

IN THE
SUPREME COURT OF ILLINOIS

Gordon Wayne Watts,

Plaintiff,

vs.

Hon. James P. Flannery, Jr., in his capacity
as presiding judge, Law Division,
Cook County, IL circuit court

and

Hon. Diane M. Shelley, in her capacity
as circuit judge, Law Division,
Cook County, IL circuit court,

Defendants.

Docket Number: _____

Motion for Supervisory Orders
Pursuant to Supreme Court Rule 383

Gordon Wayne Watts, Plaintiff, *pro se* [Code: '99500' = Non-Lawer, *pro se*]
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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 ILLINOIS Supreme Court my **Motion for Supervisory Orders and Exhibits**, 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

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Prayer for exercise of the Supreme Court's supervisory authority

This is an motion for Supervisory oversight by plaintiff, Gordon Wayne Watts, in which he moves for issuance of Supervisory Orders sufficient to correct egregious oversights pursuant to R.383. Although IL Supreme Court rules (specifically R.315) don't explicitly prohibit a PLA (Petition for Leave to Appeal) from being used for non-final or interlocutory judgments, such as this one, Movant represents to This Court that the clerks of said court have informed him that PLA's seeking redress in ongoing (e.g., non-final) cases will be rejected. THEREFORE, Movant seeks Redress via the Rule 383 method.

"Points and Authorities"

There is such light work, here, that my citation in argument shall suffice.

INTRUDUCTORY PARAGRAPH

This action is brought to compel lower courts to comply with Procedural Due Process (similar to "Original Jurisdiction" Mandamus) and to seek review of Substantive Due Process errors (similar to "Appellate Jurisdiction"). Jury trials were sought multiple times, but none ensued. Questions about pleadings are discussed in Argument. Since strong allegations of fact are made (about an elderly man being made homeless & sleeping in his rental van, putting his life in danger, as a result of the courts below), Movant shall offer proof that he's credible—that he's the same "Gordon Wayne Watts" who almost won the infamous "Terri Schiavo" case—all by himself—doing even better than former Fla. Gov. Jeb Bush, before the same panel of Justices. **(See Exhibit-A)**

Statement of Issues presented for Review

The issues presented for review are Procedural Due Process violations executed by the circuit court: ((A)) failure to comply with Illinois case law on Intervention; ((B)) failure to comply with '298' indigent fee waiver; ((C)) refusal to issue a timely order regarding fee waiver; and, ((D)) resultant refusal to prepare the Record on Appeal. Ancillary issues include: ((E)) the Reviewing Court's refusal to issue a Mandamus Writ to compel the circuit court to comply with Illinois Law in ((A))—((D)), *supra*.

However, as the underlying case is one of clear—and admitted—Mortgage Fraud (the 03-08-2013 Order by Judge Michael F. Otto—see **Exhibit-B, *infra***—admits plenty of facts verifying these claims, including admission of a forged or duplicate signature), the very egregious Substantive Due Process issues are brought up for review. Speaking of 'review,' the “Standards of Review” for each legal issue are discussed in Argument.

Statement of Jurisdiction

This Court has jurisdiction under Rule 383 to hear the instant motion.

Statement of Facts

Several related cases (**Exhibit-M**) came before IL courts, involving some of the same parties as in this case: *Lessie Towns v. Peter Blythe, Deutsche Bank, et al.* (2008-L-004574, CONSUMER FRAUD: Law Div) and *DEUTSCHE BANK v. Peter Blythe, Paul Shelton, Lessie Towns, et al.* (2006-CH-25073, MORTGAGE FORECLOSURE, Chancery Div). These cases were featured on many news outlets, giving Ms. Towns lots

of news coverage, culminating with a personal visit from former Gov. Pat Quinn (D-Ill.). In these actions, former Illinois Attorney, Paul L. Shelton (Atty. #15323, disbarred per IARDC), was first stripped of **his broker's license**, and then, in related Mortgage Fraud issues, stripped of **his law license** by the IARDC. Deutch Bank, which was involved in the “Lessie Towns” cases, above, was, in *Deutch Bank, Nat'l, v. Richard Daniggelis* (NO. 04CH-10851, also involved with Daniggelis, a party to **this** case, e.g., under Law Div. circuit judge, Hon. Diane M. Shelley, in *GMAC v. Daniggelis, Watts, Younes, et. al.*, 2007-CH-29738, a 'transfer' from Chancery into Law, and presently pending appeal in case numbers **1-18-0091** and **1-18-0572**, as well as Mandamus proceedings in **1-18-0538**.

