

**In the Appellate Court of Illinois, First District**

Gordon Wayne Watts,

Plaintiff,

vs.

Hon. James P. Flannery,  
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: 1-18-0538

**Motion – *En Banc* – for Reconsideration of Dismissal for Lack of Jurisdiction**

This matter comes before the Court on motion of Movant for Reconsideration of Dismissal for Lack of Jurisdiction of the 09/28/2018 Order entered by This Court (Hon. Mary Anne Mason, Hon. Terrence J. Lavin, and Hon. Michael B. Hyman, JUSTICES, for The Court).

Summary of Argument: This Court committed Gross Error in this holding, which is obvious when compared with *Gassman v. THE CLERK OF THE CIRCUIT COURT OF COOK COUNTY* (1-15-1738) and *Midwest Medical v. Dorothy Brown* (1-16-3230), both of which are examples of This Court having the authority to issue Mandamus Writs, as Art.6, Sec. 6 of the ILLINOIS CONSTITUTION (sentence 3) clearly says: “The Appellate Court may exercise original jurisdiction when necessary to the complete determination of any case on review,” which, of course, includes Mandamus actions. The Gross Error justifies *En Banc* treatment of this motion, so as to offer a check & balance against legal discord.

**Summary of the CASE and FACTS:** The circuit court made the appellant believe his motion for Intervention had been granted (see Exhibit-A), by putting his name on docket. But when the trial court entered an illegal ruling (upholding the title-theft of defendant, Richard Daniggelis' house, land, and hundreds of thousands of dollars in equity—without him having been paid anything), appellant remembered lots of well-documented monies Daniggelis owed him for Internet research, technological help, etc. This gave him legal rights (and needs) to intervene.

The trial court not only ruled incorrectly (causing great pain & harm to this elderly man), but would neither let the Intervenor, Watts, intervene, nor allow a qualified indigent litigant the

rights to sue/defend via Fee Waiver. Besides the appeal (in case #:1-18-0091), appellant moved for an original writ, in this case (1-18-0538). It is not without moment that This Court, in its 05/03/2018 Order in the sister-case, 1-18-0572 (Hon. Daniel J. Pierce, JUSTICE, writing for the court) held that: “This court has no jurisdiction to order the Cir. Ct. to allow Watts leave to intervene, grant a fee waiver, or to prepare the record on appeal & transmit to App. Ct. in this matter (1-18-0572). Motion denied.”

While no ill motives are imputed to any Justice (much less this Justice, who has twice graciously ordered extensions of time to prepare the Record on Appeal), nonetheless, this is not only illegal, but it places an impossible burden upon Appellant (who can not pay the estimated thousands of dollars for the full Record on Appeal in the very, very huge underlying Chancery case). Appellant asked both the circuit court and the reviewing court, here, for a Rule 321 order limiting the recorded to a handful of Sine Qua Non required filings to determine the Clear Fraud and Manifest Error of the lower tribunal in its reversal of the burden of proof—asking the elderly Daniggelis to prove the house was his, instead of requiring that the thieves prove that they aren't thieves, in spite of clear admissions by Judge Otto in his 3-8-2013 ruling, that there were duplicate signatures, which can not happen “by hand” (as it is impossible to copy your own signature exactly the same twice in a row). Otto's admission of this is damning proof of felony forgery that powered this title-theft Mortgage Fraud, yet the lower courts stood by their decision to steal the elderly victim's house, land, and hundreds of thousands of dollars in equity, without the man being paid a dime, and then being made homeless while elderly.

If the reviewing courts of appeals are not in the business of reviewing lower courts, then what is the business? This panel (in 1-18-0538) made a similar error, incorrectly claiming that it lacked authority to issue Mandamus Writs, in spite of clear facts to the contrary. We all know that ***City of Chicago v. John Hancock Mutual Life Ins. Co.*, 127 Ill.App.3d 140, 144 (1st Dist. 1984)** allows a person with unrepresented interests to intervene, to protect his or her interests, no? Thus with authority to issue mandamus (see the IL Constitution and cited case law, above) and reason to do so (error on the part of the trial courts, which caused great harm), the ball in in the court of the Reviewing Court, and given the magnitude, nature, and gravity of the legal errors committed by This Court, an *En Banc* review is appropriate.

While Movant, Watts, is not an attorney, he nearly won the largest case in the last century—all by himself—doing better, even than then Gov. Jeb Bush, before the same panel, which may be verified by looking at that court's docket:

**\*\* *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>

This would suggest that Watts' filings, and sincere allegations of grave missteps, may have some merit, and should be reviewed *En Banc*.

