\* CIVIL DIVISION: Richard J. Daley Center, 50 West Washington St., Room 601, Ph: (312) 603-5116, (312) 603-5122, (312)603-5252, Chicago, IL 60602,

#### 60602-1313

Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays

\* Hon. Patrice Munzel Ball-Reed, Associate Judge, Civil Division, District 1 - Housing Section, Daley Center, 50 W. Washington St., Rm. 1105, Chicago, Illinois 60602,

#### <u>60602-1316</u>

Ph: (312) 603-4535 The number listed on Judge's page, ends in '4536':

http://www.CookCountyCourt.org/JudgesPages/BallReedPatrice.aspx but clerk says that this is wrong number & goes to room 1107. [Note: I'm attempting to send both Judge Ball-Reed's courtesy copy and the Clerk's official copy to Emma J. Burse, Mail Room Manager (312-603-3117, EJBurse@CookCountyCourt.com), for her to deliver, since previously, Priority mail to the judge got delayed.]

\* City of Chicago, CORPORATION COUNSEL, <u>Attn: City of Chicago, Department of Law: Building and License enforcement Unit</u> 30 N LASALLE <u>700</u>, CHICAGO IL, 60602,

#### 60602-2503

Phone: (312) 742-0200; (312) 744-7764, <u>Attn: Greg Janes, Atty.#:90909</u> (312-744-9555) and Glenn Angel (312-744-4033) <u>— also: 312-744-8791</u> <u>GJanes@CityOfChicago.org</u>, Greg.Janes@cityofchicago.org, <u>GAngel@CityOfChicago.org</u>, Glenn.Angel@CityOfChicago.org, Benna.Solomon@CityOfChicago.org, <u>Edward.Siskel@CityOfChicago.org</u>

Richard B. Daniggelis, (312) 774-4742 c/o John Daniggelis, (773) 327-7198 2150 North Lincoln Park West, Apartment #603 Chicago, IL 60614-4652

Law Offices of Andjelko Galic, Esq. (Atty #: 33013)

(Cell: 312-217-5433, FAX: 312-986-1810, PH: 312-986-1510)

Email: AndjelkoGalic@Hotmail.com; AGForeclosureDefense@Gmail.com

845 Sherwood Road, LaGrange Park, IL 60526-1547

(Note: Mr. Galic just recently changed business addresses as reflected in recent Law Division filings. Please take note.)

Associated Bank, N.A., 200 North Adam Street, Green Bay, WI "543101" (look up right zip code!!) USPS.com says correct zip code is: 54301-5142

<u>Joe Younes:</u> 2625 West Farewell Avenue, Chicago, IL 60645 <u>Joe Younes@SbcGlobal.net</u> 60645-4522

\* <u>Joseph Younes (Atty#:55351)</u> Law Offices / http://ChicagoAccidentAttorney.net (312)635-5716, per website: 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602; Phone: (312) 372-1122; (312) 802-1122; usps says: 60602-3596

<u>Unknown Owners & NonRecord Claimants</u>, 1720 North Sedgwick Street, Chicago, IL 60614 (listed as <u>60644</u> on Heavner notice, dated 26 April 2017)

correct zip is: 60614-5722

Fax: (312) 372-1408. Email is (or was?) RoJoe69@yahoo.com per

http://www.ZoomInfo.com/p/JosephYounes/599467626 Note: Mr. Younes recently refused service of his copy of a filing I filed via FedEx [see e.g., EXHIBIT-E in the instant filing], so all he gets this time is "standard postal mail" or otherwise 'standard' service (not expensive signature confirmation), but I certify he is being served. If This Court doubts, it may effect service (e.g., "Postcard" Mr. Younes & other litigants), and send me a nominal bill for said

service, but, I doubt anyone would question me on this. In fact, Younes will have to get his service copy from his attorney, Hugh Howard, who uses the same mailing address: Younes' attorney Hugh Howard (Atty#:33492), c/o: Law Offices of Hugh D. Howard, 166 W Washington St, Suite 600, Chicago, Il 60602,

usps says: 60602-3596

Phone | 312-781-1002, Email | Hugh@HughDHowardLaw.com, per: http://www.HughDHowardLaw.com

# "HowardHughD@Gmail.com" per attorney's own filings

\* Heavner Beyers Mihlar LLC (Atty of Record, atty number: 40387 – look up!!), 111 E Main St #200, Decatur II, 62523,

