH YOUNES, of Palatine, Illinois, the following described real estate situated in the County of Cook, State of Illinois; to wit:

THE EAST 66 FEET OF LOT 8 IN C. J. HULL'S SUBDIVISION OF BLOCK 51 IN CANAL TRUSTEES SUBDIVISION OF SECTION 33, TOWNSHIP 40 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

CKA: 1720 North Sedgwick Street Chicago, Illinois 60614
PIN#: 14-33-324-044-0000

Subject to general real estate taxes not yet due and payable at the time of closing; covenants, conditions and restrictions of record, building lines and easements, if any, so long as they do not interfere with the current use and enjoyment of the Real Estate.

Hereby releasing and waiving all rights, if any, hereunder by virtue of the Homestead Laws of the State of Illinois.

IN WITNESS WHEREOF, the grantor RICHARD DANIGGELIS, has hereunto set his hand and seal on this 9th day of May, 2006.

Richard Daniggelis
RICHARD DANIGGELIS



MAIL TO

This instrument prepared by
(and after recording return)



Doc#: 0822826137 Fee: \$26.00
Eugene "Gene" Moore RH&P Fee: \$10.00
Cook County Recorder of Deeds
Date: 06/18/2006 12:28 PM Pg: 1 of 2

3 N. LaSalle Street
Suite 925
Chicago, IL 60602
312-848-4243

Paul L. Shelton
SHELTON LAW GROUP, LLC
1010 Jorie Blvd #144
Oak Brook, IL 60523
(630) 993-9999

STEWART 4/6918 2/9

WARRANTY DEED
Individual to Individual

THE GRANTOR, RICHARD DANIGGELIS, a single person, of the City of Chicago, County of Cook, State of Illinois, for and in consideration of TEN and NO/100ths Dollars (\$10.00), and other good and valuable consideration in hand paid, does sell, grant, convey and warrant unto the GRANTEE: JOSEPH YOUNES, of Palatine, Illinois, the following described real estate situated in the County of Cook, State of Illinois, to wit:

THE EAST 66 FEET OF LOT 8 IN C. J. HULLS SUBDIVISION OF BLOCK 51 IN CANAL TRUSTEE'S SUBDIVISION OF SECTION 33, TOWNSHIP 40 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

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Subject to general real estate taxes not yet due and payable at the time of closing; covenants, conditions and restrictions of record, building lines and easements, if any, so long as they do not interfere with the current use and enjoyment of the Real Estate.

Hereby releasing and waiving all rights, if any, hereunder by virtue of the Homestead Laws of the State of Illinois.

IN WITNESS WHEREOF, the grantor RICHARD DANIGGELIS, has hereunto set his hand and seal on this 9th day of July, 2006.

Richard Daniggelis
RICHARD DANIGGELIS

2/9



12:21:08:239.821/2/default.aspx?asp:AutoDetectCookiesSupport=1

Search

Search Home Search Criteria Search Options Search Help & Support Search FAQ Cart Checkout

COOK COUNTY RECORDER OF DEEDS

KAREN A. YARBROUGH

Property Identification Number (PIN):

14 - 33 - 324 - 044 - 0000

Search

Reset

Advanced

Property Identification Number (PIN) Search: 14-33-324-044-0000 (Total: 1 33 seconds, 44 rows)

Select All Invert Selection Purchase Results Add to Cart View: 20/P age 50/P age 100/P age Summary

Recorded Date	PIN	Type Desc	Doc #	1st Grantor	1st Grantee	1st Prior Doc#
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<input type="checkbox"/> 3/24/1992	14-33-324-044-0000	MORTGAGE	921939688	GEROULD LINDA D	NORTH COMM BK	97942198
<input type="checkbox"/> 3/24/1992	14-33-324-044-0000	QUIT CLAIM DEED	92193966	DANIGELIS RICHARD B	GEROULD LINDA D	
<input type="checkbox"/> 3/24/1992	14-33-324-044-0000	TRUSTEES DEED	92193967	MIDTOWN B&T CO CHGO TR	GEROULD LINDA D	

View Details

Document No.	1
92193966	0
PIN(s) - 1	
PIN	
14-33-324-044-0000	
Grantor(s) - 1	
Grantor(s)	DANIGELIS RICHARD B
Grantee(s) - 2	GEROULD LINDA D
Grantee(s)	GEROULD WILLIAM D

5/24/93/60/2



KNOW ALL MEN BY THESE PRESENTS, that the undersigned, WILLIAM GEROULD and LINDA GEROULD, do hereby, in consideration of the premises described on Exhibit "A" attached hereto (hereinafter called "Assignor"), do hereby, in consideration of the premises and Ten (\$10.00) dollars and other good and valuable considerations, the receipt of which is hereby acknowledged, hereby sell, assign, transfer, set over unto NORTH BROADWAY BANK, 3639 N. BROADWAY, CHICAGO, ILLINOIS Banking Corporation (hereinafter called "Assignee"), for the use and benefit of the holder or holders and owner or owners of the Note required by the Mortgage made by Assignor to Assignee, dated JANUARY 24, 1992, and recorded in the Office of the Recorder of Cook County, Illinois, all the rents, issues and profits now due or which may hereafter become due under and by virtue of any lease, whether written or verbal, or by virtue of any agreement for the use or occupancy of any part of said premises, heretofore made or entered into by the undersigned or



52493683



Watts

JAN 23 1992 THU 14:59 '92

POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS THAT LINDA D. GEROULD OF THE CITY OF Cincinnati, COUNTY OF Hamilton, STATE OF OHIO, has made, constituted and appointed, and BY THESE PRESENT DOES make, constitute and appoint, WILLIAM GEROULD, her husband, of the city of Cincinnati, County of Hamilton, State of Ohio a true and lawful ATTORNEY-IN-FACT for her and in her name, place and stead, without consultation or the consent of others, to sign all papers and do all acts that in his judgement are necessary or appropriate to complete the purchase and financing of the real property located at 170 North Sedgwick, Chicago, Illinois, County of Cook, legal described:

Limited Power Of Attorney *MAY 19*
For Real Estate Transaction

KNOW ALL MEN BY THESE PRESENTS:

THAT I, RICHARD DANIGGELIS, a United States Citizen of legal age, and resident of Chicago, Illinois, do hereby appoint, name and constitute my attorney, ERIKA RHONE, of Chicago, Illinois, to be the true and lawful Attorney-In-Fact to act in, manage and conduct all my affairs individually for that purpose in my name and on my behalf to do and execute any or all of the following acts, deeds, and other documents and things, to wit:

To execute any and all documents and perform any and all acts necessary to effectuate the sale of the property at:

THE EAST 66 FEET OF LOT 8 IN C. J. HULLS SUBDIVISION OF BLOCK 51 IN CANAL TRUSTEE'S SUBDIVISION OF SECTION 33, TOWNSHIP 40 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

CKA: 1720 North Sedgwick Street Chicago, Illinois 60614
PIN#: 14-33-324-044-0000

Other Acts (if any) _____

HEREBY GIVING AND GRANTING unto my said attorney full power and authority whatsoever requisite or proper to be done in or about the premises, as fully to all intents and purposes as I might or could lawfully do if personally present, and hereby certifying and confirming all that my said attorney shall do or cause to be done under and by virtue of these presents.

This special and limited power of attorney shall be in effect until revoked in writing. This power shall be irrevocable until June 30, 2006.

IN WITNESS WHEREOF, I have hereunto set my hand this 19th day of May, 2006 in the County of Du Page, Illinois.

Richard Daniggelis
RICHARD DANIGGELIS

Personally appeared, RICHARD DANIGGELIS, and he did free set his hand to this document, voluntarily.

Subscribed and Sworn before me this _____ day of _____, 2006.

Notary public



Limited Power Of Attorney
For Real Estate Transaction

KNOW ALL MEN BY THESE PRESENTS:

THAT I, RICHARD DANIGGELIS, a United States Citizen of legal age, and resident of Chicago, Illinois, do hereby appoint, name and constitute my attorney, EKOKA RHONE, of Chicago, Illinois, to be the true and lawful Attorney-In-Fact to act in, manage and conduct all my affairs individually for that purpose in my name and on my behalf to do and execute any or all of the following acts, deeds, and other documents and things, to wit:

To execute any and all documents and perform any and all acts necessary to effectuate the sale of the property at:

THE EAST 66 FEET OF LOT 8 IN C. J. HULLS SUBDIVISION OF BLOCK 51 IN CANAL TRUSTEE'S SUBDIVISION OF SECTION 33, TOWNSHIP 49 NORTH, RANGE 14, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

CKA: 1720 North Sedgwick Street, Chicago, Illinois 60614
PIN#: 14-33-324-044-0000

Other Acts (if any):

HEREBY GIVING AND GRANTING unto my said attorney full power and authority whatsoever requisite or proper to be done in or about the premises, as fully to all intents and purposes as I might or could lawfully do if personally present, and hereby certifying and confirming all that my said attorney shall do or cause to be done under and by virtue of these presents.

This special and limited power of attorney shall be in effect until revoked in writing. This power shall be irrevocable until June 30, 2006.

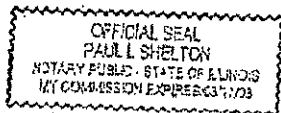
IN WITNESS WHEREOF, I have hereunto set my hand this 19th day of May, 2005 in the County of Du Page, Illinois;

Richard Daniggelis
RICHARD DANIGGELIS

Personally appeared, RICHARD DANIGGELIS, and he did free set his hand to this document, voluntarily.

Subscribed and sworn before me this
19th day of May, 2005.

Paul L. Shelton
Notary public



ELECTRONICALLY FILED
4/16/2015 4:18 PM
2014-MI-701473
PAGE 11 of 11

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

GMAC Mortgage, LLC n/k/a: Bank of America, N.A.) Case No.: 2007 CH 29738
aka: "LaSalle Bank National Association," aka "US Bank,)
NA," as trustee for Morgan Stanley Loan Trust 2006-16AX,) Before:
Plaintiff)
vs.) Hon. James P. Flannery
Richard B. Daniggelis,) Hon. Sanjay T. Taylor ;
Defendant) or whichever other judge
may so preside in Law Div.