This Court should recognise that Movant is making an honest effort to meet the court and parties halfway, and make their jobs as easy as possible (by, for example, offering to pay for some of the Preparation of the Record on Appeal—even tho he is genuinely VERY indigent). In fact, since the case for Summary Judgment, returning ownership of Daniggelis' house is so strong, This Court might save itself some time, headache, & man-hours, by simply ordering the limited record suggested in prior filings, and then issuing summary judgment on this case, and, more generally, reviewing policy on the missteps that occurred above, when the court did not comply with clearly-established Rules, case-law, Constitutional Provisions, etc.

Although it seems unlikely that Appellant, who is quite financially strapped, could pay the estimated several-thousand-dollar Record on Appeal fees to prepare the record, were he to somehow do so, he would be entitled to Mandamus relief, as the case-law, cited in the motions filed in 1-18-0081, hold, and Mandamus would issue (from This Court or The IL Supreme Court) to compel reimbursement, because he qualifies for intervention, and (via poverty) for Fee Waiver. So, that being the case, why not grant relief now, so that we avoid that legal train wreck?

**This Court also violated a direct command of the Illinois Supreme Court, here recently, in a related case:**

[Date: 5/6/2015] 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))

**Let's looks again at the ORDER rendered here:** Notice that it doesn't say “hear” the case only if Atty. Galic files his merits briefs. Notice, please, it says to “hear the case.” Period. Now, no one will hold it against the appellate court judges for being human and getting side-tracked: **If This Court does not obey The Supreme Court's last order to hear the merits, four (4) parties will suffer harm:**

- (1) This Court will risk censure, embarrassment, & failure to obey the IL Supreme Court.
- (2) Mr. Daniggelis, who is elderly (about 80 or 81 at this time), was made homeless, *via title theft*.
- (3) Movant is owed monies as documented in Intervention filings, which need to be paid.
- (4) The Rule of Law would suffer, and who else would get denied a fair hearing, simply because he's a poor, out-of-state non-Lawyer?

**Conclusion:**

Movant is grateful for the kind patience of This Court in extending time twice already, but a failure to uphold the law for poor litigants who qualify for (because they can't afford) a Record on Appeal—and who legally (and morally) qualify for Intervention, would moot any extension of time. Therefore, This Court should review the record, and—on its own motion—permit a fair review of the merits of the case being appealed (whether it requires full prep of the Record or a limited R.321 Record as Movant suggests in prior filings).

There were so many blatant and obviously huge errors committed by This Court in the 3 sister-cases referenced (1-18-0091, 1-18-0538, and 1-18-0572), than an *En Banc* reconsideration is the only appropriate course to avoid a legal train wreck.

This Court might disagree with the requests made of it or disagree with the claims that This Court violated the law—and no disrespect is meant—but, if This Court disagrees with the legal analyses and/or the requests within the “four corners” of this brief, it should enlighten those on the outside as to why we are wrong via a clearer opinion, *En Banc*, after careful review.

Hopefully, however, the meager requests made with genuine intent to get justice, but not go overboard or destroy those who broke the law & executed title-theft, should be amenable to This Court, and to that end, Movant (supported by many others who are harmed by these title-theft thieves) moves This Court to execute justice after a careful review of the merits.

*Respectfully submitted,*

*/s/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, just to remove any and all doubt hereto.**

Date: Wednesday, 17 October 2018

*/s/Gordon Wayne Watts*  
**Gordon Wayne Watts**

**INDEX TO THE EXHIBITS**

**Instrument**

**Docket/Tab#**

\*\* Motion to Intervene (7-7-2017) – with documentation supporting

Exhibit-A

NO. 1-18-0538

IN THE APPELLATE COURT OF ILLINOIS  
FIRST DISTRICT

GordonWayne Watts )  
Plaintiff )  
vs. )  
) (An Original Jurisdiction action)  
Hon. James P. Flannery and )  
Hon. Diane M. Shelley )  
Defendants )

**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 fully advised in the premises:

**IT IS HEREBY ORDERED** that the time for filing the Record on Appeal is extended to February 18, 2019, 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** – *Watts v. Flannery and Shelley*, 1-18-0538 (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 instanter 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.**

**IT IS SO ORDERED.**

\_\_\_\_\_  
Justice

\_\_\_\_\_  
Justice

\_\_\_\_\_  
Justice

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

**In the Appellate Court of Illinois, First District**

Gordon Wayne Watts,

Plaintiff,

vs.

