

**In the Appellate Court of Illinois, First District  
Docket Number: 1-18-0091**

<b>GMAC Mortgage, LLC,</b>	) Appeal from the Circuit Court of Cook County, IL
<b>Plaintiffs,</b>	) County Department, Law Division
vs.	)
	) <b>Circuit Court Case No.:</b> 2007-CH-29738
<b>Gordon Wayne Watts, et. al.,</b>	) (Transfer into <b>Law Division</b> from Chancery)
<b>Defendants.</b>	)
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<b>Gordon Wayne Watts,</b>	) <b>Trial Judge:</b> Hon. Diane M. Shelley (#1925)
<b>Appellant/Counter-Plaintiff,</b>	) <b>Notice of Appeal date:</b> Monday, 08 January 2018
vs.	) <b>Judgment Date:</b> Wednesday, 07 December 2017
	) <b>Date of Post-judgment Motion:</b> None
	) <b>Order:</b> #5
<b>Joseph Younes, Hon. Diane M. Shelley,</b>	)
<b>Hon. James P. Flannery, et al.,</b>	) Supreme Court Rule(s) which confer(s) jurisdiction
<b>Counter-Defendants.</b>	) upon the reviewing court: <b>Ill.Sup.Ct. R.301, 303</b>

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**Motion for Extension of Time to file Record on Appeal**  
**concurrent with: Motion for Clarification**

Appellant, Gordon Wayne Watts, gives judicial notice to Reviewing Court that, on Wednesday, March 28, 2018, This Court (Hon. Daniel J. Pierce, Justice, writing on behalf of The Reviewing Court), in response to a motion to extend time, entered an order that the time to file the Record on Appeal was extended to Tuesday, June 12, 2018. Today's motion, to extend time, is within the guidelines of **Rule 326**, which allow an extension of time to file the record on appeal “on motion made before the expiration of the original or extended time **or on motion filed within 35 days thereafter supported by a showing of reasonable excuse for failure to file the motion earlier.** The movant shall serve any motion for extension of time on the clerk preparing the record on appeal.” [Movant / Appellant, Watts, is doing so; see *infra.*]

Since 5 ILCS 70/1.11 states that “The time within which any act provided by law is to be done shall be computed by excluding the first day and including the last...,” this mean that 1<sup>st</sup> day of the 35-day time limit begins to run on the following day, Wednesday, June 13, 2018, and that

the 35<sup>th</sup> day falls on Tuesday, 17 July 2018. It is believed that Appellant will be able to timely finish writing, filing, and serving this motion either late Monday the 16<sup>th</sup> or early Tuesday the 17<sup>th</sup>, thereby preventing the reviewing court from losing appellate authority in this case.

Good cause (reasonable excuse) in this case shall include (but not be limited to) the fact that [[#1]] Appellant's father, Bobby Watts, passed away, on Thursday, 03 May 2018, and [[#2]] Appellant, himself, nearly died in an unrelated incident, not to mention that 3—4 sources of income all dried up and disappeared at the same time: [[#3]] Appellant's father was the chief source of income, but is now dead. [Documented by death certificate and obit notices] [[#4]] Appellant's part-time boss began beating the pure living daylight out of him, while they were in a vehicle and on the road—returning from work from his construction job—justification for Appellant to immediately quit his job. [See exhibits in *Watts v. Flannery*, No.123481, heard by the ILLINOIS Supreme Court recently, for a copy of the police report to verify—and included in these exhibits as well.] [[#5]] Appellant, himself, nearly bled to death. [See exhibits here of the Emergency Room stay.] [[#6]] Even not counting financial or health difficulties, the time-off from any meaningful side-ventures (such as this case) were precluded when Appellant had to quickly move, sell, or otherwise handle a huge inventory of his father's business, when his father unexpectedly died, as well as time spent on funeral, obituary, and estate family matters.

