

NO. 1-15-0662
Trial Court No.: 2014-M1-701473

IN THE APPELLATE COURT OF ILLINOIS
FIRST DISTRICT

Joseph Younes,)
Plaintiff)
vs.)
)
Richard B. Daniggelis,)
Defendant)

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

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

- **##1** Defendant, Richard B. Daniggelis, an elderly 76-year-old man, is homeless as a result of the eviction in this cause, and is reported to be living on the street.
- **##2** While the trial court received & docketed the Affidavit, Notice of Motion, Motion, Amicus brief, & Exhibits of Gordon Wayne Watts, as reflected on docket, Activity Date: 8/10/2015 (*see Exhibits, infra, to verify*), the Motion to Supplement the Record on Appeal, which the trial court received & signed for, on Aug. 20, 2015, is documented to be **“Lost and Missing,”** making an already difficult situation even worse.
- **##3** The need to supplement the record on appeal –in both sister cases (1-14-2751 and 1-15-0662) –was due to a delay of over one-year in the trial court's grant of a Public Record's Request, thereby delaying the ability to file an intelligible Motion on that head.
- **##4** There is a small docketing nomenclature anomaly; *see infra*.
- **##5** A new situation has arisen: Attorney Joseph Younes (co-defendant in 1-14-2751 *GMAC v. Daniggelis*, –and plaintiff in 1-15-0662, *Younes v. Daniggelis*) is documented to have begun illegal construction and/or demolition activities against the property which is the subject-matter of this litigation, namely 1720 N. Sedgwick St., Old Towne District, Chicago, IL 60614—which would moot any appeal pending.
- **##6** On Mon. 17 Aug. 2015, The Appellate Court dismissed Daniggelis' appeal, due to negligence on the part of his attorney, *thus exasperating* this semi-emergency matter.

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

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

While I don't know the particulars, I do know what Daniggelis told me. Since I later verified his claims of a duplicate signature were correct, after a Public Records request of This Court showed that the signatures on the May 09, 2006 & July 09, 2006 Warranty Deeds were ****IDENTICAL**** (an impossibility for a mere mortal to sign his name the exact same twice in a row =equals= a photocopies signature, e.g., a forgery fraud), then Daniggelis' reputation for honest gained credibility. Therefore, his claims about having to live on the street (or, occasionally, in a rental moving van when he might afford it) are accepted as fact. However, I'm hesitant to declare a “genuine” (or “total”) Emergency since I don't know if living on the streets in Chicago is an immediate/certain threat to his life. But, as we all know that homelessness is immediately correlated with risks, threats, & jeopardy to one's health, I'd be remiss in my moral (and legal) duties to remain silent on this head. Matters that have become urgent by reason of a party's failure to seek timely relief do not constitute emergencies; however, it was my understanding that This Court was aware of the fact that Daniggelis was elderly & homeless (as his attorney is reported to have warned a judge in open court that he might become homeless). But, seeing that my filings on the 16th of August (and time-stamped as the 17th of August) weren't acted upon with speed (even tho I gave conclusive evidence of the fraud alleged), I infer that This Court wasn't aware of this exigency; so, to that end, I'm giving you notice. **I have spoken: If harm befalls him because of his homelessness, his blood is not on my hands.**

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

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

- **{{#2}}** While the trial court received & docketed the Affidavit, Notice of Motion, Motion, Amicus brief, & Exhibits of Gordon Wayne Watts, as reflected on docket, Activity Date: 8/10/2015 (see Exhibits, *infra*, to verify), the Motion to Supplement the Record on Appeal, which the trial court received & signed for, on Aug. 20, 2015, is documented to be “Lost and Missing.” making an already difficult situation even worse.

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

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

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

and:

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

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

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- **{{#3}}** The need to supplement the record on appeal –in both sister cases (1-14-2751 and 1-15-0662) –was due to a delay of over one-year in the trial court's grant of a Public Record's Request, thereby delaying the ability to file an intelligible Motion on that head.

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

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

{{BONUS POINT}} I already argue in my *Amicus* brief that both attorneys Andjelko Galic and Benji Philips did a poor job in some overlooking key points—which I was able to raise. While The Court, itself, was not at fault here, it is a fact that Illinois, like Florida, recognises attorneys as 'Officers of the Court' (and not *merely* private citizens), meaning Galic's and Philips' failures were legally equivalent to a failure of the Judicial Branch, and thus Daniggelis' Due Process was denied, and no further legal argument is needed to advance an 'Ineffective Counsel' defense:

ARTICLE VIII. ILLINOIS RULES OF PROFESSIONAL CONDUCT OF 2010, Preamble: a Lawyer's Responsibilities reads: “[1] A lawyer, as a member of the legal profession, is a representative of clients, **an officer of the legal system** and a public citizen having special responsibility for the quality of justice.”

