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IN THE  
SUPREME COURT OF ILLINOIS

Gordon Wayne Watts,

Plaintiff,

vs.

Hon. James P. Flannery, Jr., in his capacity  
as presiding judge, Law Division,  
Cook County, IL circuit court

and

Hon. Diane M. Shelley, in her capacity  
as circuit judge, Law Division,  
Cook County, IL circuit court,

Defendants.

**Docket Number: 123481**

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**Motion to reconsider denial of Motion by Movant, *pro se*,  
for a Supervisory Order, Pursuant to Supreme Court Rule 383**

Gordon Wayne Watts, Plaintiff, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
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— Cover - Page —

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**NOTICE OF FILING**

To: See attached Service List

**PLEASE TAKE NOTICE** that today, **Thursday, 19 July 2018**, I am causing to be filed with the ILLINOIS Supreme Court my Motion to Reconsider **and Exhibits**, 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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**Prayer for Reconsideration**

This is an motion to reconsider. While The Supreme Court is a court of “discretionary” jurisdiction—and must refuse some “valid” cases (because of limited resources), nonetheless, Movant thinks that injustices here “rise to the level” of “repeated” or “crazy-Large” mistakes—that The Supreme Court is supposed to address, if it addresses anything. THEREFORE, Movant submits updates—and moves to reconsider.

**INTRUDUCTORY PARAGRAPH: Mortgage Fraud documented**

This Court has on file my R.383 Motion—but to refresh your memory, we recall elderly Rich Daniggelis' house was 'underwater' & he sought refinancing. I documented Judge Michael Otto basically admitting forgery by language he used to describe duplicate signatures—and we know forgery is a felony (for which there's no statutes of limitations). Daniggelis' signature for the refi was photocopied, and used to transfer title, him not getting paid a dime, losing both his house, land, and at least several hundred thousand dollars that Movant could document (*perhaps more that he overlooked*). Movant is owed a large sum, as documented in his 7-7-2017 Motion to Intervene: He placed the equivalent of a Mechanic's Lien on the house (but without the Mechanic Lien statute, to avoid paying the filing fee), and asserted standing under relevant case-law. However, many other egregious things were discovered besides mere Title Theft (Mortgage Fraud), such as how it's documented that almost none of the attorneys ever comply with Rule 11(a), and just think it's OK to **refuse** to serve all the parties of record. (Is this court OK with that trend?) **But since my original R.383 motion, the craziest order I've ever seen issued from the First Appellate Court, which I think you should see—so I am bringing it to your attention now.** *See below...* **Page 1**

### Statement of Issues presented for Review

Besides the [#1] trial court's refusal to grant intervention (as case law requires—which gave them an excuse to deny Fee Waiver—something even this court didn't do, when it correctly granted my IFP motion), and besides [#2] the documented Mortgage Fraud, two other issues are very egregious, and rise to the level of “very crazy” or “immediate attention required” type of important—something only the Supreme Court can address: [#3] As I warned This Court in my original filing, **none** of the lawyers ***ever*** followed the **Rule 11(a)** requirements to serve all the parties. (No, it's not just an 'occasional' problem, but a system-wide failure.)

Indeed, when speaking to a 'Lisa' (a supervisor in the case-docket section of the Illinois Supreme Court), and when asking her for a “Court-stamped” copy to be speedily uploaded to the eFiling host, she solemnly adjured me to serve all the parties, whether OR NOT you provide a 'court-stamped' copy on time. If she is serious about R.11(a) compliance (and she should be) regarding a mere “*pro se*” non-attorney, such as myself, how much more should This Court care that ***ALL*** the attorneys in this case have ***REPEATEDLY*** thumbed their nose at **R.11(a), in the filings below**. (But, I admit that my last filing only alleged this, and asked This Court to look at the filings below—this I overlooked documenting—but I shall not overlook that now. SEE BELOW for documentation of egregious proof that this is a trend, and not merely a “one-off.”)

[#4] Lastly, even the best judges of the First Appellate court issue CRAZY rulings which loudly contradict the Supreme Court rules—and relevant case law. See the exhibits, below, where I take one judge to task for this—politely, I would hope.



### Statement of Jurisdiction

This Court has jurisdiction under R.383 to hear this motion—but that's not enough. **This Court has “unlimited” jurisdiction—not only to vacate judgments, but also to vacate *judges*—and leave nothing in their place but a smoldering plume of smoke.**

Perhaps, that seems strong language, but in a rare nod to our humanity, I must use a bit of humour, in order to make a serious point. To verify my claim, let's recall **McDunn v. Williams, 620 N.E.2d 385 (1993)**, 156 Ill. 2D 288, 189 Ill. Dec. 417, No. 74613, which This Court heard on August 26, 1993, shall we? Without comment as to the exact details, we recall the appeals court allowed Susan McDunn to be placed on ballot for a judgeship; however, the appellate court also ordered Judge James Williams to “continue to serve in the office of Judge of the Circuit Court of Cook County until his resignation, retirement or failure to be retained,” **which made both litigants happy**. So, since neither appealed, one would think that would deprive This Court of jurisdiction?... Not. \*\*\* This Court **forcibly** took up this case for review, so if This Court ever doubts the limits of its jurisdiction, please read this paragraph a few times, slowly, OK?

### Statement of Facts

I adopt the “Statement of Facts” in my original R.383 Motion as my facts, here. However, as there were a few new findings, I shall append said Statement. On 4/20/2018, the same day I asked This Court for a Supervisory Order, I asked the appeals court for summary judgment, regarding intervention, fee waiver, and prep of the record. I also moved the circuit court to grant a Rule 321 motion to limit the Record on Appeal, since

the actual record was so large as to be cost-prohibitive. The circuit court just ignored me, even though they're documented to have received my motion. No, they didn't even enter a “denied” ruling—they just ignored me, as if I did not exist.

The appeals court, however, entered the craziest ruling I have ever seen in my entire life: See the **Exhibits B and C, below**, where I reply to that order—politely but firmly, explaining that the court is exceptionally wrong.

Please note, also, that since our last communication, GMAC, the plaintiff of record, has entered an appearance in one of my appeals, 1-18-0091.

But the attorneys adamantly and stubbornly *continue to* refuse to serve all the parties, as the “plain language” meaning Rule 11(a) clearly requires. Moreover, in my last filing, I made references to this trend, but didn't provide any documentation—trusting that you would look in the record below. But perhaps I was assuming too much:

See below in these **Exhibit-A**, below, for proof that Andjelko Galic, the attorney of record for Rich Daniggelis, served only TWO (2) parties, not even serving Joseph Younes, who was (and still is—as he has not been excused) a chief co-defendant, in this case. So, now with my allegation (my own witness), and 2 other documented examples (attorneys Rosa M. Tumialán and Andjelko Galic), you now have THREE (3) witnesses that this trend is rampant. (In fact, if you disagree with me, I would challenge you to find EVEN ONE instance in the circuit or appeals courts pleadings, in this series of cases, where anyone—other than myself—the undersigned Movant—has complied with R.11(a) regarding service to ALL parties (and not just a 'select few').

### Argument

As I mentioned in my original filing in this case, the trial courts, below, committed Manifest Error in applying the “Burden of Proof” backwards regarding ownership of 1720 N. Sedgwick (house & property, which has hundreds of thousands of dollars of equity, as many of us have documented in our past filings, below). Daniggelis was forced to prove that his house was his, beyond all reasonable doubt, even though the circuit court should clearly have demanded that Younes & Shelton be the ones to meet this threshold before just snatching house, land, & equity. (***And the appeals courts turned a blind eye to this!.***) But, there's an old “Common Law” saying: If you've done a good job in your briefs in the courts below, they'll be “just fine” 'as is', for an appeals (or Supreme) court... So, I think I'll rest on my laurels, & trust that my brief in the courts below made my case—and thus not belabor This Court to repeat myself.

### Conclusion

I respectfully ask This Court to issue a Supervisory Order, in which it finds that Watts' 7-17-2018 Motion to Extend Time (to prepare the Record on Appeal) is timely, under the Common Law concept of “*nunc pro tunc*,” in other words, since Watts filed his 7-17-2018 motion “on time,” but that was the last day to file within the 35-day time-window, the clerk's refusal to accept Motion-A concurrent with Motion-B, and ask for them to be filed “separately” – would make the next day's filing late.

While it's possible that the appeals court would come to this conclusion on their own, their track record is clear: For well-over ten (10) years, both the circuit and appeals courts have had clear evidence of felony “photocopy” forgery fraud before it—and yet refused to help the elderly Richard Daniggelis.

So, while—yes—it's “theoretically” possibly that the appeals court might “do the right thing” this time, who really believes that to be the case?. This statement is not meant to insult or demean the appeals court justices (one of whom kindly issued an order to extend time to file the record on appeal in my appeal, see e.g., Justice Daniel J. Pierce's 3-28-2018 Order). But, whatever their motives, the courts, as documented below, have issued the craziest rulings, for example, denying they had jurisdiction—when clearly this was not the case. If we're going to have this craziness on the appeals court, why even *have* an appeals court? Why would it not be better to vacate the entire appellate court system, and leave nothing in their place but an empty building. (It would save lots of taxpayer dollars!) I respectfully ask, why do The Supreme Court justices come to The Court, if it is not to address crazy things like this?

While I know This Court can not take every case, I would hope that either the court takes this case on the merits (it might save a life, as an elderly man is documented to have been made homeless by this fraud), or—at the least—compel the appeals court to “pull up for review” the 'selected' RULE 321 Record, which I've requested (and am willing to pay for if it's only this, and no more), and hear the case on the merits.

I don't seek revenge, and trust the courts to be moderate, fair, and compassionate, even to the lawbreakers. ***Respectfully submitted,*** \_\_\_\_\_

/s/ Gordon Wayne Watts

(Actual Signature, if served upon clerk)  
**Gordon Wayne Watts**

(Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
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**Page 6**

### **Certificate of Compliance**

I certify that this brief conforms to the requirements of Rules 341(a) and (b). The length of this brief, excluding the pages or words contained in the Rule 341(d) cover, the Rule 341(h)(1) statement of points and authorities, the Rule 341 (c) certificate of compliance, the certificate of service, and those matters to be appended to the brief under Rule 342(a), is **six (6) pages**.

Date: **Thursday, 19 July 2018**

/s/ Gordon Wayne Watts  
Gordon Wayne Watts

### **Verification by Certification**

I, Gordon Wayne Watts, the undersigned Movant, under penalties as provided by law pursuant to 735 ILCS 5/1-109, Section 1-109 of the ILLINOIS Code of Civil Procedure, hereby certify that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and, as to such matters, the undersigned certifies as aforesaid that he verily believes the same to be true: “Any pleading, affidavit or other document certified in accordance with this Section may be used in the same manner and with the same force and effect as though subscribed and sworn to under oath.” Source: 735 ILCS 5/1-109: <http://www.ILGA.gov/legislation/ilcs/documents/073500050K1-109.htm>

Nonetheless, This Court has on record several of my sworn, witnessed, and notarised affidavits (see e.g., **Exhibit-F, in my original R.383 Motion**, or the affidavit of assets & liabilities concurrently filed hereto), just to remove any and all doubt hereto as to my claims that I am indeed the 'real' Gordon Wayne Watts—and attest under oath, via affidavit, of certain facts & claims.

Date: **Thursday, 19 July 2018**

/s/ Gordon Wayne Watts  
Gordon Wayne Watts

**INDEX TO THE EXHIBITS****Instrument****Docket/Tab#**

**\*\* Notice of Filing by Atty. Andjelko Galic, dated Aug. 08, 2017 in *GMAC v. Younes, et al.*, 2007-CH-29738,** one of the cases for which Movant, Gordon Wayne Watts, sought/seeks review of This Court – and one which documents the trend of attorneys REFUSING to comply with R.11(a) service requirements to serve all the parties

**Exhibit-A**

**\*\* COURT-STAMPED Motion to Extend Time** to file record in 1-18-0091, one of the cases for which Movant, Gordon Wayne Watts, sought/seeks review of This Court—**dated: 7-18-2018**

**Exhibit-B**

**\*\* COURT-STAMPED Motion for Clarification** in 1-18-0091, one of the cases for which Movant, Gordon Wayne Watts, sought/seeks review of This Court—**dated: 7-18-2018**

**Exhibit-C**

**IN THE  
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Gordon Wayne Watts,  
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and

Hon. Diane M. Shelley, in her capacity as circuit judge,  
Law Division, Cook County, IL circuit court,  
Defendants.

**Docket Number: 123481**

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**ORDER**

In the exercise of this Court's supervisory authority, the Clerk of the Circuit Court, Cook County, is directed to vacate its order in *GMAC Mortgage, LLC v. Watts*, case No. 2007-CH-29738 (03/01/2018), denying Gordon Wayne Watts leave to intervene. The circuit court is instructed to prepare a limited Record on Appeal, as specified in Watts' proposed order in his 03/16/2018 filing in case number 1-18-0091, at no cost to Mr. Watts, and to transmit the Appellate Court, First District on Accelerated Docket (R.311). The appellate court is instructed to review the record presented to it, and issue summary judgment on the merits within no more than 45 days. The court, if it chooses, may allow briefing, but whether briefing is allowed or not, the Appellate Court, First District, is directed to, rule on the merits in *GMAC Mortgage, LLC v. Watts*, case No. 1-18-0091, enter an order, and publish it, within the time specified in this order.

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Justice

SERVICE LIST

\* **ILLINOIS SUPREME COURT** – Supreme Court Building, Office Hours: 8:30am-4:30pm CST, Mon-Fri, Excl. Holidays, PH: (217) 782-2035 ; TDD (217) 524-8132, Attention: Clerk's Office – 200 E. Capitol Ave. – Springfield, IL 62701-1721 [**served by eFiling, only**—as motions do not require hard copy filing]

\* **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 only, as a courtesy, since he is not a party proper**]

\* **Hon. James P. Flannery, Jr.**, Circuit Judge–Presiding Judge, Law Division 50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343, Courtesy copy via: [James.Flannery@CookCountyIL.gov](mailto:James.Flannery@CookCountyIL.gov) [**served in all ways, as Judge Flannery is a defendant**]

\* **Law Division and Hon. Diane M. Shelley, Circuit Judge**,  
[Law@CookCountyCourt.com](mailto:Law@CookCountyCourt.com) ; [ccc.LawCalendarW@CookcountyIL.gov](mailto:ccc.LawCalendarW@CookcountyIL.gov) ;  
[Diane.Shelley@CookCountyIL.gov](mailto:Diane.Shelley@CookCountyIL.gov) [**served in all ways, as Judge Shelley is a defendant**]

\* **Richard B. Daniggelis** [true owner of 1720] 312-774-4742, c/o John Daniggelis, 2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652

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

\* **Robert J. More** ( [Anselm45@Gmail.com](mailto:Anselm45@Gmail.com) ) [Note: **More's** name is **misspelled** on docket as: “**MOORE ROBERT**”] P.O. Box 6926, Chicago, IL, 60680-6926, PH: (708) 317-8812 [[Mr. More has made a formal request by email to receive service solely by email, & waives hard-copy service—see Exhibit-K-5, with a statement from Mr. More.]]

\* **Associated Bank, N.A.**, 200 North Adam Street, Green Bay, WI 54301-5142

\* **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>

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 Street, Suite 'C', Danville, IL 61834-4512**

\* **COHON RAIZES@AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)**

Attn: Carrie A. Dolan, pPh:(312) 726-2252  
 208 S LASALLE, Suite #1860, CHICAGO IL, 60604

\* **Stewart Title, Attn: Leigh Curry**

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2055 W. Army Trail Rd., STE 110, Addison, IL 60101 [ph:(630) 889-4050]

\* **Richard Indyke, Esq.** Atty. No. 20584, ([RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net) ; 312-332-2828 ; 773-593-1915 most recent “Attorney of record” for LaSalle Bank Natl. Assn.), 111 South Washington Ave., Suite 105, Park Ridge, IL 60068-4292 [[Mr. Indyke claims to not represent any party in the instant appeal, but the undersigned can not find any more recent atty of record for defendant, LaSalle Bank, and reluctantly will keep Mr. Indyke on the service list, unless excused by The Court—see Exhibit-K-6, with a statement from Mr. Indyke.]]

\* **Peter King (Atty. for Joseph Younes) (Atty. No.: 48761)**

(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221

<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com) or: [PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

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\* **Joseph Younes (Atty#:55351) Law Offices / <http://ChicagoAccidentAttorney.net>**

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\* **Paul L. Shelton, Pro Se, (Atty. #15323, disbarred per IARDC)**

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\* **Erika R. Rhone 22711 Southbrook Dr., Sauk Village, IL 60411-4291**

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

\* **Dawn Williams (DWilliams@Dykema.com) Phone: 616-776-7518, DYKEMA GOSSETT PLLC, 300 Ottawa Ave., N.W., Suite 700, Grand Rapids, MI 49503-2306 [Attorney for Appellee, GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX]**

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Hon. Diane M. Shelley, in her capacity  
as circuit judge, Law Division,  
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Defendants.

**Docket Number: 123481**

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

\* The undersigned Plaintiff, **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 Supervisory Orders and Exhibits**, copies of which are attached hereto are being herewith served upon you—and upon the parties listed in the attached Service List, above – **this Thursday, 19 July 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** and/or **FedEx 3rd-party Commercial Carrier**—whichever shall prove more convenient..

\* Additionally, I'm serving all parties **by email**, if indicated in the Service List.

\* Lastly, 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.

*Respectfully submitted,*

\_\_\_\_\_  
(Actual Signature, if served upon clerk)  
**Gordon Wayne Watts**

/s/ *Gordon Wayne Watts*  
(Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]

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*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

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 (**Exhibits-B, C, and D**), on Thursday, 03 May 2018, and [[#2]] Appellant, himself, nearly died in an unrelated incident (**Exhibit-E**), 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 (**Exhibit-J**), 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 as **Exhibit-J, infra.**] [[#5]] Appellant, himself, nearly bled to death. [See **Exhibit-E** 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. (**Exhibit-F**)

Appellant represents to this court that he acted in good faith during the time-period in which This Court prior granted an extension of time to file the Record, and made **all** reasonable

*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

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 (**Exhibit-A**), 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 (**Exhibit-G**) 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 (**Exhibit-H**) by First Class U.S. Postal Mail, **((#2))** by e-mail (**Exhibit-I**) (*Judge Shelley actually has three (3) valid emails, and Judge Flannery has one (1) email*), and **((#3))** via electronic service, as documented (**Exhibit-G**) 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

*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

Certificates of Service in said filings—and in the certificate of service in this motion.

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 of the valid **RULE 321** motion to limit the record. When This Court ordered Appellant (**Exhibit-A**) 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 & review the Record on Appeal, moved for Summary Judgment (**Exhibit-K**) 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, despite authority granted by Rule 321, to limit the record, this court alleged (**Exhibit-L**) 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. (**Exhibit-L**)

*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

**(#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 issued 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 local rules do not require “double-space,” and knew This Court would still fairly review the merits of the motions—anyhow, understanding that saving costs of paper, printer ink, & mailing weight, were/are factors that justify using **single-spaced paragraphs**. (Moreover, Service Copies were/are “**printed double-sided**” to parties, to cut costs further, & 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



*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

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 (**Exhibits B—D**), and he, himself, nearly died in a separate incident. (**Exhibit-E**)

### CONCLUSION

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. (Appellant represents to This Court that the Civil Appeals Division told him that the full “Chancery” docket, not merely the “Law Division” docket, **by the same case-number**, was the actual Record on Appeal, and must be included unless excused by a RULE 321 motion, which only this court or the trial court may do—or by a 'stipulation' agreement, which is unlikely given the animosity between the parties.)

Moreover, even had he paid for prep of the record, many contemporary legal observers noted that if the circuit court didn't abide by basic law on IFP & Fee Waiver application regs, how could the courts then be trusted with the merits of the case, which—when appellant heard & considered—scared the pure living daylight out of him, thus convincing him to not spend his

*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

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 (necessitating several appeals to correct this).