Appellant represents to this court that he acted in good faith during the time-period in which This Court granted an extension of time to file the Record, and made **all** reasonable attempts/efforts to get hold of the Record on Appeal & transmit it to This Court—PROOF:

**(#1) CIRCUIT COURT FAILURE TO RESPOND TO MOTION AT ALL:** This court, in its March 28, 2018 order, ordered that the appellant, Watts, “**direct inquiries on the content of the record on appeal to the Circuit Court of Cook County,**” which he did, as

ordered by This Court: After numerous inquiries, he was told that the only way to get a Record prepared for a party too poor to pay for it was to move the circuit court. Appellant, in his 04/20/2018 filing before the Judge of Record in said case (Hon. Diane M. Shelley, Circuit Judge #1925, who was presiding judge in said case), moved the Circuit Court to not only prepare the Record on Appeal – but, in a nod to efficiency, and to respect the man-hours of the hard-working staff – included a Rule 321 motion to limit Contents of the Record on Appeal to only a few *Sine Qua Non* required filings, sufficient for This Court to easily & quickly review & decide the case.

The Circuit Court—and the circuit judge—were both served four (4) ways, and without question received a copy of appellant's motion: ((#1)) Both Judge Flannery, the presiding judge in the Law Division, and Judge Shelley, who was (and still is) the presiding judge in this case (both judges, each independently, having authority to rule on the motion *sub judice*) were both served by First Class U.S. Postal Mail, ((#2)) by email (*Judge Shelley actually has three (3) valid emails, and Judge Flannery has one (1) email*), and ((#3)) via electronic service, as documented by the court-seal on the e-filed copy. ((#4)) BONUS: All filings, including this one, were placed online at Watts' Open Source docket, which is linked in front-page news of the websites in his Signature footer—and, as indicated in the Certificates of Service in said filings.

Judge Shelley (and for that matter, Judge Flannery), both having received multiple copies of appellant's motion, nonetheless refused to issue any order whatsoever—even a contrary order—thereby “ghosting” (ignoring) any attempt to Redress the Circuit Court and get Procedural Due Process review (whether granting or denying the motions), much less a Substantive Due Process ruling on the merits. When This Court ordered Appellant to inquire of the Circuit Court, the implied order to the circuit court was to reply to such inquiry, “yay” or “nay,” giving reasoning for whatever decision was made. This the lower court did not do, through no fault of the

appellant.

**(#2) REVIEWING COURT FAILURE TO EXERCISE CONSTITUTIONAL APPELLATE AUTHORITY:** Appellant, in an attempt to grant This Court's valid request to get hold of and review the Record on Appeal, moved for Summary Judgment in his 04/20/2018 filing to This Court, in a separate appeal, 1-18-0572, which appealed Judge Flannery's denial of an IFP fee waiver for a party to sue or defend—both of which apply. However, this court alleged in its Thursday, May 03, 2018 ruling, that it did not have appellate authority over the circuit court to compel it to obey the law in the matter of fee waiver, or several other matters where Appellant, Watts, alleges the Circuit Court did not comply with the law—and refused to explain why it ruled to the contrary.

Appellant, Watts, also respectfully disagrees with the legal conclusion by This Court that it lacks appellate authority on these matters.

**(#3) SUPREME COURT HEARS MOTION FOR SUPERVISORY ORDER:** In addition to seeking redress from both the circuit and appellate courts, Appellant took the extraordinary measure to seek review by the ILLINOIS Supreme Court, which, Justice Theis ruling, granted “Motion by Movant, pro se, for leave to proceed in forma pauperis. Allowed,” in its 05/01/2018 order in case number 123481, In re: *Watts v. Flannery*.

While The ILLINOIS Supreme Court granted the IFP motion, nonetheless, it eventually, in a ruling issues on 05/09/2018, declined to review the merits and issued the following order: “Motion by Movant, *pro se*, for a supervisory order. Denied. [line-break] Order entered by the Court.”

