IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Gordon Wayne Watts

Plaintiff,

vs.

CIRCUIT COURT OF COOK COUNTY, ILLINOIS, et al.,,

Defendants.
_____/

Case No.: 1:19-cv-03473

Judge Robert M. Dow, Jr.
Magistrate Judge Susan E. Cox

Rule 59 motion to alter / amend judgment
concurrent with Rule 60 motion for Relief from Judgment / Order

This matter comes to be heard on the motion of plaintiff for alteration and amendment of the 5/31/2019 judgment of this court [Doc.18], pursuant to Fed.R.Civ.P. 59(e), and it is timely because it's filed within the 28-day period, the day of the act not being counted, which gives me until Friday, 28 June 2019 to file, or 3 days later if filed by U.S. Postal Mail: Rule 6(d). Furthermore, plaintiff moves for relief from judgment pursuant to Fed.R.Civ.P. 60(b)(2) (newly discovered evidence) and (6) (any other reason that justifies relief), including, but not limited to, a scrivener's error/typo. Pursuant to Rule 60(c)(2) (Effect on Finality) the "rule 60" portion of my motion doesn't affect the judgment's finality or suspend its operation, thus I concurrently file to alter/amend judgment. The court (Hon. Robert M. Dow, Jr., District Judge, writing for The Court), in its very detailed 2-page, single-spaced 5/31/2019 order [18], made a number of factual and legal holdings, some correct, some incorrect, and one key holding addressing a controversial and unsettled area of law. My motion will contest that portions of the court's ruling which is incorrect. The court, in its 5/31/2019 order, made the following findings of fact and law:

1. The court granted my *in forma pauperis* motion [2] and my motion for leave to file in excess of the 25-page limit [4] of the local rules of District Court from which this case was transferred [L.R.3.01(a)], which was moot because this court's "Guide for the Pro Se Litigant" states on page 9 that "The Court's Local Rules do not limit the length of the complaint." (In fact, this court's local rules don't even address complaint page-limits.)
2. The court also held, as a matter of law, that judges may not be sued for "judicial actions," and further held that Defendants, Circuit and Appellate Courts, are not "suable entities."
3. Based on this reasoning, the court denied as moot my motions for preliminary injunction [3], my motion for appointment of counsel [5], and my motion to file CM/ECF [6].
4. The court's factual statement said, *inter alia,* that "Plaintiff... ...has named as Defendants three Cook County Circuit Judges and six Justices of the Illinois Appellate Court." This is incorrect: I names *seven* appellate judges, not six: The court overlooked Justice Terrence J. Lavin, who I named for a Civil Rights violation in Count 7 of my amended complaint [13]. I write to correct the record because captioning of a complaint is a serious matter, so serious that failure to name a defendant in an "individual capacity," when that applies, is grounds to strike the complaint—or at least that count.
5. The court also held that I am unable to represent other potential 'class' plaintiffs, if I, myself, am a *pro se* (non-lawyer) litigant, thus abrogating my "class action."
6. Finally, based on an incorrect interpretation of case law, the court alleges the two court's I am suing must be "must be dismissed as Defendants, as they are not suable entities."
7. Based on an incorrect interpretation of Federal Case law, the court dismissed, with prejudice, my civil rights complaint.

The court's order suffers from two major defects, one of which is fatal to the entire action. As an initial matter, Fed.R.Civ.P. 10 requires that "The title of the complaint must name all the parties." Accordingly, at a minimum, the court's order would need to invoke Rule 60(a): "The court may correct a clerical mistake or a mistake arising from oversight or omission whenever one is found in a[n]...order," and add Justice Lavin to the caption. In addition, to the extent that the court seeks to allow the caption to remain as "GORDON WAYNE WATTS, Individually and on behalf of similarly situated persons," the court may not do so: The court, itself admitted that I may not represent "similarly situated persons" other than myself.

Beyond that, however, there is a more fundamental flaw in the court's order: Each and every defendant may, indeed, be sued for 42 U.S.C. § 1983 violations: It is well-established that the **Eleventh Amendment** generally does not bar suits for damages against state officers, so long as those officers are sued in their individual capacities. See, e.g., *Kentucky v. Graham,* 473 U.S. 159, 165-66, 105 S.Ct. 3099, 87 L.Ed.2d 114 (1985). All government employees are "persons" under §1983 and can be sued for anything they do at work that violates clearly established constitutional rights. *Hafer v. Melo,* 502 U.S. (1991).