In spite of numerous sanctions and warnings, loss of his broker's license, and subsequently, loss of his law license, Paul L. Shelton (Atty.#15323) was still permitted to engage in such transactions, and—as documented in 2007-CH-29738—with attorney Joseph Younes (Atty.#55351), subsequently entered into negotiations with the elderly Daniggelis, because Daniggelis was seeking refinancing and/or investors for his house and land, which was “under water” –difficulty making payments. **(See Exhibit-M)**

Daniggelis, like Ms. Towns, signed over his warranty deed, as instructed by these attorneys, in order to authorize them to execute refinancing or some such actions. Unlike Towns, however, Daniggelis took extra precautions to prevent title theft: Daniggelis put in place some “side agreements” in order to place limits on both the time and purpose of the POA (Power of Attorney) governing the signing over of the warranty deed, which side-agreements were signed by Shelton, Daniggelis, and Erika Rhone. These 2 “side-agreements” were exhibits in the 7/30/2008 “ANSWER FILED,” by CHICAGO

VOLUNTEER LEGAL SERVICES, which represented Daniggelis then, and are on docket in case number 2007-CH-29738, in the Chancery Division of Cook County, IL circuit courts, but reproduced *infra* as **Exhibit-C**, for the convenience of The Court.

Shortly thereafter, Younes attempted to take title to Daniggelis' house and land, and, after many years of litigation, Judge Michael F. Otto issued an order (dated May 15, 2014—see **Exhibit-D, *infra***) handing over title to Younes. Based upon Otto's Chancery ruling, the Civil Division, in 2014-M1-701473, *Younes v. Daniggelis*, evicted Daniggelis. Both of those actions were appealed to the First Appellate Court: NO. 1-14-2751 (Trial Court No.: 2007-CH-29738 – Chancery Div) *GMAC v. Daniggelis* and NO. 1-15-0662 (Trial Court No.: 2014-M1-701473 – Civil Div) *Younes v. Daniggelis*. However, due to a lack of prosecution by Atty. Andjelko Galic (Atty#:33013), Daniggelis' attorney, the appellate court dismissed the cases. However, This Court ordered the appeals court to accept the late notice of appeal and hear the case:

[Web-Post Date: 5/6/2015 aka “March 25, 2015”] No. 118434 - GMAC Mortgage, LLC, et al., respondents, v. Richard Daniggelis, petitioner. Leave to appeal, Appellate Court, First District. (1-14-2751)
Petition for leave to appeal denied.

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))**

In spite of This Court's last standing order for the reviewing court to completely hear the case [last line, *supra*], the reviewing court disobeyed the order *supra*, when, in its June 16, 2016 Order, in 1-14-2751, *Daniggelis v. Younes* (see **Exhibit-E**, top 2 pages), it dismissed the case, presumably because of continued lack of prosecution, failure to file

briefs, seek extension of time, etc. Atty. Andjelko Galic, Daniggelis' attorney, missed numerous other court dates, one of which was documented in page 3 of **Exhibit-E, *infra***.

On September 14, 2015, Plaintiff, Gordon Wayne Watts, filed a sworn and notarised affidavit (as a stand in for a Statement of Case and Facts—see **Exhibit-F, *infra***) as well as an *Amicus Curiae* brief (**Exhibit-G, *infra***), which alleged massive mortgage fraud. Daniggelis' attorney, Galic, submitted a proposed order to deny Watts' *Amicus* motion, and, on November 16, 2015, Judge Sanjay T. Tailor signed this order without comment or explanation.