**\*\*\* Administrative Note (i.e., “Obiter Dictum of the motion”)** – Appellant, Watts' motion to the Supreme Court was double-spaced, as the rules require, and while it was tempting

for the undersigned movant to do likewise with This Court (since most filings in This Court are, indeed, double-spaced), to show proper respect, and make a “good first impression,” Movant knew that This Court's rules do not require “double-space,” and trusted This Court to review the merits of the motions—anyhow, and understand that saving costs of paper, printer ink, and mailing weight, were factors that justify using **single-spaced paragraphs**. (Moreover, Service Copies were/are “**printed double-sided**” to parties, to cut costs further, and be efficient.)

But in a nod of respect to the Reviewing Court, this brief shall be double-spaced.

**(#4) FEDERAL COURTS SOUGHT:** Appellant was considering seeking review by a Federal Circuit court to compel the (state) circuit court to comply with the law in regards to obeying Intervention and Fee Waiver law (and, by extension, prep of the Record on Appeal—all Procedural Due Process issues, the “ministerial duty” of the trial courts, here), but was side-tracked when his elderly father passed away, and he, himself, nearly died in a separate incident.

#### **CONCLUSION (--Part 1 of 2--)**

Appellant made a genuine effort to get hold of the Record on Appeal—and to transmit it to This Court in a timely manner. But, through no fault of his own, he was unable. CAVEAT: There was one “theoretical” possibility to get the record, e.g., for Appellant to have paid for it, but as he's documented to be “*In Forma Pauperis*” (this court, itself, granted Appellant's motion for fee waiver, and we trust This Court, no?), and appellant was told by the circuit court that the record was very, very lengthy, by this writer's estimate, into the thousands of dollars, something very impossible for *In Forma Pauperis* petitioners to pay. (Moreover, even had he paid for prep of the record, many contemporary legal observers noted that if the circuit court did not abide by basic law on IFP & Fee Waiver applications, how could the courts then be trusted with the merits of the case, which—when appellant heard and considered—scared the pure living daylight out

of him, thus convincing him to not spend his last few dollars on a bad investment, paying people who have shown a track-record on flouting the law, and refusing to obey even basic laws.)

Therefore, in conclusion, Movant / Appellant respectfully documents that he made several good-faith efforts to get the record & to transmit it to reviewing court, as you require, but, that through no fault of his own, he was unable. Moreover, Movant respectfully points out that he missed filing this motion to extend time to file the record on appeal within the standard guidelines because a number of extraordinary circumstances occurred, including, but not limited to (A) his father passing away, (B) Movant losing his job through no fault of his own, and (C) Movant, himself, nearly dying in an unexpected reaction to standard over-the-counter drugs, and (D) cumulative physical, financial, social, and emotional stresses from various circles (including, we add, the lower courts' continued refusal to obey basic law), and Movant, as of this writing, is still under doctor's supervision, and not feeling fully recovered. (E) The lower courts still refuse to not only prepare the record & grant fee waiver (for IFP filers, such as appellant, Watts), but even more egregious, they even refuse to prepare a “much smaller” Rule 321 Record, which appellant would be willing to pay for (even tho he is IPF and not require to). Thus, the Circuit Court purposely and of free will even refuses to prepare a “very small” record, which appellant is willing to pay for in advance—and has not explained why it refuses to do so—thus delaying prep of The Record through no fault of the appellant, Gordon Wayne Watts.

Therefore, Movant respectfully represents to this court that Good Cause (reasonable excuse), within the meaning of Rule 326 existed for a delay in filing the instant motion to extend time to file the Record on Appeal.

#### **Motion for Clarification**

Appellant is in need of clarification on several points still unclear and respectfully moves

for clarification from This Court, in order that appellant may better understand what is legally required of him, and therefore obey the law—and comply with court rules, guidelines, etc.

[[1]] This court, in its 5/3/2018 order, claimed 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.” [emphasis added for clarity]

Appellant respectfully asks This Court to clarify how that can be true in light of Rule 301 which vests appellate authority in This Court to review the merits of **\*\*every\*\*** final judgment below—including the final judgments of Judges Flannery and Shelley, as here:

**Rule 301. Method of Review**

Every final judgment of a circuit court in a civil case is appealable as of right. The appeal is initiated by filing a notice of appeal. No other step is jurisdictional. An appeal is a continuation of the proceeding.