The court also committed a very egregious error when it "conflated" (lumped together) suits for damages with injunctive or declaratory relief. While it's true that judges generally have "judicial immunity" from monetary damages, both judges (persons) and courts (instrumentalities) may be sued for both injunctive and declaratory relief. (If the court doubts this, it may inquire of a long line of state court judges who are often sued in Federal Court—sometimes for "judicial acts.") Finally, since forcing the defendants to grant me Due Process (and stop violating my Civil Rights) might indirectly result in my intervention motion being

heard on the merits, this would, necessarily, force review of the case in which I am intervening**:** My elderly friend, Richard B. Daniggelis, who is approximately eighty (80) years of age, based on information and belief, would be able to get back his house which was stolen from him in title theft based Mortgage Fraud, thereby possibly saving his life, as he was made homeless by the theft of his house, land, and hundreds of thousands of dollars of documented equity (and not having gotten paid a dime for it).

Besides possible public embarrassment which may accrue from the numerous errors in its order, this court's involvement may possibly also be a "life or death" matter for my homeless elderly friend, due to the "chain-of-events" nature of intervention case law. The court's order, therefore, is a very emotional issue with me, and it can be very easy to encounter "runaway emotions" by all parties involved (the court, plaintiff, defendants, and, of course, interested parties, such as my friend, Mr. Daniggelis). However, I write to remind this court that law is an honourable profession**;** the court, and its officers, can help a lot of people with their law degree and, accordingly, we all should, whether we can be paid for it or not, be civil to litigants, adversaries, their lawyers, and the judges who are being sued —litigation is not a blood sport. [1]

Although the court didn't address the *Rooker-Feldman* doctrine, I am constrained to pass on it briefly**:** The District Court in 11th Circuit, from which my case was transferred, issued a show cause order [9], demanding that I show cause as to why the case should not be addressed for lack of subject matter jurisdiction, based on *Rooker-Feldman.* So solid was my reply [12] that

[1] The judge may recognise the statement above as looking familiar. I admit to having read an April 10, 2019 article, titled "From the Bench: The Honorable Robert M. Dow, Jr." from the Chicago Bar Association's blog, "@theBar," about Judge Dow, before writing this motion: https://cbaatthebar.chicagobar.org/2019/04/10/from-the-bench-the-honorable-robert-m-dow-jr/ For context, the entire quote, which I reworded to describe this point from my point of view, reads as follows: "Q: Do you have any other comments? A: The law is an honorable profession; you can help a lot of people with your law degree and you should, whether they can pay you or not; please be civil to your clients, your adversaries, and the judges—litigation is not a blood sport."

the court admitted [14] that it might possibly be wrong, and declined to dismiss the case. The 7th Circuit, where the case is being heard, has the "GASH" standard of law, which is an even easier standard of review to overcome a *Rooker-Feldman* bar. It suffices, however, to say that I'm not asking this court to review the merits of either my friend's mortgage fraud case, or even my intervention case, which, of course, are prohibited by *Rooker-Feldman.* I am, however, asking for review of a complaint on independent grounds, namely the civil rights violations. As a further reminder that I'm not appealing either of the two state court decisions, let me remind the court that it might decide in my favour on my civil rights violations, compelling the state courts to review my intervention case, and I may still lose that on the merits**;** and**,** even if I'm successfully able to intervene (which would force a review of Daniggelis' case, as I have unrepresented interests there), I may still encounter a loss on the merits of *that* (title theft and foreclosure) case.

There is one last "other" legal issue that must be addressed before moving on to matters of weight**:** While I'm quite angry for violation of my civil rights, I will "speak up" and inform this court about one area where my adversaries (the appeals court) may be victims of a civil rights violation**:** When Daniggelis' attorney successfully obtained *in forma pauperis* status for his client, before getting dismissed for want of prosecution, he coaxed & coerced the circuit court into producing the entire common law record and transmit it to the appeals court, where the entire effort (many man-hours of labour) was wasted (because he was dismissed for failure to prosecute). Since Illinois state courts now use newer technology, these "old" record can't be used for my intervention (even though it comprises the same set of filings). This is relevant because I have a "technical" right to do the same (demand the entire record for free as an *in forma pauperis* litigant), but I refuse to do so**:** It would be a waste of judicial resources to ask this of

those state courts when the case may be decided on the merits based on the much-smaller limited record I have chosen (and which they have refused to include, wrongly claiming they don't have authority, when “Rule 321” clearly gives them such authority).