**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 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, **(C)** Movant, himself, nearly bleeding to death & dying in an unexpected reaction to standard over-the-counter drugs, and **(D)** cumulative physical, financial, social, & emotional stresses from various circles (including, we add, lower courts' continued refusal to obey basic law), and Movant, as of this writing, is still under doctor's supervision, & not 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 is willing to pay for (even tho he's IPF & 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 still hasn't 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.**

*Respectfully submitted,*

*/s/Gordon Wayne Watts*

*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

**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 & all doubt hereto.

**Date: Tuesday, 17 July 2018**

*/s/Gordon Wayne Watts*

**Gordon Wayne Watts**

**Judicial Notice concerning clerk's request to resubmit:**

This filing was submitted on time, on 7-17-2017, but the clerk requested me to resubmit it, since “Multiple filings” (concurrent motions) were supposedly not acceptable. However, my 3-16-2018 Motion to Extend time had a concurrent motion, and was not rejected—and moreover, there is no rule or law that prohibits concurrent motions, and so, this rejection should not be counted as late, as I filed on time. To support my venue tolling claim, I also rely on section 2-104 of the Code of Civil Procedure: “No action shall abate or be dismissed because commenced in the wrong venue if there is a proper venue to which the cause may be transferred.” 735 ILCS 5/2-104 (West 2014). NONETHELESS, even absent 735 ILCS 5/2-104, there is no rule, law, or holding that should cause my concurrent motions to be deemed late – or rejected – if otherwise filed on time—and it would offend Due Process and shut the courts down for no good reason to do otherwise.

Since the clerk asked me to resubmit, then it must be permissible to resubmit timely with corrections, as I am complying with the clerk's request to timely correct a de minimus defect.

*/s/Gordon Wayne Watts*

**Gordon Wayne Watts**

*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

**INDEX TO THE EXHIBITS**

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** Request from CLERK to resubmit my motions separately	Exhibit "P"

NO. 1-18-0091

**IN THE APPELLATE COURT OF ILLINOIS  
FIRST DISTRICT**

GMAC Mortgage, LLC, Plaintiff	)	Appeal from the Circuit Court of Cook County, IL
vs.	)	No. 07 CH 29737
Gordon W. Watts, et. al.,	)	(Transfer into <u>Law</u> Division from Chancery)
<hr style="width: 100%; border: 0.5px solid black; margin-bottom: 0;"/> 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, **THIS COURT hereby finds that it has jurisdiction to enter the following order:**

**IT IS HEREBY ORDERED** that the time for filing the Record on Appeal is extended to October 17, 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—for the elderly defendant, Richard Daniggelis.

**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 321 and 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))].

**This Court, in its Rule 321 appellate authority, orders the circuit court to speedily prepare a selected record, as specified in this order, notify this court, and transmit it to this court by electronic means, on accelerated docket.**

**IT IS SO ORDERED.**

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Justice

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Justice

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Justice

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



*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

**SERVICE LIST**

- \* **1st District Appellate Court**, Clerk's Office, 160 North LaSalle St., Chicago, IL 60601  
**(312) 793-5484 , Office Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays [served by eFiling only, since this The Court no longer accepts paper filings]**
- \* **CIVIL APPEALS DIVISION:** Richard J. Daley Center, 50 West Washington St., Room 801 Chicago, IL 60602 – (312) 603-5406, Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays  
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 all means, as he is a defendant]**
- \* **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
- \* **Paul L. Shelton, Pro Se**, 3 Grant Square, SUITE #363, Hinsdale, IL 60521-3351
- \* **Erika R. Rhone** [ph:(773) 788-3711], 22711 Southbrook Dr., Sauk Village, IL 60411-4291
- \* **Joe Younes:** 2625 West Farewell Avenue, Chicago, IL 60645-4522 [JoeYounes@SbcGlobal.net](mailto:JoeYounes@SbcGlobal.net)
- \* **Joseph Younes** (Atty#:55351) Law Offices / <http://ChicagoAccidentAttorney.net>  
312-635-5716, per website 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596  
Phone: 312-372-1122 ; 312-802-1122 ; Fax: 312-372-1408. Email: [RoJoe69@yahoo.com](mailto:RoJoe69@yahoo.com)



*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

**SERVICE LIST (continued from above)**

**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**

\* **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]

\* **Richard Indyke, Esq.** Atty. No. 20584, (312-332-2828, Atty for LaSalle Bank Natl. Assn.),  
Email: [RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net) ; 221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305

\* **Peter King (Atty. for Joseph Younes) (Atty. No.: 48761)**  
(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221  
<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com)  
or: [PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

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

\* **Dawn Williams ([DWilliams@Dykema.com](mailto:DWilliams@Dykema.com))** Phone: 616-776-7518  
DYKEMA GOSSETT PLLC, 300 Ottawa Ave., N.W., Suite 700  
Grand Rapids, MI 49503-2306 [Attorney for Appellee, GMAC MORTGAGE  
LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka  
U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX]



*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

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NO. 1-18-0091

IN THE APPELLATE COURT OF ILLINOIS  
FIRST DISTRICT

GMAC Mortgage, LLC, Plaintiff	)	Appeal from the Circuit Court of Cook County, IL
vs.	)	No. 07 CH 29737
Gordon W. Watts, et. al., Defendants	)	(Transfer into <u>Law</u> Division from Chancery)
	)	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 ~~by~~ 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. [This court notes that Watts' claims on this head were never challenged as false.]

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

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

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





THOMAS D. PALELLA  
CLERK OF THE APPELLATE COURT 1ST DISTRICT  
160 NORTH LABALLE STREET, RM 51400  
CHICAGO, ILLINOIS 60601

POSTAGE WILL BE PAID BY ADDRESSEE  
NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE U.S.

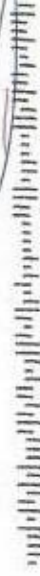
FIRST-CLASS MAIL  
neopost®  
03/28/2018  
US POSTAGE  
ZIP 60601  
041L11240569

1-18-0091

GORDON WAYNE WATTS  
821 ALICE ROAD  
LAKELAND FL 33801

Received in mailbox - 11/19  
SATURDAY, 31 March 2018  
-Dobsonburg-NW

93801-211321





Obituary for Robert F. "Bobby" Watts

**Exhibit "B"**

(source: The Ledger -- TheLedger.com)

**OBITUARIES**



**ANDREW  
"HORSEHEAD"  
LAWRENCE, Jr.**

BARTOW - Andrew Lawrence, Jr., 82, died Fri., 5/4/18. View: at Gause F.H., 5-7 pm Fri, 5/11. Service at St. James AME Church at 1 pm on Sat., 5/12.



**ROBERT  
FRANKLIN  
DELANO  
"BOBBY"  
WATTS, 83**

LAKELAND - Robert Franklin Delano "Bobby" Watts, 83, died May 3, 2018. Bobby was born in Miami, FL on Jan. 27, 1935.

With the exception of a brief stint in the Navy, Bobby spent his entire life in Florida, working for the railroad, owning a gym

**"BOBBY"  
WATTS, 83**

LAKELAND - Robert Franklin Delano "Bobby" Watts, 83, died May 3, 2018. Bobby was born in Miami, FL on Jan. 27, 1935.

With the exception of a brief stint in the Navy, Bobby spent his entire life in Florida, working for the railroad, owning a gym and auto parts stores. For 43 years he was the very proud owner of the Bobby Watts Speed Shop. One of his first jobs was with "Big Daddy, Don Garlits" the "King of Drag Racing."

Over his entire life he never missed a day of work except when he was in the hospital.

An avid drag racer as a young man, and harmonica player in his later years, he found happiness in his racing and music, and strength from his Savior Jesus Christ.

He is preceded in death by his parents, Loring M. Watts, Sr. and Iola "Mary" Whitlock Watts Wood, his brother Loring M. "Mickey" Watts, Jr. and his sisters Jessie Mattair and Janie Barnett.

Bobby is survived by his wife, Anne Watts and his son, Gordon Watts.

A memorial service will be held at 2 pm on Sat., May 12 at the Fellowship Church As-

sembly. His first job was with "Big Daddy, Don Garlits" the "King of Drag Racing."

Over his entire life he never missed a day of work except when he was in the hospital.

An avid drag racer as a young man, and harmonica player in his later years, he found happiness in his racing and music, and strength from his Savior Jesus Christ.

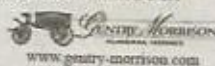
He is preceded in death by his parents, Loring M. Watts, Sr. and Iola "Mary" Whitlock Watts Wood, his brother Loring M. "Mickey" Watts, Jr. and his sisters Jessie Mattair and Janie Barnett.

Bobby is survived by his wife, Anne Watts and his son, Gordon Watts.

A memorial service will be held at 2 pm on Sat., May 12 at the Fellowship Church Assembly of God, 4405 N. Galloway Rd, Lakeland.

Condolences to the family may be given at [www.gentry-morrison.com](http://www.gentry-morrison.com).

In lieu of flowers, please follow Bobby's example and give to someone in need.



**NANCY LYNN  
MORGAN, 69**

AUBURNDALE

Thursday, May 10, 2018 A5



**GENEVA SMITH  
WOOTEN, 85**

APOPKA - Geneva Smith Wooten, 85, of Apopka, Florida passed away on May 05, 2018.

Mrs. Wooten was born on August 13, 1932. She graduated from Kathleen High School Class of 1950.

Mrs. Wooten is preceded in death by her sister Juanita S. Ruthven. She is survived by her loving husband of 59 years Mr. Edwin N. Wooten; her children Elaine Wooten Johnson, Sandra P. Wooten and The Honorable Wayne C. Wooten and his wife Tracey; sister Opal S. Carter; grandchildren Alexander Johnson, Chloë M. Johnson

# Obituary for Robert F. "Bobby" Watts

# Exhibit "C"

(source: The Register -- GordonWatts.com or GordonWayneWatts.com)



gordonwaynewatts.com



ogy / Spiritual)

[New: SEAN HANNITY section](#)

[April Mathis: World's Strongest Woman](#)

[Your ANGEL STORIES: Testimonials](#)

[LEGAL; Copyright; Terms & Conditions](#)

ise/Diet/CANCER

[ANGELS on ASSIGNMENT](#)

[New STAR TREK: PII episodes](#)

[More ANGEL Encounters](#)

[New: Terri Schiavo section](#)

**IL:**  
ri.



**Sat. 05**  
**LLINOIS**  
**granted**  
**est for**



## \* LAKELAND, FL - OBITUARIES

[\(Sat. 12 May 2018\) Robert Franklin Delano "Bobby" Watts \(01 Jan 1935 - 03 May 2018\)](#)

[Click here for obituary or to donate.](#)

## \* "The CONSERVATIVE Case for College Loan Bankruptcy bill H.R.2366"

(Sun. 25 Feb. 2017) Yes, the 'Conservative' argument for BK protection is even stronger than the 'Liberal' argument, so we don't know why the GOP supports these Constitutional rights more? *Details:* [Video link with transcript & notes](#) \*\*



## BUREAU of VITAL STATISTICS

## CERTIFICATION OF DEATH

STATE FILE NUMBER: 2018074517

DATE ISSUED: MAY 8, 2018

## DECEDENT INFORMATION

DATE FILED: MAY 8, 2018

NAME: ROBERT FRANKLIN DELANO WATTS

DATE OF DEATH: MAY 3, 2018

SEX: MALE

AGE: 083 YEARS

DATE OF BIRTH: JANUARY 27, 1935

SSN: 260-44-6565

BIRTHPLACE: MIAMI, FLORIDA, UNITED STATES

PLACE WHERE DEATH OCCURRED: DECEDENT'S HOME

FACILITY NAME OR STREET ADDRESS: 821 Alicia Road

LOCATION OF DEATH: LAKELAND, POLK COUNTY, 33801

RESIDENCE: 821 ALICIA ROAD, LAKELAND, FLORIDA 33801, UNITED STATES

COUNTY: POLK

OCCUPATION, INDUSTRY: OWNER/OPERATOR, RETAIL AUTO PARTS

EDUCATION: HIGH SCHOOL GRADUATE OR GED COMPLETED EVER IN U.S. ARMED FORCES? YES

HISPANIC OR HAITIAN ORIGIN? NO, NOT OF HISPANIC/HAITIAN ORIGIN

RACE: WHITE

## SURVIVING SPOUSE / PARENT NAME INFORMATION

(NAME PRIOR TO FIRST MARRIAGE, IF APPLICABLE)

MARITAL STATUS: DIVORCED

SURVIVING SPOUSE NAME: NONE

FATHER'S/PARENT'S NAME: LORING MITCHELL WATTS SR

MOTHER'S/PARENT'S NAME: IOLA WHITLOCK

## INFORMANT, FUNERAL FACILITY AND PLACE OF DISPOSITION INFORMATION

INFORMANT'S NAME: ANNE WATTS

RELATIONSHIP TO DECEDENT: EX-WIFE

INFORMANT'S ADDRESS: P. O. BOX 4225, PLANT CITY, FLORIDA 33565, UNITED STATES

FUNERAL DIRECTOR/LICENSE NUMBER: LEWIS H. HALL III, F021044

FUNERAL FACILITY: GENTRY MORRISON CREMATION CENTER F066603

1805 US 98 S, LAKELAND, FLORIDA 33801

METHOD OF DISPOSITION: CREMATION

PLACE OF DISPOSITION: GENTRY-MORRISON CREMATORY  
LAKELAND, FLORIDA

## CERTIFIER INFORMATION

TYPE OF CERTIFIER: Associate Medical Examiner

MEDICAL EXAMINER CASE NUMBER: 1810ME077

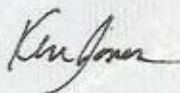
TIME OF DEATH (24 HOUR): FOUND AT 0520

DATE CERTIFIED: MAY 7, 2018

CERTIFIER'S NAME: VERA VASILIEVNA VOLNIKH

CERTIFIER'S LICENSE NUMBER: ME85865

NAME OF ATTENDING PHYSICIAN (IF OTHER THAN CERTIFIER): NOT ENTERED



, STATE REGISTRAR

REQ: 2019270621

THE ABOVE SIGNATURE CERTIFIES THAT THIS IS A TRUE AND CORRECT COPY OF THE OFFICIAL RECORD ON FILE IN THIS OFFICE.

## WARNING:

THIS DOCUMENT IS PRINTED OR PHOTOCOPIED ON SECURITY PAPER WITH WATERMARKS OF THE GREAT SEAL OF THE STATE OF FLORIDA. DO NOT ACCEPT WITHOUT VERIFYING THE PRESENCE OF THE WATERMARKS. THE DOCUMENT FACE CONTAINS A MULTICOLORED BACKGROUND, GOLD EMBOSSED SEAL, AND THERMOCHROMIC FL. THE BACK CONTAINS SPECIAL LINES WITH TEXT. THE DOCUMENT WILL NOT PRODUCE A COLOR COPY.



\* 3 7 0 5 0 9 7 2 \*

DH FORM 1946 (03-13)

CERTIFICATION OF VITAL RECORD





**EXHIBIT -- "E" (part 1 of 3)****MEDICAL RECORDS**

**Documentation of Appellant's medical emergency, which resulted in him nearly bleeding to death -- and with a blood Hemoglobin Level of '4' -- as compared with 'normal' levels of at least 13.5 (men) or 12 (women)**

Menu

RelayHealth - Health Records

app.relayhealth.com/PatientPortal/HealthRecords#!/HealthRecords/View/Results/1270788739

GordonWayneWatts (Yc) Microsoft.com/en-us/wc gww1210g gww1210f gww0dani gw00dani

[← Back to Your Results](#)

**Lakeland Regional Medical Center**  
1324 Lakeland Hills Blvd,  
Lakeland, FL 33805  
Phone: (863) 687-1100

**Patient Information**

**Order Details**

**History and Physical**

Lakeland Regional Health System

Patient: WATTS, GORDON WAYNE MRN: 000000578309 FIN: 040202961  
Age: 52 years Sex: Male DOB: 05/16/66  
Associated Diagnoses: None  
Author: LUND MD, KARA S

Basic Information  
Present at bedside: Medical personnel.  
Source of history: Self, Medical record.  
Referral source: Emergency department.  
History limitation: None.  
Advance directive: Full code.

History of Present Illness  
Mr. Gordon Watts is a 52 y.o. male with no past medical history who presented to the ED feeling short of breath and weak for several days. He also noted black and red colored stools for the past few days. He describes a recent episode of food poisoning for which he was taking Advil, ASA, Aleve and peptobismal for the abdominal pain associated with this. In teh ED, his hgb was found to be 4. He was also found to have AF with RVR. He has no known history of this. He was given a bolus o f Cardizem with some improvement in his HR. He was given one unit of emergency PRBCs and 3 units of typed and crossed PRBCs. Hgb recheck was 8.4 after transfusion. Upon arrival to the ICU, he is in SR with HR in the 90s and hemodynamically stable.

Review of Systems  
Constitutional: Chills, Weakness.  
Eye: No recent visual problem.  
Ear/Nose/Mouth/Throat: No decreased hearing.  
Respiratory: Cough, No shortness of breath.  
Cardiovascular: No chest pain.  
Gastrointestinal: Abdominal pain: Right, The severity is moderate.  
Genitourinary: No dysuria, No hematuria.  
Endo: Cold intolerance.  
Musculoskeletal: No joint pain, No muscle pain.  
Integumentary: No skin lesion.

**EXHIBIT -- "E" (part 2 of 3)****Lakeland Regional Health®**

Lakeland Regional Medical Center, Inc.  
1324 Lakeland Hills Blvd  
Lakeland, FL 33805  
863.687.1100

**MEDICAL RECORDS**

**(Documentation of Appellant  
nearly bleeding to death from  
adverse reaction to over-the-counter meds)**

**PATIENT INSTRUCTIONS FOR AFTERCARE****Name:** WATTS, GORDON WAYNE**Current Date:** 06/08/18 11:20:14 Eastern Time**DOB:** 5/16/1966 12:00 AM**Arrival Time:** 6/05/2018 5:00 PM**Diagnoses:**

Acute upper GI bleed; Atrial fibrillation with rapid ventricular response; Melena

**Attending Physician:** CAJUSTE MD, RENE**Consulting Physician:** LUND MD, KARA S; EPPERSON CRNA, JESSICA L**Primary Care Provider:** JEAN-PIERRE MD, ELMISE**Phone:** (863) 687-1300

Thank you for allowing us to care for you. Understanding how to continue your recovery is essential to help maintain good health. This document contains important information for you after you leave us. Please review these instructions carefully and bring them to any follow-up appointments.

**Nondiscrimination Notice**

Lakeland Regional Health (LRH) complies with applicable Federal civil rights laws and does not discriminate on the basis of race, color, national origin, age, disability, or sex. Lakeland Regional Health does not exclude people or treat them differently because of race, color, national origin, age, disability, or sex.

If you feel LRH has discriminated in any way, you may file a grievance by calling 863.687.1025.

**Spanish:** ATENCIÓN: si habla español, tiene a su disposición servicios gratuitos de asistencia lingüística. Llame al 863.687.1025.

**French Creole:** ATANSYON: Si w pale Kreyòl Ayisyen, gen sèvis èd pou lang ki disponib gratis pou ou. Rele 863.687.1025.