FILED
Law Div.
SEP 14 2015
DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL

3321

Time-Sensitive Judicial Notice of Adjudicative Facts – in semi-Emergency Fashion by
OVERNIGHT FedEx

I hereby bring to This Honourable Court certain Adjudicative Facts of record with regard to the above-styled case—and in semi-Emergency fashion. To that end, while true emergencies are rare, this Notice shall state the basis for the party's claim of several genuine *semi-emergency* situations—and shall demonstrate that these situations were not reasonably foreseeable—and could lead to irreparable harm if relief is not obtained prior to the time that the motion can be heard on the Court's regular motion call. **Short Description:**

- **#{1}** Defendant, Richard B. Daniggelis, an elderly 76-year-old man, is homeless as a result of the eviction in this cause, and is reported to be living on the street.
- **#{2}** While This Court received & docketed the Affidavit, Notice of Motion, Motion, Amicus brief, & Exhibits of Gordon Wayne Watts, as reflected on docket, Activity Date: 8/10/2015 (in the Chancery sister case), the Motion to Supplement the Record on Appeal, which This Court received and signed for, on Aug. 20, 2015, is documented to be "**Lost and Missing.**" making an already difficult situation even worse. [See Exhibits to verify]
- **#{3}** The need to supplement the record on appeal—in the 2 sister cases to the above-styled case—was due to a delay of over one-year in This Court's grant of a Public Record's Request, thereby delaying the ability to file an intelligible Motion on that head.
- **#{4}** There is a small docketing nomenclature anomaly; see *infra*.
- **#{5}** A new situation has arisen: Attorney Joseph Younes (co-defendant in 2007-CH-29737, *GMAC v. Daniggelis*, sister cases in Chancery and Law—and plaintiff in 2014-M1-701473, *Younes v. Daniggelis* a related case in the Civil Division) is documented to have begun illegal construction and/or demolition activities against the property which is the subject-matter of this litigation, namely 1720 N. Sedgwick St., Old Towne District, Chicago, IL 60614—which would moot any appeal pending.
- **#{6}** On Mon. 17 Aug. 2015, The Appellate court dismissed Daniggelis' appeal, due to negligence on the part of his attorney, returning jurisdiction on the merits to **This Court.**

Under Rule 201(c)(2), Fed.R.Civ.P., The Court must take judicial notice if a party requests it and the court is supplied with the necessary information. While Dual Federalism may possibly preclude the Supremacy Clause from applying this Federal Rule to This (State) Court, nonetheless, it is still a good guideline, and, to that end, I shall do my best to provide This Honourable Court the necessary information to make it's job as easy as reasonably possible.

- **{{#1}} Defendant, Richard B. Daniggelis, an elderly 76-year-old man, is homeless as a result of the eviction in this cause, and is reported to be living on the street.**

While I don't know the particulars, I do know what Daniggelis told me. Since I later verified his claims of a duplicate signature were correct, after a Public Records request of This Court showed that the signatures on the May 09, 2006 & July 09, 2006 Warranty Deeds were ****IDENTICAL**** (an impossibility for a mere mortal to sign his name the exact same twice in a row =equals= a photocopies signature, e.g., a forgery fraud), then Daniggelis' reputation for honest gained credibility. Therefore, his claims about having to live on the street (or, occasionally, in a rental moving van when he might afford it) are accepted as fact. However, I'm hesitant to declare a "genuine" (or "total") Emergency since I don't know if living on the streets in Chicago is an immediate/certain threat to his life. But, as we all know that homelessness is immediately correlated with risks, threats, & jeopardy to one's health, I'd be remiss in my moral (and legal) duties to remain silent on this head. Matters that have become urgent by reason of a party's failure to seek timely relief do not constitute emergencies; however, it was my understanding that This Court was aware of the fact that Daniggelis was elderly & homeless (as his attorney is reported to have warned a judge in open court that he might become homeless). But, seeing that my filings on the 10th of August weren't acted upon with speed (even tho I gave conclusive evidence of the fraud alleged), I infer that This Court wasn't aware of this exigency; so, to that end, I'm giving you notice. **I have spoken: If harm befalls him because of his homelessness, his blood is not on my hands.**

If, however, This Court wishes to *verify or refute* my claims, one may go and look-see to this end: I have it on information that on some days, Daniggelis is seen exercising his First Amendment Rights of Peaceable Assembly, sitting in his wheelchair, protesting on the public sidewalk in front of his home, which, I argue in my brief, was taken illegally, him having received no consideration (payment), and having lost several hundreds of thousands of dollars of equity in his house, in his attempts to seek legal help to get a loan mod (refinancing modification).

Oh, I almost forgot, but there is one more way to verify this strong claim *supra*: While Mr. Daniggelis has made it clear in no uncertain terms that his cell phone number is to be kept private (thereby precluding me including his number in this filing, which I must serve upon all parties), This Court—if it wishes to verify my strong claims here—may call to **the office of Atty. Tina Schillaci, Esq., a staff attorney at the IL First Appellate Court**, and speak with Ms. Schillaci's law clerks, Patty or Maria, who can verify that Mr. Daniggelis and I spoke with each of them, at which time Daniggelis not only gave them his private cell (should it be needed under Subpoena or Discovery), but also they may verify that Daniggelis told them that he was indeed homeless as I allege he said. Explanation: While I was satisfied with Atty. Schillaci's reassurance that she was forwarding my pleadings to the appellate justices in both appeals panels, nonetheless, Daniggelis was desperate and requested that I patch him in via 3-way—which I did—in his attempt to speak with Atty. Schillaci and convince her to ask the Appeals Court to grant him relief and "seriously" review my *Amicus* brief & my request for that court to supplement the record on appeal. Ms. Schillaci's office may be reached at **(312) 793-6199**, and both Patty and Maria can verify my claims—and Atty. Schillaci surely got their message *and can verify as well*.

- **{{#2}}** While This Court received and docketed the Affidavit, Notice of Motion, Motion, Amicus brief, and Exhibits of Gordon Wayne Watts, as reflected on docket, Activity Date: 8/10/2015, the Motion to Supplement the Record on Appeal, which This Court received and signed for, on Aug. 20, 2015, is documented to be "Lost and Missing," making an already difficult situation even worse. *[See Exhibits to verify]*

Please take judicial notice of both FedEx delivery receipts in the listed Exhibits herein: As you will notice, on Aug 07, 2015, FedEx documents that an "M.Smith" signed for and received my filings, addressed to Dorothy Brown, Clerk of the Circuit Court, 50 West Washigton [sic] Street Richard J. Daley Center, Room 1001, Chicago, IL 60602 US." These items appear on docket, and took only a few extra days to be processed (being dated Aug 10, 2015). So, when I needed to ask Your Court to supplement the Record on Appeal, in the 2 sister cases (in Chancery and Civil), I sent it to the same exact address, and it was signed for and received by the same person (name and signatures same), but even tho it be received way back on the 20th of Aug, 2015, it is (at last check) still not on docket. Those clerks in the CHANCERY DIVISION never got my filings, nor did they appear on docket. Moreover, after speaking with Emma Burse, the mail-room supervisor, she put me in touch with a 'Craig' in the 'Motions' Department of the CIVIL DIVISION where I filed a similar request to supplement the record on appeal with my filings.

All FedEx and USPS receipts to all parties –for both dates can be found in these public folders:

<http://GordonWatts.com/MortgageFraud-Court-Filings/>

and:

<http://GordonWayneWatts.com/MortgageFraud-Court-Filings/>

Since I served all the parties, I will probably forgo service on them of what I already filed, but, in accord with the rules of This Court, I shall endeavor to serve ALL parties copies of any new filing (such as this judicial notice). (One exception may be that since all of Paul Shelton's mail to the 1010 Jorie Blvd and 700 E. Ogden Ave addresses was returned as undeliverable, I will probably try to serve him copies of what he should have gotten last time, if I can locate current mailing addresses listed in either his reply to the IL Atty. Registration & Disciplinary Commission and/or the IL Dept. of Financial & Professional Regulation disbarment notice.) ***** Please take judicial notice of the fact that This Court lost my mail, through no fault of my own, thereby delaying this time-sensitive case. ***** (I would hope that, based on all these points, *supra* and *infra*, that This Court would, *sua sponte*, expedite review of my *Amicus* and the attached documentation which I am filing Instantly, in the case at bar, thereby obviating the need for me to file a motion and notice of motion –extra paperwork I wish to avoid.) Craig said that he spoke with supervisor(s), and that they told him that, since they could not find my filings, that the only solution available was for me to re-file them, sending them directly to him (and not to Dorothy Brown), so, to that end, I am re-filing that which This Court lost –and filing *de novo* in the Law Division. (I kept file copies in case this became necessary.)

While this Law Division case is not being appealed, I owe it to This Court to afford it Judicial Notice of these exigent circumstances in this time-sensitive matter regarding the lost mail I sent This Court in my motion to supplement the record in these 2 sister cases.

- **{{#3}}** The need to supplement the record on appeal was due to a delay of over one-year in This Court's grant of a Public Record's Request, thereby delaying the ability to file an intelligible Motion on that head.

As I document in my motions to supplement the record on appeal in the sister cases (2007-CH-29738 in Chancery and 2014-M1-701473 in Civil), This Court took OVER A YEAR to grant a simple Public Records Request for basic case-file documentation, which is why I couldn't file my *Amicus Curiae* brief in a timely fashion, meaning it was filed after the Notice of Appeal, and thereby didn't automatically go into the Record on Appeal.

Let me add that I do not blame the clerks involved (for either the delay in #3, here, or for losing my filings in #2, *supra*). I am fully aware that This Court is short-staffed—and overwhelmed with its caseload—due to obvious budget shortfalls that resulted from VERY UNWISE actions by State and Federal Lawmakers in regards to “cops & courts” budgeting—which was not your fault.

{{BONUS POINT}} I already argue in my *Amicus* brief that both attorneys Andjelko Galic and Benji Philips did a poor job in some overlooking key points—which I was able to raise. While The Court, itself, was not at fault here, it is a fact that Illinois, like Florida, recognises attorneys as 'Officers of the Court' (and not *merely* private citizens), meaning Galic's and Philips' failures were 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:

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

This, of course, implicates Fundamental Due Process.

While I couldn't honestly say that this situation (Ineffective Counsel) was not reasonably foreseeable at *this* point in time, when I mentioned it in my initial *Amicus* brief, it was indeed “not reasonably foreseeable,” and thus appropriate to put in the *Amicus* that I previously submitted. So, while I already did mention this point (Ineffective Counsel) in my *Amicus Curiae* brief, nonetheless, it is appropriate to tie it in to points #2 and #3 *supra* since this “Bonus Point” is – technically – **yet another failure of the Judicial Branch**—insofar as “A lawyer, as a member of the legal profession, is a representative of clients, **an officer of the legal system.**”

- **{{#4}}** There is a small docketing nomenclature anomaly; see *infra*.

This is no an 'emergency' situation, as are most or all of the others, but it is indeed a matter in the which it was indeed “not reasonably foreseeable,” and thus I shall address it to clarify: If you look at the court's docket in 2007-CH-29738, *GMAC v. Daniggelis* (the one in Chancery, not the identical case number in the Law Division), you will see my filings on 8/10/2015 as reflecting “Attorney: PRO SE” and “Participant: NON RECORD CLAIMANTS”; however, if you look at

Page 4 of Judicial Notice of Gordon Wayne Watts

the docket in 2014-M1-701473, *Younes v. Daniggelis* in the Civil Division, you will see my filing listed as "Participant: DANIGGELIS RICHARD" with the filer called "Attorney: PRO SE."

I am giving This Court judicial notice that BOTH ENTRIES are correct. *Explanation:*

While I didn't explicitly state so in any of my filings to the trial court, I did tell the clerks in Chancery that I was having trouble e-filing, and that it not only had no selection for "Amicus," but that it wouldn't even let me file as an unnamed heir / legatee, which was indeed one or two of their selections. I wasn't trying to ask for "unnamed heir / legatee" status—only *Amicus* status, but I told the clerks that I **did indeed** qualify as an unnamed heir / legatee: 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. **Whether or not** Mr. Daniggelis is able to pay me anything (I am not seeking any payment from him—but will gladly accept a donation from anyone at this time, as I am very deeply "under water" financially), his offer *de facto* constitutes a legacy and perforce makes me an unnamed heir / legatee and, therefore, also an interested party.