All along, Watts was doing much library-type research for Daniggelis to get a hold of documents on the Internet (Daniggelis didn't know how to use computers) and/or by contacting state agencies under Public Records law, and by helping him in technology & computer-related matters, for which Daniggelis agreed to pay him a huge, but unspecified, sum of monies as payment. When Watts perceived that Daniggelis was being cheated in the mortgage foreclosure case, he felt that he had sufficiency of interests that weren't being represented (by Atty. Galic), and, on 7-7-2017, intervened pursuant to Illinois “Intervention” case law (see **Exhibit-H, *infra***), carefully documenting many of his costs, in his motion to Intervene, and immediately afterwards, Watts commented on his blog that his name appeared on docket, naming him as a co-defendant, which he felt was proof that his Motion to Intervene had been granted.

On December 07, 2017, Judge Shelley entered an order with which Watts did not agree, and Watts made a timely notice of appeal, which is docketed in case number 1-18-0091, before the First Appellate Court, and is currently pending. Watts subsequently

submitted an application for fee waiver in both the circuit and appellate courts, and made several timely requests for the preparation of the record on appeal.

The 01/19/2018 application for Fee Waiver in the appellate court was granted on 01/31/2018, twelve (12) days later. The circuit court, however, did not rule on Watts' 01/22/2018 application for Fee Waiver until 03/01/2018, over five (5) weeks later, eventually denying it, alleging, *inter alia*, that Watts was not a party, proper. This order, too, was appealed, and is pending in case number 1-18-0572. Additionally, there are Mandamus proceedings which are pending in the appellate court in case number 1-18-0538, seeking to compel the trial courts to grant Intervention, Fee Waiver, and prepare a selected (limited) Record on Appeal.

On 03/16/2018, Watts filed a motion to extend time, concurrent with a motion for Mandamus Writ to compel the circuit court to grant Intervention, Fee Waiver, and prepare a selected Record on Appeal. The appeals court, in a 03/28/2018 Order, granted the motion to extend time, but denied Watts' motion to compel the trial court to prepare the record, instead, entering an Order that: "Appellant must direct inquiries on the content of the record on appeal to the Clerk of Circuit Court of Cook County." (**Exhibit-I, *infra***)

Thereafter, Watts, who gets food stamps (a standard in lower courts to qualify for Fee Waiver) was attacked by his boss (**Exhibit-J**), while driving home from work, because (according to Watts) the boss wanted him to see if traffic was clear in front, and Watts misunderstood and looked at traffic in the rear, and his boss got enraged & started hitting him whilst driving. Watts immediately quit his job, fearing for his safety, and filed a police report in the jurisdiction in which it occurred. (**Exhibit-J, *infra***) [Watts alleges

minor factual errors in the police report, such as reasons for the attacks, but, these errors are “*de minimus*” & not germane to the instant motion.]

Immediately after quitting his job under duress, Watts became fearful that he couldn't afford to prosecute his appeal, even given generous extensions of time, due to the appeals court's refusal to compel the trial court to prepare a Record on Appeal, due to his inability to pay for even a small portion of the preparation of the record on appeal—or any additional costs associated with printing & mailing copious service copies of filings.

Watts, fearing for life & safety of his elderly friend, Richard Daniggelis, whose house was taken, took immediate steps to seek review in This Court, as a court of last resort, to protect his friend, as well as his own interests, regarding his Intervention.

Argument [Overview]

This case can be looked at in two (2) ways: **First, even if we ignore Mortgage Fraud that I allege**, I clearly document a sufficient interests, **and very easily qualify for Intervention: Exhibit-H** (And I was only able to document a small portion of costs, since additional costs have accrued since then, not the least of which are my costs to litigate, that is, my huge printing and mailing costs, and even a few instances where Odyssey eFileIL (TylerHost.net) couldn't file something in Chancery or Law, and I had to use a paid service: <https://eFile.CookCountyUsCourts.com> This doesn't even count huge amounts of time lost when I couldn't work due to having to take time off from work to file pleadings & fight against “Big Law” lawyers, just for my fair share.)