My point is simple: Even though I may “technically” have this legal right, I'm speaking up to prevent the appeals court from being “burned” a second time (like Daniggelis' attorney did). The “legal theory” that could be used to remedy this problem (until Illinois changes its court rules) would be the *“de minimus”* theory: If the cost of the entire common law record is greater than the 6 or 7 thousand dollar damage award that I seek (and it probably would be), then my claim should be dismissed as *“de minimus,”* unless I can chose a smaller, more affordable, record on appeal. This court was probably not expecting me to “go to bat” for the defendants, who have egregiously victimised myself and Daniggelis (and many others), but I have religious and personal beliefs of conscience—which, while it's not relevant “which” religious beliefs—are sufficient in nature as to inform me to be fair and honest, and not fail to speak up when a person —or court—is about to be harmed**:** Remember, we must be honourable and civil—litigation is not a blood sport.

STATEMENT

I have addressed all seven points on page 2 of my motion, except the “matters of weight,” namely “Point 2,” above, the legal claim this court makes, that judges may not be sued for “judicial actions,” and further that Defendants, Circuit and Appellate Courts, are not “suable entities.” (Point 3, the related motions, point 6, dismissal of defendants, and point 7, dismissal of the case, with prejudice, all rely on the basis of point 2, so I will address that issue next.)

Memorandum of Law: The court committed numerous legal errors in its 5/31/2019

order, essentially, implicating four (4) distinct legal issues in its order, on which all else hinges:

1. Whether **individual judges** (persons) can be sued for monetary damages (in their individual capacity)
2. Whether **individual judges** (persons) can be sued via injunctive or declaratory relief
3. Whether the **state courts** (instrumentalities) are "suable entities" for monetary damages
4. Whether the **state courts** (instrumentalities) are "suable entities" for injunctive or declaratory relief

Before I give a legal analysis of these issues, let me say frankly (but with no disrespect meant) that I'm deeply surprised by the fundamental error this court made when it conflated these four issues (altogether failing to even address injunctive or declaratory reliefs, even though it certainly knows these as valid legal remedies). The Middle District Court in Florida, from which this case was transferred, made a similar error in its Show Cause order [9], but that court admitted its error in its reply [14] to my response [12]. Moreover, even in its initial show cause order, it didn't outright make a legal claim, rather merely asking for clarification. (The court, overburdened and underfunded, is comprised of people, who make human errors, and I suspect that a heavy docket load, along with the ease of "cookie cutter" form letters, created an environment in which this type of error was easy & predictable.) I write this only to make the court aware of the fact that I want this court's actions to improve (and not degrade) the judiciary's reputation & name—and avoid disaster which befalls many "cops & courts" that do egregious and bizarre things. Below, I shall address each of these four points:

I. Whether individual judges (persons) can be sued for monetary damages (in their individual capacity)

Individual judges can normally not be sued for monetary damages, due to the common

law concept of "Judicial Immunity," as this court has rightly stated, citing *Polzin v. Gage,* 636 F.3d 834, 838 (7th Cir. 2011); see also *Pierson v. Ray,* 386 U.S. 547, 554 (1967) ("immunity applies even when the judge is accused of acting maliciously and corruptly"). However, the precedent on which this court relies was decided in 1967, and apparently this court didn't get the note that the U.S. Supreme Court, subsequently, held that state judges may be sued for civil rights violations and may be ordered to pay the lawyers' fees of those who sue them successfully. While the 5-to-4 decision permitted only suits for injunctions, not damages, it marked a significant retreat from the doctrine of absolute judicial immunity to which courts have long adhered. *Pulliam v. Allen,* 466 US 522 (1984)

> "Petitioner took an appeal from the order awarding attorney's fees against her. She argued that, as a judicial officer, she was absolutely immune from an award of attorney's fees. The Court of Appeals reviewed the language and legislative history of 1988. It concluded that a judicial officer is not immune from an award of attorney's fees in an action in which prospective relief properly is awarded against her. Since the court already had determined that judicial immunity did not extend to injunctive and declaratory relief under 1983, 3 the court concluded that prospective relief properly had been awarded against petitioner. It therefore affirmed the award of attorney's fees. Allen v. Burke, 690 F.2d 376 (1982)." ***Pulliam v. Allen,* 466 US 522, at 528 (1984)**

Petitioner Gladys Pulliam was a state Magistrate in Culpeper County, Va., who, in her official capacity, issued order to order the "practice of incarcerating persons waiting trial for nonincarcerable offenses." (*Id*. at 526)

Moreover, *Polzin*, decided more recently, in 2011, was distinguished from *Pulliam* because Polzin "maintains that the district court improperly ruled on the merits of his claims" (*Polzin, at* 838), which, unlike Polzin, did not involve a request for injunctive relief. My complaints, however, do indeed seek appropriate injunctive and declaratory remedies.