**Access Your Secure Health Records Online**

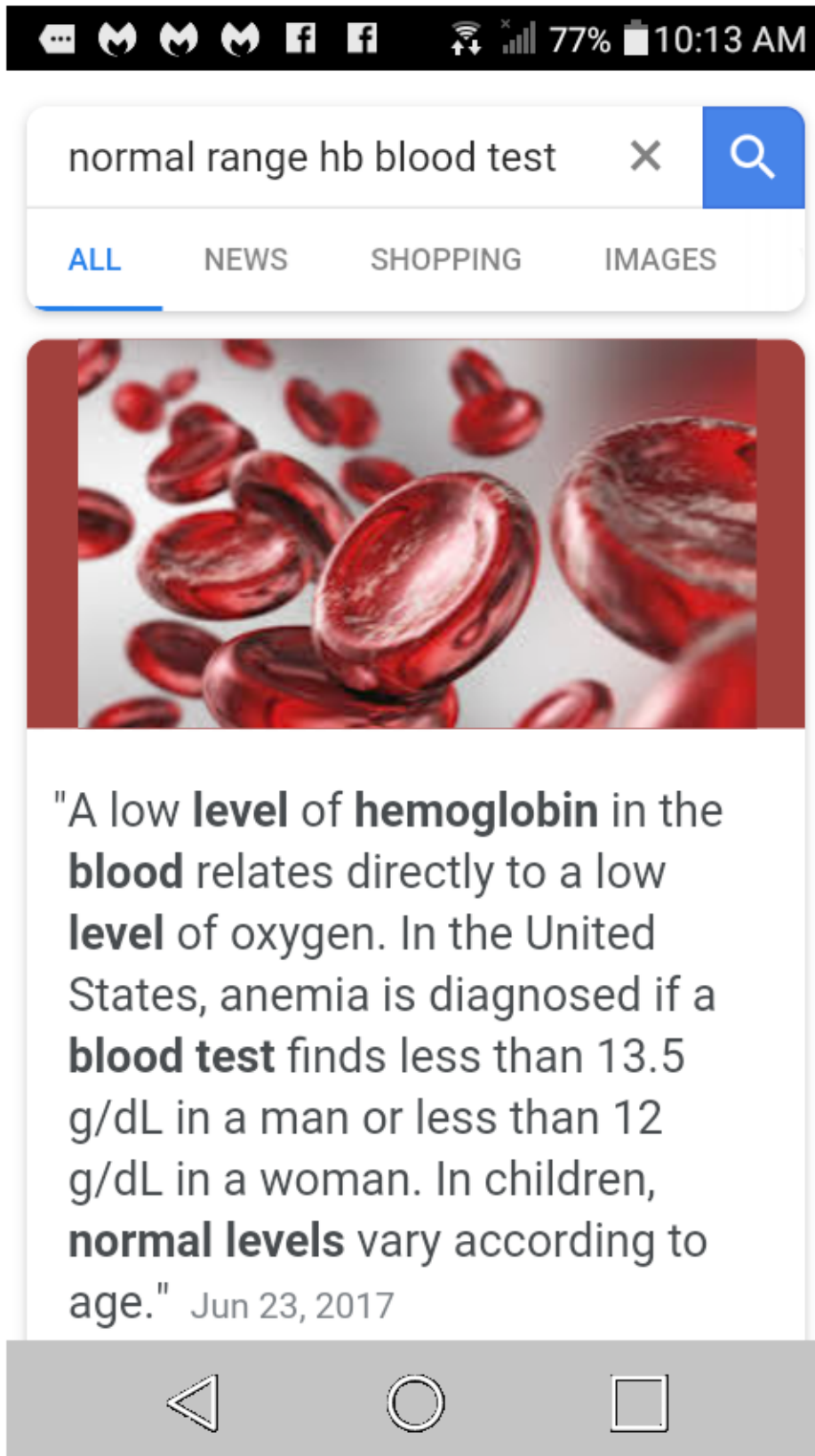
Person Full Name WATTS, GORDON  
WAYNE  
06/8/2018 11:20:16

Gender Male

Date of Birth 05/16/66

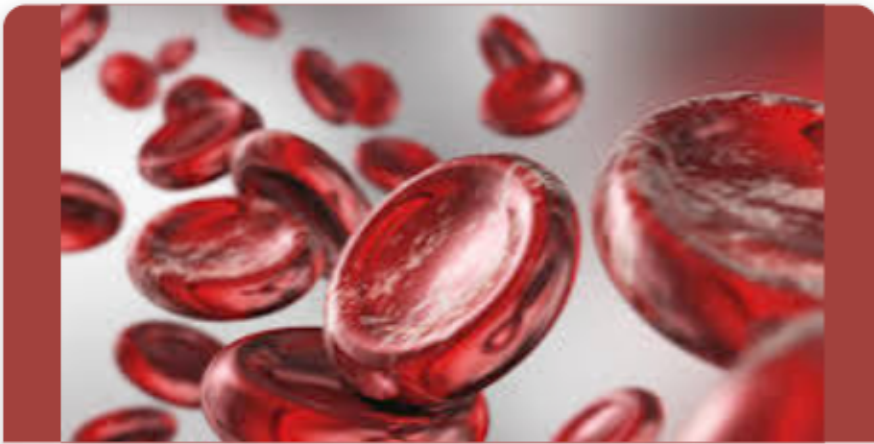
**MEDICAL DOCUMENTATION:  
'Normal' levels of Blood Hemoglobin**

**EXHIBIT -- "E" (part 3 of 3)**



normal range hb blood test

ALL NEWS SHOPPING IMAGES



"A low **level** of **hemoglobin** in the **blood** relates directly to a low **level** of oxygen. In the United States, anemia is diagnosed if a **blood test** finds less than 13.5 g/dL in a man or less than 12 g/dL in a woman. In children, **normal levels** vary according to age." Jun 23, 2017

**\*\* Documentation of sudden need to do clearance sale for the late Bobby Watts, appellant's father**

**Exhibit "F"**



**E-Notice****2007-CH-29738**

CALENDAR: W

To: Gordon Wayne Watts  
gww1210@gmail.com

---

**NOTICE OF ELECTRONIC FILING**

---

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
GMAC MORTGAGE LLC v. YOUNES JOSEPH**

The transmission was received on 04/20/2018 at 6:34 PM and was ACCEPTED with the Clerk of the Circuit Court of Cook County on 04/23/2018 at 8:55 AM.

**NOTICE OF REPORT OF RECORDS OF PROCEEDINGS (This is closest I can find to describe filing:  
I'm giving notice of report of proceedings in Appellate Court, which has issued order for my to  
direct inquiry to this court regarding Record on Appeal./)**

Filer's Email: gww1210@gmail.com  
Filer's Fax:  
Notice Date: 4/23/2018 8:55:26 AM  
Total Pages: 10

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

(312) 603-5031  
courtclerk@cookcountycourt.com



IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
 COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC	)	
<b>Plaintiff,</b>	)	Case No.: 2007 CH 29738
	)	(Transfer to Law Division)
vs.	)	Before: Hon. DIANE M. SHELLEY,
	)	Circuit Judge
Gordon Wayne Watts, et. al.,	)	District: First Municipal
<b>Defendants.</b>	)	Calendar "W", Courtroom 1912

**Motion for Clarification concurrent with  
 Rule 321 motion to limit Contents of the Record on Appeal**

In the exercise of the reviewing Court's appellate authority, the Appellate Court, First District, has entered an order, in ***GMAC v. Watts***, 1-18-0091, that: "Appellant must direct inquiries on the content of the record on appeal to the Clerk of the Circuit Court of Cook County."

ORDER ENTERED MAR 28 2018, Appellate Court, First District.

Pursuant to the above-quoted/cited order (see *infra*: **Exhibit-A**), Appellant, Gordon Wayne Watts, now directs inquiry to This Court regarding the content of the record on appeal in 1-18-0091—**hereby moving for clarification** of whether or not the 7-7-2017 motion to Intervene stated sufficient grounds to intervene in the case at bar.

Moreover, in concurrent motion, Appellant, Watts, now moves this court to "order less" for the Record on Appeal, in accordance with Rule 321, notice, and proper hearing will having been given. [In support of this motion, Movant respectfully points out that a stipulation is highly unlikely given the fact that many parties can't even be located or have bad service addresses, and/or are unlikely to consent to anything, big or small, in this regard.]

Specifically, movant requests that the clerk prepare the limited record sought in the 3/16/2018 Motion for Extension of Time, in GMAC v Watts, 1-18-0091, a copy of which has been served upon this court in prior filings—and reproduced below, in the proposed order.

*Respectfully submitted,*

*/s/Gordon Wayne Watts*

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
 821 Alicia Road, Lakeland, FL 33801-2113  
 PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
 Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
 Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

GMAC v. Watts, et al., 07-CH-29738 (Law Division, Cook County, IL)

**Verification by Certification**

I, Gordon Wayne Watts, the undersigned Movant, under penalties as provided by law pursuant to 735 ILCS 5/1-109, Section 1-109 of the ILLINOIS Code of Civil Procedure, hereby certify that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and, as to such matters, the undersigned certifies as aforesaid that he verily believes the same to be true: "Any pleading, affidavit or other document certified in accordance with this Section may be used in the same manner and with the same force and effect as though subscribed and sworn to under oath." Source: 735 ILCS 5/1-109: <http://www.ILGA.gov/legislation/ilcs/documents/073500050K1-109.htm>

**Nonetheless, This Court has on record several of my sworn, witnessed, and notarised affidavits, just to remove any and all doubt hereto.**

Date: **Friday, 20 April 2018**

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

ELECTRONICALLY FILED  
4/20/2018 6:34 PM  
2007-CH-29738  
PAGE 2 of 10







GMAC v. Watts, et al., 07-CH-29738 (Law Division, Cook County, IL)

**SERVICE LIST**

\* **CIVIL APPEALS DIVISION: Cook County, IL Circuit Court**, 312-603-5406, Richard J. Daley Center, 50 West Washington St., Room 801, Chicago, IL 60602 – Attention: Deputy Chief, Patricia O'Brien, [PAOBrien@CookCountyCourt.com](mailto:PAOBrien@CookCountyCourt.com) Hours: 8:30a-4:30p, Mon-Fri, Excl. Holidays, **[served by email only, as a courtesy, since they are not a party proper]**

\* **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 only, as a courtesy, since he is not a party proper]**

\* **Hon. James P. Flannery, Jr.**, Circuit Judge–Presiding Judge, Law Division 50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343, Courtesy copy via: [James.Flannery@CookCountyIL.gov](mailto:James.Flannery@CookCountyIL.gov) **[served in all ways, as Judge Flannery is a defendant]**

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

\* **Richard B. Daniggelis** [true owner of 1720] 312-774-4742, c/o John Daniggelis, 2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652

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

\* **Robert J. More** ( [Anselm45@Gmail.com](mailto:Anselm45@Gmail.com) ) [Note: **More's** name is **misspelled** on docket as: “**MOORE ROBERT**”] P.O. Box 6926, Chicago, IL, 60680-6926, PH: (708) 317-8812 [[Mr. More has made a formal request by email to receive service solely by email, and waives hard-copy service.]]

\* **Associated Bank, N.A.**, 200 North Adam Street, Green Bay, WI 54301-5142

\* **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

GMAC v. Watts, et al., 07-CH-29738 (Law Division, Cook County, IL)

**SERVICE LIST (continued)**

Holdings, Inc. – PH: (703) 761-1270, FAX: (703) 748-0183, [SharonH@MersInc.org](mailto:SharonH@MersInc.org) ; [SharonH@MersCorp.com](mailto:SharonH@MersCorp.com) Cc: Janis Smith, 703-738-0230, VP, Corp. Comm. is no longer with MersCorp, and Amy Moses ([AmyM@MersCorp.com](mailto:AmyM@MersCorp.com) ; [AmyM@MersInc.org](mailto:AmyM@MersInc.org)) has replaced her as an email contact; Sandra Troutman 703-761-1274, E: [SandraT@MersInc.org](mailto:SandraT@MersInc.org) ; [SandraT@MersCorp.com](mailto:SandraT@MersCorp.com)) Dir, Corporate Communications, Karmela Lejarde, Communications Manager, Tel~ 703-761-1274, Mobile: 703-772-7156, Email: [KarmelaL@MersInc.org](mailto:KarmelaL@MersInc.org) ; [KarmelaL@MersCorp.com](mailto:KarmelaL@MersCorp.com) C/o: **MERS (Mortgage Electronic Registration Systems, Inc.), 1901 East Vorhees Street, Suite 'C', Danville, IL 61834-4512**

\* **COHON RAIZES®AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)**

Attn: Carrie A. Dolan, pPh:(312) 726-2252  
208 S LASALLE, Suite #1860, CHICAGO IL, 60604

\* **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]

\* **Richard Indyke, Esq.** Atty. No. 20584, ([RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net) ; 312-332-2828 ; 773-593-1915 most recent “Attorney of record” for LaSalle Bank Natl. Assn.), 111 South Washington Ave., Suite 105, Park Ridge, IL 60068-4292 [[Mr. Indyke claims to not represent any party in the instant appeal, but the undersigned can not find any more recent atty of record for defendant, LaSalle Bank, and reluctantly will keep Mr. Indyke on the service list, unless excused by The Court.]]

\* **Peter King (Atty. for Joseph Younes)** (Atty. No.: 48761)

(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221  
<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com) or: [PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

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

\* **Joseph Younes** (Atty#:55351) Law Offices / <http://ChicagoAccidentAttorney.net>

312-635-5716, per website, Ph: 312-372-1122 ; 312-802-1122 ; Fax: 312-372-1408 E: [RoJoe69@yahoo.com](mailto:RoJoe69@yahoo.com) 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596

\* **Paul L. Shelton, Pro Se,** (Atty. #15323, disbarred per IARDC)

E: [PMSA136@Gmail.com](mailto:PMSA136@Gmail.com) ; [PLShelton@SBCGlobal.net](mailto:PLShelton@SBCGlobal.net) – 3 Grant Square, SUITE #363, Hinsdale, IL 60521-3351

\* **Erika R. Rhone** 22711 Southbrook Dr., Sauk Village, IL 60411-4291



**INDEX TO THE EXHIBITS**

**Instrument**

**Docket/Tab#**

\*\* March 28, 2018 Order from the IL First appellate Court,  
directing Appellant to inquire in the instant motion

Exhibit-A

ELECTRONICALLY FILED  
4/20/2018 6:34 PM  
2007-CH-29738  
PAGE 8 of 10



NO. 1-18-0091

IN THE APPELLATE COURT OF ILLINOIS  
FIRST DISTRICT

GMAC Mortgage, LLC, Plaintiff	)	Appeal from the Circuit Court of Cook County, IL
vs.	)	No. 07 CH 29737
Gordon W. Watts, et. al., Defendants	)	(Transfer into <u>Law</u> Division from Chancery)
	)	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 ~~by~~ 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. [This court notes that Watts' claims on this head were never challenged as false.]~~

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

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

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

Page 1 of 2 [ORDER]

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4/20/2018 6:34 PM  
2007-CH-29738  
PAGE 9 of 10





**Law DIVISION**

## Litigant List

Printed on 04/23/2018

Case Number: 2007-CH-29738

Page 1 of 2

**Plaintiffs**

Plaintiffs Name	Plaintiffs Address	State	Zip	Unit #
GMAC MORTGAGE LLC			0000	
BANK AMERICA NA			0000	
CHICAGO VOLUNTEER LEGAL			0000	
LASALLE			0000	
US BANK NATIONAL ASSOCI			0000	

Total Plaintiffs: 5

**Defendants**

Defendant Name	Defendant Address	State	Unit #	Service By
DANIGGELIS RICHARD			0000	
GORDON WAYNE WATTS			0000	
HLB MORTGAGE			0000	
INVEST ONE			0000	
LAROCQUE JOHN			0000	
LEGATEES			0000	
MOORE ROBERT			0000	

Case Number: 2007-CH-29738

Page 2 of 2

MORTGAGE ELECTRONICS RE	0000
NON RECORD CLAIMANTS	0000
PHONE ERIKA	0000
SHELTON PAUL	0000
STEWART TITLE ILLINOISZ	0000
TRUST ONE MORTGAGE	0000
UNKNOWN HEIRS	0000
UNKNOWN OWNERS	0000
YOUNES JOSEPH	0000

Total Defendants: **16**

SOUTHSIDE BR  
6000 S FLORIDA AVENUE  
LAKELAND, FL 33813-9996

04/21/2018

12:53:35 PM

Sales Receipt

Product Description	Sale Qty	Unit Price	Final Price
---------------------	----------	------------	-------------

CHICAGO, IL 60602-1322 Zone-5			\$7.45
----------------------------------	--	--	--------

Priority Mail 2-Day® with up to \$50.00 insurance and USPS Tracking™ included  
 \* USPS Tracking #:  
 9505 5000 1793 8111 0001 22  
 0 lb. 15.80 oz.

\* Expected Delivery Day Monday, April 23  
**-FLANNERY-**

Issue Postage: *Flannery* \$7.45

Total: \$7.45

Paid by: DebitCard \$7.45

Account #: XXXXXXXXXXXX8222

Approval #:  
 Transaction #: 121

4445023595397-99  
 Receipt #: 185063

SSK Transaction #: 16  
 USPS® #: 114922-9552

\*\*\* Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit USPS.com USPS tracking or call 1-800-222-1811, or use this self-service kiosk (or any self-service kiosk at other Postal locations).

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Thanks.  
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SOUTHSIDE BR  
6000 S FLORIDA AVENUE  
LAKELAND, FL 33813-9996

04/21/2018

01:29:46 PM

Sales Receipt

Product Description	Sale Qty	Unit Price	Final Price
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HINSDALE, IL 80521-3351 Zone-5			\$7.45
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*SHELTON*

DOWNTOWN LAKELAND  
218 N MISSOURI AVE  
LAKELAND  
FL

33815-9996  
1149210835

04/21/2018 (800)275-8777 12:26 PM

Product Description	Sale Qty	Final Price
---------------------	----------	-------------

PM 3-Day (Domestic) IL (Supreme Court) 1		\$45.10
--	--	---------

(SPRINGFIELD, IL 62701)  
 (Weight: 21 LB 7.6 OZ)  
 (Expected Delivery Date)  
 (Tuesday 04/24/2018)

(USPS Tracking #)  
 (9505 5145 5448 8111 1374 63)

Insurance 1 \$0.00  
 (Up to \$50.00 included)

Total \$45.10

Debit Card Remit'd \$45.10

(Card Name: MasterCard)  
 (Account #: XXXXXXXXXXXX8222)  
 (Approval #:  
 (Transaction #: 145)  
 (Receipt #: 009772)  
 (Debit Card Purchase: \$45.10)  
 (Cash Back: \$0.00)  
 (Entry Mode: Chip)  
 (AID: A0000000042203)  
 (Application Preferred Name: Debit)  
 (Application Label: Debit)  
 (PIN: Verified by PIN)  
 (Cryptogram: ECBOE3E444081FBB)  
 (ARC: 00)  
 (CVR: 420300)  
 (IAD: 0110601001220000000000000000)  
 00000FF)  
 (TSI: 6800)  
 (TVR: 8000048000)

*Delivered*  
*Apr 24*  
*2018*

*Expected*  
*April 24*  
*2018*

Includes up to \$50 insurance

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit USPS.com USPS Tracking or call 1-800-222-1811.

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All sales final on stamps and postage  
 Refunds for guaranteed services only  
 Thank you for your business



(TSI:6800)  
(TVR:8000048000)

Includes up to \$50 insurance

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit USPS.com USPS Tracking or call 1-800-222-1811.

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All sales final on stamps and postage Refunds for guaranteed services only Thank you for your business

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Go to: <https://postalexperience.com/Pos>

840-5335-0065-003-00013-85114-02

or scan this code with your mobile device:



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6000 S FLORIDA AVENUE  
LAKELAND, FL 33813-9996

04/21/2018 12:58:32 PM

Sales Receipt			
Product Description	Sale Qty	Unit Price	Final Price

CHICAGO, IL 60602-1321			\$7.45
------------------------	--	--	--------

Zone-5  
Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
%% USPS Tracking #: 9505 5000 1793 8111 0001 39  
0 lb. 15 70 oz.  
\* Expected Delivery Day Monday, April 23.

Issue Postage: \$7.45

CHICAGO, IL 60614-4610			\$7.45
------------------------	--	--	--------

Zone-5  
Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
%% USPS Tracking #: 9505 5000 1793 8111 0001 46  
0 lb. 15 70 oz.  
\* Expected Delivery Day Monday, April 23.

Issue Postage: \$7.45

CHICAGO, IL 60614-5722			\$7.45
------------------------	--	--	--------

Zone-5  
Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
%% USPS Tracking #:

123481

Thanks.

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SOUTHSIDE BR  
6000 S FLORIDA AVENUE  
LAKELAND, FL 33813-9996

04/21/2018 01:29:46 PM

Sales Receipt			
Product Description	Sale Qty	Unit Price	Final Price

HINSDALE, IL 80521-3351			\$7.45
-------------------------	--	--	--------

Zone-5  
Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
%% USPS Tracking #: 9505 5000 1793 8111 0003 06  
0 lb. 15 70 oz.  
\* Expected Delivery Day Monday, April 23.

Issue Postage: \$7.45

SAUK VILLAGE, IL 60411-4291			\$7.45
-----------------------------	--	--	--------

Zone-5  
Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
%% USPS Tracking #: 9505 5000 1793 8111 0003 13  
0 lb. 15 70 oz.  
\* Expected Delivery Day Monday, April 23.

Issue Postage: \$7.45

Total: \$14.90

Paid by: MasterCard \$14.90  
Account #: XXXXXXXXXXXXX8222  
Approval #: 042113  
Transaction #: 039  
4445023595397-99

SSK Transaction #: 28  
USPS® #: 114922-9552

%% Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit USPS.com USPS Tracking or call 1-800-222-1811, or use this self-service kiosk (or any self-service kiosk at other Postal locations).

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SOUTHSIDE BR  
6000 S FLORIDA AVENUE  
LAKELAND, FL 33813-9996

04/21/2018 01:15:26 PM



\* Expected Delivery Day Monday, April 23.

Issue Postage: Rich Demgohr \$7.45

CHICAGO, IL 60614-4610 \$7.45  
Zone-5

Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included

% USPS Tracking #: 9505 5000 1793 8111 0001 46  
0 lb. 15 70 oz.

\* Expected Delivery Day Monday, April 23.