Next, however, even if we ignore what monies I'm owed (the interests for

which I can assert intervention), Mr. Daniggelis has suffered huge losses, which I document were thefts and not his fault: **MORTGAGE FRAUD in bold-faced capital.**

The trial courts have taken a dim view of my prior *amicus curiae* briefs, but is this right? What if it were *your* grandfather whose house was stolen (mortgage fraud), not paid a dime, and lost house, land, and hundreds of thousands of dollars of (documented) equity? What if *your* grandfather was kicked out and made homeless, and potentially attacked on the street? What if someone called the Chicago, IL Police? Would the police tell the caller to “butt out,” that it's “none of his business” because he's not a party to the attack? God forbid, and certainly not! The Police would send someone out and investigate. But that isn't what the circuit court has told me. They've said that I'm not a “party” and to butt out, and keep on going on down the road.

However, if this 'logic' wasn't right when one calls the Police, it's just as insane when we apply it to courts. Indeed, Illinois case law does indeed allow non-parties to “participate,” not only *Amicus Curiae* (R.345), but even more-so, under the “mootness” exception: Even if all parties to a case die of old age (Mr. Daniggelis is about 79 or 80, as I speak), Your Court can nonetheless hear & decide my motion under the exception to the mootness doctrine for cases that are capable of repetition yet avoiding review, e.g., are of “great public importance.” See *In re Alfred H.H.*, 233 Ill. 2d 345, 358-60, 910 N.E.2d 74, 82-83 (2009). So, even *if* this case were 'moot,' Your Court could hear it—however, as it stands, it's ***not*** moot—all parties are alive, and I implore your court to save lives: review this matter whilst we're still alive. I make my argument below...

So, if the case can be 'solid' on *either* my Intervention grounds *or* the Mortgage

Fraud, then guess what? It's even stronger, since **both** Redresses exist! As Mr. Daniggelis' losses were greater than mine, they deserve review **first** (and, I parenthetically add: What if it were *your* grandfather who had his house, land, & hundreds of thousands of dollars of equity stolen, & not paid a dime... Daniggelis isn't my grandfather, but, in the interests of transparency, I will admit, he's like a grandfather...)

Argument I: Admitted forgery

In my 09-11-2015 *amicus*, **Exhibit-G**, (which Judge Tailor denied), I alleged a forgery, & even showed, from the record, **two** identical signatures. (Brief, pp.5—6). But, wait, Judge Otto already knew of forgery way back on 03-08-2013: Otto admits (Order, p.4, top of page, **Exhibit-B**) that the July 9, 2006 warranty deed "is in most respects identical" to the May 9, 2006 warranty deed that Daniggelis signed (except, of course, for the word 'July' being hand-written in), which supports Daniggelis claims that there was photocopy forgery of his signature, **which forgery - all by itself - would void the entire illegal transfer of title**. So, let me see if I can get this straight: Judge Otto already knew of damning proof of forgery back in 2013, in an order I'd overlooked when filing my 2015 *amicus*, but The Courts are all still 'OK' with taking title on proven & documented (double documented: by myself & by Judge Otto) forgery? Oh, really?.. (**Standard of Review: de novo**, as this court has just as good a grasp on the law as the circuit court)

Argument II: Side-agreements

Judge Otto (Order, p.3) acknowledges (admits) that 'Exhibit L' existed, a side-

agreement to limit the title transfer only for the purpose of paying the “mortgage arrearage.” Judge Otto claims that this document was not properly signed, but apparently, Otto did not see the exhibits filed in **Daniggelis' July 30, 2008 answer—Exhibit-C, below: Or**, see pages 38 and 40 of the 96-page PDF file of a public records request at this link, provided by my personal repository and online docket: <http://GordonWayneWatts.com/MortgageFraudCourtDocs/07ch29738-07242015.pdf> or <http://GordonWatts.com/MortgageFraudCourtDocs/07ch29738-07242015.pdf> Since both Shelton and Rhone sign on to such statements, and Daniggelis also signs them: These contracts place limits on both the time and purpose of the POA). So, this conclusively proves **the POA to be fraudulently used, which fraud - all by itself - would void the entire illegal transfer of title**. If you can't access my website, please compel the circuit court to send up Daniggelis' July 30, 2008 answer. Or, see **Exhibit-C, below: Otto's** made false claims that documents weren't signed, even tho the record says otherwise. (**Standard of Review:** “Clearly Erroneous” (aka: Plain Error aka Manifest Error))