Before moving on to point 2, I would like to admit that this court is (legally, that is)

correct in asserting that judicial immunity even protects a judge who had ordered a young woman to be sterilized without her knowledge or consent was absolutely immune from the woman's subsequent damage suit. *Stump v. Sparkman,* 435 US 349, at 355-364 (1978) ("*Held:* The Indiana law vested in the Circuit Judge the power to entertain and act upon the petition for sterilization, and he is, therefore, immune from damages liability even if his approval of the petition was in error.") It is safe to say that Judge Harold D. Stump, who granted the "Petition To Have Tubal Ligation Performed On Minor and Indemnity Agreement," committed grave error, which brings into question the concept of judicial immunity (and suggests that the U.S. Supreme Court did not go far enough in *Pulliam v. Allen,* 466 US 522 to satisfy Due Process, or properly inform judges that they may be held accountable for their acts. On the other hand, there is a good argument that the "chilling effect" of possible lawsuits would make it difficult to have an independent judiciary. Nonetheless, while this court is "legally" correct, if case-law protects Judge Stump, it is probably 'bad' case-law, in which *Pulliam* needs to be "expanded" a bit to rein in 'bad actors' on the bench, who give all other judges (most of whom are good judges) a bad name. But, as it stands, The Seventh Circuit is bound by recent case-law precedent on *Pulliam*, which does, indeed, allow for a limited amount of civil damages from judges acting in their official capacity—who willfully violate litigants' Civil Rights.

II. Whether individual judges (persons) can be sued via injunctive or declaratory relief

This asks the same legal question as "IV," below, and will be addressed there.

III. Whether the state courts (instrumentalities) are "suable entities" for monetary damages

I will admit that, on this one, narrow, legal point, this court correctly applied case-law to

my case**:** It is well settled law that the Eleventh Amendment generally doesn't bar suits for damages against state officers, so long as those officers are sued in their individual capacities. See, e.g., *Kentucky v. Graham,* 473 U.S. 159, 165-66, 105 S.Ct. 3099, 87 L.Ed.2d 114 (1985). That point was well proved in point "I," above. But, the opposite is also true: The Eleventh Amendment does, indeed, protect a governmental entity (the Illinois state courts, in this case) from monetary damages:

> "[To hold that fees can be recovered from a governmental entity following victory in a personal-capacity action against government officials] would be inconsistent with the statement in *Monell, supra,* that a municipality cannot be made liable under 42 U. S. C. § 1983 on a *respondeat superior* basis. Nothing in the history of § 1988, a statute designed to make effective the remedies created in § 1983 and similar statutes, suggests that fee liability, unlike merits liability, was intended to be imposed on a *respondeat superior* basis...Section 1988 simply does not create fee liability where merits liability is nonexistent." *Kentucky v. Graham,* 473 U.S. 159, at 168."

IV. Whether the state courts (instrumentalities) are "suable entities" for injunctive or declaratory relief – and, per II., above, can "individual judges (persons)" be sued for injunctive and declaratory relief? [[I address both point 'II' and 'IV' here]]

Here is where the court totally goes off the rails and ignores clear, unambiguous case-law. The court, in its 5/31/2019 order, briefly mentioned that it was dismissing the Preliminary Injunction Motion [2] as "moot," but it gave no legal reasons for this, whatsoever—other than to address related, but distinct, limitations on the court's authority. (Oddly enough, the court's order didn't address injunctive or declaratory relief at all.) So, I want to "camp out," here for a bit: Indeed, even if this court isn't persuaded by my "judicial immunity" arguments, above, this matter is so solidly-grounded in case-law that it would risk great confusion in the legal community, and bring a bad name upon the court if it were to not give serious consideration to my complaints for injunctive and declaratory relief:

First off, if this court doubts, even for a second, my legal bases, then it should inform a long line of state judges who are often sued in Federal Court, for their judicial actions, and very-often lose:

We all remember when Alabama Chief Justice Roy Moore entered an order that U.S. Supreme Court's decision in *Obergefell v. Hodges* 135 S.Ct. 2584 (2015) "does not disturb the existing March orders in this case or the Court's holding therein that the Sanctity of Marriage Amendment, art. I, § 36.03, Ala. Const. 1901, and the Alabama Marriage Protection Act, § 30-1-9, Ala. Code 1975, are constitutional." ***Ex parte State ex rel. Alabama Policy Inst.,*** 2016 WL 859009, at *5, *39 (Ala. Mar. 4, 2016). But, does anyone remember what happened next?