Issue Postage: Dani \$7.45

CHICAGO, IL 60614-5722 \$7.45  
Zone-5

Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included

% USPS Tracking #: 9505 5000 1793 8111 0001 53  
0 lb. 15 70 oz.

\* Expected Delivery Day Monday, April 23.

Issue Postage: GALIC \$7.45

LA GRANGE PARK, IL 60526-1547 \$7.45  
Zone-5

Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included

% USPS Tracking #: 9505 5000 1793 8111 0001 60  
0 lb. 15 70 oz.

\* Expected Delivery Day Monday, April 23.

Issue Postage: Ass'd Bank \$7.45

GREEN BAY, WI 54301-5142 \$7.60  
Zone-6

Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included

% USPS Tracking #: 9505 5000 1793 8111 0001 77  
0 lb. 15 80 oz.

\* Expected Delivery Day Monday, April 23.

Issue Postage: M.E.R.S. \$7.60

DANVILLE, IL 61834-4512 \$7.45  
Zone-5

Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included

% USPS Tracking #: 9505 5000 1793 8111 0001 84  
0 lb. 15 70 oz.

\* Expected Delivery Day Monday, April 23.

Issue Postage: \$7.45

Total: \$44.85

Paid by: Master Card \$44.85

Account #: XXXXXXXXXXXX8222  
Approval #: 042111

SSK Transaction #: 28  
USPS® # 114922-9552

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SOUTHSHORE BR  
6000 S FLORIDA AVENUE  
LAKELAND, FL 33813-9996

04/21/2018 01:15:26 PM

Sales Receipt			
Product Description	Sale Qty	Unit Price	Final Price

CHICAGO, IL 60604-1166 \$7.45  
Zone-5

Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included

% USPS Tracking #: 9505 5000 1793 8111 0002 21  
0 lb. 15 70 oz.

\* Expected Delivery Day Monday, April 23.

Issue Postage: Stewart T.H. \$7.45

CHICAGO, IL 60601 \$7.45  
Zone-5

Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included

% USPS Tracking #: 9505 5000 1793 8111 0002 38  
0 lb. 15 70 oz.

\* Expected Delivery Day Monday, April 23.

Issue Postage: INDYKE \$7.45

PARK RIDGE, IL 60068-4292 \$7.45  
Zone-5

Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included

% USPS Tracking #: 9505 5000 1793 8111 0002 45  
0 lb. 15 70 oz.

\* Expected Delivery Day Monday, April 23.

Issue Postage: KING \$7.45

CHICAGO, IL 60602-4087 \$7.45  
Zone-5

Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included

% USPS Tracking #: 9505 5000 1793 8111 0002 52  
0 lb. 15 70 oz.



0 lb. 15.70 oz.  
\* Expected Delivery Day Monday, April 23.

Issue Postage: ASS'D BANK \$7.45  
GREEN BAY, WI 54301-5142 \$7.60  
Zone-6  
Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
% USPS Tracking #: Ass'd Bank  
9505 5000 1793 8111 0001 77  
0 lb. 15.80 oz.

\* Expected Delivery Day Monday, April 23.  
Issue Postage: M.E.R.S. \$7.60  
DANVILLE, IL 61834-4512 \$7.45  
Zone-5  
Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
% USPS Tracking #: MERS  
9505 5000 1793 8111 0001 84  
0 lb. 15.70 oz.

\* Expected Delivery Day Monday, April 23.  
Issue Postage: \$7.45  
Total: \$44.85

Paid by:  
MasterCard \$44.85  
Account #: XXXXXXXXXXXXX8222  
Approval #: 042111  
Transaction #: 033  
4445023595397-99

SSK Transaction #: 18  
USPS® # 114922-9552

% Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit USPS.com USPS Tracking or call 1-800-222-1811, or use this self-service kiosk (or any self-service kiosk at other Postal locations).

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123481  
Expected Delivery Day Monday, April 23.

Issue Postage: Stewart Title \$7.45  
CHICAGO, IL 60601 \$7.45  
Zone-5  
Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
% USPS Tracking #: Stewart Title  
9505 5000 1793 8111 0002 38  
0 lb. 15.70 oz.

\* Expected Delivery Day Monday, April 23.  
Issue Postage: INDYKE \$7.45  
PARK RIDGE, IL 60068-4292 \$7.45  
Zone-5  
Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
% USPS Tracking #: Indyke  
9505 5000 1793 8111 0002 45  
0 lb. 15.70 oz.

\* Expected Delivery Day Monday, April 23.  
Issue Postage: KING \$7.45  
CHICAGO, IL 60602-4087 \$7.45  
Zone-5  
Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
% USPS Tracking #: King  
9505 5000 1793 8111 0002 52  
0 lb. 15.70 oz.

\* Expected Delivery Day Monday, April 23.  
Issue Postage: YOUNG (Hm F) \$7.45  
CHICAGO, IL 60645-4522 \$7.45  
Zone-5  
Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
% USPS Tracking #: Young (H)  
9505 5000 1793 8111 0002 69  
0 lb. 15.70 oz.

\* Expected Delivery Day Monday, April 23.  
Issue Postage: YOUNG (work) \$7.45  
CHICAGO, IL 60602-3596 \$7.45  
Zone-5  
Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
% USPS Tracking #: Young (W)  
9505 5000 1793 8111 0002 76  
0 lb. 15.70 oz.

\* Expected Delivery Day Monday, April 23.  
Issue Postage: \$7.45  
Total: \$44.70

Paid by:  
MasterCard \$44.70  
Account #: XXXXXXXXXXXXX8222  
Approval #: 042112  
Transaction #: 035  
4445023595397-99



Gordon Watts &lt;gww1210@gmail.com&gt;

## Watts v. Flannery and Shelley (No.: 123481 IL Supreme Court), Motion for Supervisory Orders, and lower court filings

gww1210@aol.com &lt;gww1210@aol.com&gt;

Sat, Apr 21, 2018 at 7:36 PM

To: gww1210@aol.com, Law@cookcountycourt.com, Diane.Shelley@cookcountyiil.gov, James.Flannery@cookcountyiil.gov, Timothy.Evans@cookcountyiil.gov, Tim.Evans@cookcountyiil.gov, PAOBrien@cookcountycourt.com, ccc.LawCalendarW@cookcountyiil.gov, AndjelkoGalic@hotmail.com, AGForeclosureDefense@gmail.com, Anselm45@gmail.com, ThirstForJustice@yahoo.com, Pking@khl-law.com, Pking@kingholloway.com, RIndyke@sbcglobal.net, PMSA136@gmail.com, PLShelton@sbcglobal.net, JoeYounes@sbcglobal.net, RoJoe69@yahoo.com, Hugh@hughdhowardlaw.com, HowardHughD@gmail.com, HughHowardWeb@gmail.com, AmyM@merscorp.com, AmyM@mersinc.org, SandraT@mersinc.org, SandraT@merscorp.com, JanisS@merscorp.com, JanisS@mersinc.org, SharonH@mersinc.org, SharonH@merscorp.com, KarmelaL@mersinc.org, KarmelaL@merscorp.com, Gww1210@gmail.com

Cc: iTeam@abc.com, Jason.R.Knowles@abc.com, WLS.Desk@abc.com, Chuck.Goudie@abc.com, AssignmentDesk@nbcuni.com, isee@nbcchicago.com, tips@nbcchicago.com, tips@cbschicago.com, wbbmnewsradiohost@entercom.com, wbbmnewsradiohost@cbsradio.com, wbbmnewsradiotips@entercom.com, wbbmnewsradiotips@cbsradio.com, DRWhite@cbs.com, jilevine@cbs.com, DLBlom@cbs.com, wbbmtvdesk@cbs.com, HCPAHL@cbs.com, MMEsparza@cbs.com, dvsavini@cbs.com, pzekman@cbs.com, News@foxchicago.com, Amy.Matheson@foxtv.com, Dane.Placko@foxtv.com, Info@moody.edu, Kurt@moody.edu, Dan.Craig@moody.edu, ChicagoBreaking@chicagotribune.com, Asachdev@chicagotribune.com, Asachdev@tribpub.com, JsKass@tribune.com, tis-dnsadmin@tribpub.com, byerak@chicagotribune.com, WLee@chicagotribune.com, JsKass@chicagotribune.com, PKendall@chicagotribune.com, jskass@aol.com, WLee@tribune.com, GPapaJohn@chicagotribune.com, BBrown@chicagotribune.com, ctcNorthWest@chicagotribune.com, ChicagoLand@chicagotribune.com, tips@chicagotribune.com, Geoff.Dankert@cbsradio.com, Geoff.Dankert@entercom.com, Jmann@cbs.com, Julie.Mann@entercom.com, ron.gleason@cbsradio.com, ron.gleason@entercom.com, ssmiller@wbbm-am.com, Stephen.Miller@entercom.com, pbiasco2@gmail.com, Pbiasco@dnainfo.com, Tcox@dnainfo.com, steve@steveance.net, info@chicagocityscape.com, SRN\_News@yahoo.com, LenzVideo@yahoo.com, info@oneillinois.com

**\* Watts v. Flannery and Shelley (No.: 123481 IL Supreme Court), Motion for Supervisory Orders, with IFP motion, and lower court filings: Motion for Summary Judgment (1st. App. Ct., 1-18-0572, GMAC v. Watts, et. al.) and Motion for Clarification concurrent with Rule 321 motion to limit Contents of the Record on Appeal (07CH29738, Law Division)**

### Court and Counsel:

I have just filed a motion for Supervisory Orders in the Illinois Supreme Court, Pursuant to Supreme Court Rule 383, and, after several failed attempts, it has now been accepted for review in case number 123481, and was E-FILED & court-stamped on Friday, 4/20/2018, 10:38 AM, by Carolyn Taft Grosboll, SUPREME COURT CLERK, seeking full review of the GMAC-line of cases, in which I am a defendant. As required by Rules 9-12, I filed electronically with the Supreme Court, and am effecting service as indicated in the Certificates of Service, and including courtesy email copies of those court and counsel for whom I have email addresses. The lead document is a 142-page PDF file, has numerous exhibits (A-M), and is about 20.4 MB in file size, and is therefore too large to include as an attachment. **Pursuant to Rule 11(c), "If service is made by e-mail, the documents may be transmitted via attachment or by providing a link within the body of the e-mail that will allow the party to download the document through a reliable service provider."** You may pick up a copy at mirror 1, hosted by GoDaddy, in Mesa, AZ:

[http://GordonWatts.com/MortgageFraudCourtDocs/Court-Stamped\\_No.123481\\_Fri20Apr2018\\_MotionForSupervisoryOrder\\_with\\_Exhibits\\_GordonWayneWatts.pdf](http://GordonWatts.com/MortgageFraudCourtDocs/Court-Stamped_No.123481_Fri20Apr2018_MotionForSupervisoryOrder_with_Exhibits_GordonWayneWatts.pdf)

You may also pick up a copy at mirror 2, hosted by HostGator, in Austin, TX:

[http://GordonWayneWatts.com/MortgageFraudCourtDocs/Court-Stamped\\_No.123481\\_Fri20Apr2018\\_MotionForSupervisoryOrder\\_with\\_Exhibits\\_GordonWayneWatts.pdf](http://GordonWayneWatts.com/MortgageFraudCourtDocs/Court-Stamped_No.123481_Fri20Apr2018_MotionForSupervisoryOrder_with_Exhibits_GordonWayneWatts.pdf)

The other 3 filings (my Motion in forma pauperis, in the Supreme Court, my motion for summary judgment to the 1st Appellate court, and directions for record on appeal, to the circuit court) are attached as PDF's. Additionally, you may pick up all the latest filings in this case, under the 'Law Division' heading, at my online docket, at these 2 direct links (which are also linked in front-page news of my main, namesake web-ring):

<http://www.GordonWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html>

or here

<http://www.GordonWayneWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html>

**\*\* P.S.: Please note, in the cc line of this email, the current and updated service addresses all parties, as there have been a few additions/deletions, in recent times. \*\***

Besides (#1) the hard copies served via U.S. Postal Mail, and (#2) the electronic copy of my filing, served, hereto (and #3 via court-approved efilings), you can, for your convenience, also (#4) if you lose the link above, you can pick up your copies of the all the key filings, on my Open Source (free) online docket—which appears to be up-to-date—in the above-captioned case (and related cases), linked as front-page news on my namesake blogs, GordonWatts.com or GordonWayneWatts.com – or directly linked above – which, unlike the court's docket, has downloads available: [https://courtlink.lexisnexis.com/cookcounty/FindDock.aspx?NCase=2007-CH-29738&SearchType=0&Database=2&case\\_no=&PLtype=1](https://courtlink.lexisnexis.com/cookcounty/FindDock.aspx?NCase=2007-CH-29738&SearchType=0&Database=2&case_no=&PLtype=1) ;

Let me remind everyone that there's a CASE MANAGEMENT CALL in Court Room 1105, before Hon. Patrice Munzel Ball-Reed, Associate Judge, CIVIL DIVISION, in the related Housing/Code case, at 9:30am CST, on Thursday, 31 May 2018, the sister-case, **where Mr. Younes is also a defendant, City of Chicago v. Younes et. al., case #: 2017-M1-400775**. Here's the Court's docket to verify:

<https://courtlink.lexisnexis.com/cookcounty/FindDock.aspx?DocketKey=CABH0MB0EAAHHF0MD>

For your reference, this code violation case is the one which was featured in at least seven (7) recent DNAinfo stories, and other news sources—two of which are shown here for brevity:

\*\* "'Rotted' Historic Building In Old Town Triangle Could Be Seized By City," by Ted Cox, *DNAinfo*, March 30, 2017:

<https://www.dnainfo.com/chicago/20170330/old-town/rotted-historic-building-old-town-triangle-could-be-seized-by-city>

\*\* "'Rotted' Old Town House Owner Given 45 Days To Come Up With Repair Plan," by Ted Cox, *DNAinfo*, September

01, 2017: <https://www.dnainfo.com/chicago/20170901/old-town/rotted-old-town-house-owner-given-45-days-come-up-with-repair-plan>

—and several related stories *The Register*, for which I'm the editor-in-chief, & more-recently, *ChicagoCityScape*:

\*\* "Landmarks commission still threatening fines if house in historic district isn't worked on once building permit is issued," by Ted Cox, *ChicagoCityscape*, November 09, 2017:

<https://blog.ChicagoCityScape.com/landmarks-commission-still-threatening-fines-if-house-in-historic-district-isnt-worked-on-once-390f052a2ab2>

Both the Housing and Law Division filings are docketed on the Open-source docket above, on my personal blog. Or, you could wait for the hard copies, which are in the mail to you, as required by Court rules. Should you lose these links, above, my open-source docket is still linked through the front-page news item in question, on The Register, my namesake blogs.

Best,

Gordon Wayne Watts

821 Alicia Road, Lakeland, FL 33801-2113

PH: (863) 688-9880 [home] or (863) 409-2109 [cell]

Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>

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

Court filings attached in PDF format.///



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**3 attachments**



**Court-Stamped\_No.123481\_Fri20Apr2018\_Motion-InFormaPauperis\_WATTS.pdf**  
2199K



**Fri20Apr2018\_1-18-0572\_Watts\_MotSummaryJudgment.pdf**  
172K



**Fri20Apr2018\_MotionClarification\_07CH29738\_LawDiv\_Watts.pdf**  
1567K

**Exhibit 'J' -- Gordon Wayne Watts filing**

<b>FL0130900</b>	Gang Related	<b>N</b>	<b>OFFENSE-INCIDENT REPORT</b>	Juvenile in Report	<b>N</b>	Juvenile Warn/Dismiss		1. Original		2. Supplement	<b>1</b>
ADM	Date of Supplement	<b>Miami Springs Police Department</b>			Agency Report Number	Primary Offense Description					
					<b>1800522</b>	<b>ASLT/BAT SIMP</b>					

Event Information																																														
Original Day Reported	<b>MON</b>	Date	<b>04/09/2018</b>	Time (mil)	<b>1751</b>	Time Dispatched (mil)	<b>1751</b>	Time Arrived (mil)	<b>1751</b>	Time Completed (mil)	<b>1830</b>																																			
Incident Type	1. Felony 3. Misdemeanor 5. Ordinance			Incident: Day	<b>FRI</b>	Date	<b>04/06/2018</b>	Time (mil)	<b>1800</b>	To	<b>FRI 04/06/2018 1815</b>																																			
OFFINC #1	Type	<b>BATT/SIMP</b>		A-Attempted		C-Committed	<b>C</b>	Statute Violation Number - Chapter, Section, Sub	<b>784 - 03</b>		NCIC/UCR Code	<b>130B</b>																																		
OFFINC #2				A-Attempted		C-Committed																																								
Incident Location (Street Number, Street, Apt.)																																														
<b>5301 NW 36ST</b>			City			<b>MIAMI SPRINGS</b>		Zip	<b>33166</b>	District	<b>05</b>	Grid	<b>1012</b>	Area		Zone	<b>1012</b>																													
Business Name/Area Identifier								Forced Entry	Occupancy																																					
<b>CLARION INN (RM# 431)</b>								<b>N/A</b>	<b>N/A</b>																																					
Location Type																																														
<table style="width:100%; font-size: small;"> <tr> <td>01. Residence Single</td> <td>05. Convenience Store</td> <td>10. Dept/Discount Store</td> <td>15. Industrial/Mfg.</td> <td>20. Religious Bldg.</td> <td>25. Parking Lot/Garage</td> <td>30. Other Mobile</td> </tr> <tr> <td>02. Apartment/Condo</td> <td>06. Gas Station</td> <td>11. Specialty Store</td> <td>16. Storage</td> <td>21. Airport</td> <td>26. Highway/Roadway</td> <td>31. Other</td> </tr> <tr> <td>03. Residence-Other</td> <td>07. Liquor Sales</td> <td>12. Drug Store/Hospital</td> <td>17. Gov't/Public Bldg.</td> <td>22. Bus/Rail Terminal</td> <td>27. Park/Woodlands/Field</td> <td></td> </tr> <tr> <td>04. Hotel/Motel</td> <td>08. Bar/Nightclub</td> <td>13. Bank/Financial Inst.</td> <td>18. School/University</td> <td>23. Construction Site</td> <td>28. Lake/Waterway</td> <td></td> </tr> <tr> <td></td> <td>09. Supermarket</td> <td>14. Commercial/Office Bldg.</td> <td>19. Jail/Prison</td> <td>24. Other Structure</td> <td>29. Motor Vehicle</td> <td></td> </tr> </table>												01. Residence Single	05. Convenience Store	10. Dept/Discount Store	15. Industrial/Mfg.	20. Religious Bldg.	25. Parking Lot/Garage	30. Other Mobile	02. Apartment/Condo	06. Gas Station	11. Specialty Store	16. Storage	21. Airport	26. Highway/Roadway	31. Other	03. Residence-Other	07. Liquor Sales	12. Drug Store/Hospital	17. Gov't/Public Bldg.	22. Bus/Rail Terminal	27. Park/Woodlands/Field		04. Hotel/Motel	08. Bar/Nightclub	13. Bank/Financial Inst.	18. School/University	23. Construction Site	28. Lake/Waterway			09. Supermarket	14. Commercial/Office Bldg.	19. Jail/Prison	24. Other Structure	29. Motor Vehicle	
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<b>Hotel/Motel</b>																																														
# OFFINC.	<b>01</b>	# Victims	<b>01</b>	# Offenders	<b>01</b>	# Prem. Ent.	<b>00</b>	# Veh. Stolen	<b>00</b>	Type of Weapon	<b>Hands/Fist/Feet</b>																																			
<table style="width:100%; font-size: x-small;"> <tr> <td>00. N/A</td> <td>02. Rifle</td> <td>05. Knife/Cutting Instrument</td> <td>07. Hands/Fist/Feet</td> <td>10. Fire/Incendary</td> <td>13. Drugs</td> </tr> <tr> <td>01. Handgun</td> <td>03. Shotgun</td> <td>06. Blunt Object</td> <td>08. Poison</td> <td>11. Threat/Intimidation</td> <td>88. Unknown</td> </tr> <tr> <td></td> <td>04. Firearm</td> <td></td> <td>09. Explosives</td> <td>12. Simulated Weapon</td> <td>99. Other</td> </tr> </table>												00. N/A	02. Rifle	05. Knife/Cutting Instrument	07. Hands/Fist/Feet	10. Fire/Incendary	13. Drugs	01. Handgun	03. Shotgun	06. Blunt Object	08. Poison	11. Threat/Intimidation	88. Unknown		04. Firearm		09. Explosives	12. Simulated Weapon	99. Other																	
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Persons Information													
CODES	VW Code	Person Type		Race	Sex	Residence Type	Residence Status	Extent of Injury					
	V - Victim W - Witness	C - Complainant O - Other	1. Juvenile 2. L.E. Officer 3. Adult	4. Business 5. Government 8. Church 9. Other	N-N/A W-White B-Black O-Oriental/Asian U-Unknown	N-N/A M-Male F-Female U-Unknown	0. N/A 1. City 2. County	3. Florida 4. Out-of-State	0. N/A 1. Full Year 2. Part Year 3. Non-Resident	0. None 1. Minor 2. Serious 3. Fatal			
VICTIM / WITNESS	Injury Type	Victim Relationship To Offender		Name (Last, First, Middle or Business)		City		State	Zip	Residence Phone			
	00. N/A 01. Gunshot 02. Stabbed	03. Laceration 04. Unconscious 05. Poss. Broken Bones 06. Poss. Internal Injury	07. Loss of Teeth 08. Burns 09. Abrasions/Bruses 99. Other	00. N/A 01. Undetermined 02. Stranger	03. Spouse 04. Ex-Spouse 05. Co-Habitant	06. Parent 07. Brother/Sister 08. Child 09. Step-Parent	10. Step-Child 11. In-Law 12. Other Family 13. Student	14. Teacher 15. Child of Boy/Girl Friend 16. Boy/Girl Friend	17. Friend 18. Neighbor 19. Sister/Day Care 20. Employee	21. Employer 22. Landlord/Tenant 23. Acquaintance 99. Other Known			
	OFFINC Indicator	VW Code #	Person Type	Name (Last, First, Middle or Business)				City		State	Zip	Residence Phone	
	1 - #1 2 - #2 3 - Both	<b>V 01</b>	<b>3</b>	<b>WATTS GORDON WAYNE</b>				<b>LAKELAND</b>		<b>FL</b>	<b>33801</b>	<b>863 608-9880</b>	
	Address (Street, Apt. Number)						City		State	Zip	Business Phone		
	<b>821 ALICIA RD</b>						<b>LAKELAND</b>		<b>FL</b>	<b>33801</b>			
	Other Contact Info. (Time Available, Interpreter, etc.)						Synopsis of Involvement						
	<b>CELL# (863) 404-2109/ EMAIL: GWW1210@GMAIL.COM</b>						<b>V-1/ VICTIM OF BATTERY</b>						
	If VW Code is V, W or C Fill in this Line	Dom. Violence	Race	Sex	Date of Birth	Age	Res. Type	Res. Status	Extent of Injury	Injury Type(s)	Relationship	Ethnicity	Will Victim prefer charge?
		<b>N</b>	<b>W</b>	<b>M</b>	<b>04/19/1966</b>	<b>51</b>	<b>3</b>	<b>1</b>	<b>1</b>	<b>03 00</b>	<b>20</b>		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