Moreover, if This Court lacks authority in the matter of Intervention, then how was it able to issue the following ruling, holding that:

“[T]he trial court’s jurisdiction is limited to determining **timeliness, inadequacy of representation and sufficiency of interest**; once these threshold requirements have been met, the plain meaning of the statute directs that the petition be granted.” ***City of Chicago v. John Hancock Mutual Life Ins. Co.***, 127 Ill.App.3d 140, 144 (1st Dist. 1984). [Emphasis added in underline & bold; not in original, thus showing that Petitioner satisfies all three requirements, giving Watts the right to intervene under 735 ILCS 5/2-408(a)(3).]

[[2]] This court, in its 5/3/2018 order, claimed 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.” [emphasis added for clarity] How is this possible in light of RULE 301, supra—and the Article VI, Sec.6 of the ILLINOIS State Constitution?

## SECTION 6. APPELLATE COURT - JURISDICTION

Appeals from final judgments of a Circuit Court are a matter of right to the Appellate Court in the Judicial District in which the Circuit Court is located except in cases appealable directly to the Supreme Court and except that after a trial on the merits in a criminal case, there shall be no appeal from a judgment of acquittal. The Supreme Court may provide by rule for appeals to the Appellate Court from other than final judgments of Circuit Courts. The Appellate Court may exercise original jurisdiction when necessary to the complete determination of any case on review. The Appellate Court shall have such powers of direct review of administrative action as provided by law.

(Source: <http://www.ilga.gov/commission/lrb/conent.htm> )

[[3]] This court, in its 5/3/2018 order, claimed 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.”**

[emphasis added for clarity] Appellant respectfully moves This Court for clarification, posing the question: How can this legal claim be true in light of Rule 321?

### **Rule 321. Contents of the Record on Appeal**

**The record on appeal shall consist of** the judgment appealed from, the notice of appeal, and the entire original common law record, **unless the parties stipulate for, or the trial court, after notice and hearing, or the reviewing court, orders less.** The common law record includes every document filed and judgment and order entered in the cause and any documentary exhibits offered and filed by any party. **Upon motion the reviewing court may order that other exhibits be included in the record.** The record on appeal shall also include any report of proceedings prepared in accordance with Rule 323. There is no distinction between the common law record and the report of proceedings for the purpose of determining what is properly before the reviewing court.

In other words, in light of RULE 321, RULE 303,, RULE 301, and Art.VI,Sec.6, Ill.Const., how can The Reviewing Court claim that it lacks authority to issue a RULE 321 Order which “orders less” to be placed in the record—as Appellant is wishing to direct—and pay for?

[[4]] Why are some parties not required to serve all the parties of record, as appellant is



required to do, pursuant to RULE 11?

It is a matter of record that GMAC MORTGAGE LLC, the lead plaintiff in the instant case, has just entered an appearance, by and through 2 of its staff attorneys, Rosa M. Tumialán ([RTumialan@Dykema.com](mailto:RTumialan@Dykema.com)) and Dawn Williams ([DWilliams@Dykema.com](mailto:DWilliams@Dykema.com)), of the DYKEMA GOSSETT PLLC law firm, as reflected in their notice, which was e-filed on 05/02/2018, with This Court, a day before appellant's father untimely passed away on 05/03/2018.

However, looking at their certificate of service, we see that they only served appellant, Watts, in spite of the plain-language meaning of RULE 11, which requires otherwise:

**Rule 11. Manner of Serving Documents Other Than Process and Complaint on Parties Not in Default in the Trial and Reviewing Courts**

**(a) On Whom Made.** If a party is represented by an attorney of record, service **shall be made** upon the attorney. Otherwise service **shall be made** upon the party. *[Emphasis added for clarity]*

Ironically, the lower courts claims (Judge Flannery's opinion) that appellant, Watts, was not a party, and ironically, he was the only one that DYKEMA served—refusing adamantly to serve all the other parties of record—whom really *were* 'parties' according to Flannery, et. al.