Cite: http://www.Illinoiscourts.gov/supremecourt/rules/art_viii/artviii_new.htm

This, of course, implicates Fundamental Due Process.

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

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

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

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

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

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

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

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

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

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

- **{{#6}}** On Mon. 17 Aug. 2015, The Appellate Court dismissed Daniggelis' appeal, due to negligence on the part of his attorney, *thus exasperating* this semi-emergency matter.

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

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

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

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

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

Thus, in *GMAC v. Daniggelis*, your court still retains jurisdiction, and in *Younes v. Daniggelis*, since my motion “slipped in under the wire,” *nunc pro tunc, supra*, you may rule affirmatively on my motion and grab back jurisdiction, and save Daniggelis' life, if you will.

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

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

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

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

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

The undersigned, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above Judicial Notice of Adjudicative Facts – in *semi*-Emergency Fashion and all attached pleadings were delivered to the following parties as indicated:

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

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

William D. and Linda D. Gerould
(Owners of record of subject property, according to <http://CookRecorder.com>)
49 Lorelei Lane, Menlo Park, CA 94025-1715

Mr. Robert J. More (Anselm45@Gmail.com) (Former tenant of Daniggelis)
P.O. Box 6926, Chicago, IL, 60680-6926 – PH: (608) 445-5181

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

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

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

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

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

Stewart Title, Attn: Leigh Curry
<http://www.Stewart.com/en/stc/chicago/contact-us/contact-us.html>
2055 W. Army Trail Rd., STE 110, Addison, IL 60101, PH: (630) 889-4050

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

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

Perry Perelman (Atty no: 57398) (PPerelman@PerelmanDorf.com) (Atty. for Joseph Younes)
PERELMAN | DORF, LLC <http://PerelmanDorf.com/contact/> Email: Info@PerelmanDorf.com
2059 W. Chicago Ave., Chicago, IL 60622, PH: (312) 888-9608 / FAX: +1-312-674-7644

Joseph Younes Law Offices / <http://ChicagoAccidentAttorney.net>
120 W Madison St Ste 1405, Chicago, IL 60602-4128
Phone: (312) 372-1122 ; Fax: (312) 372-1408
Email is thought to be: RoJoe69@yahoo.com per <http://www.ZoomInfo.com/p/Joseph-Younes/599467626>)

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

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

Paul L. Shelton
10 North Adams Street
Hinsdale, IL 60521
PH: 630-986-5555
–address per: <https://www.idfpr.com/banks/resfin/discipline/LO2009/2009-LO-26.pdf>
and: <https://www.idfpr.com/News/newsrsls/05072009SheltonOrder.pdf>
and: <https://www.idfpr.com/banks/resfin/discipline/2009/MBR-128-bandLO-26-b.pdf>
and per: http://chicago.blockshopper.com/property/09-02-422-012/10_n_adams
and: <http://www.whitepages.com/search/FindNearby?utf8=✓&street=10+N+Adams+St&where=Hinsdale,+IL>
and: <http://www.whitepages.com/name/Mike-Shelton/Hinsdale-IL/6y8peece>

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

MERS (Mortgage Electronic Registration Systems, Inc.)

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

a nominee for HLB Mortgage, Janis Smith – (703) 738-0230 – Email: JanisS@mersinc.org

Vice President, Corporate Communications, Sandra Troutman – (703) 761-1274 – Email:

SandraT@mersinc.org – Director, Corporate Communications

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

I, Gordon Wayne Watts, the undersigned, hereby certify under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above notice and all attached pleadings (Affidavit of Gordon Wayne Watts, Notice of Motion, Motion for leave to file *Amicus Curiae* brief, *Amicus Curiae* of Gordon Wayne Watts in the above-captioned case, and related exhibits – with an Appendix of Exhibits) were served upon all parties listed above, this 9th day of September, 2015 by the following methods:

- **FedEx 3rd-party commercial Carrier:** Every party was served by FedEx [[with delivery confirmation and tracking, should it be necessary to verify service]] excepting the cases of a PO Box, which are not serviced by FedEx.
- See e.g., <http://GordonWatts.com/MortgageFraud-Court-Filings/> or <http://GordonWayneWatts.com/MortgageFraud-Court-Filings/> for FedEx and USPS receipts of past, present, and future filings in this cause.
- **United State Postal Service:** The party with a PO Box, Mr. More, was served by USPS.
- **Internet:** I shall, when practically possible, post a TRUE COPY of this filing – and related filings – online at my official websites, *infra*.