ADMINISTRATIVE	Signature of Officer Reporting	Name of Officer Reporting	I.D. Number/Locator Code	Unit#	Date							
		<b>ROBBINS, J</b>	<b>0163</b>	<b>216</b>	<b>04/09/2018</b>							
	Signature of Officer Reviewing	Officer Reviewing (If Applicable)	I.D. Number	Date								
		<b>LOPEZ, T</b>	<b>0170</b>	<b>04/09/2018</b>								
	Case Status	CF - Filed with State Atty CE - Cleared Exceptionally	I - Inactive A - Active P - Pending	Clearance Type	A-Adult J-Juvenile	Date Cleared	Arrest Number					
			<b>P</b>	1. Arrest 2. Exceptional								
	Exemption Type	1. Extradition Declined				2. Arrest on Primary Offense Secondary Offense Without Prosecution	3. Death of Offender	4. V / W Refused to Cooperate	5. Prosecution Declined	6. Juvenile/No Custody	Related Report Number(s)	Number Arrested

FL0130900		Gang Related	N	<b>OFFENSE-INCIDENT REPORT</b>				Juvenile in Report	N	Juvenile Warn/Dismiss	1. Original	2. Supplement	1				
ADM	Date of Supplement			<b>Miami Springs Police Department</b>				Agency Report Number		Primary Offense Description							
								1800522		ASLT/BAT SIMP							
CODES	Suspect Race		Suspect Sex		Hair Length		Hair Style		Complexion		Build		Facial Hair				
	N-NIA W-White B-Black		N-NIA F-Female M-Male U-Unknown		L-Long M-Medium S-Short		A-Afro B-Braided C-Curly		ACN-Acne DK-Dark MED-Medium		HEV-Heavy MED-Medium THN-Thin		B-Beard/Goatee C-Beard & Mustache E-Ear Ring(s)				
SUSPECT OR MISSING PERSONS	OFFINC Indicator		Suspect Code		Code		Susp. #		Juvenile		Name (Last, First, Middle)						
	1 - #1 2 - #2 3 - Both		S-Suspect A-Arrestee		S		01		N		[REDACTED]						
	Maiden Name				Nickname/Street Name				Place of Birth		Residence Phone						
											863 [REDACTED]						
	Last Known Address (Street, Apt. Number)						City		State		Zip		Business Phone				
	[REDACTED] LANE						LAKELAND		FL		33813						
	Occupation				Employer/School				Address				Social Security Number				
	CONSTRUCTION																
	Driver's License State/Number				Immigration and Naturalization Number				Other ID. Number		OBTS Number		SCIC/NCIC				
	[REDACTED] FL																
Clothing (Describe)						Scars/Marks/Tatoos (Location/Describe)											
Race		Sex		Date of Birth or Age		Height		Weight		Eye Color		Hair Color		Hair Length		Hair Style	
W		M		[REDACTED]		509		170		BRO		BRO		S		W	
Complexion		Build		Facial Hair		Teeth		Speech/Voice		Social Identifiers							
LT		THN															

**Narrative**

Watts contacted MSPD and advised he was battered by his employer [REDACTED] on the listed date and between the listed times at the listed hotel. Watts stated he and [REDACTED] were staying at the Clarion Inn (rm# 431). Watts stated [REDACTED] then confronted him about talking about a subject that [REDACTED] did not want Watts talking about with other employees. [REDACTED] then became irate and pushed Watts onto the bed and then started slapping him numerous times in his face, causing a minor cut to Watt's right eyebrow. Watts stated he did not fight back or call the police because he was worried about not having transportation back to Lakeland the next day.

The following day Watts and [REDACTED] were traveling back to Lakeland in [REDACTED]'s vehicle, at which time [REDACTED] back handed Watts in the face because Watt's was talking to much. It is unknown if the battery inside the Watt's vehicle occurred in Miami Springs jurisdiction. Watts stated he took photos of his injuries and e-mail them to the Miami Springs CPO. This report was taken over the telephone since victim is back in Lakeland.

ADMINISTRATIVE	Signature of Officer Reporting		Name of Officer Reporting		I.D. Number/Locator Code		Unit#		Date				
			ROBBINS, J		0163		216		04/09/2018				
	Signature of Officer Reviewing		Officer Reviewing (If Applicable)		I.D. Number				Date				
			LOPEZ, T		0170				04/09/2018				
Case Status		CF - Filed with State Atty		I - Inactive		Clearance Type		A-Adult		Date Cleared		Arrest Number	
CA - Cleared by Arrest CE - Cleared Exceptionally		CU - Cleared Unfounded		A - Active P - Pending		1 Arrest 2 Exceptional		J-Juvenile					
Exception Type		2. Arrest on Primary Offense Secondary Offense Without Prosecution		3. Death of Offender		5. Prosecution Declined				Related Report Number(s)		Number Arrested	
1. Extradition Declined				4. V / W Refused to Cooperate		6. Juvenile/No Custody							

**In the Appellate Court of Illinois, First District****Docket Number: 1-18-0572**

**GMAC Mortgage, LLC, Plaintiffs,** ) Appeal from the Circuit Court of Cook County, IL  
**vs.** ) County Department, Law Division  
) **Trial Court No.: 07CR29738**  
**Gordon Wayne Watts, et. al., Defendants.** ) (Transfer into **Law Division** from Chancery)  
) **Trial Judge:** Hon. James P. Flannery, Jr. (#1505)  
**Gordon Wayne Watts,** ) **Notice of Appeal date:** Friday, 16 March 2018  
**Appellant/Counter-Plaintiff,** ) **Judgment Date:** Thursday, 01 March 2018  
**vs.** ) **Date of Post-judgment Motion:** None  
) **Order:** #6  
**Hon. Diane M. Shelley and Hon. James** ) Supreme Court Rule(s) which confer(s) jurisdiction  
**P. Flannery, Jr., Counter-Defendants.** ) upon the reviewing court: **Ill.Sup.Ct. R.301, 303**

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**Motion for Summary Judgment**

**Appellant, Gordon Wayne Watts, gives judicial notice to Reviewing Court** that the appeal in this case was on 16 March 2018, and Rule 326 mandates that the Record on Appeal “shall be filed in the reviewing court within 63 days after the filing of the notice of appeal,” making Friday, 18 May 2018 the due date for the Record on Appeal. However, as the matter being appealed (1-18-0572, the instant appeal) is the circuit court's refusal to prepare the Record on Appeal in the sister case, 1-18-0091, due to 'alleged' lack of rights to Intervene, and subsequent lack of rights to Fee Waiver, the preparation of **any** preparation of the record in these case is moot: The trial court refuses to comply with the law, forcing this appeal. However, as the 7-7-2017 Motion to Intervene (Exhibit A, which was filed with the docketing statement and fee waiver in this case) gives sufficient, even overwhelming, rights to Intervene, no further record is needed, and the matter is ripe for Summary Judgment is favour of movant.

A motion for summary judgment should be granted only when the pleadings, depositions, admissions, and affidavits on file, if any, show that there is no genuine issue of material fact and that the moving party is entitled to judgment as a matter of law. **735 ILCS 5/2-1005 (West 1994)** Summary judgment is a drastic measure and should be used only when the right of the moving party is clear and free from doubt. *Loyola Academy v. S & S. Roof Maintenance, Inc.*, 146 Ill.2d 263, 271, 166 Ill.Dec. 882,586 N.E.2d 1211 (1992). This court reviews summary judgment orders *de novo*. *Zoeller v. Augustine*, 271 Ill.App.3d 370, 374,208 Ill.Dec. 17, 648 N.E.2d 939 (1995); *Demos v. National Bank of Greece*, 209 Ill.App.3d 655, 659,153 Ill.Dec. 856, 567 N.E.2d 1083 (1991).

Appellant, Gordon Wayne Watts, elects to allow his docketing statement & exhibits to stand as his initial brief of the appellant, as no new material facts are needed to decide this appeal—and now moves for Summary Judgment vacating the order being appealed.

*Respectfully submitted,**/s/Gordon Wayne Watts***Page 1**

GMAC v. Watts, et al., 1-18-0572 (ILLINOIS First Appellate Court)

**Verification by Certification**

I, Gordon Wayne Watts, the undersigned Movant, under penalties as provided by law pursuant to 735 ILCS 5/1-109, Section 1-109 of the ILLINOIS Code of Civil Procedure, hereby certify that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and, as to such matters, the undersigned certifies as aforesaid that he verily believes the same to be true: “Any pleading, affidavit or other document certified in accordance with this Section may be used in the same manner and with the same force and effect as though subscribed and sworn to under oath.” Source: 735 ILCS 5/1-109: <http://www.ILGA.gov/legislation/ilcs/documents/073500050K1-109.htm>

**Nonetheless, This Court has on record several of my sworn, witnessed, and notarised affidavits, just to remove any and all doubt hereto.**

Date: **Friday, 20 April 2018**

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

NO. 1-18-0572

**IN THE APPELLATE COURT OF ILLINOIS  
FIRST DISTRICT**

GMAC Mortgage, LLC,	)	Appeal from the Circuit Court of Cook County, IL
Plaintiff	)	
vs.	)	No. <b>07CR29738</b>
	)	<b>(Transfer into <u>Law</u> Division from Chancery)</b>
Gordon W. Watts, et. al.,	)	
Defendants	)	Hon. James P. Flannery, Jr., Judge Presiding

**ORDER**

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

**IT IS HEREBY ORDERED that** the Circuit Court of Cook County shall vacate its order in *GMAC Mortgage, LLC v. Watts*, case No. 2007-CH-29738 (03/01/2018), denying Gordon Wayne Watts leave to intervene. The circuit court is instructed to grant Mr. Watts a Fee Waiver, and prepare the selected Record on Appeal items listed in Watts' draft order in his 03/16/2018 Motion for Extension of Time to file Record on Appeal in case no. 1-18-0091 and transmit the record to this court by electronic means.

**The trial court shall speedily prepare the selected record, so notify this court, and transmit it to this court by electronic means, on accelerated docket.**

**IT IS SO ORDERED.**

\_\_\_\_\_  
Justice

\_\_\_\_\_  
Justice

\_\_\_\_\_  
Justice

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

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

**Docket Number: 1-18-0572**

<b>GMAC Mortgage, LLC, Plaintiffs,</b> vs.	)	Appeal from the Circuit Court of Cook County, IL County Department, Law Division <b>Trial Court No.: 07CR29738</b>
<b>Gordon Wayne Watts, et. al., Defendants.</b>	)	(Transfer into <b>Law Division</b> from Chancery)
<b>Gordon Wayne Watts,</b> <b>Appellant/Counter-Plaintiff,</b> vs.	)	<b>Trial Judge:</b> Hon. James P. Flannery, Jr. (#1505) <b>Notice of Appeal date:</b> Friday, 16 March 2018 <b>Judgment Date:</b> Thursday, 01 March 2018 <b>Date of Post-judgment Motion:</b> None <b>Order:</b> #6
<b>Hon. Diane M. Shelley and Hon. James P. Flannery, Jr., Counter-Defendants.</b>	)	Supreme Court Rule(s) which confer(s) jurisdiction upon the reviewing court: <b>Ill.Sup.Ct. R.301, 303</b>

---

**NOTICE OF FILING**

To: See attached Service List

**PLEASE TAKE NOTICE** that today, **Friday, 20 April 2018**, I am causing to be filed with the ILLINOIS 1<sup>st</sup> Appellate Court my **Motion for Summary Judgment**, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,

\_\_\_\_\_  
 (Actual Signature, if served upon clerk)  
**Gordon Wayne Watts**

/s/ Gordon Wayne Watts  
 (Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
 821 Alicia Road, Lakeland, FL 33801-2113  
 PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
 Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
 Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)



*GMAC v. Watts, et al.*, 1-18-0572 (ILLINOIS First Appellate Court)

**SERVICE LIST**

\* **CIVIL APPEALS DIVISION: Cook County, IL Circuit Court**, 312-603-5406, Richard J. Daley Center, 50 West Washington St., Room 801, Chicago, IL 60602 – Attention: Deputy Chief, Patricia O'Brien, [PAOBrien@CookCountyCourt.com](mailto:PAOBrien@CookCountyCourt.com) Hours: 8:30a-4:30p, Mon-Fri, Excl. Holidays, **[served by email only, as a courtesy, since they are not a party proper]**

\* **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 only, as a courtesy, since he is not a party proper]**

\* **Hon. James P. Flannery, Jr.**, Circuit Judge–Presiding Judge, Law Division 50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343, Courtesy copy via: [James.Flannery@CookCountyIL.gov](mailto:James.Flannery@CookCountyIL.gov) **[served in all ways, as Judge Flannery is a defendant]**

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

\* **Richard B. Daniggelis** [true owner of 1720] 312-774-4742, c/o John Daniggelis, 2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652

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

\* **Robert J. More** ( [Anselm45@Gmail.com](mailto:Anselm45@Gmail.com) ) [Note: **More's** name is **misspelled** on docket as: “**MOORE ROBERT**”] P.O. Box 6926, Chicago, IL, 60680-6926, PH: (708) 317-8812 [[Mr. More has made a formal request by email to receive service solely by email, and waives hard-copy service.]]

\* **Associated Bank, N.A.**, 200 North Adam Street, Green Bay, WI 54301-5142

\* **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

GMAC v. Watts, et al., 1-18-0572 (ILLINOIS First Appellate Court)

**SERVICE LIST (continued)**

Holdings, Inc. – PH: (703) 761-1270, FAX: (703) 748-0183, [SharonH@MersInc.org](mailto:SharonH@MersInc.org) ; [SharonH@MersCorp.com](mailto:SharonH@MersCorp.com) Cc: Janis Smith, 703-738-0230, VP, Corp. Comm. is no longer with MersCorp, and Amy Moses ([AmyM@MersCorp.com](mailto:AmyM@MersCorp.com) ; [AmyM@MersInc.org](mailto:AmyM@MersInc.org)) has replaced her as an email contact; Sandra Troutman 703-761-1274, E: [SandraT@MersInc.org](mailto:SandraT@MersInc.org) ; [SandraT@MersCorp.com](mailto:SandraT@MersCorp.com)) Dir, Corporate Communications, Karmela Lejarde, Communications Manager, Tel~ 703-761-1274, Mobile: 703-772-7156, Email: [KarmelaL@MersInc.org](mailto:KarmelaL@MersInc.org) ; [KarmelaL@MersCorp.com](mailto:KarmelaL@MersCorp.com) C/o: **MERS (Mortgage Electronic Registration Systems, Inc.), 1901 East Vorhees Street, Suite 'C', Danville, IL 61834-4512**

\* **COHON RAIZES®AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)**

Attn: Carrie A. Dolan, pPh:(312) 726-2252  
208 S LASALLE, Suite #1860, CHICAGO IL, 60604

\* **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]

\* **Richard Indyke, Esq.** Atty. No. 20584, ([RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net) ; 312-332-2828 ; 773-593-1915 most recent “Attorney of record” for LaSalle Bank Natl. Assn.), 111 South Washington Ave., Suite 105, Park Ridge, IL 60068-4292 [[Mr. Indyke claims to not represent any party in the instant appeal, but the undersigned can not find any more recent atty of record for defendant, LaSalle Bank, and reluctantly will keep Mr. Indyke on the service list, unless excused by The Court.]]

\* **Peter King (Atty. for Joseph Younes)** (Atty. No.: 48761)

(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221  
<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com) or: [PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

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

\* **Joseph Younes** (Atty#:55351) Law Offices / <http://ChicagoAccidentAttorney.net>

312-635-5716, per website, Ph: 312-372-1122 ; 312-802-1122 ; Fax: 312-372-1408 E: [RoJoe69@yahoo.com](mailto:RoJoe69@yahoo.com) 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596

\* **Paul L. Shelton, Pro Se,** (Atty. #15323, disbarred per IARDC)

E: [PMSA136@Gmail.com](mailto:PMSA136@Gmail.com) ; [PLShelton@SBCGlobal.net](mailto:PLShelton@SBCGlobal.net) – 3 Grant Square, SUITE #363, Hinsdale, IL 60521-3351

\* **Erika R. Rhone** 22711 Southbrook Dr., Sauk Village, IL 60411-4291



NO. 1-18-0572

IN THE APPELLATE COURT OF ILLINOIS  
FIRST DISTRICT

GMAC Mortgage, LLC, Plaintiff	) Appeal from the Circuit Court of Cook County, IL
vs.	)
	) No. 07CR29738
	) (Transfer into Law Division from Chancery)
Gordon W. Watts, et. al., Defendants	)
	) Hon. James P. Flannery, Jr., Judge Presiding

**ORDER**

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

**IT IS HEREBY ORDERED** that the ~~Circuit Court of Cook County shall vacate its order in GMAC Mortgage, LLC v. Watts, case No. 2007-CH-29738 (03/01/2018), denying Gordon Wayne Watts leave to intervene. The circuit court is instructed to grant Mr. Watts a Fee Waiver, and prepare the selected Record on Appeal items listed in Watts' draft order in his 03/16/2018 Motion for Extension of Time to file Record on Appeal in case no. 1-18-0091 and transmit the record to this court by electronic means.~~ *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)*

~~The trial court shall speedily prepare the selected record, so notify this court, and transmit it to this court by electronic means, on accelerated docket.~~

*Motion Denied.*

IT IS SO ORDERED.

**ORDER ENTERED**

MAY 03 2018

**APPELLATE COURT, FIRST DISTRICT**

*James P. Flannery, Jr.*  
Justice

\_\_\_\_\_  
Justice

\_\_\_\_\_  
Justice

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



THOMAS D. PALELLA  
CLERK OF THE APPELLATE COURT 1ST DISTRICT  
160 NORTH LASALLE STREET, RM 51400  
CHICAGO, ILLINOIS 60601

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1-18-0572

GORDON WAYNE WATTS  
821 ALICIA ROAD  
LAKELAND FL 33801

*Rec'd  
Sat. 07 May 2018*

33801-211321



**From:** Tumialán, Rosa M. <RTumialan@dykema.com>

**To:** gww1210 <gww1210@aol.com>

**Subject:** Re: GMAC v Watts - Atty's Indyke, Tumialán, and Williams: Questions about who is to be served filings...

**Date:** Wed, May 2, 2018 9:21 pm

I received a similar long winded voicemail. Tread carefully. And perhaps only in writing.