So, the bottom line is this: My difficulties with the e-filing system in the trial court forced me to try to file as an unnamed heir / legatee (i.e. a non-record claimant), and even though that didn't work, I still qualified and was so named in the docket entry in Chancery. (But, of court, the Civil Court docket was also correct: I am indeed a "pro se," non-lawyer who filed with Mr. Daniggelis as the key "participant.")

- **{}#5} A new situation has arisen: Attorney Joseph Younes (co-defendant in 2007-CH-29737, *GMAC v. Daniggelis*, and plaintiff in 2014-M1-701473, *Younes v. Daniggelis*) is documented to have begun illegal construction and/or demolition activities against the property which is the subject-matter of this litigation, namely 1720 N. Sedgwick St., Old Towne District, Chicago, IL 60614—which would moot any appeal pending.**

This last new development is indeed, at the very least, a *semi-emergency* situation—and I shall demonstrate that this situation, too, was not reasonably foreseeable—and could lead to irreparable harm if relief is not obtained prior to the time that the motion can be heard on the Court's regular motion call.

Looking at the Exhibits herein, we see proof to verify this claim: After I heard reports from Daniggelis of a possible attempt by Younes to destroy the house (and thus "moot" the appeal), I made contact with a professional photographer in Chicago, and he took photos documenting a Stop Work order by City Code, which I am sure would not be necessary had no illegal demolition or construction been going on. I am not accusing Younes of anything intentional or malicious, **but it is what it is**, and I'll document my strong claims. It doesn't take a rocket Scientist or a Supreme Court Justice to understand the legal implications here: Younes' attempts to conduct illegal demolition or construction are likely—whether intentional or not—to destroy the house, and thus render **any** court action "moot."

- **On Mon. 17 Aug. 2015, The Appellate court dismissed Daniggelis' appeal, due to negligence on the part of his attorney, returning jurisdiction on the merits to This Court.**

Looking at the Electronic Docket for This Honourable Court, I can see that the This Court didn't get the note that the appeal was dismissed, and so—as I am morally obligated (and legally permitted), I am giving **Judicial Notice of these Adjudicative Facts to the effect that This Court now has “subject matter” jurisdiction, once again — to wit:**

In *GMAC v. Daniggelis* (2007-CH-29738 – the sister case in the Chancery Division), Atty. Andjelko Galic, representing Defendant, Richard B. Daniggelis, filed a Notice of Appeal on 05/6/2015 and made a “REQUEST FOR PREPARATION OF RECORD” on 07/14/2015, and that case is on appeal in your court in NO. 1-14-2751. The Record on Appeal in NO. 1-14-2751 was due on July 08, 2015, and is LONG OVERDUE, and there are no Motions for Extension of Time, nor any similar orders granting an extension.

In *Younes v. Daniggelis* (2014-M1-701473 – in the Civil Division), Atty. Andjelko Galic, representing Defendant, Richard B. Daniggelis, filed a Notice of Appeal on 02/26/2015 and made a “REQUEST FOR PREPARATION OF RECORD” on 04/21/2015, and that case is on appeal in your court in NO. 1-15-0662. The Record on Appeal in NO. 1-15-0662 was due on April 30, 2015, and is LONG OVERDUE, and there are no Motions for Extension of Time, nor any similar orders granting an extension.

Additionally, Atty. Galic has missed several court dates in the trial court **—and was late filing a Notice of Appeal in one case above:** Galic made a late appeal to the First Appellate Court, which was denied, but appealed to the Illinois Supreme Court, which, on 03/25/2015, entered the following order: “In the exercise of this Court's supervisory authority, the Appellate Court, First District, is directed to vacate its order in *GMAC Mortgage, LLC v. Daniggelis*, case No. 1-14-2751 (09/24/14), denying Richard Daniggelis leave to file a late notice of appeal. The appellate court is instructed to allow Richard Daniggelis to file a late notice of appeal and hear the case.” (27 N.E.3d 610 (2015)) This case is pending before your appeals court in case #:1-14-2751.

Since my earlier affidavit in the sister cases, I was informed by the First Appellate Court that one of the appeals, 1-15-0662, *Younes v. Daniggelis*, was indeed dismissed on Monday, 17 August 2015, for want of prosecution, as I had feared. That case is still in grave jeopardy as I speak—and pending on motion for reinstatement by Daniggelis' attorney of record, Mr. Galic. My request to intervene as both an *Amicus Curiae* and also an interested party (non-record claimant prospective / heir-legatee), was time-stamped earlier than the dismissal, and my motions are also being reviewed; however my motions, being *nunc pro tunc*, due to the time-stamp, as guaranteed by Illinois Supreme Court Rule 373 (Date of Filing Papers in Reviewing Court; Certificate or Affidavit of Mailing) are timely, and not late as with Mr. Galic's filings: I FedEx'ed and signed it the day before it was dismissed, which invoked R.373, and made my filings timely, even though it arrived in court after the dismissal: the travel-time was less than 3-days, thus triggered R.373.

Thus, in *Younes v. Daniggelis*, This Court now has subject matter jurisdiction once again (and in *GMAC v. Daniggelis* in Chancery, it looks like it will again get jurisdiction), and I look forward to a “fair fight” in my quest to get all the evidence fairly reviewed—and get justice.

Conclusion: Points #2, #3, and the 'Bonus Point' are documentation of huge failures of the Judicial System, which unnecessarily delay justice. (Justice delayed =equals= justice denied.) Points #1 and #5 demonstrate clear jeopardy to life, limb, and/or property, which must be addressed.

Lastly, on April 20, 2007, Daniggelis executed a "Fraudulent Document Notice" to **both** the Cook County Recorder's office (doc number: 0711039132, on 4/20/2007) **and** to the trial court (exhibit 'F' of the July 30, 2008 filing by Atty. Benji Philips, in 2007-CH-29738, in Chancery) that the July 09, 2006 Warranty Deed (doc no: 0622826137 at the Recorder's Office, on 8/16/2006) was a forgery. Since he regularly complained to both the cops and the courts, even putting it "on record," then the police, sheriff, courts system, state attorney's office, AND the attorney general's office should have had official notice of this and questioned Daniggelis for details so that this felony forgery fraud (by photocopying a signature) could be investigated and prosecuted. **That is wasn't investigated in a timely fashion might result in the Statutes of Limitations running out for forgery, perjury, or other such criminal felonies.** However, "Delay in the prosecution of a suit is sufficiently excused, where occasioned solely by the official negligence of the referee, without contributory negligence of the plaintiff, especially where no steps were taken by defendant to expedite the case." *Robertson v. Wilson*, 51 So. 849, 59 Fla. 400, 138 Am.St.Rep. 128. (Fla. 1910) Moreover, "When facts are to be considered and determined in the administration of statutes, there must be provisions prescribed for due notice to interested parties as to time and place of hearings with appropriate opportunity to be heard in orderly procedure sufficient to afford due process and equal protection of the laws..." *Declaration of Rights, §§ 1, 12, McRae v. Robbins*, 9 So.2d 284, 151 Fla. 109. (Fla. 1942)

While this is Florida case law (where I am more familiar), I am sure that any good lawyer could find Illinois state law to support this. – In fact, *EEOC v. Indiana Bell*, 256 F.3d 516 (2001), allows for excusable delay in filing, prosecution, etc., and as this is a Federal case, the Supremacy Clause would probably control on this point of law, if Illinois State Law is silent. (And, any judge or justice who was truly seeking Due Process and Equal Protection, would find this to be Constitutionally sound case law—and allow Daniggelis to avoid being penalised or lose his house simply because the cops, courts, and state attorney's office kept "passing the buck" back and forth until the clock ran out. Of course, since cops, courts, and SAO refused to act when they could, this is legally equivalent to fraudulent concealment. **In addition, there indeed is Illinois state law in favour of equitable tolling for Daniggelis, should he need it:** Equitable tolling of a statute of limitations is appropriate if the plaintiff has been prevented from asserting his or her rights in some extraordinary way. (Daniggelis, whose has counter-claims of fraud, would be a plaintiff here, and thus this controls.) *Ciers v. O.L. Schmidt Barge Lines, Inc.*, 285 Ill.App.3d 1046, 1052, 221 Ill.Dec. 303, 675 N.E.2d 210 (1996). Thus, even if Statutes of Limitations is used to bar Daniggelis' claims on this head (and it may not), here is case law to grant justice & prevent his house from outright being stolen in this mortgage fraud.

Thus, while this Judicial Notice of Adjudicative Facts is not a motion, in & of itself, nonetheless, I anticipate This Court will be honest & fairly review the affidavit statements of fact, arguments at law, & documentation to verify—and grant in the affirmative the motions to stay enforcement, review my *Amicus*, **and, of course, give Daniggelis' house back to him.**

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 Judicial Notice of Adjudicative Facts – in *semi*-Emergency Fashion and all attached pleadings were delivered to the following parties as indicated:

Dorothy Brown, Clerk of the Circuit Court, Richard J. Daley Center, Room 1001, 50 West Washington Street, Chicago, Illinois 60602, PH: 312-603-5031 (5133: Chancery / 5116: Civil / 6930, 5426: Law), Hours: 8:30am—4:30pm (CST)

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)

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

PIERCE & ASSOCIATES (Atty. for GMAC) (PA0715886) PH: (312) 346-9088
URL: http://www.Atty-Pierce.com/index.php?option=com_content&view=article&id=223&Itemid=112
Attn: Joseph J. Knopic, II, Esq., 1 North Dearborn St., STE #1300 CHICAGO IL, 60602

Richard Indyke, Esq. (312-332-2828 Atty for LaSalle Bank Natl Assn),
John K. Kallman, Esq. (312-578-1515, atty for STG: atty no: 25182)
221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305

STONE MCGUIRE SIEGEL, P.C. (Atty for JOHN LAROCQUE) PH: (847) 239-7555
Attn: Carlo E. Poli, Esq., 801 SKOKIE BLVD, STE #200, NORTHBROOK IL, 60062

KROPIK PAPUGA AND SHAW (Atty for 'MERS' aka Mortgage Electronic Registration Systems, Inc.) Attn: Charanne M. Papuga, <http://Kropik.net/contact.html> / Kropik@Kropik.net
120 South LaSalle Street #1500, CHICAGO IL, 60603, PH: (312) 236-6405

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

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

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, Pro Se
3 Grant Square, SUITE #363
Hinsdale, IL 60521-3351
address per: <http://www.iardc.org/ans13pr0039.pdf>
and: <http://www.avvo.com/attorneys/60521-il-paul-shelton-1115009.html>
and: <http://www.martindale.com/Paul-Leslie-Shelton/941051-lawyer.htm>
and: <http://www.lawyer.com/paul-leslie-shelton.html>
and: <http://www.lawyer.com/paul-shelton-il.html>
and: <http://www.lawyer.com/firm/shelton-law-group.html>

Paul L. Shelton
10 North Adams Street
Hinsdale, IL 60521
PH: 630-986-5555
-address per: <https://www.idfpr.com/banks/resfin/discipline/LO2009/2009-LO-26.pdf>
and: <https://www.idfpr.com/News/newsrsls/05072009SheltonOrder.pdf>
and: <https://www.idfpr.com/banks/resfin/discipline/2009/MBR-128-bandLO-26-b.pdf>
and per: http://chicago.blockshopper.com/property/09-02-422-012/10_n_adams
and: <http://www.whitepages.com/search/FindNearby?utf8=✓&street=10+N+Adams+St&where=Hinsdale,+IL>
and: <http://www.whitepages.com/name/Mike-Shelton/Hinsdale-IL/6y8peee>

David J. Cooper, 3622 N. Fremont St., Chicago, IL 60613

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:

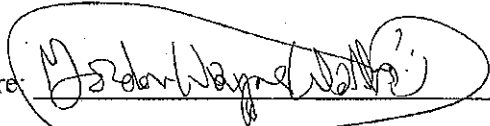
SandraT@mersinc.org – Director, Corporate Communications

1595 Springhill Rd., STE 310, Vienna VA 22182, PH: (703) 761-0694 / (800)-646-6377

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 (Affidavit of Gordon Wayne Watts, Notice of Motion, Motion for leave to file *Amicus Curiae* brief, *Amicus Curiae* of Gordon Wayne Watts in the above-captioned case, and related exhibits – with an Appendix of Exhibits) were served upon all parties listed above, this 9th day of September, 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.
- See e.g., <http://GordonWatts.com/MortgageFraud-Court-Filings/> or <http://GordonWayneWatts.com/MortgageFraud-Court-Filings/> for FedEx and USPS receipts of past, present, and future filings in this cause.
- **United State Postal Service:** The party with a PO Box, Mr. More, was served by USPS.
- **Internet:** I shall, when practically possible, post a TRUE COPY of this filing – and related filings – online at my official websites, *infra*.

