

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

| | | |
|------------------------------|---|--------------------------------|
| GMAC Mortgage, LLC |) | |
| Plaintiff, |) | Case No.: 2007 CH 29738 |
| |) | (Transfer to Law Division) |
| vs. |) | Before: Hon. DIANE M. SHELLEY, |
| |) | Circuit Judge |
| Gordon Wayne Watts, et. al., |) | District: First Municipal |
| Defendants. |) | Calendar "W", Courtroom 1912 |

**Motion for Clarification concurrent with
Rule 321 motion to limit Contents of the Record on Appeal**

In the exercise of the reviewing Court's appellate authority, the Appellate Court, First District, has entered an order, in ***GMAC v. Watts***, 1-18-0091, that: "Appellant must direct inquiries on the content of the record on appeal to the Clerk of the Circuit Court of Cook County."

ORDER ENTERED MAR 28 2018, Appellate Court, First District.

Pursuant to the above-quoted/cited order (see *infra*: **Exhibit-A**), Appellant, Gordon Wayne Watts, now directs inquiry to This Court regarding the content of the record on appeal in 1-18-0091—**hereby moving for clarification** of whether or not the 7-7-2017 motion to Intervene stated sufficient grounds to intervene in the case at bar.

Moreover, in concurrent motion, Appellant, Watts, now moves this court to "order less" for the Record on Appeal, in accordance with Rule 321, notice, and proper hearing will having been given. [In support of this motion, Movant respectfully points out that a stipulation is highly unlikely given the fact that many parties can't even be located or have bad service addresses, and/or are unlikely to consent to anything, big or small, in this regard.]

Specifically, movant requests that the clerk prepare the limited record sought in the 3/16/2018 Motion for Extension of Time, in GMAC v Watts, 1-18-0091, a copy of which has been served upon this court in prior filings—and reproduced below, in the proposed order.

Respectfully submitted,

/s/Gordon Wayne Watts

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]
821 Alicia Road, Lakeland, FL 33801-2113
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>
Email: Gww1210@aol.com / Gww1210@gmail.com

Verification by Certification

I, Gordon Wayne Watts, the undersigned Movant, under penalties as provided by law pursuant to 735 ILCS 5/1-109, Section 1-109 of the ILLINOIS Code of Civil Procedure, hereby certify that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and, as to such matters, the undersigned certifies as aforesaid that he verily believes the same to be true: “Any pleading, affidavit or other document certified in accordance with this Section may be used in the same manner and with the same force and effect as though subscribed and sworn to under oath.” Source: 735 ILCS 5/1-109: <http://www.ILGA.gov/legislation/ilcs/documents/073500050K1-109.htm>

Nonetheless, This Court has on record several of my sworn, witnessed, and notarised affidavits, just to remove any and all doubt hereto.

Date: **Day, DD April 2018**

/s/Gordon Wayne Watts
Gordon Wayne Watts

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| Defendants. |) | Calendar "W", Courtroom 1912 |

ORDER

This matter coming on to be heard on the motion of Movant, Gordon Wayne Watts, for Clarification and for preparation of a limited Record on Appeal, and, notice having been given, and the Court being fully advised in the premises:

IT IS HEREBY ORDERED that the Clerk of the Circuit Court of Cook County shall prepare the following record of appeal without and costs to appellant, Gordon Wayne Watts, and transmit it to the IL First Appellate Court, in case number 1-18-0091—only the following lower court pleadings in the above-captioned case:

- All lower court pleadings – and related “exhibits” – filed by Gordon Wayne Watts
- The 10/17/2007 Complaint to Foreclose Mortgage filed by GMAC
- The July 16, 2008 Motion for Extension of Time filed by CVLS for Daniggelis
- The July 30, 2008 Answer filed by CVLS on behalf of Daniggelis
- Two (2) “Answer” briefs, filed by Defendant, Joseph Younes, dated Oct 24, 2008
- The 2/15/2013 Answer filed by Atty. Galic on behalf of Daniggelis
- The 2/15/2013 and 3/8/2013 ORDERS by Judge Michael F. Otto
- The 5/6/2015 Supervisory ORDER by the IL Supreme Court, in the instant case [No. 118434, (27 N.E.3d 610 (2015))]
- The 8/8/2017 Motion to Reconsider filed by Atty. Galic for Daniggelis
- The 12/06/2017 Motion to Comply filed by Robert J. More
- The 12/07/2017 ORDERS by Judge Diane M. Shelley, from which Watts appeals