62523-1204

(217) 422-1719, (312)-999-9110, **FAX: (217) 422-1754** 

Notice signed by Austin Schultz Croom (look up his email addy) 100 N. LaSalle, Suite 1410, Chicago, IL 60602 Austin Schultz (HSBattys.com , Ordinance Violations (HSBattys.com 60602-3534

[Mailing Address: P.O. Box 740, Decatur, IL 62525, per http://www.HSBattys.com/page/about-us/] RickHeavner@hsbattys.com, JulieBeyers@hsbattys.com, FaigMihlar@hsbattys.com, MeredithPitts@hsbattys.com

\* CR Realty Advisors, LLC, which has been appointed by the court as a temporary receiver on the property: 325 W. Huron, Suite 708, Chicago, IL 60654, P: 312.332.7100, F: 312.332.7102, E: info@cr-ra.com, per: 60654-3617

NOT: "60654-3642," which referred to Suite 230, their old address http://www.cr-ra.com/contact/ —and— Attention: Josh Nadolna and David J. Mitidiero via: JoshN@cr-ra.com and <a href="mailto:DaveM@cr-ra.com">DaveM@cr-ra.com</a>

- I, Gordon Wayne Watts, the undersigned, hereby certify under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above "Notice of Motion," and its exhibits, were served upon all parties listed above, this 6th day of July , 2017 by the following methods:
- United State Postal Service: I am serving the parties proper via my city's local post office on the date listed and with proper postage and/or by FedEx 3rd-party commercial carrier (whichever proves more convenient). I hope to obtain certification of delivery with return receipt and signature confirmation on as many packages as I can afford.
- E-mail: I may, later, serve all the parties listed above via email, in such cases as I have their e-mail address—as a courtesy. Or, then again, I may not (as it is not required), but if I serve any party electronically (via email), then I will serve all parties, so as to keep everybody in the loop.
- Internet: I shall, when practically possible, post a TRUE COPY of this filing and related filings online at my official websites, infra-- linked at the "Mortgage Fraud" story, dated. Fri. 14 Apr. 2017.

Bcc's in Housing case are same as those in Law Division case:

Subject: GMAC v. Daniggelis, No. 2007-CH-29738 (Law Division): Intervention filed/TRIAL.

Date: 7/10/2017 6:48:17 A.M. Eastern Daylight Time

From: Gww1210@aol.com

Reply To:

To: Law@CookCountyCourt.com, Diane.Shelley@CookCountyIL.gov, ccc.LawCalendarW@CookcountyIL.gov, AndjelkoGalic@Hotmail.com, AGForeclosureDefense@Gmail.com, Anselm45@Gmail.com, PKing@khl-law.com, PKing@KingHolloway.com, RIndyke@SBCGlobal.net, PMSA136@gmail.com, PLShelton@SBCGlobal.net, RoJoe69@yahoo.com, Hugh@HughDHowardLaw.com, JanisS@mersinc.org, SandraT@mersinc.org

AssignmentDesk@nbcuni.com, isee@nbcchicago.com, tips@nbcchicago.com, tips@cbschicago.com, wbbmnewsradiotips@cbsradio.com, jjlevine@cbs.com, DLBlom@CBS.com, wbbmtvdesk@cbs.com, HCPAHL@cbs.com, MMEsparza@cbs.com, dvsavini@cbs.com, pzekman@cbs.com, News@FoxChicago.com, Amy.Matheson@FoxTV.com, Dane.Placko@FoxTV.com, Info@moody.edu, Kurt@moody.edu, Dan.Craig@moody.edu, ChicagoBreaking@ChicagoTribune.com, ASachdev@chicagotribune.com, Asachdev@tribpub.com, JsKass@tribune.com, tis-dnsadmin@tribpub.com, byerak@chicagotribune.com, WLee@chicagotribune.com, JsKass@chicagotribune.com, GPapaJohn@ChicagoTribune.com, WLee@chicagotribune.com, tis-dnsadmin@tribpub.com, byerak@chicagotribune.com, WLee@chicagotribune.com, JsKass@chicagotribune.com, GPapaJohn@ChicagoTribune.com, BBrown@chicagotribune.com, tips@chicagotribune.com, Tcox@dnainfo.com, SRN\_News@yahoo.com, LenzVideo@yahoo.com
BCC: WB4ONX@juno.com, Jbertucci14@gmail.com, Gilliam498@gmail.com, Gilliam798@gmail.com, Rpolk115@gmail.com, NLandholt@hotmail.com, JDonfrio@comcast.net, Cable0484@gmail.com, FogartyC@att.net, LOAmu@aol.com, SamUmunna@juno.com, MFaulkner@EndJudicialCorruption.org, AllureMgtConstruction@comcast.net, AnswerCreatively@gmail.com, RaySandersUS@yahoo.com, Hassan904@aol.com, JMMillerMidura@yahoo.com, Gww12102002@yahoo.com, GordonWayneWatts@aol.com, GordonWayneWatts@hotmail.com, gww@aol.com, gww1210@gmail.com