Signature



Date: Wed. Sept. 09, 2015

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, 09 September 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

<u>Instrument</u>	<u>Docket/Tab#</u>
FedEx Proof of Delivery to This Court: Aug 07, 2015	Exhibit-A
FedEx Proof of Delivery to This Court: Aug 20, 2015	Exhibit-B
Chancery Docket (zoom view)	Exhibit-C
Civil Docket (zoom view)	Exhibit-D
Richard Daniggelis' house: 1720 N. Sedgwick St., Chicago, IL 60614 (pan view)	Exhibit-E
Richard Daniggelis' house ('Stop Work Order' sign: pan view)	Exhibit-F
Richard Daniggelis' house ('Stop Work Order' sign: zoom view)	Exhibit-G



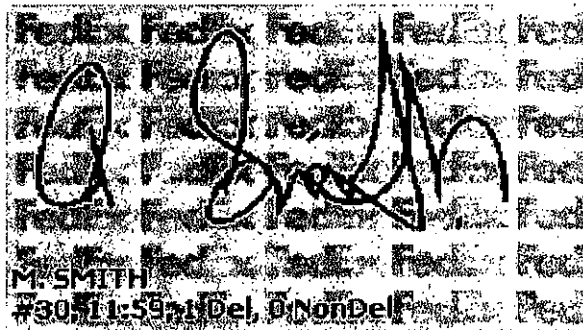
August 31, 2015

Dear Customer:

The following is the proof-of-delivery for tracking number 781089955899.

Delivery Information:

Status:	Delivered	Delivery location:	50 W WASHINGTON ST Chicago, IL 60602
Signed for by:	MSMITH	Delivery date:	Aug 7, 2015 12:00
Service type:	FedEx Ground		
Special Handling:			



Shipping Information:

Tracking number:	781089955899	Ship date:	Aug 4, 2015
		Weight:	1.7 lbs/0.8 kg

Recipient:
Dorothy Brown
Clerk of the Circuit Court
50 West Washington Street
Richard J. Daley Center, Room 1001
Chicago, IL 60602 US

Shipper:
Gordon Watts
Gordon Watts
821 ALICIA RD
LAKELAND, FL 33801 US

Thank you for choosing FedEx.



August 26, 2015

Dear Customer:

The following is the proof-of-delivery for tracking number 781161203804.

Delivery Information:

Status:	Delivered	Delivery location:	50 W WASHINGTON ST COMPTROLLER'S OFFICE Chicago, IL 60602
Signed for by:	MSMITH	Delivery date:	Aug 20, 2015 12:46
Service type:	FedEx Ground		
Special Handling:			



Shipping Information:

Tracking number:	781161203804	Ship date:	Aug 17, 2015
		Weight:	1.0 lbs/0.5 kg

Recipient:
Dorothy Brown
Clerk of the Circuit Court
50 West Washington Street
Richard J Daley Ctr, Room 1001
Chicago, IL 60602 US

Shipper:
Gordon Wayne Watts
Gordon Wayne Watts
821 ALICIA RD
LAKELAND, FL 33801 US

Thank you for choosing FedEx.

Case Information Summary for Case Number
2007-CH-29738

Case Type:

w3.courtlink.lexisnexis.com/cockcounty/Finddocket.asp?DocketKey=CAAH0CH0CJHD70CH

Search

Activity Date: 8/10/2015

NOTICE OF MOTION FILED

Attorney: PRO SE

Activity Date: 8/10/2015

MOTION FILED

Attorney: PRO SE

Activity Date: 8/21/2015

NOTICE OF MOTION FILED

Attorney: GALIC ANDJELKO

Activity Date: 8/21/2015

NOTICE OF MOTION FILED

Case Information Summary for Case Number
2014-M1-701473

Case Type: FORCIBLE ENTRY AND DETAINER

3.courtlink.lexisnexis.com/cookcounty/Finddocket.asp?DocketKey=CABEDMBQHABEHDOMD

Date: 7/2/2015

Court Time: 0930

Judge: SHEAHAN, PATRIC

Court Room: 1302

Activity Date: 6/30/2015

ANSWER/RESPONSE/REPLY

Attorney: GALIC ANDJELKO

Activity Date: 7/2/2015

EXTEND JUDGMENT - ALLOWED

Date: 9/30/2015

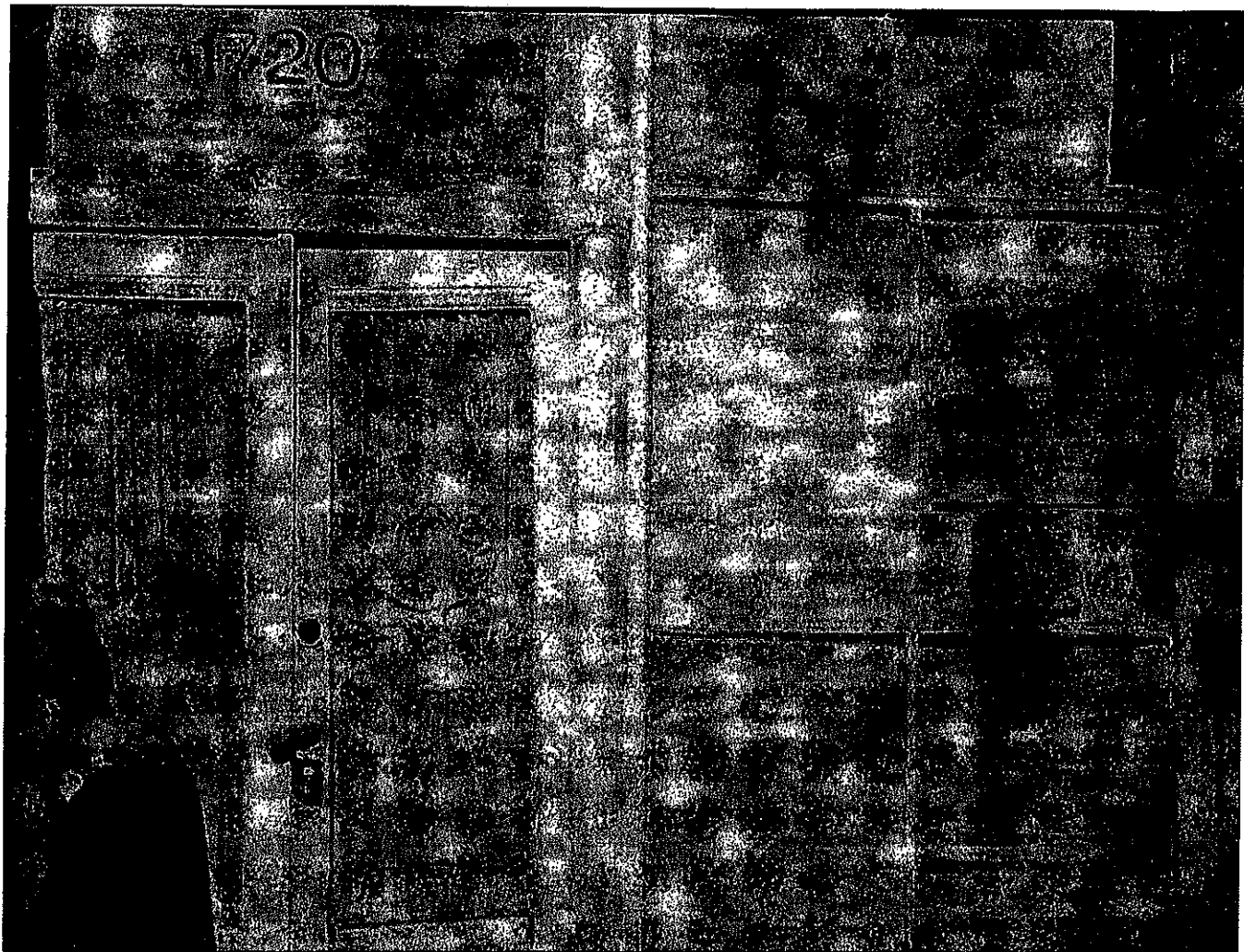
Judge: ROSARIO, DIANA

Activity Date: 8/10/2015

MOTION FILED

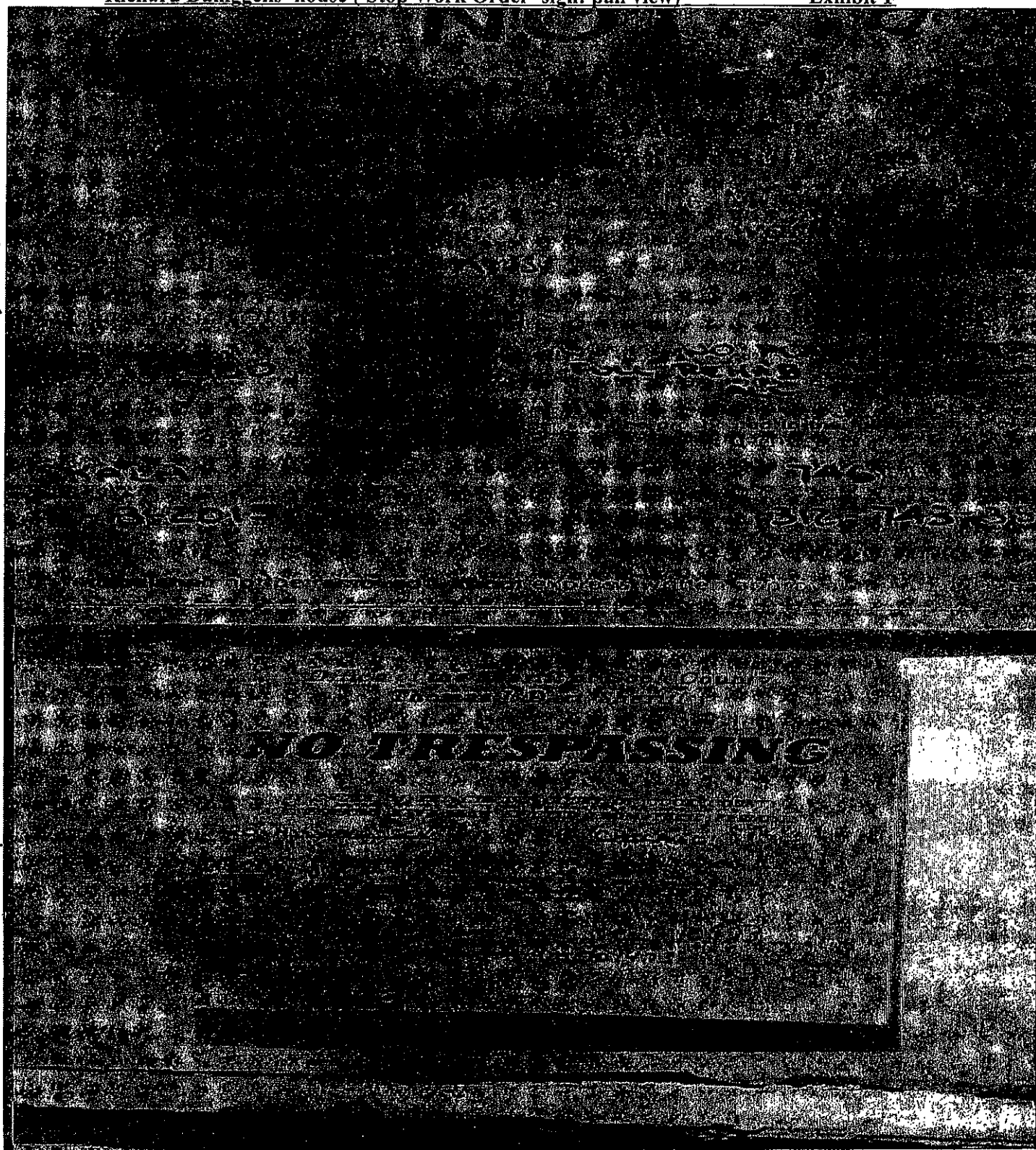
Attorney: PRO SE

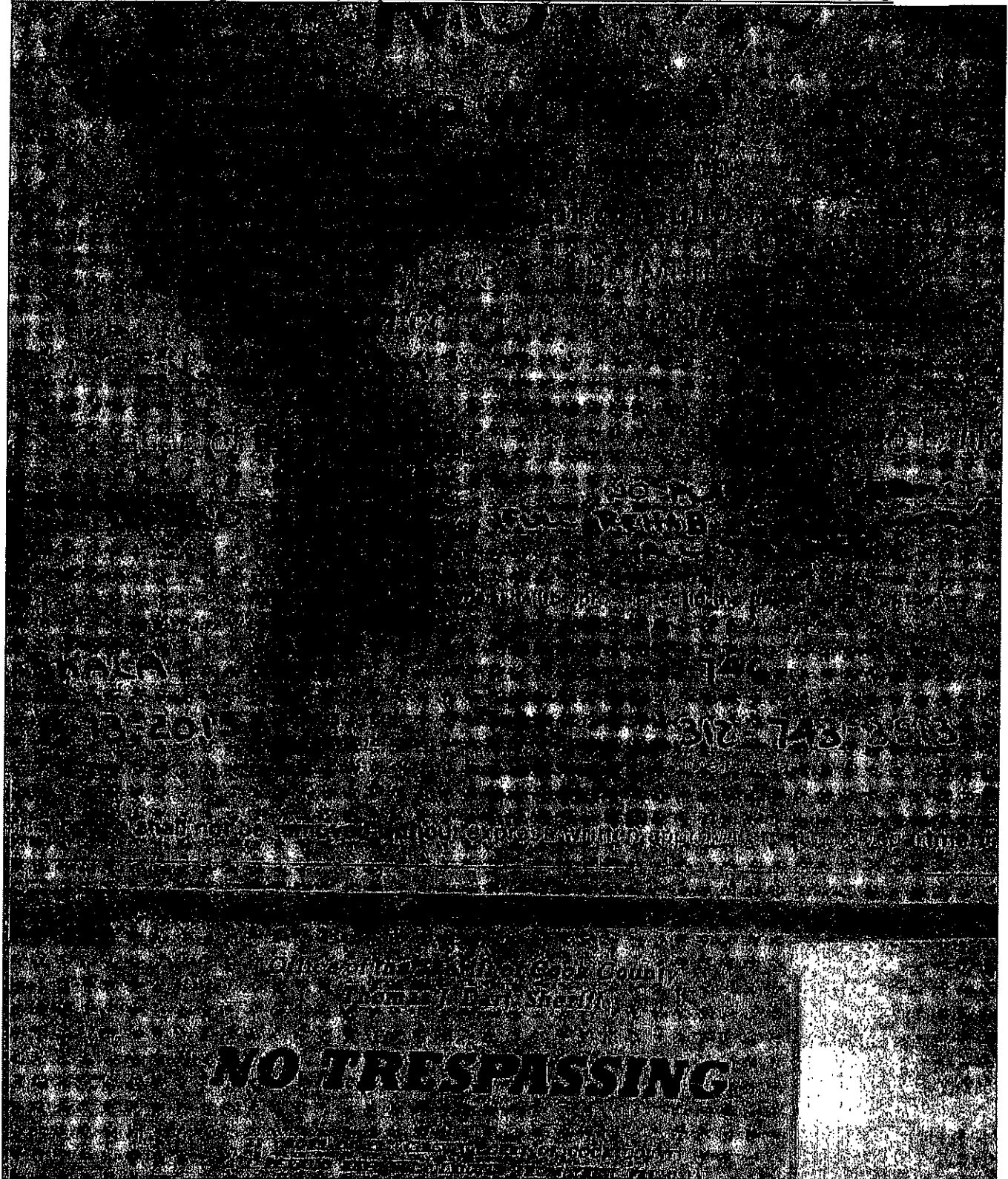
Richard Daniggelis' house: 1720 N. Sedgwick St., Chicago, IL 60614 (pan view) Exhibit-E
[[Photo credits for Exhibits E, F, and G, *infra*: Mr. Lorenz Joseph (LenzVideo@yahoo.com), professional photographer, Chicago, IL, USA]]



Richard Daniggelis' house ('Stop Work Order' sign: pan view)

Exhibit-F





IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

409

GMAC

v

Younes

)
)
)
)
)
)
)
)
)
)
)

No. 07ch 29738

ORDER

Plaintiff having failed to appear, IT IS HEREBY ORDERED that this case is continued to 10-14-15 at 9:20 AM for status.

4619

Failure to appear on this date may result in the case being dismissed for want of prosecution.

ENTERED
JUDGE SANJAY TAILOR-1870
OCT 07 2015
DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL
DEPUTY CLERK

Atty No.
Atty Name:
Attorney for:
Address:
City:
Phone:

Enter:



Dorothy Brown, Clerk of the Circuit Court of Cook County, Illinois

<http://thirstforjustice.tripod.com/DanNoticePetint3dcom101315.html>

<http://thirstforjustice.tripod.com/DanNoticePetint3dcom101315.pdf>

IN THE CIRCUIT COURT OF COOK COUNTY, IL
LAW DIVISION

G.M.A.C.

V

07 CH 29738

Richard Daniggelis et al

Notice of Motion

To: The Law Division, Cook Co, IL Courts, and all parties being served (see list, below)

From: Robert J. More ("RJM")

Notice Proper: On Monday, November 16, 2015 at 09:30am, CST, in Courtroom 1912, I shall present the attached pleading, "Notice of Intervention by right, and, in the alternative, Petition for Intervention by Non-attorney, Robert J. More," in person, if this court shall expedite the participation of RJM in the adjudication of this case by issuing orders requiring the Cook County, IL, Sheriff to permit RJM unfettered access to the R. Daley Center.

In the alternative, RJM will be available via telephone on Monday, 11/16/15 at or about 930am, CST to participate in any proceeding conducted in regard to this document at: (608) 445-5181. See Art. II, Rule 185 (Telephone Conferences), R.Civ. Proceedings in the Trial Court, Rule 206(h)(Remote Electronic Means Depositions), etc.

Respectfully submitted,

Robert J. More 10/13/15

Robert J. More, Heb. 10:31, 1 Cor. 10:13, Ja. 2:13, Rom. 12:21

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 and all attached pleadings were delivered to the following parties as indicated:

Clerk of the Circuit Court, Cook County, IL, Law Division

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

Gordon W. Watts URL: www.gordonwatts.com and www.gordonwaynewatts.com (Email:

Gww1210@aol.com and Gww1210@gmail.com) 821 Alicia Road, Lakeland, FL, 33801-2113.
Cell: 863-4092109, PH: 863-688-9880

PIERCE & ASSOCIATES (Atty. for GMAC) (PA0715886) PH: (312) 346-9088 URL:
http://www.Atty-Pierce.com/index.php?
option=com_content&view=article&id=223&Itemid=112 Attn: Joseph J. Knopic, II, Esq., 1
North Dearborn St., STE #1300 CHICAGO IL, 60602

Richard Indyke, Esq. (312-332-2828 Atty for LaSalle Bank Natl Assn), John K. Kallman, Esq.
(312-578-1515, atty for STG: atty no: 25182) 221 N. LaSalle St. STE 1200, Chicago, IL 60601-
1305

STONE MCGUIRE SIEGEL, P.C. (Atty for JOHN LAROCQUE) PH: (847) 239-7555
Attn: Carlo E. Poli, Esq., 801 SKOKIE BLVD, STE #200, NORTHBROOK IL, 60062

KROPIK PAPUGA AND SHAW (Atty for 'MERS' aka Mortgage Electronic Registration
Systems, Inc.) Attn: Charanne M. Papuga, http://Kropik.net/contact.html / Kropik@Kropik.net
120 South LaSalle Street #1500, CHICAGO IL, 60603. PH: (312) 236-6405

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

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

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. PH: (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

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:
RoJoe69@yahoo.com

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

Paul L. Shelton, Pro Se, 3 Grant Square, SUITE #363, Hinsdale, IL 60521-3351.
PMSA136@aol.com, PLShelton@SBCGlobal.net

Paul L. Shelton, 10 North Adams Street, Hinsdale, IL 60521.
PMSA136@aol.com, PLShelton@SBCGlobal.net

David J. Cooper, 3622 N. Fremont St., Chicago, IL 60613

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MERS (Mortgage Electronic Registration Systems, Inc.) P.O. Box 2026, Flint, MI 48501-2026

MERS (Mortgage Electronic Registration Systems, Inc.), 1901 East Voorhees St, Suite 'C'
Danville, IL 61834-4512 – Hours: 8a-430p (CST)

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
1595 Springhill Rd., STE 310, Vienna VA 22182. PH: (703) 761-0694 / (800)-646-6377

I, Robert J. More, 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 were served upon all parties listed above, this 13th day of October, 2015 by the following methods:

I am serving all parties by electronic filing, using the court's electronic filing system.