All it took was one <u>single</u> U.S. District Court judge to grant relief when Justice Moore was sued: "Plaintiffs' motion for permanent injunction and final judgment (Doc. 142), is GRANTED." ***Strawser v. Stranger, et. al.,*** No. 1**:**2014cv00424 - Document 179 (S.D. Ala. 2016), Hon. Callie Virginia Smith "Ginny" Granade, U.S. District Judge, writing for the court.

The line of state court judges (and entire state courts) who <u>often</u> get hit with injunctions is so long that space would not permit me to properly document & list them. It should be noted, however, that this court improperly applied ***Koorsen v. Dolehanty,*** 401 F. App'x 119, 120 (7th Cir. Oct. 29, 2010) because it relied upon these three standards "(i) is frivolous or malicious; (ii) fails to state a claim on which relief may be granted; or (iii) seeks monetary relief against a defendant who is immune from such relief," none of which apply to the case at bar:

First off, no one could assume that my case is frivolous or malicious. Secondly, I do state a claim—a number of them, in fact. Lastly, The U.S. Supreme court recently did indeed hold that monetary relief may issue in limited circumstances, some of which apply to my case. (I am not

malicious: In fact, I “go to bat” for judges on the appeals court, defendants in this case, who might be victimised by *'de minimus'* requests for a huge record, whose cost—when compared with the damages sought—is cost-prohibitively large. The same might not be said of the judges. See. e.g., “Exhibit-R,” attached to this complaint: In his 05/03/2018 order, Justice Pierce held that: “IT IS HEREBY ORDERED 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.” (EXHIBIT-R – Underline for emphasis – not in original) I'm not speculating about the motives of this judge (that would be inappropriate, and furthermore, I honestly don't know his motives, and must assume the best: Perhaps he was pressured into this by colleagues.) But, regardless of his motives, he lied three (3) times: [[#1]] Case law I cited in my complaint [1] and as amended [13] clearly document case law from Illinois that permits intervention, thus vesting his court with jurisdiction. [[#2]] a fee waiver decision by the lower court can be appealed like any other decision, as his court has jurisdiction to entertain all appeals. [[#3]] ILLINOIS State Supreme Court “Rule 321” certainly and explicitly grants jurisdiction to Justice Pierce's court to expand or shrink the record on appeal.

Now, either Justice Pierce (and the other 6 appellate justices) lied-- our they didn't. (Which is it?) Lying may not be illegal, but it should be. Moreover, the 1983 violations enumerated in my complaint were meticulously documented in my complaint most certainly were violations of my civil rights, and not immune from either injunctive or declaratory relief.

Here, where I live, in central Florida, is the “Lakeland, Florida Police Department” or 'LPD' for short. They, like the infamous New Orleans, Louisiana Police Department, are famous (or, should I say, infamous) for acting illegally under the colour of law: Google: Lakeland

Florida Police Department corruption, if you doubt:

www.Google.com/search?&q=Lakeland+Florida+Police+Department+corruption

And, regarding N.O. Police Department, they are infamous for "gun grabbing" during Hurricane Katrina: "Police Begin Seizing Guns of Civilians," By Alex Berenson and John M. Broder, NY Times, SEPT. 9, 2005: https://www.nytimes.com/2005/09/09/us/nationalspecial/police-begin-seizing-guns-of-civilians.html

Why am I mentioning these cases? Is it to threaten or intimidate the court into issuing a good ruling? (No: This would not only be improper, but, given the limited scope of my personal blog, most-likely impossible: Remember, I am not the NY Times.) But, while I can not (and don't desire to) threaten or intimidate the courts, nonetheless, the courts are become their own worst enemy, and that is bad for many reasons, a chief one being that many, if not most, judges are honest. (I believe that even the defendants judges are trying to be honest, but are intimidated or scared by colleagues, and are issuing "bullying" rulings to keep from being fired.)