CC: iTeam@abc.com, Jason.R.Knowles@abc.com, WLS.Desk@abc.com, Chuck.Goudie@abc.com,

From: Gordon Watts <gww1210@gmail.com>

Date: Thu, Jul 13, 2017 at 4:53 AM

**Subject:** CoChgo v 1720 N Sedgeick, Younes, 2017-M1-400775 (Housing): Intervention filed, with Notice/Exhibits. \*\*\* **To:** EJBurse@cookcountycourt.com, GJanes@cityofchicago.org, Greg.Janes@cityofchicago.org, GAngel@cityofchicago.org, Glenn.Angel@cityofchicago.org, Benna.Solomon@cityofchicago.org, Edward.Siskel@cityofchicago.org, Robert More <Anselm45@gmail.com>, Joseph Younes <RoJoe69@yahoo.com>, Hugh@hughdhowardlaw.com, RickHeavner@hsbattys.com, JulieBeyers@hsbattys.com, FaiqMihlar@hsbattys.com, MeredithPitts@hsbattys.com, info@cr-ra.com, JoshN@cr-ra.com, DaveM@cr-ra.com, Andjelko Galic <AndjelkoGalic@hotmail.com>, Andjelko Galic <AGForeclosureDefense@gmail.com>

# \*\* Add in: JoeYounes@SbcGlobal.net, "HowardHughD@Gmail.com"-AustinSchultz@HSBattys.com , OrdinanceViolations@HSBattys.com

\*\* Cc: iTeam@abc.com, Jason.R.Knowles@abc.com, WLS.Desk@abc.com, Chuck.Goudie@abc.com, AssignmentDesk@nbcuni.com, isee@nbcchicago.com, tips@nbcchicago.com, tips@cbschicago.com, wbbmnewsradiotips@cbsradio.com, Jay Levine <jjlevine@cbs.com>, DLBlom@cbs.com, wbbmtvdesk@cbs.com, HCPAHL@cbs.com, MMEsparza@cbs.com, dvsavini@cbs.com, pzekman@cbs.com, News@foxchicago.com, Amy.Matheson@foxtv.com, Dane.Placko@foxtv.com, Info@moody.edu, Kurt@moody.edu, Dan Craig <Dan.Craig@moody.edu>, ChicagoBreaking@chicagotribune.com, ASachdev@chicagotribune.com, Asachdev@tribpub.com, John Kass <JsKass@tribune.com>, tis-dnsadmin@tribpub.com, byerak@chicagotribune.com, ULee@chicagotribune.com, JsKass@chicagotribune.com, GPapaJohn@chicagotribune.com, BBrown@chicagotribune.com, ctc-NorthWest@chicagotribune.com, tips@chicagotribune.com, Ted Cox <Tcox@dnainfo.com>, SRN\_News@yahoo.com, Lenz joseph <LenzVideo@yahoo.com>

\*\*\* BCC: WB4ONX@juno.com, Jbertucci14@gmail.com, Gilliam498@gmail.com, Gilliam798@gmail.com, Rpolk115@gmail.com, NLandholt@hotmail.com, JDonfrio@comcast.net, Cable0484@gmail.com, FogartyC@att.net, LOAmu@aol.com, SamUmunna@juno.com, MFaulkner@EndJudicialCorruption.org, AllureMgtConstruction@comcast.net, AnswerCreatively@gmail.com, RaySandersUS@yahoo.com, Hassan904@aol.com, JMMillerMidura@yahoo.com, Gww12102002@yahoo.com, GordonWayneWatts@aol.com, GordonWayneWatts@hotmail.com, gww@aol.com, gww1210@gmail.com

#### Counsel,

I am filing, in the above-captioned case, my 735 ILCS 5/2-408 brief for intervention, as a matter of right, under City

of Chicago v. John Hancock Mutual Life Ins. Co., 127 Ill.App.3d 140, 144 (1st Dist. 1984), along with a notice of motion, giving when, where, & how particulars of how I shall present my motion to the court.