I am contemporaneously serving all parties by email, as indicated above.

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

I am not serving any party by hard copy due to the fact that it is a morally and financially unfeasible burden for which I am not morally obliged to waste the nonrenewable limited resources for which I am an humble steward. Let this statement serve as notice as to whom I have and have not serve.

Signature:

Robert J. More
10/13/15

Intervenor Non-attorney Robert J. More

P.O. Box 6926, Chicago, IL, 60680-6926. PH: (608) 445-5181

Web: <http://thirstforjustice.tripod.com>

Email: Anselm45@gmail.com

Date: Tuesday, October 13, 2015

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10/13/2015 1:25 PM
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<http://thirstforjustice.tripod.com/danpetint3dcom101315.html>

<http://thirstforjustice.tripod.com/danpetint3dcom101315.pdf>

IN THE CIRCUIT COURT OF COOK COUNTY, IL
LAW DIVISION

G.M.A.C.

V

07 CH 29738

Richard Daniggelis et al

**Notice of Intervention by right, and, in the alternative,
Petition for Intervention by Non-attorney, Robert J. More**

I, Robert J. More, hereby give notice of my intervention by right for the following two reasons:

1) As you can see on the docket, I am a named party. (Note to the court: on docket, my name is misspelled: I am not 'MOORE ROBERT' but rather, the correct spelling of my name is 'ROBERT J. MORE' with one 'O' and not two.)

2) 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."

Therefore, I give notice to the court and all parties that I intervene and participate as a matter of right. In the alternative, if this legal argument is deficient, I respectfully move this court for leave to intervene in the above-named case as a Prospective Intervenor.

Prospective Intervenor ("PI"), Robert J. More's ("RJM's") Proposed Third Component of 10/13/15 of Petition for Leave to Intervene Into This Case of 10/13/15 set for Monday, 11/16/15, at 9:30am, CST, in courtroom 1912, before Associate Judge, Sanjay T. Tailor, Law Division, to be Superseded, Retracted, Augmented, Supplemented, or Otherwise Modified Before or After Such November Date

Now comes RJM to move this Court to grant RJM leave to participate in the adjudication of this case as some form of intervenor wherein, for a number of reasons, a complete explication of which would necessarily be beyond the scope of this document but in regard to which an enumeration whereof would be provided upon RJM's receiving a request and/or demand wherefore and/or in any foreseeable scenario, in future components of this document, and in support and explanation

whereof, RJM avers and explains as follows:

1. RJM incorporates herein the factual predicates contained in the documents Prospective Intervenor G. W. Watts has filed in regard to the case this document concerns ("this case") and those legal arguments included wherein which are devoid of flattery and/or any other sinful content and/or illegitimate legal postulations as if fully set forth herein, while simultaneously declaring his disapproval of such material not so incorporated.

2. The primary reason for RJM's filing of this document is the concern of RJM to ensure the adequate coverage of that component of his moral liability as he subjectively apprehends it in regard to the matters this case concerns ("these matters") which correlates to the axiom: *Qui nocentibus parcit, innocentibus punit*. (Latin for: "He who spares the guilty, punishes the innocent." Jenk. Cent. Cas. 126. <http://legaldictionary.lawin.org/qui-parcit-nocentibus-innocentibus-punit/>)

3. Secondary reasons for RJM's intervention endeavor herein include RJM's concern to ensure that there are funds from which RJM can collect judgments against both Daniggelis and his Attorney A. Galic for the (several) torts committed by each against RJM over the past five years and to secure the damages that RJM understands that Younes owes RJM for the tort liability he has incurred via injuries he has unjustifiably caused RJM, w/n such period, as well as the burden which RJM as an able-bodied citizen must continue to bear to contribute to the adequate coverage of the "Alter or Abolish" ("forms of government" which have become [at any given juncture of history] "destructive of the ends for which governments are [legitimately] established amongst men") provision of the Declaration of Independence, which document, of course, has, besides constituting an enabling document of the U.S. Constitution, been statutorily instituted into the U.S. Code. 4. In so many ways, such matters represent all that is presently so very wrong with the world.

5. The contents of documents already filed in various theatres by RJM in regard to these matters, and/or which regard problems related to this adjudication have all been compiled in one document which is (or soon shall tentatively be) accessible here:

<http://thirstforjustice.tripod.com/dan101215.html>

6. RJM's initial demand in this filing is an adjudication of the "Standard and Method of Adjudication" documents posted in the entry of the same name in the Table of Contents of the website whose URL is provided in the entry immediately preceding this one.

7. Most recently in regard to RJM's endeavors to intervene in regard to these matters, Judge G. Scully issued an order in the Eviction Case related whereto transferring possession of Daniggelis' former residence to a Mr. J. Younes, without ever having issued any ruling in regard to the documents filed by RJM in that case, not even in regard to whether Daniggelis may have misrepresented his financial condition to the Court in contesting Younes' eviction action against him.

8. RJM is still endeavoring to get a document inviting him to demonstrate that he did not incur felony liability in utilizing such tactic delivered to him, which document can tentatively be accessed here: <http://thirstforjustice.tripod.com/daninvitjiscuno242.html>, before RJM endeavors to present a "Petition for the Issuance of an Indictment for a Violation of the Provisions of 18 USC 242" to the Federal Grand Jury assessing evidence of activity alleged to constitute Federal crimes in Chicago, IL, and RJM would put the reception of his present contact information to good use in such regard, as RJM would certainly never risk placing anyone not guilty of any crime in jeopardy of being subjected to any criminal prosecution, on the one hand, w/o on the other, risking leaving his "*Qui parcit*" liability inadequately covered.

9. RJM will be available via telephone on Monday, 11/16/15 at or about 930am, CST to participate in any proceeding conducted in regard to this document at: (608) 445-5181.

10. This Court can substantially expedite the participation of RJM in the adjudication of this case by issuing orders requiring the Cook County, IL, Sheriff to permit RJM unfettered access to the R. Daley Center, and the possession and use of (an) Electronic Recording Device(s) ("ERD") at all times at which RJM would ever be conducting activity upon Cook County, IL, property of any type, subject only to the limitations referenced in the IL Supreme Court's opinion in "*People v. Clark*."

11. To be continued, etc. as the prioritized burden(s) to which RJM is subject (see: *Divini Redemptoris*, 1937) may permit.

Wherefore, RJM herein respectfully moves this Court to grant the relief described in the title to this

document.

Respectfully submitted,

Robert J. More
10/13/15

Robert J. More, Heb. 10:31, 1 Cor. 10:13, Ja. 2:13, Rom. 12:21

Document List of 10/13/15

1. Document List of 10/13/15 - D/L of 10/13/15 X
2. Prospective...Third Component ...RJM ...Intervene.... X
3. Notice of Motion of 10/13/15 in.... X
4. Invitation to Judge G. Scully to Demonstrate Non-criminality of Abstinence from Ruling....
5. Petition to Federal Grand Jury...for Indictment ...18 USC 242...George Scully
6. Proposed Release and Satisfaction...10/13/15....
7. Record of Time and Resources Consumed....X
8. List of URL's of Documents, Authorities and/or Acronyms Referenced in Main Document

#6

Research, Organization, Composition of Documents - 10/12, 19:00 - 0:15, 10/13, 9:15 - 10:00
Posting, Filing, Service, Report, Posting

Entries adjacent to which there is an "X" have been included in document submission of 10/13/15
in this case

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 and all attached pleadings were delivered to the following parties as indicated:

Clerk of the Circuit Court, Cook County, IL, Law Division

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

Gordon W. Watts URL: www.gordonwatts.com and www.gordonwaynewatts.com (Email: Gww1210@aol.com and Gww1210@gmail.com) 821 Alicia Road, Lakeland, FL, 33801-2113. Cell: 863-4092109, PH: 863-688-9880

PIERCE & ASSOCIATES (Atty. for GMAC) (PA0715886) PH: (312) 346-9088 URL: <http://www.Atty-Pierce.com/index.php?>

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[option=com_content&view=article&id=223&Itemid=112](#) Attn: Joseph J. Knopic, II,
Esq., 1 North Dearborn St., STE #1300 CHICAGO IL, 60602

Richard Indyke, Esq. (312-332-2828 Atty for LaSalle Bank Natl Assn), John K. Kallman,
Esq. (312-578-1515, atty for STG: atty no: 25182) 221 N. LaSalle St. STE 1200,
Chicago, IL 60601-1305

STONE MCGUIRE SIEGEL, P.C. (Atty for JOHN LAROCQUE) PH: (847) 239-7555
Attn: Carlo E. Poli, Esq., 801 SKOKIE BLVD, STE #200, NORTHBROOK IL, 60062

KROPIK PAPUGA AND SHAW (Atty for 'MERS' aka Mortgage Electronic Registration
Systems, Inc.) Attn: Charanne M. Papuga, <http://Kropik.net/contact.html> /
Kropik@Kropik.net 120 South LaSalle Street #1500, CHICAGO IL, 60603. PH: (312)
236-6405

COHON RAIIZES@AL LLP (90192) (Atty for STEWART TITLE ILLINOIS) Attn:
Carrie A. Dolan, 208 S LASALLE#1860, CHICAGO IL, 60604. PH: (312) 726-2252

Stewart Title, Attn: Leigh Curry [http://www.Stewart.com/en/stc/chicago/contact-
us/contact-us.html](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

KING HOLLOWAY LLC (Atty. for Joseph Younes)
<http://www.KingHolloway.com/contact.htm> Attn: Peter M. King, Esq. [PKing@khl-
law.com](mailto:PKing@khl-law.com) One North LaSalle Street, Suite 3040, Chicago, IL 60602. PH: (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

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:
RoJoe69@yahoo.com

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

Paul L. Shelton, Pro Se, 3 Grant Square, SUITE #363, Hinsdale, IL 60521-3351.
PMSA136@aol.com, PLShelton@SBCGlobal.net

Paul L. Shelton, 10 North Adams Street, Hinsdale, IL 60521.
PMSA136@aol.com, PLShelton@SBCGlobal.net

David J. Cooper, 3622 N. Fremont St., Chicago, IL 60613

MERS (Mortgage Electronic Registration Systems, Inc.) P.O. Box 2026, Flint, MI 48501-

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2026

MERS (Mortgage Electronic Registration Systems, Inc.), 1901 East Voorhees St, Suite 'C'
Danville, IL 61834-4512 – Hours: 8a-430p (CST)

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
1595 Springhill Rd., STE 310, Vienna VA 22182. PH: (703) 761-0694 / (800)-646-6377

I, Robert J. More, 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 were served upon all parties listed above, this 13th day of October, 2015 by the following methods:

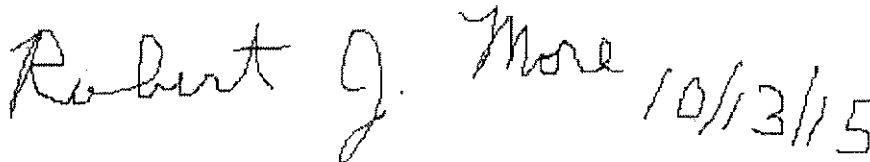
I am serving all parties by electronic filing, using the court's electronic filing system.

I am contemporaneously serving all parties by email, as indicated above.