On May 2, 2018, at 7:49 PM, "[gww1210@aol.com](mailto:gww1210@aol.com)" <[gww1210@aol.com](mailto:gww1210@aol.com)> wrote:

**\*\*\* SUBJECT: "GMAC v Watts - Atty's Indyke, Tumialán, and Williams: Questions about who is to be served filings..."**

**\*\*\* To: Rosa M. Tumialán, Esq.** ([RTumialan@Dykema.com](mailto:RTumialan@Dykema.com)) c/o DYKEMA GOSSETT, PLLC

10 South Wacker Drive, Suite 2300, Chicago, IL 60606-7407 ; Phone: 312-876-1700 ; Direct: 312-627-2139

**\*\*\* To: Dawn N. Williams, Esq.** ([DWilliams@Dykema.com](mailto:DWilliams@Dykema.com)) c/o DYKEMA GOSSETT, PLLC

300 Ottawa Ave., N.W., Suite 700, Grand Rapids, MI 49503-2306 ; Phone: 616-776-7518

**\*\*\* Cc: Richard Indyke, Esq. Atty. No. 20584.** ([RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net)) -- most recent "Attorney of record" for LaSalle Bank Natl. Assn. --until now) -- 111 South Washington Ave., Suite 105, Park Ridge, IL 60068-4292 ; Phone: 312-332-2828 ; 773-593-1915

### Attorneys Tumialán and Williams:

I am in receipt of your e-filing, earlier today, in [GMAC v. Watts, 1-18-0091](#), in the Illinois 1st Appellate Court (and which I've attached as a PDF to my email, here). There are a few confusing issues that need addressing.

[[#1]] -- First off, I got an email from Atty, Richard Indyke (who is a cc recipient here), and he claims that he is not representing any party in my appeal, but he was the last attorney of record for LaSalle Bank. So, I kept him in my "Service List" to comply with IL Supreme Court Rule 11(a), regarding service of parties. However, now that I see you enter an appearance for GMAC, and call it "aka LaSALLE BANK NATIONAL ASSOCIATION" in the case style of your appearance brief (which is attached as a PDF file to my email here), I would like clarification on Mr. Indyke's concern: Is he correct in asserting that a new attorney or firm took over representation of the plaintiff?

I ask this because he strongly implied in his last email that he didn't want me to bother with serving him Service Copies of my pleadings, as I thought I was required to do. (I inferred this from his request to not respond to his email.) If either, or, both of you can certify that you all (and not Mr. Indyke) now represent the plaintiff, then I will (in any future Certificates of Service and/or Service Lists) note that Mr. Indyke no longer is on my Service list due to not representing any party any longer. (I am advocating on Mr. Indyke's behalf, as a professional courtesy, and because my religion -- whatever it is -- compels me to seek the easiest, and most peaceful, solution for all.)

[[#2--a]] Secondly, you made 2 typos in your brief: First off, my zip code isn't 3380, but rather 33801, as zip codes are either 5-digit, or, in my case, a 9-digit upgrade is applicable, which is 33801-2113, if you like.

[[#2--b]] Your other typo is a bit tricky.. while Judge Flannery is indeed the presiding judge of the Law Division, he is NOT the presiding judge of the underlying case from which I appeal in 1-18-0091 (as you indicate in your appearance brief), but rather, as the docket shows, Judge Diane M. Shelley, Circuit Judge (Law Division, Cook County, IL Circuit Court) is the presiding judge, at present. Now, in 1-18-0572, a sister case, where I appealed Judge Flannery's denial of a fee waiver, he might be considered a 'presiding' judge, and, in fact, both appeals derive from the same Law Division case (which was transferred from Chancery, and bears the same style and case number), so I can see why you might have gotten confused. (No worries, as this is -- legally-speaking, "*de minimus*," LOL).

[[#3]] -- Lastly, however, speaking of Rule 11(a)... No disrespect meant to any of you ... but I plainly notice that you all are egregiously violating this rule, as you claim, in your Certificate of Service, to have served ONLY myself. I'm not trying to insult or offend any of you, but I respectfully ask: Am I missing something, here? Is there some rule, statute, or case law, which allows you to serve only 1 or 2 of the parties... and not "all" of the parties as the rules clearly require?

**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.

Also, in case you didn't notice, your client, LaSalle aka GMAC, is a party to all five (5) cases in which I am litigating for justice: (1) the circuit court case, GMAC v Daniggelis, Watts, Younes, Shelton, et al. 2007-CH-29738, (2) THREE cases in the 1st Appellate Court, 1-18-0091 (appealing Judge Shelley's last order), 1-18-0572 (appealing the subsequent order by Judge Flannery in that case), and 1-18-0538 (an Art. 6, Sec. 6, Original Jurisdiction MANDAMUS action in this reviewing court, and, yes, they do have jurisdiction under Art. VI, Sec. 6), and lastly, a Rule 383 Motion for Supervisory Orders in case number: 123481, in the Illinois Supreme Court.

As I am the guy who nearly won the infamous 'Terri Schiavo' case -- all by myself -- in \*my\* state's supreme court (losing 4-3, and doing than former Gov. Jeb Buch, who lost 7-0 before the same panel), I think I have a chance of getting a fair shake in \*this\* state's supreme court.

In case you didn't get the note, regarding these filings, and don't want to pay huge Public Records fees to the courts, you may download a True Copy of most or all filings in these - and related - cases, on my own on-line docket, for free. Mirror 1, here, is hosted by GoDaddy, based in Mesa AZ:

<http://GordonWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html>

Mirror 2, here, is hosted by HostGator, based in Austin, TX:

<http://GordonWayneWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html>

Should you lose the links, my docket is linked in front-page news, of my namesake blogs, [GordonWatts.com](http://GordonWatts.com) and [GordonWayneWatts.com](http://GordonWayneWatts.com), as indicated in my Certificates of Service. If I may be of any further service to you, please don't hesitate to contact me.

By the way, in case you're curious, I will spill: I don't have any beef, gripes, complaints, or grievances with or against your client, GMAC, as I think they were just as much an innocent victim, here. Thank you for exercising your 1st Amendment Rights of Redress in these matters: This is what makes Democracy work in our Republic.

Please clarify me on these matters, above. Thank you, in advance, for your help here. With kind regard, I am,

Sincerely,

Gordon Wayne Watts  
 821 Alicia Road, Lakeland, FL 33801-2113  
 PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
 Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
 Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)  
 Court filings attached in PDF format.///

---/

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**Gordon Wayne Watts, editor-in-chief, [The Register](#)**

[www.GordonWayneWatts.com](http://www.GordonWayneWatts.com) / [www.GordonWatts.com](http://www.GordonWatts.com)

## **ALWAYS FAITHFUL - To God**

**BS, The Florida State University, Biological & Chemical Sciences**

**AS, United Electronics Institute**

**821 Alicia Road, Lakeland, FL 33801-2113**

**Home: (863) 688-9880 Work: (863) 686-3411 Voice&FAX: (863) 687-6141 Cell: (863)409-2109**

**See also: [http://Gordon\\_Watts.Tripod.com/consumer.html](http://Gordon_Watts.Tripod.com/consumer.html)**

**[Gww1210@aol.com](mailto:Gww1210@aol.com) ; [Gww12102002@Yahoo.com](mailto:Gww12102002@Yahoo.com)**

**Truth is the strongest, most stable force in the Universe**

**Truth doesn't change because you disbelieve it**

**TRUTH doesn't bend to the will of tyrants**

[www.GordonWayneWatts.com](http://www.GordonWayneWatts.com) / [www.GordonWatts.com](http://www.GordonWatts.com)

**Get Truth.**

**"First, they [Nazis] came for the Jews. I was silent. I was not a Jew. Then they came for the Communists. I was silent. I was not a Communist. Then they came for the trade unionists. I was silent. I was not a trade unionist. Then they came for me. There was no one left to speak for me." (Martin Niemöller, given credit for a quotation in The Harper Religious and Inspirational Quotation Companion, ed. Margaret Pepper (New York: Harper & Row, 1989), 429 -as cited on page 44, note 17, of Religious Cleansing in the American Republic, by Keith A. Fornier, Copyright 1993, by Liberty, Life, and Family Publications.**

**Some versions have Mr. Niemöller saying: "Then they came for the Catholics, and I didn't speak up, because I was a Protestant"; other versions have him saying that they came for Socialists, Industrialists, schools, the press, and/or the Church; however, it's certain he DID say SOMETHING like this. Actually, they may not have come for the Jews first, as it's more likely they came for the prisoners, mentally handicapped, & other so-called "inferiors" first -as historians tell us -so they could get "practiced up"; however, they did come for them -due to the silence of their neighbors -and due in part to their own silence. So: "Speak up now or forever hold your peace!"-GWW**

<Wed02AMay2018\_1-18-0091\_GMAC\_NoticeOfAppearance.pdf>

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**Rosa M. Tumialán**  
Member

[RTumialan@dykema.com](mailto:RTumialan@dykema.com)

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312-876-1700 Main  
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Chicago, Illinois 60606  
[www.dykema.com](http://www.dykema.com)



Gordon Watts &lt;gww1210@gmail.com&gt;

---

**GMAC v Watts - Atty's Indyke, Tumialán, and Williams: Questions about who is to be served filings...**

---

**gww1210@aol.com** <gww1210@aol.com>  
To: RTumialan@dykema.com  
Cc: gww1210@gmail.com, gww1210@aol.com

Wed, May 2, 2018 at 11:09 PM

You are correct: I left you a similar, somewhat lengthy, voicemail. Thank for your suggestions, atty Tumialan. I hope to do as you suggest. As soon as you are able to look into my questions, you would have my gratitude for clarifying these gray areas.

I know normally email suffices, but the last matter looked important, and I thought maybe it wouldn't inconvenience you when you might know the answer easily, so I called before it got too late in the central time zone, where you are. But as important as the service matter may be (and I admit frustration with the system, tho not with your client), take your time if you need more time to get clear answers yourself. Thank you in advance in this regard.

Ps: what are gmac's interests in this matter, as they apparently suffered less losses than myself and Mr. Daniggelus, if I may ask?

Gordon W. Watts

Sent from AOL Mobile Mail

---

On Wednesday, May 2, 2018 Tumialán, Rosa M. <RTumialan@dykema.com> wrote:

I received a similar long winded voicemail. Tread carefully. And perhaps only in writing.

[Quoted text hidden]

<Wed02AMay2018\_1-18-0091\_GMAC\_NoticeOfAppearance.pdf>

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No. 1-18-0091

IN THE APPELLATE COURT OF ILLINOIS  
FIRST JUDICIAL DISTRICT

GMAC MORTGAGE LLC k/n/a BANK OF AMERICA,  
N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka  
U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust  
2006-16AX,

Plaintiff/Appellee,

vs.

GORDON WAYNE WATTS,

Defendant/Appellant

and

RICHARD B. DANIGGELIS, JOSEPH YOUNES,  
MORTGAGE ELECTRONIC REGISTRATION SYSTEMS  
(MERS), PAUL L. SHELTON, ERIKA R. RHONE,  
STEWART TITLE ILLINOIS, JOHN P. LaROCQUE,  
ROBERT J. MORE, LEGATEES AND NON-RECORD  
CLAIMANTS, UNKNOWN HEIRS, UNKNOWN  
OWNERS,

Defendants.

Appeal from the Circuit Court  
of Cook County, Illinois

Case No. 2007 CH 29738

Honorable James P. Flannery, Judge  
Presiding

**APPEARANCE**

We hereby enter the Appearance of Dykema Gossett PLLC as attorneys for Appellee, **GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX**, in the above-entitled cause.

DATED: May 2, 2018

Respectfully submitted,

Rosa M. Tumialán ([rtumialan@dykema.com](mailto:rtumialan@dykema.com))  
DYKEMA GOSSETT PLLC  
10 South Wacker Drive, Suite 2300  
Chicago, IL 60606-7407  
(312) 876-1700

By: Rosa M. Tumialán  
Attorney for Appellee, GMAC MORTGAGE  
LLC k/n/a BANK OF AMERICA, N.A. aka  
LaSALLE BANK NATIONAL  
ASSOCIATION aka U.S. BANK N.A., as  
trustee for Morgan Stanley Loan Trust 2006-  
16AX

Dawn Williams ([dwilliams@dykema.com](mailto:dwilliams@dykema.com))  
DYKEMA GOSSETT PLLC  
300 Ottawa Ave., N.W., Suite 700  
Grand Rapids, MI 49503-2306  
Phone: 616-776-7518

No. 1-18-0091

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IN THE APPELLATE COURT OF ILLINOIS  
FIRST JUDICIAL DISTRICT

---

GMAC MORTGAGE LLC k/n/a BANK OF AMERICA,  
N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka  
U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust  
2006-16AX,

Plaintiff/Appellee,

vs.

GORDON WAYNE WATTS,

Defendant/Appellant

and

RICHARD B. DANIGGELIS, JOSEPH YOUNES,  
MORTGAGE ELECTRONIC REGISTRATION SYSTEMS  
(MERS), PAUL L. SHELTON, ERIKA R. RHONE,  
STEWART TITLE ILLINOIS, JOHN P. LaROCQUE,  
ROBERT J. MORE, LEGATEES AND NON-RECORD  
CLAIMANTS, UNKNOWN HEIRS, UNKNOWN  
OWNERS,

Defendants.

Appeal from the Circuit Court  
of Cook County, Illinois

Case No. 2007 CH 29738

Honorable James P. Flannery, Judge  
Presiding

**NOTICE OF FILING**

TO: Gordon Wayne Watts  
821 Alicia Road  
Lakeland, FL 3380

PLEASE TAKE NOTICE that on **May 2, 2018**, we caused to be filed with the Clerk of the Appellate Court of Illinois, First District, the attached **Plaintiff/Appellee's Appearance**, a copy of which is served on you.

Rosa M. Tumialán ([rtumialan@dykema.com](mailto:rtumialan@dykema.com)) Respectfully submitted,  
DYKEMA GOSSETT PLLC  
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Chicago, IL 60606-7407  
(312) 876-1700

Dawn Williams ([dwilliams@dykema.com](mailto:dwilliams@dykema.com))  
DYKEMA GOSSETT PLLC  
300 Ottawa Ave., N.W., Suite 700  
Grand Rapids, MI 49503-2306  
Phone: 616-776-7518

By: Rosa M. Tumialán  
One of the Attorneys for Plaintiff/ Appellee,  
Attorney for Appellee, GMAC MORTGAGE  
LLC k/n/a BANK OF AMERICA, N.A. aka  
LaSALLE BANK NATIONAL  
ASSOCIATION aka U.S. BANK N.A., as  
trustee for Morgan Stanley Loan Trust 2006-  
16AX

**PROOF OF SERVICE**

The undersigned, an attorney, states on oath that she served a copy of the foregoing to the above counsel of record at the above mailing addresses by depositing a copy of same in the U.S. mail at 10 South Wacker Drive, Chicago, Illinois 60606 on May 2, 2018.

[X] Under penalties as provided by law pursuant to 735 ILCS 5/1-109 I certify that the statements set forth herein are true and correct.

*Rosa M. Tumialán*





Gordon Watts &lt;gww1210@gmail.com&gt;

**Filing Returned for Envelope Number: 1526622 in Case: 1-18-0091, GMAC Mortgage, LLC v. Watts, Gordon Wayne for filing Motion - Extension of Time**

1 message

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Wed, Jul 18, 2018 at 9:49 AM

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Case Style: GMAC Mortgage, LLC v. Watts, Gordon Wayne

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<b>Returned Comments</b>	you must file your motions separately.

**Document Details**

<b>Case Number</b>	1-18-0091
<b>Case Style</b>	GMAC Mortgage, LLC v. Watts, Gordon Wayne
<b>Date/Time Submitted</b>	7/17/2018 4:24 PM CST
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<b>Filing Description</b>	Mot Ext time concurrent with Mot Clarification
<b>Activity Requested</b>	Motion - Extension of Time
<b>Filed By</b>	Gordon Watts
<b>Filing Attorney</b>	

**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>	)
<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
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>

**Motion for Clarification**

**[resubmitted by request of clerk-time, and received on time on 7-17-2018: Exhibit-P]**

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 (**Exhibit-L**), 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

*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

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 re Intervention, then how was it able to issue the following ruling, holding, *infra*, in *CoC v. Hancock?* [*Has Hancock been overturned?*]

“[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, *infra*?

#### **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**

*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

**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.”

Appellant respectfully moves This Court for clarification, posing the question: *How can this legal claim be true in light of Rule 321, which vests this court with authority to do just that?*

### **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 (**Exhibit-O**), 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

*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

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, & discreetly, contact them (**Exhibits-M and N**), asking what was going on with regard to the **Rule 11** service concerns that he had, here—and, to that end, emailed and telephoned them, in order to privately inform them of this matter—and avoid embarrassing them. 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 (**Exhibit-M**), implying that Watts was about to tread into dangerous territory and issuing a veiled or 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 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



*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

communications—and make it easier to have a clear record of legal filings.

Nonetheless, even after Watts politely & respectfully inquired (sending only ONE email, with ONE follow-up reply, 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—and *furthermore refused to clarify who were and were not attorneys of record for plaintiff, GMAC.*

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 & without malice, nonetheless, her refusal to either clarify Indyke's role or 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, & mandated by her bosses at the law firm—which apparently viewed Watts' filing as some sort of threat to their client's interest: Since DYKEMA's only interests here are to protect their client, any actions they make are without doubt motivated by this motive.

*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

For the record, Appellant, Watts, has no animosity, malice, or ill will towards either the Dykema law firm (which he doesn't know) or GMAC (who was the mortgager, here, and not responsible for any of the felony photocopy forgery frauds, documented to have occurred in the title-theft in this matter—and the subject of much litigation & other investigation).

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 clarify Indyke's status—which was questioned when his claims of being no longer attorney of record were contradicted by the record below; ((B)) their refusal to address the Rule 11 \_issue, and (more-importantly) ((C)) their refusal to comply with this rule—their actions, in ((C)) speaking louder than their words (or emails) in ((B)). While Appellant sympathizes with DYKEMA in their concerns, here, he notes that it's 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 & 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 & deeper in trouble for both ((a)) repeated code violations, as well as ((b)) outright destruction of the house by

*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

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 hasn't exercised its appellate authority over Younes in the instant case—which has allowed him to continue to wreak havoc & destruction in this 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 to him 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 ~~(-c-)~~ will help the elderly Daniggelis get justice, and also, lastly: ~~(-d-)~~ will restore the reputation & good name of the judicial system, which has taken a hit in recent years—which is good, since the good judges on This Court don't deserve to be made fun of in the news media—and also good because courts run smoother if there's more light & 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)?

**[[5]]** Since neither of the 2 DYKEMA attorneys (**Exhibit-O**) were willing to answer the question (**Exhibits-M and N**) about who is (and isn't) the attorney(s) of record for plaintiff, GMAC, [e.g., where appellant asks the DYKEMA attorneys: “I would like clarification on Mr. Indyke's concern: Is he correct in asserting that a new attorney or firm took over representation of the plaintiff?”], appellant now puts forth this question to The Court: Please see Exhibits M and

*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

N for said question—and DYKEMA's refusal to clarify this matter. **CAVEAT:** The record in the court below shows that Indyke is the last attorney of record, but he claims otherwise, and since several of DYKEMA's attorneys refuse to clarify, it's now passed on to the reviewing court to clarify—via this concurrent motion for clarification.

*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 & all doubt hereto.

**Date: Tuesday, 17 July 2018**

*/s/Gordon Wayne Watts*

**Gordon Wayne Watts**

**Judicial Notice concerning clerk's request to resubmit:**

This filing was submitted on time, on 7-17-2017, but the clerk requested me to resubmit it, since “Multiple filings” (concurrent motions) were supposedly not acceptable. However, my 3-16-2018 Motion to Extend time had a concurrent motion, and was not rejected—and moreover, there is no rule or law that prohibits concurrent motions, and so, this rejection should not be counted as late, as I filed on time. To support my venue tolling claim, I also rely on section 2-104 of the Code of Civil Procedure: “No action shall abate or be dismissed because commenced in the wrong venue if there is a proper venue to which the cause may be transferred.” 735 ILCS 5/2-104 (West 2014). NONETHELESS, even absent 735 ILCS 5/2-104, there is no rule, law, or holding that should cause my concurrent motions to be deemed late – or rejected – if otherwise filed on time—and it would offend Due Process and shut the courts down for no good reason to do otherwise.