But my 05/18/2017 motion inadvertently did not include a proper "Notice of Motion." My apologies. I am refiling with the proper notice. See PDF attachment: 2017-M1-400775-July06-2017-NoticeOfMotion\_WATTS.pdf (1.9 MB). For your convenience, I am including another copy of my original Intervention. See PDF attachment: 2017-M1-400775-May17-2017-Intervention-Proper WATTS.pdf (7.6 MB).

Additionally, The Court has received (787107161963-FedEx-ProofOfDelivery-AttnEmmaBurse.pdf) and docketed https://courtlink.lexisnexis.com/cookcounty/FindDock.aspx?DocketKey=CABH0MB0EAAHHF0MD my Intervention and Exhibits.

\*Please note that I am including the mailroom manager, Emma Burse, an email copy to ensure that my hard copies were received and forwarded to the clerk and the judges chambers, which I had to do when there was problems with delivery recently. Her official Court email address in included in eService above. Additionally, for your convenience, you can peruse the "from and to" lines in the email header, to get all the current service email addresses.

Let me remind everyone that there is a CASE MANAGEMENT CALL in Court Room 1105, before Hon. Patrice Munzel Ball-Reed, Associate Judge, CIVIL DIVISION, in this Housing/Code case, at 11:00am CST, today (Thursday, 13 July 2017). Here is the Court's docket to verify:

https://courtlink.lexisnexis.com/cookcounty/FindDock.aspx?DocketKey=CABH0MB0EAAHHF0MD

Additionally, sources tell me that there was an unexpected continence in the the related LAW DIVISION case, in which Mr. Younes is also a Defendant, even though, apparently, the docket has not been updated yet: https://w3.courtlink.lexisnexis.com/cookcounty/FindDock.asp?

NCase=&SearchType=2&Database=2&case\_no=&PLtype=2&sname=daniggelis&CDate= Sources tell me that Judge Diane Shelley contained the case for extenuating circumstances, as indicated in the forthcoming ruling (not yet on the docket at this time), but for official information (or subsequent court dates), I would refer you to the court or clerks.

For your reference, this code violation case is the one which was featured in 4 recent DNAinfo stories:

"Rotted' Historic Building In Old Town Triangle Could Be Seized By City," by Ted Cox, DNAinfo, March 30, 2017 COMMENTS; and: "Rotted' Old Town Triangle House Owner Faces Daily \$1K Fine As Charges Fly," by Ted Cox, DNAinfo, April 07, 2017 COMMENTS; and: "Rotted' Old Town House Slated For Repairs As Fines Threatened Again," by Ted Cox, DNAinfo, April 28, 2017 COMMENTS; and: "Owner Of 'Rotted' Old Town Home Threatened With \$150,000 Fine," by Ted Cox, DNAinfo, July 07, 2017 COMMENTS,

https://www.DNAinfo.com/chicago/20170707/old-town/rotted-old-town-house-fines-building-violations-demolition-landmarks-joseph-younes

—and several related stories by The Register, for which I am the editor-in-chief. Here is the Court's docket to verify:

For your convenience, you can also pick up your copies of the all the key filings in the above-captioned case, here: www.GordonWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html or here:

www.GordonWayneWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html

Both the Housing and Law Division filings are docketed on the Open-source docket above, on my personal blog. Or, you could wait for the hard copies, which are in the mail to you, as required by Court rules. Should you lose these links, above, my open-source docket is still linked through the front-page news item in question, on The Register, my namesake blogs.

Gordon Wayne Watts,

## **Notes on format:**

[Motion proper: Bold-faced Red on Yellow] Any exhibits: in red italics

Certificate of Service: Blue on "30% Gray"

[Notice of Motion: "Green #3" on Sky Blue aka "Cyan #1"]

# 4 "Big Law" Attorneys, counting one filing by Daniggelis with Galic's help (concensus)

Notice of Motion / Filing is used in 3 of 4 cases—and with Certificate of Service right after in all cases. Notice of Motion / Filing, however, is AFTER motion/filing/etc. in question in 2 of 3 cases.