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

I am not serving any party by hard copy due to the fact that it is a morally and financially unfeasible burden for which I am not morally obliged to waste the nonrenewable limited resources for which I am an humble steward. Let this statement serve as notice as to whom I have and have not served.

Signature:

 Robert J. More 10/13/15

Date: Tuesday, October 13, 2015

Intervenor Non-attorney Robert J. More
P.O. Box 6926, Chicago, IL, 60680-6926. PH: (608) 445-5181
Web: <http://thirstforjustice.tripod.com>
Email: Anselm45@gmail.com

Date: Tuesday, October 13, 2015

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

GMAC
Plaintiff
YOUNG
Defendant

No. 07 CH 29738

CASE MANAGEMENT ORDER

This case is before the court for ___ initial subsequent status, or motion, counsel for ___ plaintiff, defendant, ___ third party defendant present, it is hereby ordered:

- 4296 1. Non-opinion written discovery to be completed by _____
- 4218 2. Non-opinion oral discovery to be completed by _____
- 4296 3. _____ shall complete outstanding written discovery by _____
- 4218 4. _____ shall be presented for deposition by _____
- 4253 5. Plaintiff shall serve Rule 213 f(2) and (3) disclosures by _____
- 4253 6. Defendant shall serve Rule 213 f(2) and (3) disclosures by _____
- 4218 7. Plaintiff's 213 f(2) and (3) witnesses to be deposed by _____
- 4218 8. Defendant's 213 f(2) and (3) witnesses to be deposed by _____
- 4295 9. All discovery to be completed by _____
- 4231 10. All dispositive motions shall be filed and noticed no later than _____
- 4619 11. This matter is continued to 11-4-15 at 9:10 AM for:
(check one or more)
 Service Status Pleadings Status Written Discovery Status
 Compliance Status Settlement Status Oral Discovery Status
 Default / Prove Up Final Pretrial Expert Discovery Status
 Pretrial (parties must be present unless excused by order of Court)
 Other status
- 4482 12. Jury/Bench trial is set to begin on _____ at 10:30 a.m.

is further ordered: All parties of record are ordered to appear on 11-4-2015 at 9:10 AM.

4250

ENTERED
JUDGE SANJAY TAILOR - 1870
OCT 14 2015
DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY,
DEPUTY CLERK

Atty No. 33013
Atty Name: ANDREAS GAUC
Attorney for: RICHARD DANIEGERS
Address: 134 N. La Salle St. #1040
City: CHICAGO, IL 60602
Phone: 312 986-1070

Enter:

Judge Sanjay T. Tailor No. 1870

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

5
40

GMAC

Plaintiff

vs.

MOONES

Defendant

No. 07 CH 29738

CASE MANAGEMENT ORDER

This case is before the court for initial subsequent status, or motion, counsel for plaintiff, defendant, third party defendant present, it is hereby ordered:

- 4296 1. Non-opinion written discovery to be completed by _____
- 4218 2. Non-opinion oral discovery to be completed by _____
- 4296 3. _____ shall complete outstanding written discovery by _____
- 4218 4. _____ shall be presented for deposition by _____
- 4253 5. Plaintiff shall serve Rule 213 f(2) and (3) disclosures by _____
- 4253 6. Defendant shall serve Rule 213 f(2) and (3) disclosures by _____
- 4218 7. Plaintiff's 213 f(2) and (3) witnesses to be deposed by _____
- 4218 8. Defendant's 213 f(2) and (3) witnesses to be deposed by _____
- 4295 9. All discovery to be completed by _____
- 4231 10. All dispositive motions shall be filed and noticed no later than _____
- 4619 11. This matter is continued to 11-16-15 at 9:30 AM for:
 - (check one or more)
 - Service Status
 - Compliance Status
 - Default / Prove Up
 - Pretrial (parties must be present unless excused by order of Court)
 - Other _____
 - Pleadings Status
 - Settlement Status
 - Final Pretrial
 - Written Discovery Status
 - Oral Discovery Status
 - Expert Discovery Status
- 4482 12. Jury/Bench trial is set to begin on _____ at 10:30 a.m.

It is further ordered:

Richard Daniggelis is granted 10 days to file a report regarding the status of the pleadings and regarding the parties said in this case.

ENTERED
JUDGE SANJAY TAILOR-1870
NOV 04 2015
DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL
DEPUTY CLERK

Atty No. 33013
Atty Name: ANDREAS GAI
Attorney for: RICHARD DANIGGELIS
Address: 134 N. La Salle St #1010
City: CHICAGO, IL 60602
Phone: 312 986-1510

[Signature]
Judge Sanjay T. Tailor No. 1870

<http://ThirstForJustice.net/AmendedDaniggelis11162015.pdf>

<http://ThirstForJustice.Tripod.com/AmendedDaniggelis11162015.pdf>

IN THE CIRCUIT COURT OF COOK COUNTY, IL
LAW DIVISION

G.M.A.C.

V

07 CH 29738

Richard Daniggelis et al.

**Amended Notice of Intervention by right, and, in the alternative,
Petition for Intervention by Non-attorney, Robert J. More**

Comes now, Robert J. More (hereinafter abbreviated "RJM") and amends my pleading, dated Tuesday, October 13, 2015, in the above-styled case, as a matter of right of 1st Amendment Redress:

amended complaint – definition:

"n. what results when the party suing (plaintiff or petitioner) [in the case, RJM] changes the complaint he/she has filed. It must be in writing, and can be done before the complaint is served on any defendant... Complaints are amended to correct facts, add new causes of action (bases for the lawsuit)... Source: *LAW.com* –

<http://dictionary.law.com/Default.aspx?selected=2395>

"Rule 15 of the federal rules of civil procedure (USCS Fed Rules Civ Proc R 15) [which RJM apprehends is controlling viz the Supremacy Clause] provides that a plaintiff may amend his complaint as a matter of course, if the defendant has not filed an answer to the original complaint." Source: <http://definitions.uslegal.com/a/amended-complaint/>

ROBERT J. MORE'S COUNTER-CLAIMS AND CROSS-CLAIMS

Now comes non-lawyer Robert J. More (hereinafter "RJM"), a named party to this case, *pro se*, and makes the following counterclaims:

Introduction

I incorporate, by reference, my claims and statements contained within the 4 corners of the original complaint (dated Tue., Oct. 13, 2015), for which this filing is an amendment.

This counterclaim, *infra*, is restricted Solely to the Incident of 10/29/13, Regarding the Allegedly Unauthorized Entry into the Residence at 1720 N. Sedgwick St. Chicago, IL, ("1720") Accompanied by Notice of Intent to Specify Other Damages Incurred by RJM from Various Tortious Activities of Various Tortfeasors Involved in the Case this Document Concerns as the Circumstances of Providence May Permit. I aver and affirm that I attempted, but was unable to,

to e-file this claim in the above-styled case on or before 10/29/15, in order to beat the 2-year deadline, but, insofar as I was unable, I invoke the Common Law standard of *nunc pro tunc*, if that would be needed (it may not be) regarding “changing back to an earlier date of an order, judgment or filing of a document” i.e., **said failed attempt to file this counterclaim.**

Claim Proper – for Trespass on the Case Damages of 10/28/15:

1. RJM abided, abode, and resided on the property referenced herein supra as 1720, from mid January of 2011 until early November, 2013.
2. On or about 10/30/13, RJM was informed by Mr. Richard B. Daniggelis (“RBD”) that he had encountered one or more individuals climbing the stairs to his second floor living area on or about 10/29/13.
3. RBD claimed that such individuals had cut the lock on the front door of 1720 w/o RBD’s permission.
4. RBD claimed that the men whom he encountered on this occasion fled the residence shortly after this encounter.
5. RBD then changed the locks on 1720 from those to which RBD had provided RJM a key to locks to which RJM was denied any key.
6. RBD then established a complex rule or more appropriately, collection of rules for RJM’s entrance and departure from 1720.
7. These rules were so onerous that RJM returned to residing (homeless) under the bridge from which he had relocated to 1720 in January of 2011, upon the request of Mr. John Dzendrowski to help rescue the alleged victim of mortgage fraud – RBD.
8. RJM did not succeed in getting his possessions removed from 1720 at that juncture.
9. This development ended up costing RJM enormously in terms of lost access to the possessions which he had brought from various origins to 1720, which costs and the arrangements and developments to which they correspond will be itemized at some future date, Providence permitting.
10. RJM finally succeeded in recovering such possessions in 2015, including a water filter recovered in July of 2015 as RBD was removing his own possessions subject to his eviction.
11. This document supersedes any and all demands issued in regard to this matter prior to its filing, such as that referenced in Doc. #8 of the D/L of 10/28/15.

Prayer for Relief

RJM herein demands the sum of \$5,000.00 for all damages incurred from the trespass on the case referenced herein *supra*, not constituting consequential damages of the duty breach(es) this conveyance concerns, with all consequential damages of this particular tort claim to be itemized as might be necessary at some future date, along with particularization of the components of other claims and itemization of any and all damages concerned wherewith. Trial by Jury herein demanded on this claim and any and all others which RJM might ever have to file in regard to

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the matters this document concerns.

Respectfully submitted,

Robert J. More, Heb. 10:31, 1 Cor. 10:13, Jas. 2:13, Rom. 12:21

Addendum to the Doc. List of the original complaint – record of time spent:

Research, Organization, Composition of Documents - 10/27, 19:00 - 19:30, 10/28, procurement of email addresses of parties concerned 9:00 – 10:00 and transfer of "...Demand..." document and emailing, 14:45 - 16:45 – Composition of Documents, Posting, Filing, Service, Report, Posting
Entries adjacent to which there is an "X" have been included in document submission of 10/28/15 in this case

Additional Counter-Claims: Regarding Front-Door Lock Disassembly described supra:

Robert J. More herein demands the sum of \$5,000.00, as settlement of all claims *other* than any claim for consequential damages in regard to the injuries he sustained via the trespass referenced in the title to this documentation, which are demanded via a trespass on the case theory in regard to the matters concerned.

This demand has been transmitted in lieu of the filing of any legal case in the Circuit Court of Cook County, IL ("CCCC") in regard to the matters it concerns, in light of the demonstrably criminal and tortious order issued by Judge Sidney Jones on 9/13/13 postulating that Robert J. More ("RJM") is prohibited from filing any legal case in the CCCC unless and until RJM remits a fine which RJM understands that he entirely lacks the moral authority to remit and which he lacks the resources to remit, even were he to not lack the moral authority to remit, and without the permission of whatever Judge would be presiding in Room 1307 of the R. Daley Center at the time of any attempted filing of any new case.

Given the constraints and exigencies to which RJM has been made, howsoever unjustifiably, unconscionably, criminally, despotically, and tortiously, subject as referenced herein *supra*, it is RJM's understanding that the transmission of this document to those to whom it has been transmitted effectively puts such persons and entities on notice of the matters concerned to a measure sufficient to ensure the protection of any and all claims related to the incident so referenced from any legitimate invocation of any Statute of Limitations ("SOL") Defense and/or any other such type defense, that might, absent the delivery of this document have been available as a legitimate defense whereto. The law cannot require the impossible and this notice enables those receiving it to preserve evidence as it might ever be considered necessary to preserve such in order to present a legitimate defense if any can be presented in regard to the claims concerned.