Argument III: Lack of consideration (payment)

There's no material disagreement with repeated assertions, by multiple parties, that Richard Daniggelis never got paid, which is a key proof of fraud that's being alleged by multiple parties. Daniggelis wouldn't simply give away the farm, for free. Moreover, even had he done so, case law I cite in my briefs [see pp.6—8 of my *Amicus*] shows that a sale is void *ab initio* if it lacks consideration. My filings [see pp.6—8 of my *Amicus*, **Exhibit-G**] have repeatedly accused the other parties of failing to pay Daniggelis any

consideration, and no one has contested this claim. Per 735 ILCS 5/15-1506(a), that which the other parties to this case don't deny is admitted, and, as such, it's plain that Daniggelis **didn't get paid a dime for his house**, which is documented [see pp.7—8 my *amicus*, where I cite to other filings documenting said equity] to have had hundreds of thousands of dollars equity, and which equity (and house and land) were taken without any consideration (payment), thus voiding any purported sale. But even if you think my case law, here, is “outdated,” the fact Daniggelis didn't get paid shows he had NO motive to give away—for free—the house and all its equity, **thus the transfer of title was not authorised by Daniggelis, and is therefore NOT legal or valid. At all. Period.** (Standards of review: *de novo* of the case-law, and clear fraud of the documented facts)

Argument IV: Judge Otto's justification is indefensible

On page 7, par.2, of Judge Otto's ORDER (**Exhibit-B, below**), he claims that the 'difficulty' for Daniggelis is that, even assuming the signature to be altered (forgery by photocopy), Otto claims that Daniggelis “provides no factual or legal basis support for his assertion that, assuming the signature to have been altered, the Bank therefore “knew or should have known that the deed ... was no longer valid when the closing occurred.” This argument by Judge Otto is totally ridiculous: Let's say, for example, that a group of thieves steal Daniggelis' vehicle, and then sell it on the Black Market to a Bank (or take a loan out on it, using as collateral for a mortgage). When the police finally catch the thieves, do you really think, for one second, that the Bank will be allowed to keep the hot (stolen) property, simply because they didn't have “notice” that the property was stolen?

Certainly not, and may God forbid! If Otto's logic seems crazy when we use a stolen vehicle, then it's just as crazy with the stolen house. Otto's claim that the bank needed 'notice' is ridiculous on its face, and invites the federal courts to investigate him for civil rights violations, under the color of law. However, the bank certainly did get notice: Daniggelis recording a statement of forgery in the recorder's office: Indeed, Otto admits (Order, p.4, par. 2) that: "In April 2007, Daniggelis filed a Notice of Forgery with the Recorder of Deeds, stating that the deed filed in August 2006 [i.e., the one dated "July 9, 2006"] was a forgery." Moreover, the Bank was also notified of this fraud by voluminous and lengthy litigation which ensued. [Thus, Otto's claim that the bank wasn't notified is contradicted by himself, no less.] However, more important than the fact Otto's claims were in contradiction to himself is the fact his ridiculous argument is in direct contradiction to absolute truth and common sense, and that this trial court judge used said 'nonsense' argument as an excuse to "rubber stamp" plain & obvious fraud. **Standard of review: "clear error," "plain error," "manifest error," or even "plainly nonsense," depending on your verbiage.** Otto further admits (Order, p.4, par. 3) that: "Daniggelis contends that the deed he signed in May 2006 was intended to take effect only if the property was sold on or before May 31, 2006. He claims that the July 2006 closing took place without his awareness or consent," and the Record on Appeal clearly supports Daniggelis' valid claim, which Otto acknowledges, but thereafter ignores.

Argument V: BONUS: Here is what results...