Appellant, Watts, is not trying to embarrass or insult Attys. Tumialán or Williams. Indeed, he sought to privately, and discreetly, contact them, asking what was going on with regard to the Rule 11 service concerns that he had, here—and, to that end, emailed and telephones them, in order to privately inform them of this matter—and avoid embarrassing the. After all, even attorneys are human, and Watts wasn't seeking to bully or embarrass anybody.

However, his “good faith” efforts to privately & discreetly resolve this matter were met with a bizarre response: Atty. Tumialán responded by email, implying that Watts was about to tread into dangerous territory and issuing a veiled and implied warning to not tread any further. In all fairness to Attorney Tumialán, Watts isn't representing to This Court that she had any

malicious or ill motives. Indeed, had she had ill motives, she could easily have made up false allegations of harassing phone calls, harassing emails, etc. That Tumialán did not do. Moreover, her advice to limit communications solely to that which is in writing (e.g., emails, court filings, etc.) is good advice, both to avoid misunderstandings, as well as to document all communications—and make it easier to have a clear record of legal filings.

Nonetheless, even after Watts politely and respectfully inquired (sending only ONE email, and leaving only ONE polite, respectful—albeit a bit lengthy—voice-mail, which was identical to the email—even as Tumialán, herself admits), the attorneys never responded to the question, nor said they were concerned about looking into it.

Moreover, while Tumialán's advice was good, many attorneys—including, for example, Peter King (Atty. No.: 48761), the Attorney Of Record for co-Defendant, Joseph Younes—have had no qualms or compunctions in speaking briefly with Appellant, Watts, on legal matters. (Watts represents to This Court that King answered questions about updates to his service address—and even offered to accept filings solely by email, which was a generous offer.)

Watts is not representing to This Court that Tumialán's email was meant to threaten, intimidate, or bully (as shown above by her refusal to make any false allegations—especially in light of the fact that her email was “good advice” in general). However, her email most certainly did intimidate and frighten the pure living daylights out of Appellant, Watts—and for this reason: While Tumialán's motives, herself, were no doubt pure and without malice, nonetheless, her refusal to ever address the Rule 11(a) issue (even admitting that, hey, we don't know: We're looking into it) is damning proof that her actions were pushed, motivated, and mandated by her bosses at the law firm—which apparently viewed Watts' filing as some sort of threat to their clients interest: Since DYKEMA's only interests here are to protect the client, any actions they

make are without doubt motivated by this motive.

For the record, Appellant, Watts, has no animosity, malice, or ill will towards either the Dykema law firm (which he does not know) or GMAC (who was the mortgager, here, and not responsible for any of the forgery fraud that is documented to have occurred in the title-theft in this matter).

But, after much thought on this matter, appellant now believes that Dykema views Watts as some sort of threat to their client, GMAC, which is the only conclusion that can be drawn from the bizarre silence from the 2 staff attorneys regarding ((A)) their refusal to address the Rule 11 issue, and (more-importantly) ((B)) their refusal to comply with this rule—their actions, in ((B)) speaking louder than their words (or emails) in ((A)). While Appellant sympathizes with DYKEMA in their concerns, here, he notes that it is just as likely that their client will be out the monies owed if Younes (who stole the title) keeps possession, as opposed to if Daniggelis (the true & rightful owner) takes possession through a ruling of this court.