Additional Demands / Notices to satisfy the due Process of 1st. Amendment Redress:

1. This Court has been apprised that, to the best of my ability, I shall post these documents as front-page news at <http://ThirstForJustice.Tripod.com> and <http://www.ThirstForJustice.net>

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11/16/2015 8:30 AM
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2. Robert J. More shall be permitted to possess and use an electronic recording device ("ERD") on the property of the R. Daley Center as he understands he would ever have to possess and use such, limited only the limitations referenced in the *People v. Clark*, 2014 IL 1097190, and *People v. Melongo*, 2014 IL 114852, decisions of the IL Supreme Court, issued simultaneously on March 20, 2014.
3. To satisfy Constitutional Redress and Due Process requirements, and applicable case law, RJM shall be permitted access to the complete case file compiled in re the case this document concerns which is in the custody of the Clerk of the CCCC, IL, with the possession and use of the means to reproduce the entirety and/or any component part whereof.
4. RJM has informed this Court that it is his informed understanding that there would be no justification for the addressing of the merits of the case this document concerns prior to the adjudication of all of the Standard & Method of Adjudication issues ("S&MAI") referenced in RJM's "...Petition for Intervention of ...10/13/15...." – in order, *inter alia*, to ensure adequate "*Webb v. Webb*," (451 U.S. 493) preservation of any and all issues of a federal constitutional dimension present to this juncture in re the merits of this case and/or the S&M of Adjudication used thus far in re where to and/or in regard to whatever such S&M might be used in re where to in the future such that what would either be ensured in re where to would be that if a legitimate adjudication would not result in re where to, that such result could not be legitimately attributed to any culpable negligence in there not having been an adequate securing of this theatre – or that a legitimate adjudication will be executed and conducted in regard to this case.
5. This Court has been informed that RJM will endeavor to procure protection for any and any and all government official(s) ever requesting such in order to enable him, her and/or them, respectively, in any given instance, to bear the burdens of the exercise of the authority of any given government office w/o having to expect uncontested retaliation from the button pushers and string pullers of this nation's institutions as a consequence of the bearing of any given burden, such as that most onerous one referenced in *In re Murchison* 349 U.S. 133, 136 (1955) to keep the adjudication balance "nice, clear and true" between the parties competing in any given adjudication.
6. This Court has been informed that it is the informed understanding of Robert J. More ("RJM") that for, *inter alia*, the resuscitation of the Non-counterfeit Version of the Rule of Law and the salvaging of what might still be salvaged from the ruins of the civilization once known as "Christendom" - from which countless blessings of every type accrued to the human race- that the presumption of regularity in government activity implicitly present in the enforcement of laws and the deployment of military units, which is not not defined, w/ a presumption that the ordinary and customary arrangement in re which activity has been conducted in and by government entities in this period of history has continued to be one of the accommodation of the patently illegitimate agenda of the

corrupt business leaders who directly, or indirectly, influence the courts with an agenda to defraud legitimate reliance interests anchored in unalienable natural law rights w/ impunity, and which implemented agenda in its implementation, besides having unjustifiably caused hundreds of millions of deaths and incalculable suffering and misery and worse, sin, has left according to seemingly creditable reports the poorest 80% of Americans possessing claim to just 7% of this Country's resources and the replacement of the regulation of the summoning of the collective force of the body politic/bearing of the sword from the Court systems presently in place and operative in this nation, to common law tribunals of the type referenced as the "25 Barons" in Clause # 61 of the **Magna Carta** and the Standing Armies" presently in place both professedly for National Defense and Domestic Law Enforcement w/ the Militia referenced in the Constitution and the Posse Summoning and Deployment Used in Medieval England, respectively and that the matters this document concerns thoroughly substantiates such claim.

TRANSLATION: This Court is being told and informed (in point #6. *supra*) that Robert J. More ("RJM") holds out some hope that This Court (Judge Sanjay T. Tailor, presiding) will give a 'fair hearing' to the above-styled case.

***** CONCLUSION: *****

Wherefore, RJM hereby prays for a "nice, clear, and true" adjudication by This Court (cf: *In re Murchison* 349 U.S. 133, 136 (1955)), of the matter at case currently before the court.

In order to expedite this, RJM asks This Court to:

1. Carefully review all the filings of RJM and other parties, and:
2. Either:
 1. issue an order allowing RJM to attend this morning's hearing at 9:30am (RJM is 'trespassed' from the main courthouse, and thus Due Process and Redress are DENIED, thus necessitating my request for you to issue an order permitting me to attend) – or:
 2. permit me, **as a matter of right**, to participate in this hearing by telephone: See Art. II, Rule 185 (Telephone Conferences), R.Civ. Proceedings in the Trial Court, Rule 206(h)(Remote Electronic Means Depositions), etc. via telephone means.
3. **My telephone number is (608) 445-5181.**
3. It has come to RJM's attention that This Court believes that RJM and Gordon W. Watts (hereinafter "GWW") are one in the same person: "Who is that Robert More from Florida?" (reported to me to be a question that Judge Tailor asked RBD)
4. Therefore, RJM asks This Court to allow GWW to participate by teleconference in today's hearing, as with myself. GWW's telephone numbers of record are:
 1. **Home number is (863) 688-9880.**
 2. **Cell number is (863) 409-2109.**

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3. GWW is the "guy in Florida," and can not attend; I am the "guy in Chicago," and am willing, ready, and able to attend the hearing, for which you have scheduled a hearing date.
4. Therefore, I ask This Court, Judge S.T. Tailor presiding, to carefully review all docs filed in this cause and rule accordingly.

Respectfully submitted,

Electronic Signature:

Robert J. More, Heb. 10:31, 1 Cor. 10:13, Ja. 2:13, Rom. 12:21

Intervenor Non-attorney Robert J. More

P.O. Box 6926, Chicago, IL, 60680-6926. PH: (608) 445-5181

Web: <http://ThirstForJustice.Tripod.com> and <http://ThirstForJustice.net>

Email: Anselm45@gmail.com Date: Monday, November 16, 2015

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 and all attached pleadings were delivered to the following parties as indicated:

Clerk of the Circuit Court, Cook County, IL, Law Division, by electronic filing - and by email, if applicable/possible.

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

Gordon W. Watts URL: www.gordonwatts.com and www.gordonwaynewatts.com (Email: Gww1210@aol.com and Gww1210@gmail.com) 821 Alicia Road, Lakeland, FL, 33801-2113. Cell: 863-4092109, PH: 863-688-9880

Joseph Younes Law Offices / <http://ChicagoAccidentAttorney.net> 1166 W WASHINGTON ST Ste 600, Chicago, IL 60602-3596 Phone: (312) 372-1122, Fax: (312) 372-1408 Email: RoJoe69@yahoo.com

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

Richard Indyke, Esq. (312-332-2828 Atty for LaSalle Bank Natl Assn), John K. Kallman, Esq. (312-578-1515, atty for STG; atty no: 25182) 221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305, *no known email address.*

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Paul L. Shelton, Pro Se, 3 Grant Square, SUITE #363, Hinsdale, IL 60521-3351.
PMSA136@aol.com, PLShelton@SBCGlobal.net

Paul L. Shelton, 10 North Adams Street, Hinsdale, IL 60521.
PMSA136@aol.com, PLShelton@SBCGlobal.net

I, Robert J. More, 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 were served upon all parties listed above, this 16th day of November, 2015 by the following methods:

I am serving all parties by electronic filing, using the court's electronic filing system.

I am contemporaneously serving all parties by email, as indicated above.

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

I am not serving any party by hard copy due to the fact that it is a morally and financially unfeasible burden for which I am not morally obliged to waste the nonrenewable limited resources for which I am an humble steward. Let this statement serve as notice as to whom I have and have not served.

Electronic Signature:

Robert J. More, Heb. 10:31, 1 Cor. 10:13, Ja. 2:13, Rom. 12:21

Date: Monday, November 16, 2015

Intervenor Non-attorney Robert J. More

P.O. Box 6926, Chicago, IL, 60680-6926. PH: (608) 445-5181

Web: <http://ThirstForJustice.Tripod.com> and <http://ThirstForJustice.net>

Email: Anselm45@gmail.com

Date: Monday, November 16, 2015

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

GMAC

Plaintiff

v.

No. 07 CH 29738

YOUNG

Defendant

ORDER

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

TT 11-23-15 / 9231

1. ANDREW SAUC, the attorney for Richard Damigello, is ordered to file a report regarding the status of the pleadings in 7 days.

TT 5231

2. Gordon Wattson's motion to file amicus curiae brief is denied and Robert Moore's motion to intervene is denied. In addition Gordon Watt's request to participate via phone is also denied.

Atty. No.: 33013

3. ^{Defendant's counsel represents that} There are no pending claims

Name: ANDREW SAUC against GMAC

Atty. for: Richard Damigello 4. This matter is continued for TT 11-25-15

Address: 34 N. LaSalle St. # 1040 Dated: 11-25-15

City/State/Zip: CHICAGO, IL 60602 Signed at 9:30 AM

Telephone: 312 986-1510

Judge

ENTERED Judge's No. JUDGE SANJAY TAILOR-1870

NOV 16 2015

DOROTHY BROWN DEPUTY CLERK COOK COUNTY, IL

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

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

16

GMAC)
Plaintiff)
vs.)
YOUNES et al.)
Defendants)

No. 07 CH 29738

CASE MANAGEMENT ORDER

Counsel

This case is before the court for ___ initial subsequent status, or motion, counsel for plaintiff, ___ defendant, ___ third party defendant present, it is hereby ordered:

- 4296 1. Non-opinion written discovery to be completed by _____
- 4218 2. Non-opinion oral discovery to be completed by _____
- 4296 3. _____ shall complete outstanding written discovery by _____
- 4218 4. _____ shall be presented for deposition by _____
- 4253 5. Plaintiff shall serve Rule 213 f(2) and (3) disclosures by _____
- 4253 6. Defendant shall serve Rule 213 f(2) and (3) disclosures by _____
- 4218 7. Plaintiff's 213 f(2) and (3) witnesses to be deposed by _____
- 4218 8. Defendant's 213 f(2) and (3) witnesses to be deposed by _____
- 4295 9. All discovery to be completed by _____
- 4231 10. All dispositive motions shall be filed and noticed no later than _____
- 4619 11. This matter is continued to 12-21-15 at 9:10 AM for:

(check one or more)

- _____ Service Status _____ Pleadings Status Written Discovery Status
- _____ Compliance Status _____ Settlement Status _____ Oral Discovery Status
- _____ Default / Prove Up _____ Final Pretrial _____ Expert Discovery Status
- _____ Pretrial (parties must be present unless excused by order of Court)
- _____ Other _____

4482 12. Jury/Bench trial is set to begin on _____ at 10:30 a.m.


It is further ordered: _____

ENTERED
JUDGE SANJAY TAILOR - 1870

NOV 25 2015

DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL
DEPUTY CLERK

Atty No. 33013
 Atty Name: ANDRZEJ GAUC
 Attorney for: RICHARD DANIBELUS
 Address: 134 N. La Salle St. #1040
 City: CHICAGO, IL 60602
 Phone: 312 986-1510

Enter: 
 Judge Sanjay T. Tailor No. 1870