Because numerous courts & judges repeatedly continue to ignore Joseph Younes'

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

Cf: “Rotted' Historic Building In Old Town Triangle Could Be Seized By City,” by Ted Cox, *DNAinfo*, Mar 30, 2017: <https://www.dnainfo.com/chicago/20170330/old-town/rotted-historic-building-old-town-triangle-could-be-seized-by-city> *Cf*: “Rotted' Old Town House Owner Given 45 Days To Come Up With Repair Plan,” by Ted Cox, *DNAinfo*, Sept 01, 2017: <https://www.dnainfo.com/chicago/20170901/old-town/rotted-old-town-house-owner-given-45-days-come-up-with-repair-plan> (See, e.g., Exhibit-M)

Argument VI: BONUS: Burden of Proof issues, and more...

There are numerous other legal issues of great public importance, as described in my docketing statements, such as inquiring: Whether the trial courts, below, committed Manifest Error in applying the “Burden of Proof” backwards regarding ownership of 1720 N. Sedgwick (house & property, which has hundreds of thousands of dollars of equity, as many of us have documented in our past filings, below). [Daniggelis was forced to prove that his house was his, beyond all reasonable doubt, even though the circuit court should clearly have demanded that Younes and Shelton be the ones to meet this threshold before just snatching house, land, & equity.]

Argument VII: BONUS: Service of all parties, incl. Rule 383(b) 'nominal' parties

Also, litigants rarely serve all the parties, as the rules require. Please notice, if you will, that I serve **all** the parties, even the 'nominal' parties [[Rule 383(b)], by all four (4) methods: [[#1]] Hard copy (**Exhibits K-1 and K-4**) – [[#2]] By electronic service (**Exhibit-K-2**) – [[#3]] By email, when able (**Exhibit-K-3**), and lastly, [[#4]] by posting copies of my filings on a docket on my own website (**p. 2 of Exhibit-K-4**), and making it 'front-page' news for the duration of these proceedings. **** VERY IMPORTANT:** Even if everything else in this motion is 'bad,' nonetheless, this one point, “Argument VII,” here, is very important, and sufficient ALL BY ITSELF to take up this case as a “matter of great public importance”: As I've noticed a VERY pervasive pattern of lawyers NOT serving all the parties, and the circuit and reviewing courts NOT taking issue with this problem (in many Chancery, Civil, and Law Division matters), this makes the Judicial Branch (and The IL Supreme Court) look bad in the public's eye. Service to parties is the most basic duty, is it not? My docketing statements (in 1-18-0091, 1-18-0538, and 1-18-0572) are a “hard read,” but you will benefit greatly from them. (And, as I did much copying/pasting, that should speed up your review.) Remember: While I'm not a lawyer (and don't play one on T.V.), I am 'the' guy who almost won the Terri Schiavo case—all by myself—doing better than former Fla. Gov. Jeb Bush—or Schiavo's blood family.

Ante Conclusion

Obviously, you see that my frustration is 2-fold: First, with the egregious violations of law, resulting in the theft of Daniggelis' house, and then the man who stole it

then let it fall into disrepair for—as many believe—to bully the City of Chicago into allowing him to execute demolition on the house. And, of course, this impacts me, since any harm that befalls Mr. Daniggelis will adversely affect my chances of getting paid for services rendered (the thrust of my Intervention). But, besides the Substantive Due Process violations, above, we have the circuit court stubbornly refusing to prepare the Record on Appeal, and, as their excuse, blaming me for the failures of their own court to grant me intervention (**Exhibit-L**) according to Illinois case law (**see Exhibit-H**), ironically out of the First Appellate Court, no less. I don't mean any disrespect to the Appellate Court, which refused (**Exhibit-I**) to issue a Writ of Mandamus compelling the trial court to grant Intervention, Fee Waiver, & preparation of a smaller (limited) Record on Appeal I'd sought in my motions in the courts below. (*See Exhibit-I, which was scratched out, for my proposed order.*) Perhaps the appellate court thought that I might afford to pay for the Record on Appeal (and, if I encounter a miracle, or win the lottery, maybe I will be able to—but I don't play the Lotto). However, the appeals court, in asking me to inquire of the circuit court (**Exhibit-I**) is no different than you and me walking into a 7-11 store, and after we get robbed, we go to the police, who identify and locate the armed robbers—and when we ask the cops to help get our stolen properties back, they tell us that we must “direct inquiries” on the return of our property to the thieves who stole it from us. I don't mean any disrespect to the court which issued this ruling (as I impute pure and good motives), but this ruling is useless, and will not effect justice. Moreover, the court, in reviewing my proposed order, protested that it was not “fully” advised on the premises (**Exhibit-I, top of page 1**), scratching out the word 'fully'. – OK, fair enough,