ENTERED: _____
Judge Diane M. Shelley, #1925
Date: _____

Prepared by:
Gordon Wayne Watts
821 Alicia Road
Lakeland, FL 33801-2113
(863) 688-9880, (863) 409-2109

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| Gordon Wayne Watts, et. al., |) | District: First Municipal |
| Defendants. |) | Calendar "W", Courtroom 1912 |

NOTICE OF FILING

To: See attached Service List

PLEASE TAKE NOTICE that today, **Day, DD April 2018**, I am causing to be filed with the Clerk of the Court of Cook County, Illinois, my **Motion for Clarification concurrent with Rule 321 motion to limit Contents of the Record on Appeal**, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,

(Actual Signature, if served upon clerk)
Gordon Wayne Watts

/s/ Gordon Wayne Watts
(Electronic Signature)
Gordon Wayne Watts

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]
821 Alicia Road, Lakeland, FL 33801-2113
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]
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Email: Gww1210@aol.com / Gww1210@gmail.com

SERVICE LIST

* **CIVIL APPEALS DIVISION: Cook County, IL Circuit Court**, 312-603-5406, Richard J. Daley Center, 50 West Washington St., Room 801, Chicago, IL 60602 – Attention: Deputy Chief, Patricia O'Brien, PAOBrien@CookCountyCourt.com Hours: 8:30a-4:30p, Mon-Fri, Excl. Holidays, **[served by email only, as a courtesy, since they are not a party proper]**

* **Hon. Timothy C. Evans**, Chief Judge (Ph 312-603-6000, 4299, 4259 TTY: 6673) Circuit Court of Cook County, 50 W. Washington St., Room 2600, Richard J. Daley Center Chicago, IL 60602, Courtesy copy via: Timothy.Evans@CookCountyIL.gov **[served by email only, as a courtesy, since he is not a party proper]**

* **Hon. James P. Flannery, Jr.**, Circuit Judge–Presiding Judge, Law Division 50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343, Courtesy copy via: James.Flannery@CookCountyIL.gov **[served in all ways, as Judge Flannery is a defendant]**

* **Law Division and Hon. Diane M. Shelley, Circuit Judge**, Law@CookCountyCourt.com ; ccc.LawCalendarW@CookcountyIL.gov ; Diane.Shelley@CookCountyIL.gov **[served in all ways, as Judge Shelley is a defendant]**

* **Richard B. Daniggelis** [true owner of 1720] 312-774-4742, c/o John Daniggelis, 2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652

* **Richard B. Daniggelis (who receives mail, via USPS mail-forwarding at his old address)** 1720 North Sedgwick St., Chicago, IL 60614-5722

* **Andjelko Galic** Atty for Richard B. Daniggelis (Atty#:33013) C:312-217-5433, Fx:312-986-1810, Ph:312-986-1510, AGForeclosureDefense@Gmail.com ; AndjelkoGalic@Hotmail.com 845 Sherwood Road, LaGrange Park, IL 60526-1547

* **Robert J. More** (Anselm45@Gmail.com) [Note: **More's** name is **misspelled** on docket as: “**MOORE ROBERT**”] P.O. Box 6926, Chicago, IL, 60680-6926, PH: (708) 317-8812 [[Mr. More has made a formal request by email to receive service solely by email, and waives hard-copy service.]]

* **Associated Bank, N.A.**, 200 North Adam Street, Green Bay, WI 54301-5142

* **MERS (Mortgage Electronic Registration Systems, Inc.)** <https://www.MersInc.org/about-us/about-us> a nominee for HLB Mortgage, (703) 761-0694 / (800)-646-MERS (6377) / 888-679-MERS (6377) ATTN: Sharon McGann Horstkamp, Esq., Corporate Counsel, Mortgagee: <https://www.MersInc.org/component/content/article/8-about-us/401-sharon-horstkamp> Senior Vice President, Chief Legal and Legislative Officer, and Corporate Secretary for MERSCORP

SERVICE LIST (continued)