In short, when one judge tells bold-faces lies (like Justice Pierce – Exhibit "R"), ALL judges (and courts) look bad in the public eye. And when many judges lie and misuse their power (as has happened in my case alone – see the 10 named defendants here alone), all courts look "really bad," and this makes the work of honest judges (the majority of judge) much, much more difficult. (Moreover, it is wrong, as both a matter of law and a matter of conscience.) Lest we forget how illegal courts can wreck the legal system (and if Judge Stump, above, wasn't enough), let me remind this court that a 7-2 majority of America's highest court, not too long ago, held that "[T]he negro might justly and lawfully be reduced to slavery for his benefit." Chief Justice Roger B. Taney, writing for the Court. ***Dred Scott v. John F. Sanford*, 15 L.Ed. 691; 19 How. 393; 60**

US 393 at 407.(US 1857).

How did that work out? Not too well, I would hope readers would admit. Add to that that a loss in my case would forfeit the intervention, which would forfeit the opportunity to reopen Mr. Daniggelis' case (and thus potentially get him his house back, and prevent an elderly man from being homeless, possibly saving his life). Because ILLINOIS courts allowed Atty. Joseph Younes to steal Daniggelis' house even after they admitted to a forged warranty deed, Younes was able to gut and destroy the house, and it a defendant in an ongoing City Code Violation case. If you doubt my claims about my friend, please refer to the recent ***DNAinfo*** story:

> "Younes has previously insisted the building naturally "rotted" with age. Who should turn up at the hearing, however, but previous owner Richard Daniggelis. "Oh, I love this," he said. "I just love this." Maintaining that he was still the rightful owner of the building, Daniggelis said, "That house, every inch, is precious to me." Bought by his grandfather in 1911, it was the home the 78-year-old was brought home to as an infant. "It was fine. The roof was fine," he said. "That foundation was solid," he added, as it was poured by his father in 1960 with elements of steel mixed in. "I was evicted because of the falsification of documents," Daniggelis charged, adding that he was still pursuing the case in court." ***Source:*** "'Rotted' Old Town Triangle House Owner Faces Daily $1K Fine As Charges Fly," By Ted Cox @tedcoxchicago, ***DNAinfo,*** April 7, 2017: https://www.DNAinfo.com/chicago/20170407/old-town/rotted-old-town-triangle-house-owner-faces-daily-1k-fine-as-charges-fly/

Conclusion: I don't have high hopes of pursuing monetary damages against these judges [even though the recent U.S. Supreme Court ruling in *Pulliam v. Allen,* 466 US 522 permits me an award of attorney's fees from these judges who are breaking the law], which would apply as my "time off " from work is a loss and a tort. However, at a minimum, injunctive relief can (and should) issue forthwith, compelling the defendants to grant me the civil rights which are detailed in my amended complaint [13], Deprivation of a right without Due Process of Law being a complaint: Judicial immunity is logically precluded and excluded by authority of 18 USC 242

and 42 USC 1983. The U.S. Supreme Court, in *Mitchum v. Foster,* 407 U.S. 225, 237 (1972), held that a 42 U.S.C. §1983 suit is an exception to §2283 and that persons suing under this authority may, if they satisfy the requirements of comity, obtain an injunction against state court proceedings: Since 42 U.S.C. §1983 is just such an exception, This Court may issue injunctive relief—and *Mitchum* even went further, holding that an exception need not "on its face and in every one of its provisions, be totally incompatible with the prohibition of the anti-injunction statute." (*Id.* At 237) My case-law is binding upon the Seventh Circuit, most especially since it comes from from higher Federal Courts. This court may verify my cites, but it must comply.

Respectfully submitted, /s/_____

Date:_____, this _____ day of _____, 2019 **Mr. Gordon Wayne Watts**
(Day of Week)

Certificate of Service

I, GordonWayne Watts, hereby certify that I have filed a copy of this motion ("**Rule 59 motion to alter / amend judgment concurrent with Rule 60 motion for Relief from Judgment / Order**") with the clerk of the Circuit Court, Northern District of Illinois, Eastern Division, this _____ day of _____, 2019, but on no one else, as Judge Dow's order of 5/31/2019 found me *In Forma Pauperis.*

Date: _____(Day of Week) , the _____ day of _____, 2019

Respectfully submitted,

_____
(Signature of Counsel)

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