but if The Appeals Court feels it is not fully advised, then it is their responsibility to order the circuit court to prepare at least the limited record I requested in the Proposed Order—especially given my very indigent poverty—and even more-so, now that I've had to quit my job.

Conclusion

I respectfully ask This Court to compel the circuit court to prepare a limited Record on Appeal (Exhibit-I) and compel the appeals court to hear the merits, or, your court, itself, hear the merits. [The mitigating circumstances existed—Daniggelis' attorney not prosecuting the case—but the appeals court still disobeyed your court's order to hear the merits, thus maybe it's your turn to take the case up.] I don't feel the need to submit an Initial brief, and waive briefing, as I feel my docketing statements (and exhibits) can “stand in” for my arguments, just fine, and convince the courts to give back the house & land to its rightful owner, Rich Daniggelis, and order damage awards to all other parties, including the house, which Mr. Younes basically destroyed—getting himself in the *DNAinfo* news repeatedly for the 'Rotted House' case. As I'm owed monies for work done, that should be factored in. While I'm frustrated with Mr. Younes and the courts (I feel he's more guilty than Shelton, who didn't get title), I don't seek revenge, and trust the courts to be moderate, fair, and compassionate, even to the lawbreakers. ***Respectfully***

submitted,

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

/s/ Gordon Wayne Watts

(Electronic Signature)
Gordon Wayne Watts

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Certificate of Compliance

I certify that this brief conforms to the requirements of Rules 341(a) and (b). The length of this brief, excluding the pages or words contained in the Rule 341(d) cover, the Rule 341(h)(1) statement of points and authorities, the Rule 341 (c) certificate of compliance, the certificate of service, and those matters to be appended to the brief under Rule 342(a), is **sixteen (16) pages**.

Date: **Day, DD April 2018**

/s/ Gordon Wayne Watts
Gordon Wayne Watts

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 (see e.g., **Exhibit-F, *infra***, or the affidavit of assets & liabilities concurrently filed hereto), just to remove any and all doubt hereto as to my claims that I am indeed the 'real' Gordon Wayne Watts—and attest under oath, via affidavit, of certain facts & claims.

Date: **Day, DD April 2018**

/s/ Gordon Wayne Watts
Gordon Wayne Watts

INDEX TO THE EXHIBITS

| <u>Instrument</u> | <u>Docket/Tab#</u> |
|--|--------------------|
| ** Selected court cases in the infamous 'Terri Schiavo' matter | Exhibit-A |
| ** March 08, 2013 Order by Judge Michael F. Otto in <u>GMAC v. Daniggelis</u> 2007-CH-29738 (Chancery) | Exhibit-B |
| ** Selected pages/exhibits from July 30, 2008 'Answer' brief of Richard Daniggelis, filed by CVLS | Exhibit-C |
| ** May 15, 2014 Order by Judge Michael F. Otto in <u>GMAC v. Daniggelis</u> 2007-CH-29738 (Chancery) | Exhibit-D |
| ** June 16, 2016 Order by 1 st App Ct, 1-14-2751, <u>Daniggelis v. Younes</u> and: Sept. 02, 2015 Order by Judge Sanjay T. Taylor, in <u>GMAC v. Daniggelis</u> 07CH29738 (Law Div) | Exhibit-E |
| ** Sworn / Notarised Affidavit of Gordon Wayne Watts filed on 09/11/2015 in 2007 CH 29738 (transfer to Law Division) | Exhibit-F |
| ** <i>AMICUS CURIAE</i> BRIEF OF GORDON WAYNE WATTS filed on 09/11/2015 in 2007 CH 29738 (transfer to Law Division) | Exhibit-G |
| ** MOTION TO INTERVENE BY INTERVENOR, GORDON WAYNE WATTS, filed on 07/07/2017, 07CH29738 (Law Div) | Exhibit-H |
| ** March 28, 2018 Order by 1 st Appellate Court, in 1-18-0091, <u>GMAC v. Watts</u> | Exhibit-I |
| ** 04/09/2018 Police Report by Gordon Wayne Watts of his boss attacking him on the way back from a job site | Exhibit-J |
| ** USPS & FedEx tracking receipts for filings in 1-18-0091 | Exhibit-K-1 |
| ** Receipt for e-Filing in 1-18-0538 | Exhibit-K-2 |
| ** Copy of Electronic Mail service in 1-18-0578 | Exhibit-K-3 |
| ** Screenshot of online tracker docket & photos of outgoing & returned mails to document veracity of Certificate of Service | Exhibit-K-4 |
| ** Email from Robert J. More, waiving hard-copy service | Exhibit-K-5 |
| ** Email from Atty. Richard Indyke, disclaiming representation | Exhibit-K-6 |
| ** March 01, 2018 Order by Judge James P. Flannery, Jr., in <u>GMAC v. Watts</u> 2007-CH-29738 (Chancery) | Exhibit-L |
| ** Relationship diagram of major payers (2 pages, <i>DNAinfo</i> ref) | Exhibit-M |