#### 4 Misc. Attorneys (concensus)

Motion / Answer / Complaint, etc. in 100% of time.

Certificate of Service / Service List, however, only in 50% of cases.

#### **Deutch Bank (concensus)**

Motion in question first 100% of the time.

Certificate of filing + Certificate of service, after motion, but only used 50% of the time.

#### **Younes (concensus)**

**Notice of Motion + Certificate of Service** 

**Motion in question** 

#### **Benji Philips (concensus)**

Motion in question first only 50% of time.

"Notice of Motion/Filing" 2/2 of times.

# LaSalle Bank (concensus)

"Notice of Motion/Filing" 50% of time.

Certificate of Service after Motion/Answer 50% of time.

#### Andjelko (concensus)

50%—50% split as to Motion first or last.

"Notice of Motion/Filing" 5/6 times + Certificate of Service appended.

# City of Chicago:

- \*\* Complaint + signature + Verification by Certification + signature
- \*\* List of Defendants

## **Heavner:**

- \*\* Entry of Appearance
- \*\* Notice of Filing and Certificate of Service

## Howard:

- \*\* Answer + signature
- \*\* Certification + signature
- \*\* "Notice of Filing / Notice of Mailing" + Certificate of Service + signature

# **Daniggelis – court forms:**

- \*\* Notice of Motion + Proof of Service by Mail + signature
- \*\* Motion to Quash Service of Process + signature
- \*\* Certification (of service) + signature
- \*\* Affidavit (with notary signature & his signature)

#### **Craig A. Cronquist:**

\*\* Answer to Richard Daniggelis + 1-109 Certification

#### John J. Kallman:

- \*\* Plaintiff's Motion to Strike
- \*\* Certificate of Service

#### Paul L. Shelton:

- \*\* Motion to Vacate
- \*\* Service List

#### Perry Perelman:

\*\* Complaint \*\* Exhibits

## **Deutch Bank:**

- \*\* Motion for Default Order + sig
  \*\* Certificate of Filing & Certificate of Service + sig

#### **Deutch Bank:**

- \*\* Motion to Dismiss + Attorney certification + signature (but no notice of motion) August 08, 2006
- \*\* Order granting above motion (August 09, 2006)

\*\* Reference: <u>Deutch Bank v. Daniggelis</u>, Case #: 2004-CH-10851 (Chancery Division)

#### Habib S. Younes:

\*\* Notice of Motion + Proof of Service

\*\* Motion to Stay

# Peter M. King, for Joseph Younes:

- \*\* Notice of Motion (for Leave to file Amended Answer) + Certificate of Service
- \*\* Motion (for Leave to file Amended Answer)
- \*\* (Proposed) Amended Response

# Benji Philips:

\*\* Motion for Extension of Time / Answer + Certification under 1-109 \*\* Exhibits

\*\* Notice of Filing + Certificate of Service

#### Benji Philips:

\*\* Notice of Motion + Certificate of Service

\*\* Motion

#### LaSalle Bank:

\*\* Answer

\*\* Certificate of Service

\*\* Exhibits

## LaSalle Bank:

- \*\* Notice of Emergency Motion
- \*\* Proof of Service
- \*\* Emergency Motion

# Andjelko Galic:

\*\* Combined motions \*\* Exhibits

\*\* Notice of Motion + Proof of Service

# **Andjelko Galic:**

\*\* Proof of Service

\*\* Motion to Dismiss \*\* Exhibits

## Andjelko Galic:

\*\* Notice of Filing (of Motion to Dismiss) + Certificate of Service

\*\* Motion to Dismiss

# Andjelko Galic:

\*\* Notice of Motion to Reconsider + Certificate of Service

# \*\* Motion to Reconsider

# Andjelko Galic:

- \*\* Notice of Motion for Leave to file answer + Certificate of Service

  \*\* Motion for Leave to file answer + said answer
- \*\* Verification

# Andjelko Galic:

- \*\* Defendant's Response to Plaintiff's Motion for Extension of Time to Enforce Judjment
  \*\* Notice of Electronic Filing + Certificate of Service