



E-Notice

2007-CH-29738

CALENDAR: 61

To: PRO SE
anselm45@gmail.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

GMAC MORTGAGE LLC vs. YOUNES JOSEPH
2007-CH-29738

The transmission was received on 03/07/2016 at 10:09 PM and was ACCEPTED with the Clerk of the Circuit Court of Cook County on 03/08/2016 at 12:27 PM.

RULE TO SHOW CAUSE (SET FOR MOTION HEARING)

Filer's Email: agforeclosuredefense@gmail.com
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Notice Date: 3/8/2016 12:27:15 PM
Total Pages: 5

DOROTHY BROWN
CLERK OF THE CIRCUIT COURT
COOK COUNTY
RICHARD J. DALEY CENTER, ROOM 1001
CHICAGO, IL 60602

(312) 603-5031
courtclerk@cookcountycourt.com

PETITION FOR RULE TO SHOW CAUSE AGAINST JOHN LAROCQUE

Now comes the Counter-Plaintiff, RICHARD DANIGGELIS, through his attorney, Andjelko Galic, and moves this court of an order finding John P. Larocque in indirect civil contempt. In support of his petition Counter-Plaintiff, RICHARD DANIGGELIS, states as follows:

1. On January 4, 2016 a subpoena was issued to John Larocque requiring him to appear for a deposition at 134 N. LaSalle Street, Suite 1040 in Chicago, Illinois 60602. See attached Exhibit "A", a copy of subpoena issued to John Larocque

2. On January 12, 2016 John Larocque was served with this subpoena. See attached Exhibit "B".

3. John Larocque did not appear for his deposition testimony that was scheduled for January 29, 2016 as required by the subpoena and he failed to contact Counter-Plaintiff

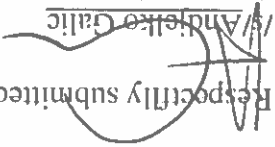
attorney's office to schedule his deposition at some other time.

4. The subpoena served on John Larocque contained specific language advising him that his "failure to respond to this subpoena will subject you to punishment for contempt of this court".

5. John LaRocque's failure to comply with subpoena was intentional and without any legal justification.

6. As a result of John LaRocque's refusal to comply with this subpoena Counter-Petitioner was forced to incur additional attorney's fees and expenses.

Wherefore, Counter- Petitioner, RICHARD DANIGGELIS, prays for an order issuing a rule to show cause against John LaRocque returnable at a date certain, requiring him to appeal in court and to explain why he should not be held in indirect civil contempt for his failure to appear for his January 29, 2016 deposition and ordering him to pay for legal fees incurred in having to bring this Petition for Rule to Show Cause.

Respectfully submitted

/s/ Andjelko Galic

Attorney for Richard Daniggelis


Law Firm of Andjelko Galic, Inc.
34 N. LaSalle Street
Suite 1040
Chicago, Illinois 60602
Tel. 312 986 1510
Attorney No.: 33013

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3/8/2016 8:30 AM
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VERIFICATION

I, Andjelko Galic, under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, certify that I have read the above Petition for Rule to Show Cause and that statements given in this Petition are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certify as aforesaid that they verily believe the same to be true.

March 7, 2016


Andjelko Galic



English

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Product & Tracking Information

Postal Product: First-Class Mail®

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See tracking for related item: 9590952106150275668477

Text Updates

Email Updates

Available Actions

DATE & TIME

January 12, 2016 , 4:51 pm

Delivered

HINSDALE, IL 60521

LOCATION

Your item was delivered at 4:51 pm on January 12, 2016 in HINSDALE, IL 60521.

January 7, 2016 , 12:54 pm

Notice Left (No Secure Location Available)

HINSDALE, IL 60521

January 7, 2016 , 10:55 am

Out for Delivery

HINSDALE, IL 60521

January 7, 2016 , 10:45 am

Sorting Complete

HINSDALE, IL 60521

January 7, 2016 , 5:54 am

Arrived at Unit

OAK BROOK, IL 60523

January 6, 2016 , 3:07 pm

Departed USPS Destination Facility

FOX VALLEY, IL 60599

January 6, 2016 , 10:15 am

Arrived at USPS Destination Facility

FOX VALLEY, IL 60599

January 6, 2016 , 5:39 am

Departed USPS Facility

BEDFORD PARK, IL 60499

January 5, 2016 , 10:03 pm

Arrived at USPS Destination Facility

BEDFORD PARK, IL 60499

January 5, 2016 , 6:09 pm

Departed Post Office

CHICAGO, IL 60699

January 4, 2016 , 11:18 pm

Acceptance

CHICAGO, IL 60699

Track Another Package

Tracking (or receipt) number

70143490000146805479

Track It

Manage Incoming Packages

Track all your packages from a dashboard.

No tracking numbers necessary.

Sign up for My USPS ›



Chancery DIVISION

Litigant List

Printed on 03/08/2016

Case Number: 2007-CH-29738

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Plaintiffs

Plaintiffs Name	Plaintiffs Address	State	Zip	Unit #
GMAC MORTGAGE LLC			0000	
LASALLE			0000	
CHICAGO VOLUNTEER LEGAL			0000	
BANK AMERICA N A			0000	
US BANK NATIONAL ASSN			0000	
TRANSFER TO LAWDIVISION			0000	
08/07/14			0000	
				Total Plaintiffs: 7

Defendants

Defendant Name	Defendant Address	State	Unit #	Service By
YOUNES JOSEPH			0000	
MORTGAGE ELECTRONIC REGIS			0000	
HLB MORTGAGE			0000	
DANIGGELIS RICHARD			0000	
UNKNOWN HEIRS			0000	

LEGATEES	0000
UNKNOWN OWNERS	0000
NON RECORD CLAIMANTS	0000
RHONE ERIKA	0000
STEWART TITLE ILLINOIS	0000
SHELTON PAUL	0000
STEWART TITLE OF ILLINOIS	0000
LAROCQUE JOHN	0000
TRUST ONE MORTGAGE CORP	0000
INVEST ONE	0000
MOORE ROBERT	0000

Total Defendants: **16**