Hon. James P. Flannery,  
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: 1-18-0538

**NOTICE OF FILING**

To: See attached Service List

**PLEASE TAKE NOTICE** that today, Wednesday, 17 October 2018, I am causing to be filed with the ILLINOIS 1<sup>st</sup> Appellate Court my Motion for Extension of Time, Verification by Certification, Exhibits –with an Index to exhibits, Proposed Order, this NOTICE OF FILING, an updated/corrected SERVICE LIST, and my Certificate of Service, 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]  
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)



**SERVICE LIST**

\* **1st District Appellate Court**, Clerk's Office, 160 North LaSalle St., Chicago, IL 60601 (312) 793-5484 , Office Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays [**served by eFiling only, since this The Court no longer accepts paper filings**]

\* **CIVIL APPEALS DIVISION: 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](mailto:PAOBrien@CookCountyCourt.com) Hours: 8:30a-4:30p, Mon-Fri, Excl. Holidays

\* **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](mailto:Timothy.Evans@CookCountyIL.gov) [**served, 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](mailto:James.Flannery@CookCountyIL.gov) [**served, as Judge Flannery is a defendant in the Mandamus proceedings**]

\* **Law Division and Hon. Diane M. Shelley, Circuit Judge, Daley Center, 50 W. Washington St., Rm. 1912, Chicago, Illinois 60602** [Law@CookCountyCourt.com](mailto:Law@CookCountyCourt.com) ; [ccc.LawCalendarW@CookcountyIL.gov](mailto:ccc.LawCalendarW@CookcountyIL.gov) ; [Diane.Shelley@CookCountyIL.gov](mailto:Diane.Shelley@CookCountyIL.gov) [**served, as Judge Shelley is a defendant in the Mandamus proceedings**]

\* **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 [**Not served, as Mr. Daniggelis has asked that service copies not be sent to him, which is permissible, since he has an attorney of record.**]

\* **Richard B. Daniggelis** (who receives mail, via USPS mail-forwarding at his old address) 1720 North Sedgwick St., Chicago, IL 60614-5722 [**Not served, as Mr. Daniggelis has asked that service copies not be sent to him, which is permissible, since he has an attorney of record.**]

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

\* **Joe Younes**: 2625 West Farewell Avenue, Chicago, IL 60645-4522 [JoeYounes@SbcGlobal.net](mailto:JoeYounes@SbcGlobal.net)

**SERVICE LIST (continued)**

\* **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](mailto:RoJoe69@yahoo.com) 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596

\* **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](mailto:PKing@khl-law.com) or:  
[PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

\* **Paul L. Shelton**, *Pro Se*, (Atty. #15323, disbarred per IARDC) E: [PMSA136@Gmail.com](mailto:PMSA136@Gmail.com) ;  
[PLShelton@SBCGlobal.net](mailto:PLShelton@SBCGlobal.net) – 3 Grant Square, SUITE #363, Hinsdale, IL 60521-3351

\* **Erika R. Rhone** 22711 Southbrook Dr., Sauk Village, IL 60411-4291, last known emails (see **Exhibit-G**) are as follows: [ERRegi@mail2.tread.net](mailto:ERRegi@mail2.tread.net), [Erika.Rhone@SbcGlobal.net](mailto:Erika.Rhone@SbcGlobal.net),  
[Erhone@Mindspring.com](mailto:Erhone@Mindspring.com), [Erika@GrandKahn.com](mailto:Erika@GrandKahn.com), [ErikaRhone@sbcglobal.net](mailto:ErikaRhone@sbcglobal.net),  
[ER5526199@aol.com](mailto:ER5526199@aol.com) and per: [https://www.FastPeopleSearch.com/ms-erika-r-rhone\\_id\\_G-5317261083665188477](https://www.FastPeopleSearch.com/ms-erika-r-rhone_id_G-5317261083665188477)

\* **Rosa M. Tumialán** ([RTumialan@Dykema.com](mailto:RTumialan@Dykema.com)) (312) 876-1700, DYKEMA GOSSETT PLLC, 10 South Wacker Drive, Suite 2300 Chicago, IL 60606-7407 [Attorney for Appellee, GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX]