Signature: _____

Date: _____

Gordon Wayne Watts, Amicus Curiae*

821 Alicia Road

Lakeland, FL 33801-2113

PH: (863) 688-9880

Web: www.GordonWatts.com / www.GordonWayneWatts.com

Email: Gww1210@aol.com / Gww1210@gmail.com

Date: Wednesday, 09 September 2015

* Watts, acting counsel of record, is not a lawyer. Per Local Rule 2.1, “Notice of Hearing of Motions,” Watts, appearing pro se, is giving notice of his motion

INDEX TO THE EXHIBITS

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



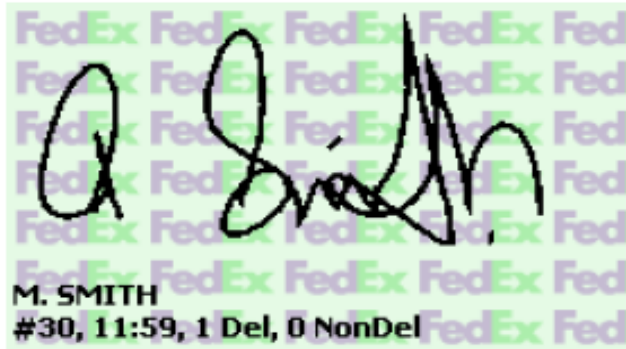
August 31, 2015

Dear Customer:

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

Delivery Information:

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



Shipping Information:

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

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

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

Thank you for choosing FedEx.



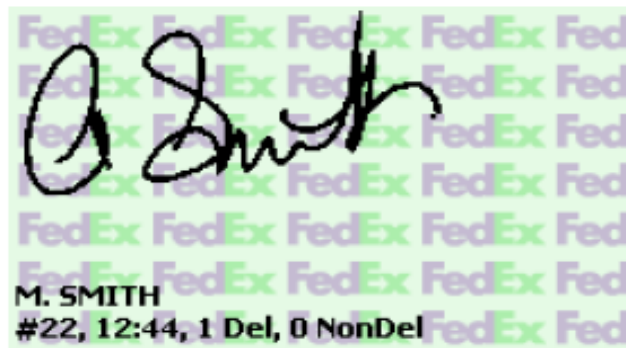
August 26, 2015

Dear Customer:

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

Delivery Information:

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



Shipping Information:

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

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

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

Thank you for choosing FedEx.

Case Information Summary for Case Number
2007-CH-29738

Case Type:

w3.courtlink.lexisnexis.com/cookcounty/Finddocket.asp?DocketKey=CAAH0CH0CJHDI0CH

Search

Attorney: PRO SE

Activity Date: 8/10/2015

NOTICE OF MOTION FILED

Attorney: PRO SE

Activity Date: 8/10/2015

MOTION FILED

Attorney: PRO SE

Activity Date: 8/21/2015

NOTICE OF MOTION FILED

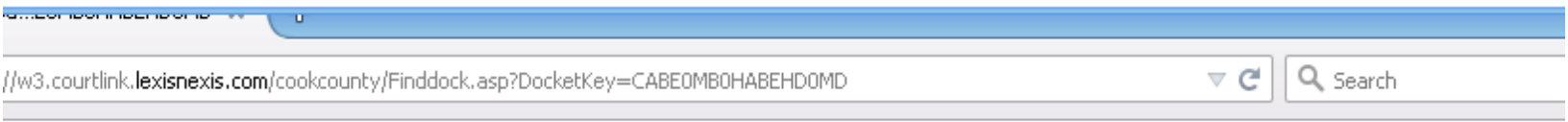
Attorney: GALIC ANDJELKO

Activity Date: 8/21/2015

NOTICE OF MOTION FILED

Case Information Summary for Case Number
2014-MI-701473

Case Type: FORCIBLE ENTRY AND DETAINER



Date: 7/2/2015
Court Time: 0930
Court Room: 1302

Judge: SHEAHAN, PATRICIA

Activity Date: 6/30/2015

ANSWER/RESPONSE/REPLY

Attorney: GALIC ANDJELKO

Activity Date: 7/2/2015

EXTEND JUDGMENT - ALLOWED

Date: 9/30/2015

Judge: ROSARIO, DIANA

Activity Date: 8/10/2015

MOTION FILED

Attorney: PRO SE

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



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

Exhibit-F