**\*\*\* VERY IMPORTANT \*\*\*** This is the most important aspect of the Dykema law-firm involvement, and is highlighted as such: If, in fact, This Court returns possession of 1720 N. Sedgwick (property and damaged house) to Daniggelis, it is **more** likely that GMAC will get any monies owed, since an elderly victim is more likely to get donations via community sympathy than verses Younes being able to repay it—especially in light of Mr. Younes' continued legal battles with the City of Chicago, wherein he continues to get deeper and deeper in trouble for both ((a)) repeated code violations, as well as ((b)) outright destruction of the house by negligence, with, as the CoC claims, an attempt to skirt the historic district building restrictions: See e.g., 2017-M1-400775 (City of Chicago, IL v. 1720 N. SEDGWICK ST., Atty. JOSEPH YOUNES, et al.), which is still pending, due to the fact that This Court has not exercised its

appellate authority over Younes in the instant case—which has allowed him to continue to wreak havoc and destruction in the code violation case, cited above. Therefore, appellant includes this finding for the benefit of the Dykema attorneys, who are probably worried that Watts' eventual success in returning Daniggelis' stolen house will be adverse to their client, GMAC. (Returning Daniggelis' house will ((--a--)) increase the odds that GMAC gets any monies it's owed; ((--b--)) increase the odds that Watts will get paid monies Daniggelis owes him for research issues, the reason Watts is legally above to intervene with the equiv. of a Mechanic's lien; and ((--cc--)) will help the elderly Daniggelis get justice, and also, lastly: ((--dd--)) will restore the reputation and good name of the judicial system, which has taken a hit in recent news coverage—which is good, since the good judges on This Court do not deserve to be made fun of in the news media—and also good because courts run smoother if there is more light and less heat in the news.

So, to recap appellant respectfully seeks clarification: Are the DYKEMA attorneys right—or, rather, is appellant right—in regards to whom must be served pursuant to RULE 11(a)?

*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 affidavit, just to remove any and all doubt hereto.

Date: WEEKday, DD Month 2018

/s/Gordon Wayne Watts

**Gordon Wayne Watts**

Page 5 of 12

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

**INDEX TO THE EXHIBITS**

**Instrument**

**Docket/Tab#**

** Motion for Intervention (in 2 file formats: Court-Stamped Image & text-searchable)	Exhibit "A"
** Fee Waiver ORDER (Granted by This Court)	Exhibit "B"
** Fee Waiver application (to trial court)	Exhibit "C"
** Fee Waiver ORDER (Denied by Trial Court)	Exhibit "D"
** Returned Mail & web-tracking (to document updated addresses & Service of filings)	Exhibit "E"
** Judge OTTO's 3-8-2013 ORDER	Exhibit "F"
*** Docketing Statement (bundled with Court-Stamped Fee Waiver app)	Exhibit "G"

\*\* June 16, 2016 ORDER by this court in 1-14-2751, chewing out Galic, the attorney for Daniggelis, to verify Watts' interests were not being represented by Galic, thus justifying Intervention

Exhibit "H"

NO. 1-18-0091

IN THE APPELLATE COURT OF ILLINOIS  
FIRST DISTRICT

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

**ORDER**

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

**IT IS HEREBY ORDERED** that the time for filing the Record on Appeal is extended to June 12, 2018, and, pursuant to **Rule 311(b)** [Rule 311. Accelerated Docket, (b) Discretionary Acceleration of Other Appeals], this appeal is placed on accelerated track. Pursuant to Rule 311(b), “The motion [to expedite] shall be supported by an affidavit stating reasons why the appeal should be expedited,” and This Court notes that both the instant motion and prior pleadings by Appellant had either 'Verification' affirmations, or actual Sworn/Notarized affidavits, which compel The Court to accept at face value allegations that an accelerated appeal is necessary.