\* **Dawn Williams** ([DWilliams@Dykema.com](mailto:DWilliams@Dykema.com)) ([DPeacock@KentLaw.iit.edu](mailto:DPeacock@KentLaw.iit.edu)) Note: Served to work address, as she has NOT been excused by Court as an attorney of record—but not served to personal email, as a courtesy, as she claims, via auto-responder email, to no longer work at DYKEMA. Phone: 616-776-7518, DYKEMA GOSSETT PLLC, 300 Ottawa Ave., N.W., Suite 700, Grand Rapids, MI 49503-2306 [Attorney for Appellee, GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX]

\* **Atty. Justine A. Lewis, Esq.** ([JLewis@Dykema.com](mailto:JLewis@Dykema.com)), Senior Manager, Recruiting and Professional Development \*\* Note: Now included on service list per official email from Dykema – see **Exhibit-H**. Phone: 312-876-1700, FAX: 866-771-2154 or 312-876-1155, DYKEMA GOSSETT PLLC, 10 South Wacker Drive, Suite 2300, Chicago, IL 60606-7407 [Attorney for Appellee, GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX] Chicago office address per: <https://www.Dykema.com/www.dykema.com/careers-associates-opportunities.html>

**SERVICE LIST (continued)**

\* **Robert J. More** ( [Anselm45@Gmail.com](mailto: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 Adams Street, Green Bay, WI 54301-5142  
Web: <https://www.AssociatedBank.com/about-us> PH: (920)433-3200, (800)236-8866, or (800)682-4989, Email address: [WeCare@associatedbank.com](mailto:WeCare@associatedbank.com) per: view-source:<https://www.AssociatedBank.com/contact> and: [ShareHolders@AssociatedBank.com](mailto:ShareHolders@AssociatedBank.com) per: <http://Investors.EquityApartments.com/drip.aspx?iid=100135> and [ColleagueCare@AssociatedBank.com](mailto:ColleagueCare@AssociatedBank.com) per: <https://AllHispanicJobs.com/s/find-associated-bank-jobs-in-usa>

\* **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, [SharonH@MersInc.org](mailto:SharonH@MersInc.org) ; [SharonH@MersCorp.com](mailto:SharonH@MersCorp.com) Cc: Janis Smith, 703-738-0230, VP, Corp. Comm. is no longer with MersCorp, and Amy Moses ([AmyM@MersCorp.com](mailto:AmyM@MersCorp.com) ; [AmyM@MersInc.org](mailto:AmyM@MersInc.org)) has replaced her as an email contact; Sandra Troutman 703-761-1274, E: [SandraT@MersInc.org](mailto:SandraT@MersInc.org) ; [SandraT@MersCorp.com](mailto:SandraT@MersCorp.com)) Dir, Corporate Communications, Karmela Lejarde, Communications Manager, Tel~ 703-761-1274, Mobile: 703-772-7156, Email: [KarmelaL@MersInc.org](mailto:KarmelaL@MersInc.org) ; [KarmelaL@MersCorp.com](mailto: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)**  
Removed from service list, and not served, as the court excused them as parties—see **Exhibit-I**.

\* **Stewart Title, Attn: Leigh Curry**  
Removed from service list, and not served, as the court excused them as parties—see **Exhibit-I**.

\* **Richard Indyke, Esq.** Atty. No. 20584, ([RIndyke@SBCGlobal.net](mailto: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.]]**

**In the Appellate Court of Illinois, First District**

Gordon Wayne Watts,

Plaintiff,

vs.

Hon. James P. Flannery,  
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: 1-18-0538

**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 Extension of Time, Verification by Certification, Index to exhibits, Proposed Order, NOTICE OF FILING, an updated/corrected SERVICE LIST, and this Certificate of Service, and attached EXHIBITS**, copies of which are attached hereto are being herewith served upon you—and upon the parties listed in the attached Service List, above – **today, this Wednesday, 17 October 2018**, via **the Odyssey eFileIL (TylerHost.net) Electronic Filing system** if they're e-file registered.

\* I am NOT any parties via **First Class U.S. Postal Mail** –*as I customarily do (due to financial constraints), as Rule 11 does not require hard-copy service if email is used.*

\* 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—see e.g., the “Open Source Docket” link in said news item.

\* Lastly, I am concurrently effecting service via **e-mail.**

***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](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

*Watts v. Flannery and Shelley*, 1-18-0538 (ILLINOIS First Appellate Court)

**INDEX TO THE EXHIBITS**

**Instrument**

**Docket/Tab#**

\*\* Motion to Intervene (7-7-2017) – with documentation supporting

Exhibit-A