Since the clerk asked me to resubmit, then it must be permissible to resubmit timely with corrections, as I am complying with the clerk's request to timely correct a de minimus defect.

*/s/Gordon Wayne Watts*

**Gordon Wayne Watts**

*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

**INDEX TO THE EXHIBITS**

<b><u>Instrument</u></b>	<b><u>Docket/Tab#</u></b>
** 3/28/2018 ORDER extending time to file Record on Appeal	Exhibit "A"
** Obituary for Robert F. "Bobby" Watts (source: TheLedger.com)	Exhibit "B"
** Obituary for Robert F. "Bobby" Watts (source: The Register)	Exhibit "C"
** Death Certificate for Robert F. "Bobby" Watts	Exhibit "D"
** Medical Documentation that Appellant nearly bled to death	
** Medical documentation of Appellant blood levels	Exhibit "E-1"
** Official hospital discharge diagnoses for Appellant	Exhibit "E-2"
** Medical documentation of normal Hgb blood levels	Exhibit "E-3"
** Documentation of sudden need to do clearance sale for the late Bobby Watts, appellant's father (storefront photo)	Exhibit "F"
** Appellant's 4/20/2018 e-filed RULE 321 motion to Circuit Court, as Reviewing court had ordered him to do, pursuant to the MARCH 28, 2018 ORDER of said court to direct inquiries there	Exhibit "G"
** U.S. Postal Mail tracking to verify Judges Shelley & Flannery were served copies of appellant's RULE 321 motion, pursuant to This Court's order for appellant to direct inquiries there re Record on Appeal	Exhibit "H"
** Electronic Mail service to Judges Shelley & Flannery, pursuant to This Court's order for appellant to direct inquiries there re Record on Appeal	Exhibit "I"
** 4/09/2018 Police Report by Gordon Wayne Watts of his boss attacking him on the way back from a job site	Exhibit "J"
** 4/20/2018 motion for summary judgment in 1-18-0572, an appeal of the intervention denial in the instant case	Exhibit "K"
** 5/3/2018 ORDER denying jurisdiction to entertain 4/20/18 motion	Exhibit "L"
** May 2, 2018, 9:21pm(EST) response from Rosa M. Tumialán, Esq., in response to May 2, 2018, at 7:49pm(CST) email from Appellant	Exhibit "M"
** Appellant's reply to Atty. Tumialán's email	Exhibit "N"
** Notice of Appearance by DYKEMA law firm in the instant case	Exhibit "O"
** Request from CLERK to resubmit my motions separately	Exhibit "P"



NO. 1-18-0091

**IN THE APPELLATE COURT OF ILLINOIS  
FIRST DISTRICT**

GMAC Mortgage, LLC, Plaintiff	)	Appeal from the Circuit Court of Cook County, IL
vs.	)	No. 07 CH 29737
Gordon W. Watts, et. al.,	)	(Transfer into <u>Law</u> Division from Chancery)
<u>Defendants</u>	)	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, **THIS COURT hereby finds that it has jurisdiction to enter the following order:**

**IT IS HEREBY ORDERED** that the time for filing the Record on Appeal is extended to October 17, 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—for the elderly defendant, Richard Daniggelis.

**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 321 and 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))].

**This Court, in its Rule 321 appellate authority, orders the circuit court to speedily prepare a selected record, as specified in this order, notify this court, and transmit it to this court by electronic means, on accelerated docket.**

**IT IS SO ORDERED.**

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Justice

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Justice

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Justice

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



*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

**SERVICE LIST**

- \* **1st District Appellate Court**, Clerk's Office, 160 North LaSalle St., Chicago, IL 60601  
**(312) 793-5484 , Office Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays [served by eFiling only, since this The Court no longer accepts paper filings]**
- \* **CIVIL APPEALS DIVISION:** Richard J. Daley Center, 50 West Washington St., Room 801 Chicago, IL 60602 – (312) 603-5406, Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays  
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 all means, as he is a defendant]**
- \* **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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- \* **Joseph Younes** (Atty#:55351) Law Offices / <http://ChicagoAccidentAttorney.net>  
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*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

**SERVICE LIST (continued from above)**

**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**

\* **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]

\* **Richard Indyke, Esq.** Atty. No. 20584, (312-332-2828, Atty for LaSalle Bank Natl. Assn.), Email: [RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net) ; 221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305

\* **Peter King (Atty. for Joseph Younes) (Atty. No.: 48761)**  
(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221  
<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com)  
or: [PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

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

\* **Dawn Williams ([DWilliams@Dykema.com](mailto:DWilliams@Dykema.com))** Phone: 616-776-7518  
DYKEMA GOSSETT PLLC, 300 Ottawa Ave., N.W., Suite 700  
Grand Rapids, MI 49503-2306 [Attorney for Appellee, GMAC MORTGAGE  
LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka  
U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX]





*Motion Ext. Time / Clarification – GMAC v. Watts, 1-18-0091 (IL 1<sup>st</sup> App.Ct.) 7-17-2018*

**INDEX TO THE EXHIBITS**

<b><u>Instrument</u></b>	<b><u>Docket/Tab#</u></b>
** 3/28/2018 ORDER extending time to file Record on Appeal	Exhibit "A"
** Obituary for Robert F. "Bobby" Watts (source: TheLedger.com)	Exhibit "B"
** Obituary for Robert F. "Bobby" Watts (source: The Register)	Exhibit "C"
** Death Certificate for Robert F. "Bobby" Watts	Exhibit "D"
** Medical Documentation that Appellant nearly bled to death	
** Medical documentation of Appellant blood levels	Exhibit "E-1"
** Official hospital discharge diagnoses for Appellant	Exhibit "E-2"
** Medical documentation of normal Hgb blood levels	Exhibit "E-3"
** Documentation of sudden need to do clearance sale for the late Bobby Watts, appellant's father (storefront photo)	Exhibit "F"
** Appellant's 4/20/2018 e-filed RULE 321 motion to Circuit Court, as Reviewing court had ordered him to do, pursuant to the MARCH 28, 2018 ORDER of said court to direct inquiries there	Exhibit "G"
** U.S. Postal Mail tracking to verify Judges Shelley & Flannery were served copies of appellant's RULE 321 motion, pursuant to This Court's order for appellant to direct inquiries there re Record on Appeal	Exhibit "H"
** Electronic Mail service to Judges Shelley & Flannery, pursuant to This Court's order for appellant to direct inquiries there re Record on Appeal	Exhibit "I"
** 4/09/2018 Police Report by Gordon Wayne Watts of his boss attacking him on the way back from a job site	Exhibit "J"
** 4/20/2018 motion for summary judgment in 1-18-0572, an appeal of the intervention denial in the instant case	Exhibit "K"
** 5/3/2018 ORDER denying jurisdiction to entertain 4/20/18 motion	Exhibit "L"
** May 2, 2018, 9:21pm(EST) response from Rosa M. Tumialán, Esq., in response to May 2, 2018, at 7:49pm(CST) email from Appellant	Exhibit "M"
** Appellant's reply to Atty. Tumialán's email	Exhibit "N"
** Notice of Appearance by DYKEMA law firm in the instant case	Exhibit "O"
** Request from CLERK to resubmit my motions separately	Exhibit "P"

NO. 1-18-0091

IN THE APPELLATE COURT OF ILLINOIS  
FIRST DISTRICT

GMAC Mortgage, LLC, Plaintiff	)	Appeal from the Circuit Court of Cook County, IL
vs.	)	No. 07 CH 29737
Gordon W. Watts, et. al., Defendants	)	(Transfer into <u>Law</u> Division from Chancery)
	)	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 ~~by~~ 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. [This court notes that Watts' claims on this head were never challenged as false.]

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

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

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





THOMAS D. PALELLA  
CLERK OF THE APPELLATE COURT 1ST DISTRICT  
160 NORTH LABALLE STREET, RM 51400  
CHICAGO, ILLINOIS 60601

POSTAGE WILL BE PAID BY ADDRESSEE  
NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES

FIRST-CLASS MAIL  
usps.com  
03/28/2018  
US POSTAGE  
\$00.47  
ZIP 60601  
041L11240569



1-18-0091

GORDON WAYNE WATTS  
821 ALICE ROAD  
LAKELAND FL 33801

Received in mailbox - 11/19  
SATURDAY, 31 March 2018  
-Dobsonburg-NW

93801-211321  
93801-211321



## Obituary for Robert F. "Bobby" Watts

## Exhibit "B"

(source: The Ledger -- TheLedger.com)

### OBITUARIES



**ANDREW  
"HORSEHEAD"  
LAWRENCE, Jr.**

BARTOW - Andrew Lawrence, Jr., 82, died Fri., 5/4/18. View: at Gause F.H., 5-7 pm Fri, 5/11. Service at St. James AME Church at 1 pm on Sat., 5/12.



**ROBERT  
FRANKLIN  
DELANO  
"BOBBY"  
WATTS, 83**

LAKELAND - Robert Franklin Delano "Bobby" Watts, 83, died May 3, 2018. Bobby was born in Miami, FL on Jan. 27, 1935.

With the exception of a brief stint in the Navy, Bobby spent his entire life in Florida, working for the railroad, owning a gym

### "BOBBY" WATTS, 83

LAKELAND - Robert Franklin Delano "Bobby" Watts, 83, died May 3, 2018. Bobby was born in Miami, FL on Jan. 27, 1935.

With the exception of a brief stint in the Navy, Bobby spent his entire life in Florida, working for the railroad, owning a gym and auto parts stores. For 43 years he was the very proud owner of the Bobby Watts Speed Shop. One of his first jobs was with "Big Daddy, Don Garlits" the "King of Drag Racing."

Over his entire life he never missed a day of work except when he was in the hospital.

An avid drag racer as a young man, and harmonica player in his later years, he found happiness in his racing and music, and strength from his Savior Jesus Christ.

He is preceded in death by his parents, Loring M. Watts, Sr. and Iola "Mary" Whitlock Watts Wood, his brother Loring M. "Mickey" Watts, Jr. and his sisters Jessie Mattair and Janie Barnett.

Bobby is survived by his wife, Anne Watts and his son, Gordon Watts.

A memorial service will be held at 2 pm on Sat., May 12 at the Fellowship Church As-

sembly. His first job was with "Big Daddy, Don Garlits" the "King of Drag Racing."

Over his entire life he never missed a day of work except when he was in the hospital.

An avid drag racer as a young man, and harmonica player in his later years, he found happiness in his racing and music, and strength from his Savior Jesus Christ.

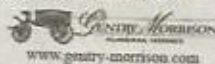
He is preceded in death by his parents, Loring M. Watts, Sr. and Iola "Mary" Whitlock Watts Wood, his brother Loring M. "Mickey" Watts, Jr. and his sisters Jessie Mattair and Janie Barnett.

Bobby is survived by his wife, Anne Watts and his son, Gordon Watts.

A memorial service will be held at 2 pm on Sat., May 12 at the Fellowship Church Assembly of God, 4405 N. Galloway Rd, Lakeland.

Condolences to the family may be given at [www.gentry-morrison.com](http://www.gentry-morrison.com).

In lieu of flowers, please follow Bobby's example and give to someone in need.



**NANCY LYNN  
MORGAN, 69**

AUBURNDALE

Thursday, May 10, 2018 A5



**GENEVA SMITH  
WOOTEN, 85**

APOPKA - Geneva Smith Wooten, 85, of Apopka, Florida passed away on May 05, 2018.

Mrs. Wooten was born on August 13, 1932. She graduated from Kathleen High School Class of 1950.

Mrs. Wooten is preceded in death by her sister Juanita S. Ruthven. She is survived by her loving husband of 59 years Mr. Edwin N. Wooten; her children Elaine Wooten Johnson, Sandra P. Wooten and The Honorable Wayne C. Wooten and his wife Tracey; sister Opal S. Carter; grandchildren Alexander Johnson, Chloë M. Johnson



# Obituary for Robert F. "Bobby" Watts

# Exhibit "C"

(source: The Register -- GordonWatts.com or GordonWayneWatts.com)



gordonwaynewatts.com

2



ogy / Spiritual)

[New: SEAN HANNITY section](#)

[April Mathis: World's Strongest Woman](#)

[Your ANGEL STORIES: Testimonials](#)

[LEGAL; Copyright; Terms & Conditions](#)

ise/Diet/CANCER

[ANGELS on ASSIGNMENT](#)

[New STAR TREK: PII episodes](#)

[More ANGEL Encounters](#)

[New: Terri Schiavo section](#)



ri.

Sat. 05

LLINOIS

[granted](#)

est for



## \* LAKELAND, FL - OBITUARIES

[\(Sat. 12 May 2018\) Robert Franklin Delano "Bobby" Watts \(01 Jan 1935 - 03 May 2018\)](#)

[Click here for obituary or to donate.](#)

## \* "The CONSERVATIVE Case for College Loan Bankruptcy bill H.R.2366"

(Sun. 25 Feb. 2017) Yes, the 'Conservative' argument for BK protection is even stronger than the 'Liberal' argument, so we don't know why the GOP supports these Constitutional rights more? *Details:* [Video link with transcript & notes](#) \*\*



## BUREAU of VITAL STATISTICS

## CERTIFICATION OF DEATH

STATE FILE NUMBER: 2018074517

DATE ISSUED: MAY 8, 2018

## DECEDENT INFORMATION

DATE FILED: MAY 8, 2018

NAME: ROBERT FRANKLIN DELANO WATTS

DATE OF DEATH: MAY 3, 2018

SEX: MALE

AGE: 083 YEARS

DATE OF BIRTH: JANUARY 27, 1935

SSN: 260-44-6565

BIRTHPLACE: MIAMI, FLORIDA, UNITED STATES

PLACE WHERE DEATH OCCURRED: DECEDENT'S HOME

FACILITY NAME OR STREET ADDRESS: 821 Alicia Road

LOCATION OF DEATH: LAKELAND, POLK COUNTY, 33801

RESIDENCE: 821 ALICIA ROAD, LAKELAND, FLORIDA 33801, UNITED STATES

COUNTY: POLK

OCCUPATION, INDUSTRY: OWNER/OPERATOR, RETAIL AUTO PARTS

EDUCATION: HIGH SCHOOL GRADUATE OR GED COMPLETED EVER IN U.S. ARMED FORCES? YES

HISPANIC OR HAITIAN ORIGIN? NO, NOT OF HISPANIC/HAITIAN ORIGIN

RACE: WHITE

## SURVIVING SPOUSE / PARENT NAME INFORMATION

(NAME PRIOR TO FIRST MARRIAGE, IF APPLICABLE)

MARITAL STATUS: DIVORCED

SURVIVING SPOUSE NAME: NONE

FATHER'S/PARENT'S NAME: LORING MITCHELL WATTS SR

MOTHER'S/PARENT'S NAME: IOLA WHITLOCK

## INFORMANT, FUNERAL FACILITY AND PLACE OF DISPOSITION INFORMATION

INFORMANT'S NAME: ANNE WATTS

RELATIONSHIP TO DECEDENT: EX-WIFE

INFORMANT'S ADDRESS: P. O. BOX 4225, PLANT CITY, FLORIDA 33565, UNITED STATES

FUNERAL DIRECTOR/LICENSE NUMBER: LEWIS H. HALL III, F021044

FUNERAL FACILITY: GENTRY MORRISON CREMATION CENTER F066603

1805 US 98 S, LAKELAND, FLORIDA 33801

METHOD OF DISPOSITION: CREMATION

PLACE OF DISPOSITION: GENTRY-MORRISON CREMATORY  
LAKELAND, FLORIDA

## CERTIFIER INFORMATION

TYPE OF CERTIFIER: Associate Medical Examiner

MEDICAL EXAMINER CASE NUMBER: 1810ME077

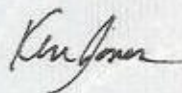
TIME OF DEATH (24 HOUR): FOUND AT 0520

DATE CERTIFIED: MAY 7, 2018

CERTIFIER'S NAME: VERA VASILIEVNA VOLNIKH

CERTIFIER'S LICENSE NUMBER: ME85865

NAME OF ATTENDING PHYSICIAN (IF OTHER THAN CERTIFIER): NOT ENTERED



, STATE REGISTRAR

REQ: 2019270621

THE ABOVE SIGNATURE CERTIFIES THAT THIS IS A TRUE AND CORRECT COPY OF THE OFFICIAL RECORD ON FILE IN THIS OFFICE.

## WARNING:

THIS DOCUMENT IS PRINTED OR PHOTOCOPIED ON SECURITY PAPER WITH WATERMARKS OF THE GREAT SEAL OF THE STATE OF FLORIDA. DO NOT ACCEPT WITHOUT VERIFYING THE PRESENCE OF THE WATERMARKS. THE DOCUMENT FACE CONTAINS A MULTICOLORED BACKGROUND, GOLD EMBOSSED SEAL, AND THERMOCHROMIC FL. THE BACK CONTAINS SPECIAL LINES WITH TEXT. THE DOCUMENT WILL NOT PRODUCE A COLOR COPY.



\* 3 7 0 5 0 9 7 2 \*

DH FORM 1946 (03-13)

CERTIFICATION OF VITAL RECORD





**EXHIBIT -- "E" (part 1 of 3)****MEDICAL RECORDS**

**Documentation of Appellant's medical emergency, which resulted in him nearly bleeding to death -- and with a blood Hemoglobin Level of '4' -- as compared with 'normal' levels of at least 13.5 (men) or 12 (women)**

Menu

RelayHealth - Health Records

app.relayhealth.com/PatientPortal/HealthRecords#!/HealthRecords/View/Results/1270788739

GordonWayneWatts (Yc) Microsoft.com/en-us/wc gww1210g gww1210f gww0dani gw00dani

[← Back to Your Results](#)

**Lakeland Regional Medical Center**  
1324 Lakeland Hills Blvd,  
Lakeland, FL 33805  
Phone: (863) 687-1100

**Patient Information**

**Order Details**

**History and Physical**

Lakeland Regional Health System

Patient: WATTS, GORDON WAYNE MRN: 000000578309 FIN: 040202961  
Age: 52 years Sex: Male DOB: 05/16/66  
Associated Diagnoses: None  
Author: LUND MD, KARA S

**Basic Information**  
Present at bedside: Medical personnel.  
Source of history: Self, Medical record.  
Referral source: Emergency department.  
History limitation: None.  
Advance directive: Full code.

**History of Present Illness**  
Mr. Gordon Watts is a 52 y.o. male with no past medical history who presented to the ED feeling short of breath and weak for several days. He also noted black and red colored stools for the past few days. He describes a recent episode of food poisoning for which he was taking Advil, ASA, Aleve and peptobismal for the abdominal pain associated with this. In teh ED, his hgb was found to be 4. He was also found to have AF with RVR. He has no known history of this. He was given a bolus o f Cardizem with some improvement in his HR. He was given one unit of emergency PRBCs and 3 units of typed and crossed PRBCs. Hgb recheck was 8.4 after transfusion. Upon arrival to the ICU, he is in SR with HR in the 90s and hemodynamically stable.

**Review of Systems**  
Constitutional: Chills, Weakness.  
Eye: No recent visual problem.  
Ear/Nose/Mouth/Throat: No decreased hearing.  
Respiratory: Cough, No shortness of breath.  
Cardiovascular: No chest pain.  
Gastrointestinal: Abdominal pain: Right, The severity is moderate.  
Genitourinary: No dysuria, No hematuria.  
Endo: Cold intolerance.  
Musculoskeletal: No joint pain, No muscle pain.  
Integumentary: No skin lesion.

**EXHIBIT -- "E" (part 2 of 3)****Lakeland Regional Health®**

Lakeland Regional Medical Center, Inc.  
1324 Lakeland Hills Blvd  
Lakeland, FL 33805  
863.687.1100

**MEDICAL RECORDS**

**(Documentation of Appellant  
nearly bleeding to death from  
adverse reaction to over-the-counter meds)**

**PATIENT INSTRUCTIONS FOR AFTERCARE****Name:** WATTS, GORDON WAYNE**Current Date:** 06/08/18 11:20:14 Eastern Time**DOB:** 5/16/1966 12:00 AM**Arrival Time:** 6/05/2018 5:00 PM**Diagnoses:**

Acute upper GI bleed; Atrial fibrillation with rapid ventricular response; Melena

**Attending Physician:** CAJUSTE MD, RENE**Consulting Physician:** LUND MD, KARA S; EPPERSON CRNA, JESSICA L**Primary Care Provider:** JEAN-PIERRE MD, ELMISE**Phone:** (863) 687-1300

Thank you for allowing us to care for you. Understanding how to continue your recovery is essential to help maintain good health. This document contains important information for you after you leave us. Please review these instructions carefully and bring them to any follow-up appointments.