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

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

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

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

**The trial court shall** prepare the Record on Appeal, with ONLY the items listed above (all the enumerated items, and ALL pleadings and related exhibits filed by Appellant, Gordon Wayne Watts), **and shall** place preparation of the selected records on “accelerated” track, **and shall** notify This Court when the record is prepared, **and transmit it 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 give ALL parties 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:  
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**In the Appellate Court of Illinois, First District**

**Docket Number: 1-18-0091**

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<b>Counter-Defendants.</b>	) upon the reviewing court: <b>Ill.Sup.Ct. R.301, 303</b>

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**NOTICE OF FILING**

To: See attached Service List

**PLEASE TAKE NOTICE** that today, WEEKday, DD Month 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, 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**

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**SERVICE LIST [NOTE: Update-2-reflect new attorneys of record; double-check+page#'s]**

- \* **1st District Appellate Court**, Clerk's Office, 160 North LaSalle St., Chicago, IL 60601  
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Attention: Deputy Chief, Patricia O'Brian, [PAOBrien@CookCountyCourt.com](mailto:PAOBrien@CookCountyCourt.com) **[served by all means, as Rule 326 requires for Motions for Extension of Time]**
- \* **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 by email / electronic service only, as a courtesy, since this is an appeal]**
- \* **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 by email / electronic service only, as a courtesy, since this is an appeal]**
- \* **Law Division and Hon. Diane M. Shelley, Circuit Judge**, **[served by email / electronic service only, as a courtesy, since this is an appeal]** [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)
- \* **Richard B. Daniggelis** [true owner of 1720] 312-774-4742, c/o John Daniggelis 773-327-7198  
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#:33013) Cell:312-217-5433, Fax:312-986-1810, Phone:312-986-1510  
845 Sherwood Road, LaGrange Park, IL 60526-1547 **(Please take note of Mr. Galic's new address)** Email: [AndjelkoGalic@Hotmail.com](mailto:AndjelkoGalic@Hotmail.com) ; [AGForeclosureDefense@Gmail.com](mailto:AGForeclosureDefense@Gmail.com)
- \* **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
- \* **Associated Bank, N.A.**, 200 North Adam Street, Green Bay, WI 54301-5142

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**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. – Telephone No.: (703) 761-1270, Facsimile No.: (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**

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\* **Erika R. Rhone** [ph:(773) 788-3711], 22711 Southbrook Dr., Sauk Village, IL 60411-4291

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

**Docket Number: 1-18-0091**

<b>GMAC Mortgage, LLC,</b>	) Appeal from the Circuit Court of Cook County, IL
<b>Plaintiffs,</b>	) County Department, Law Division
<b>vs.</b>	)
	) <b>Circuit Court Case No.:</b> 2007-CH-29738
<b>Gordon Wayne Watts, et. al.,</b>	) (Transfer into <b>Law Division</b> from Chancery)
<b>Defendants.</b>	)
<hr/>	
<b>Gordon Wayne Watts,</b>	) <b>Trial Judge:</b> Hon. Diane M. Shelley (#1925)
<b>Appellant/Counter-Plaintiff,</b>	) <b>Notice of Appeal date:</b> Monday, 08 January 2018
<b>vs.</b>	) <b>Judgment Date:</b> Wednesday, 07 December 2017
	) <b>Date of Post-judgment Motion:</b> None
	) <b>Order:</b> #5
<b>Joseph Younes, Hon. Diane M. Shelley,</b>	)
<b>Hon. James P. Flannery, et al.,</b>	) Supreme Court Rule(s) which confer(s) jurisdiction
<b>Counter-Defendants.</b>	) upon the reviewing court: <b>Ill.Sup.Ct. R.301, 303</b>

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**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**, copies of which are attached hereto are being herewith served upon you—and upon the parties listed in the attached Service List, above – this **WEEKday, DD Month 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** –*except The Appeals Court (which only accepts eFiling), or as otherwise indicted in the Service List.*

\* Additionally, I shall, when practically possible, post a TRUE COPY of this filing –and related filings –**online at my official websites, infra** –linked at the “Mortgage Fraud” story, dated Fri. 14 April 2017.

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

<hr style="width: 30%; margin-left: 0;"/>	<u>/s/ Gordon Wayne Watts</u>
(Actual Signature, if served upon clerk)	(Electronic Signature)
<b>Gordon Wayne Watts</b>	<b>Gordon Wayne Watts</b>

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**Gordon's notes: new EXHIBITS**

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1.