IN THE
SUPREME COURT OF ILLINOIS

Gordon Wayne Watts,
Plaintiff,

vs.

Hon. James P. Flannery, Jr., in his capacity as presiding
judge, Law Division, Cook County, IL circuit court

and

Hon. Diane M. Shelley, in her capacity as circuit judge,
Law Division, Cook County, IL circuit court,
Defendants.

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|| Docket Number: _____
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ORDER

In the exercise of this Court's supervisory authority, the Clerk of the Circuit Court, Cook County, is directed to vacate its order in *GMAC Mortgage, LLC v. Watts*, case No. 2007-CH-29738 (03/01/2018), denying Gordon Wayne Watts leave to intervene. The circuit court is instructed to prepare a limited Record on Appeal, as specified in Watts' proposed order in his 03/16/2018 filing in case number 1-18-0091, at no cost to Mr. Watts, and to transmit the Appellate Court, First District on Accelerated Docket (R.311). The appellate court is instructed to review the record presented to it, and issue summary judgment on the merits within no more than 45 days. The court, if it chooses, may allow briefing, but whether briefing is allowed or not, the Appellate Court, First District, is directed to, rule on the merits in *GMAC Mortgage, LLC v. Watts*, case No. 1-18-0091, enter an order, and publish it, within the time specified in this order.

Justice

SERVICE LIST

* **ILLINOIS SUPREME COURT** – Supreme Court Building, Office Hours: 8:30am-4:30pm CST, Mon-Fri, Excl. Holidays, PH: (217) 782-2035 ; TDD (217) 524-8132, Attention: Clerk's Office – 200 E. Capitol Ave. – Springfield, IL 62701-1721 [[served by eFiling , and, if accepted/docketed, thirteen (13) hard copies]]

* **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, & waives hard-copy service—see Exhibit-K-5, with a statement from Mr. More.]]

* **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 Holdings, Inc. – PH: (703) 761-1270, FAX: (703) 748-0183,

SERVICE LIST (continued from above)

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—see Exhibit-K-6, with a statement from Mr. Indyke.]]

*** 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
SUPREME COURT OF ILLINOIS

Gordon Wayne Watts,

Plaintiff,

vs.

Hon. James P. Flannery, Jr., in his capacity
as presiding judge, Law Division,
Cook County, IL circuit court

and

Hon. Diane M. Shelley, in her capacity
as circuit judge, Law Division,
Cook County, IL circuit court,

Defendants.

Docket Number: _____

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

* The undersigned Plaintiff, **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 Supervisory Orders and Exhibits**, 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 **the Odyssey eFileIL (TylerHost.net) Electronic Filing system** 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**—whichever shall prove more convenient..

* Additionally, I'm serving all parties **by email**, if indicated in the Service List.

* Lastly, 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.

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