Holdings, Inc. – PH: (703) 761-1270, FAX: (703) 748-0183, SharonH@MersInc.org ;
SharonH@MersCorp.com Cc: Janis Smith, 703-738-0230, VP, Corp. Comm. is no longer with
MersCorp, and Amy Moses (AmyM@MersCorp.com ; AmyM@MersInc.org) has replaced her
as an email contact; Sandra Troutman 703-761-1274, E: SandraT@MersInc.org ;
SandraT@MersCorp.com) Dir, Corporate Communications, Karmela Lejarde, Communications
Manager, Tel~ 703-761-1274, Mobile: 703-772-7156, Email: KarmelaL@MersInc.org ;
KarmelaL@MersCorp.com C/o: **MERS (Mortgage Electronic Registration Systems, Inc.),
1901 East Vorhees Street, Suite 'C', Danville, IL 61834-4512**

* **COHON RAIZES®AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)**

Attn: Carrie A. Dolan, pPh:(312) 726-2252
208 S LASALLE, Suite #1860, CHICAGO IL, 60604

* **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]

* **Richard Indyke, Esq.** Atty. No. 20584, (RIndyke@SBCGlobal.net ; 312-332-2828 ; 773-593-
1915 most recent “Attorney of record” for LaSalle Bank Natl. Assn.), 111 South Washington
Ave., Suite 105, Park Ridge, IL 60068-4292 [[Mr. Indyke claims to not represent any party in the
instant appeal, but the undersigned can not find any more recent atty of record for defendant,
LaSalle Bank, and reluctantly will keep Mr. Indyke on the service list, unless excused by The
Court.]]

* **Peter King (Atty. for Joseph Younes)** (Atty. No.: 48761)

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

* **Joe Younes**: 2625 West Farewell Avenue, Chicago, IL 60645-4522 JoeYounes@SbcGlobal.net

* **Joseph Younes** (Atty#:55351) Law Offices / <http://ChicagoAccidentAttorney.net>

312-635-5716, per website, Ph: 312-372-1122 ; 312-802-1122 ; Fax: 312-372-1408 E:
RoJoe69@yahoo.com 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596

* **Paul L. Shelton, Pro Se**, (Atty. #15323, disbarred per IARDC)

E: PMSA136@Gmail.com ; PLShelton@SBCGlobal.net – 3 Grant Square, SUITE #363,
Hinsdale, IL 60521-3351

* **Erika R. Rhone** 22711 Southbrook Dr., Sauk Village, IL 60411-4291

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
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| |) | Circuit Judge |
| Gordon Wayne Watts, et. al., |) | District: First Municipal |
| Defendants. |) | Calendar "W", Courtroom 1912 |

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

* The undersigned **Defendant-Appellant, Gordon Wayne Watts**, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above **Motion for Clarification concurrent with Rule 321 motion to limit Contents of the Record on Appeal**, copies of which are attached hereto are being herewith served upon you—and upon the parties listed in the attached Service List, above – this **Day, DD April 2018**, via **“Cook County E-File”** if they're e-file registered.

* I'm concurrently serving all parties via **First Class U.S. Postal Mail** and/or FedEx 3rd-party commercial carrier.

* Additionally, 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 April 2017.

* Lastly, I may, later, cc all parties via **e-mail**, if I am able.

Respectfully submitted,

(Actual Signature, if served upon clerk)
Gordon Wayne Watts

/s/ Gordon Wayne Watts
(Electronic Signature)
Gordon Wayne Watts

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]
821 Alicia Road, Lakeland, FL 33801-2113
PH: (863) 688-9880 [home] or (863) 409-2109 [cell]
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>
Email: Gww1210@aol.com / Gww1210@gmail.com

INDEX TO THE EXHIBITS

Instrument

Docket/Tab#

** March 28, 2018 Order from the IL First appellate Court,
directing Appellant to inquire in the instant motion

Exhibit-A

NO. 1-18-0091

IN THE APPELLATE COURT OF ILLINOIS
FIRST DISTRICT

GMAC Mortgage, LLC,) Appeal from the Circuit Court of Cook County, IL.
Plaintiff)
vs.) No. 07 CH 29737
) (Transfer into Law Division from Chancery)
Gordon W. Watts, et. al.,)
Defendants) Hon. Diane M. Shelley, Judge Presiding

ORDER

This matter coming on to be heard on the motion of Movant, Gordon Wayne Watts, for an extension of time, and, notice having been given, and the Court being ~~by~~ advised in the premises:

IT IS HEREBY ORDERED that the time for filing the Record on Appeal is extended to June 12, 2018, and, pursuant to ~~Rule 311(b)~~ [Rule 311 Accelerated Docket, (b) Discretionary Acceleration of Other Appeals], ~~this appeal is placed on accelerated track. Pursuant to Rule 311(b), "The motion [to expedite] shall be supported by an affidavit stating reasons why the appeal should be expedited," and This Court notes that both the instant motion and prior pleadings by Appellant had either 'Verification' affirmations, or actual Sworn/Notarized affidavits, which compel The Court to accept at face value allegations that an accelerated appeal is necessary. [This court notes that Watts' claims on this head were never challenged as false.]~~

IT IS FURTHERMORE ORDERED that the trial court shall grant Movant's motion for Intervention, Grant his application for fee waiver, and prepare selected' items described below:

This court finds, per Rule 311(b), that it is warranted by the circumstances, and This Court now enters a ruling that the trial court prepare only the following supporting record prepared pursuant to Rule 328, consisting only the following lower court pleadings:

- All lower court pleadings – and related “exhibits” – filed by Gordon Wayne Watts
- The 10/17/2007 Complaint to Foreclose Mortgage filed by GMAC
- The July 16, 2008 Motion for Extension of Time filed by CVLS for Daniggelis
- The July 30, 2008 Answer filed by CVLS on behalf of Daniggelis
- Two (2) “Answer” briefs, filed by Defendant, Joseph Younes, dated Oct 24, 2008
- The 2/15/2013 Answer filed by Atty. Galic on behalf of Daniggelis
- The 2/15/2013 and 3/8/2013 ORDERS by Judge Michael F. Otto
- The 5/6/2015 Supervisory ORDER by the IL Supreme Court, in the instant case [No. 118434, (27 N.E.3d 610 (2015))]
- The 8/8/2017 Motion to Reconsider filed by Atty. Galic for Daniggelis
- The 12/06/2017 Motion to Comply filed by Robert J. More
- The 12/07/2017 ORDERS by Judge Diane M. Shelley, from which Watts appeals

ORDER – *GMAC v. Watts, et al.*, 1-18-0091 (ILLINOIS First Appellate Court)

The trial court shall prepare the Record on Appeal, with ONLY the items listed above (all the enumerated items, and ALL pleadings and related exhibits filed by Appellant, Gordon Wayne Watts), and shall place preparation of the selected records on “accelerated” track, and shall notify This Court when the record is prepared, and transmit it ~~instantly~~ to This Court.

After This Court makes the “selected” Record on Appeal, above, available to all litigants, it shall give ALL named parties ONE last opportunity, within thirty (30) days, to respond and to include anything relevant in the record (to make up for anything that was omitted for the sake of brevity), and to file ONE supporting brief, which complies with page and word-length requirements, citing to any supplemental record items.

Since the 'Record on Appeal' shall be less than 100% of the total record (due to time and space constraints), This Court deems it necessary, to satisfy Due Process, to give ALL parties opportunity to respond, and then This Court shall, if no counter arguments are raised, return Richard Daniggelis' house to him, with equitable damages awarded, by Summary Judgment. The “last chance” to file a brief, to grant fair Due Process to defendants, Joseph Younes, and other named defendants, shall be considered a chance to reply to a “Show Cause” order, This Court asking litigants to show cause why Daniggelis' house should not return to him.

Whether or not litigants file an 'answer' brief (this is optional), This Court shall review The Record (and any “one-time” briefs, submitted, as described above), shall consider the facts and law, and shall render a decision, in compliance with the 5/6/2015 Supervisory ORDER by the IL Supreme Court, in the instant case [No. 118434, (27 N.E.3d 610 (2015))].

The trial court shall speedily prepare the selected record, notify this court, and transmit it to this court by electronic means, on accelerated docket.

Appellant must direct signature on the content of record on appeal to Clerk of Circuit Court of Cook County.
~~IT IS SO ORDERED~~

Justice

David J. Quince

Justice

Justice

ORDER ENTERED

MAR 28 2018

APPELLATE COURT, FIRST DISTRICT

Prepared by:
Gordon Wayne Watts
821 Alicia Road
Lakeland, FL 33801-2113
(863) 688-9880 (h), (863) 409-2109 (c)