**Nondiscrimination Notice**

Lakeland Regional Health (LRH) complies with applicable Federal civil rights laws and does not discriminate on the basis of race, color, national origin, age, disability, or sex. Lakeland Regional Health does not exclude people or treat them differently because of race, color, national origin, age, disability, or sex.

If you feel LRH has discriminated in any way, you may file a grievance by calling 863.687.1025.

**Spanish:** ATENCIÓN: si habla español, tiene a su disposición servicios gratuitos de asistencia lingüística. Llame al 863.687.1025.

**French Creole:** ATANSYON: Si w pale Kreyòl Ayisyen, gen sèvis èd pou lang ki disponib gratis pou ou. Rele 863.687.1025.

**Access Your Secure Health Records Online**

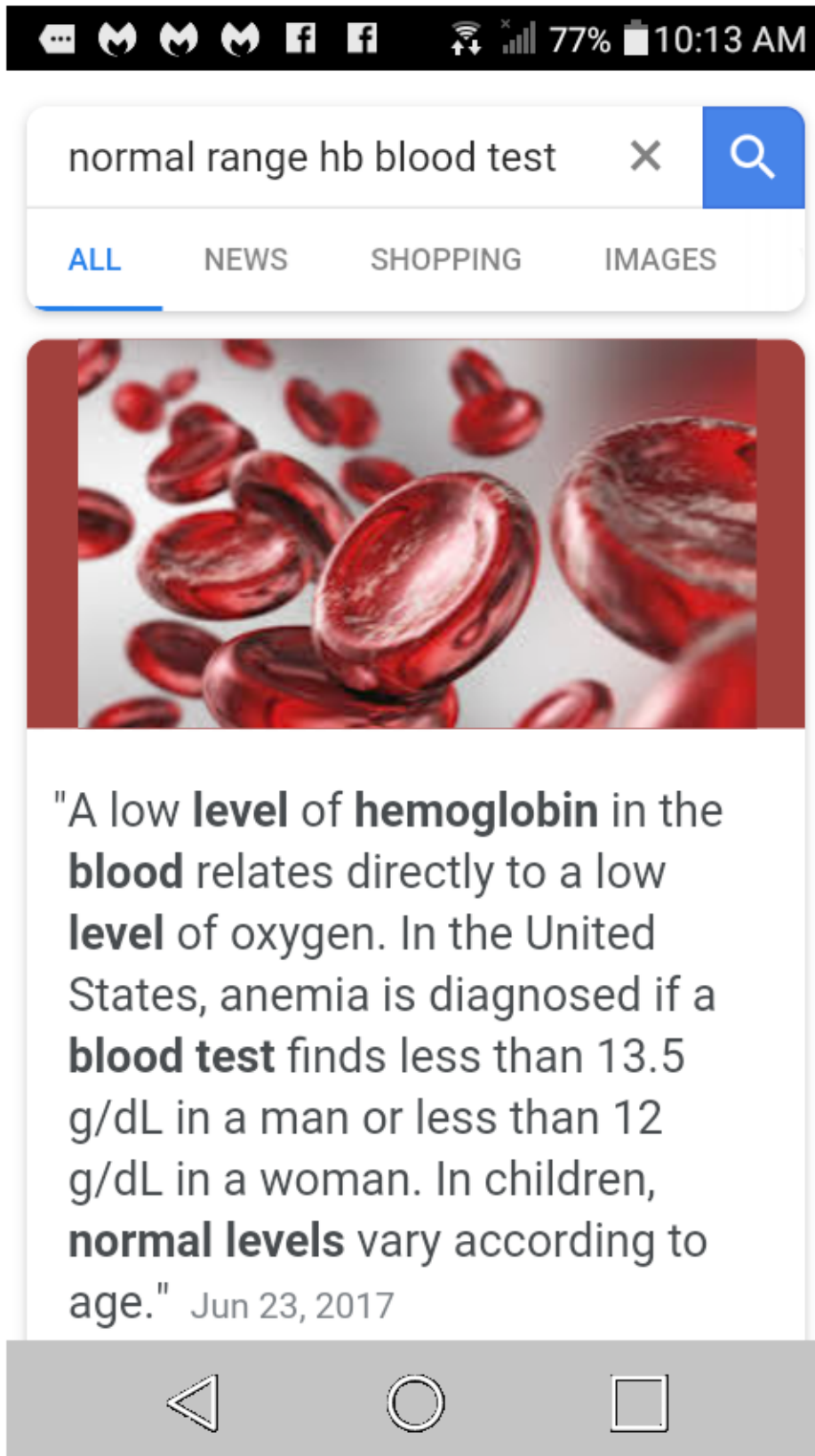
Person Full Name WATTS, GORDON  
WAYNE  
06/8/2018 11:20:16

Gender Male

Date of Birth 05/16/66

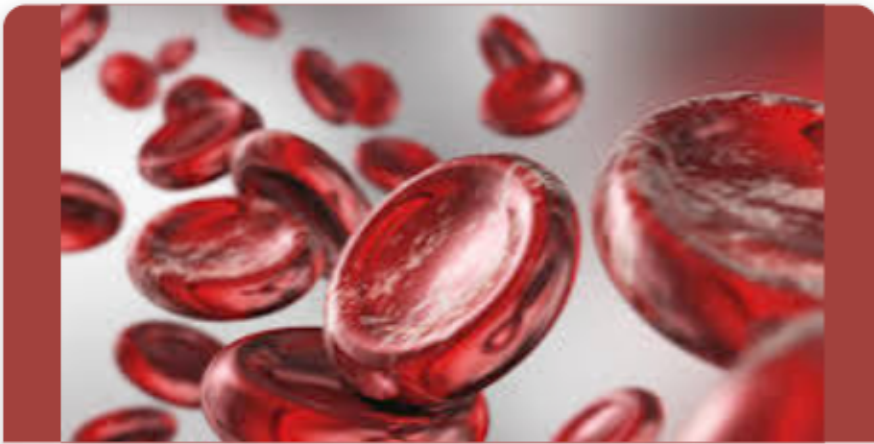
**MEDICAL DOCUMENTATION:  
'Normal' levels of Blood Hemoglobin**

**EXHIBIT -- "E" (part 3 of 3)**



normal range hb blood test

ALL NEWS SHOPPING IMAGES



"A low **level** of **hemoglobin** in the **blood** relates directly to a low **level** of oxygen. In the United States, anemia is diagnosed if a **blood test** finds less than 13.5 g/dL in a man or less than 12 g/dL in a woman. In children, **normal levels** vary according to age." Jun 23, 2017

**\*\* Documentation of sudden need to do clearance sale for the late Bobby Watts, appellant's father**

**Exhibit "F"**





**E-Notice****2007-CH-29738**

CALENDAR: W

To: Gordon Wayne Watts  
gww1210@gmail.com

---

**NOTICE OF ELECTRONIC FILING**

---

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
GMAC MORTGAGE LLC v. YOUNES JOSEPH**

The transmission was received on 04/20/2018 at 6:34 PM and was ACCEPTED with the Clerk of the Circuit Court of Cook County on 04/23/2018 at 8:55 AM.

**NOTICE OF REPORT OF RECORDS OF PROCEEDINGS (This is closest I can find to describe filing:  
I'm giving notice of report of proceedings in Appellate Court, which has issued order for my to  
direct inquiry to this court regarding Record on Appeal./)**

Filer's Email: gww1210@gmail.com  
Filer's Fax:  
Notice Date: 4/23/2018 8:55:26 AM  
Total Pages: 10

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

(312) 603-5031  
courtclerk@cookcountycourt.com

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
 COUNTY DEPARTMENT – LAW DIVISION

GMAC Mortgage, LLC	)	
<b>Plaintiff,</b>	)	Case No.: 2007 CH 29738
	)	(Transfer to Law Division)
vs.	)	Before: Hon. DIANE M. SHELLEY,
	)	Circuit Judge
Gordon Wayne Watts, et. al.,	)	District: First Municipal
<b>Defendants.</b>	)	Calendar "W", Courtroom 1912

**Motion for Clarification concurrent with  
 Rule 321 motion to limit Contents of the Record on Appeal**

In the exercise of the reviewing Court's appellate authority, the Appellate Court, First District, has entered an order, in ***GMAC v. Watts***, 1-18-0091, that: "Appellant must direct inquiries on the content of the record on appeal to the Clerk of the Circuit Court of Cook County."

ORDER ENTERED MAR 28 2018, Appellate Court, First District.

Pursuant to the above-quoted/cited order (see *infra*: **Exhibit-A**), Appellant, Gordon Wayne Watts, now directs inquiry to This Court regarding the content of the record on appeal in 1-18-0091—**hereby moving for clarification** of whether or not the 7-7-2017 motion to Intervene stated sufficient grounds to intervene in the case at bar.

Moreover, in concurrent motion, Appellant, Watts, now moves this court to "order less" for the Record on Appeal, in accordance with Rule 321, notice, and proper hearing will having been given. [In support of this motion, Movant respectfully points out that a stipulation is highly unlikely given the fact that many parties can't even be located or have bad service addresses, and/or are unlikely to consent to anything, big or small, in this regard.]

Specifically, movant requests that the clerk prepare the limited record sought in the 3/16/2018 Motion for Extension of Time, in GMAC v Watts, 1-18-0091, a copy of which has been served upon this court in prior filings—and reproduced below, in the proposed order.

*Respectfully submitted,*

*/s/Gordon Wayne Watts*

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
 821 Alicia Road, Lakeland, FL 33801-2113  
 PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
 Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
 Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

GMAC v. Watts, et al., 07-CH-29738 (Law Division, Cook County, IL)

**Verification by Certification**

I, Gordon Wayne Watts, the undersigned Movant, under penalties as provided by law pursuant to 735 ILCS 5/1-109, Section 1-109 of the ILLINOIS Code of Civil Procedure, hereby certify that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and, as to such matters, the undersigned certifies as aforesaid that he verily believes the same to be true: "Any pleading, affidavit or other document certified in accordance with this Section may be used in the same manner and with the same force and effect as though subscribed and sworn to under oath." Source: 735 ILCS 5/1-109: <http://www.ILGA.gov/legislation/ilcs/documents/073500050K1-109.htm>

**Nonetheless, This Court has on record several of my sworn, witnessed, and notarised affidavits, just to remove any and all doubt hereto.**

Date: **Friday, 20 April 2018**

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

ELECTRONICALLY FILED  
4/20/2018 6:34 PM  
2007-CH-29738  
PAGE 2 of 10





GMAC v. Watts, et al., 07-CH-29738 (Law Division, Cook County, IL)

**SERVICE LIST**

\* **CIVIL APPEALS DIVISION: Cook County, IL Circuit Court**, 312-603-5406, Richard J. Daley Center, 50 West Washington St., Room 801, Chicago, IL 60602 – Attention: Deputy Chief, Patricia O'Brien, [PAOBrien@CookCountyCourt.com](mailto:PAOBrien@CookCountyCourt.com) Hours: 8:30a-4:30p, Mon-Fri, Excl. Holidays, **[served by email only, as a courtesy, since they are not a party proper]**

\* **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 only, as a courtesy, since he is not a party proper]**

\* **Hon. James P. Flannery, Jr.**, Circuit Judge–Presiding Judge, Law Division 50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343, Courtesy copy via: [James.Flannery@CookCountyIL.gov](mailto:James.Flannery@CookCountyIL.gov) **[served in all ways, as Judge Flannery is a defendant]**

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

\* **Richard B. Daniggelis** [true owner of 1720] 312-774-4742, c/o John Daniggelis, 2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652

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

\* **Robert J. More** ( [Anselm45@Gmail.com](mailto:Anselm45@Gmail.com) ) [Note: **More's** name is **misspelled** on docket as: “**MOORE ROBERT**”] P.O. Box 6926, Chicago, IL, 60680-6926, PH: (708) 317-8812 [[Mr. More has made a formal request by email to receive service solely by email, and waives hard-copy service.]]

\* **Associated Bank, N.A.**, 200 North Adam Street, Green Bay, WI 54301-5142

\* **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



GMAC v. Watts, et al., 07-CH-29738 (Law Division, Cook County, IL)

**SERVICE LIST (continued)**

Holdings, Inc. – PH: (703) 761-1270, FAX: (703) 748-0183, [SharonH@MersInc.org](mailto:SharonH@MersInc.org) ; [SharonH@MersCorp.com](mailto:SharonH@MersCorp.com) Cc: Janis Smith, 703-738-0230, VP, Corp. Comm. is no longer with MersCorp, and Amy Moses ([AmyM@MersCorp.com](mailto:AmyM@MersCorp.com) ; [AmyM@MersInc.org](mailto:AmyM@MersInc.org)) has replaced her as an email contact; Sandra Troutman 703-761-1274, E: [SandraT@MersInc.org](mailto:SandraT@MersInc.org) ; [SandraT@MersCorp.com](mailto:SandraT@MersCorp.com)) Dir, Corporate Communications, Karmela Lejarde, Communications Manager, Tel~ 703-761-1274, Mobile: 703-772-7156, Email: [KarmelaL@MersInc.org](mailto:KarmelaL@MersInc.org) ; [KarmelaL@MersCorp.com](mailto:KarmelaL@MersCorp.com) C/o: **MERS (Mortgage Electronic Registration Systems, Inc.), 1901 East Vorhees Street, Suite 'C', Danville, IL 61834-4512**

\* **COHON RAIZES®AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)**

Attn: Carrie A. Dolan, pPh:(312) 726-2252  
208 S LASALLE, Suite #1860, CHICAGO IL, 60604

\* **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]

\* **Richard Indyke, Esq.** Atty. No. 20584, ([RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net) ; 312-332-2828 ; 773-593-1915 most recent “Attorney of record” for LaSalle Bank Natl. Assn.), 111 South Washington Ave., Suite 105, Park Ridge, IL 60068-4292 [[Mr. Indyke claims to not represent any party in the instant appeal, but the undersigned can not find any more recent atty of record for defendant, LaSalle Bank, and reluctantly will keep Mr. Indyke on the service list, unless excused by The Court.]]

\* **Peter King (Atty. for Joseph Younes)** (Atty. No.: 48761)

(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221  
<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com) or: [PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

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

\* **Joseph Younes** (Atty#:55351) Law Offices / <http://ChicagoAccidentAttorney.net>

312-635-5716, per website, Ph: 312-372-1122 ; 312-802-1122 ; Fax: 312-372-1408 E: [RoJoe69@yahoo.com](mailto:RoJoe69@yahoo.com) 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596

\* **Paul L. Shelton, Pro Se,** (Atty. #15323, disbarred per IARDC)

E: [PMSA136@Gmail.com](mailto:PMSA136@Gmail.com) ; [PLShelton@SBCGlobal.net](mailto:PLShelton@SBCGlobal.net) – 3 Grant Square, SUITE #363, Hinsdale, IL 60521-3351

\* **Erika R. Rhone** 22711 Southbrook Dr., Sauk Village, IL 60411-4291



**INDEX TO THE EXHIBITS**

**Instrument**

**Docket/Tab#**

\*\* March 28, 2018 Order from the IL First appellate Court,  
directing Appellant to inquire in the instant motion

Exhibit-A

ELECTRONICALLY FILED  
4/20/2018 6:34 PM  
2007-CH-29738  
PAGE 8 of 10

NO. 1-18-0091

IN THE APPELLATE COURT OF ILLINOIS  
FIRST DISTRICT

GMAC Mortgage, LLC, Plaintiff	)	Appeal from the Circuit Court of Cook County, IL
vs.	)	No. 07 CH 29737
Gordon W. Watts, et. al., Defendants	)	(Transfer into <u>Law</u> Division from Chancery)
	)	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 ~~by~~ 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. [This court notes that Watts' claims on this head were never challenged as false.]~~

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

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

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

Page 1 of 2 [ORDER]

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2007-CH-29738  
PAGE 9 of 10





**Law DIVISION**

## Litigant List

Printed on 04/23/2018

Case Number: 2007-CH-29738

Page 1 of 2

**Plaintiffs**

Plaintiffs Name	Plaintiffs Address	State	Zip	Unit #
GMAC MORTGAGE LLC			0000	
BANK AMERICA NA			0000	
CHICAGO VOLUNTEER LEGAL			0000	
LASALLE			0000	
US BANK NATIONAL ASSOCI			0000	

Total Plaintiffs: 5

**Defendants**

Defendant Name	Defendant Address	State	Unit #	Service By
DANIGGELIS RICHARD			0000	
GORDON WAYNE WATTS			0000	
HLB MORTGAGE			0000	
INVEST ONE			0000	
LAROCQUE JOHN			0000	
LEGATEES			0000	
MOORE ROBERT			0000	



Case Number: 2007-CH-29738

Page 2 of 2

MORTGAGE ELECTRONICS RE	0000
NON RECORD CLAIMANTS	0000
PHONE ERIKA	0000
SHELTON PAUL	0000
STEWART TITLE ILLINOISZ	0000
TRUST ONE MORTGAGE	0000
UNKNOWN HEIRS	0000
UNKNOWN OWNERS	0000
YOUNES JOSEPH	0000

Total Defendants: **16**





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Sales Receipt			
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CHICAGO, IL 60602-1321 *SHELLEY* \$7.45  
 Zone-5  
 Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
 %% USPS Tracking #: 9505 5000 1793 8111 0001 39  
 0 lb. 15 70 oz.  
 \* Expected Delivery Day Monday, April 23.

Issue Postage: *Richardson* \$7.45

CHICAGO, IL 60614-4610 *John* \$7.45  
 Zone-5  
 Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
 %% USPS Tracking #: 9505 5000 1793 8111 0001 46 *Dani*  
 0 lb. 15 70 oz.  
 \* Expected Delivery Day Monday, April 23.

Issue Postage: *Dani* \$7.45

CHICAGO, IL 60614-5722 *Dani* \$7.45  
 Zone-5  
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 Zone-5  
 Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
 %% USPS Tracking #: 9505 5000 1793 8111 0003 06  
 0 lb. 15 70 oz.  
 \* Expected Delivery Day Monday, April 23.

Issue Postage: *Rhone* \$7.45

SAUK VILLAGE, IL 60411-4291 *Rhone* \$7.45  
 Zone-5  
 Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
 %% USPS Tracking #: 9505 5000 1793 8111 0003 13  
 0 lb. 15 70 oz.  
 \* Expected Delivery Day Monday, April 23.

Issue Postage: \$7.45

Total: \$14.90

Paid by: MasterCard \$14.90  
 Account #: XXXXXXXXXXXXX8222  
 Approval #: 042113  
 Transaction #: 039  
 4445023595397-99

SSK Transaction #: 28  
USPS® #: 114922-9552

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\* Expected Delivery Day Monday, April 23.

Issue Postage: Rich Dangoz \$7.45

CHICAGO, IL 60614-4610 \$7.45  
Zone-5

Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included

% USPS Tracking #: 9505 5000 1793 8111 0001 46  
0 lb. 15 70 oz.

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Issue Postage: Daniyalk @ 1720 M. \$7.45

CHICAGO, IL 60614-5722 \$7.45  
Zone-5

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LA GRANGE PARK, IL 60526-1547 \$7.45  
Zone-5

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Issue Postage: Ass'd Bank \$7.45

GREEN BAY, WI 54301-5142 \$7.60  
Zone-6

Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included

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0 lb. 15 80 oz.

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Issue Postage: M.E.R.S. \$7.60

DANVILLE, IL 61834-4512 \$7.45  
Zone-5

Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included

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Total: \$44.85

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Zone-5

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PARK RIDGE, IL 60068-4292 \$7.45  
Zone-5

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\* Expected Delivery Day Monday, April 23.

Issue Postage: KING \$7.45

CHICAGO, IL 60602-4087 \$7.45  
Zone-5

Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included

% USPS Tracking #: 9505 5000 1793 8111 0002 52  
0 lb. 15 70 oz.



0 lb. 15.70 oz.  
\* Expected Delivery Day Monday, April 23.

Issue Postage: ASS'D BANK \$7.45  
GREEN BAY, WI 54301-5142 \$7.60  
Zone-6  
Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
% USPS Tracking #: Ass'd Bank  
9505 5000 1793 8111 0001 77  
0 lb. 15.80 oz.

\* Expected Delivery Day Monday, April 23.  
Issue Postage: M.E.R.S. \$7.60  
DANVILLE, IL 61834-4512 \$7.45  
Zone-5  
Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
% USPS Tracking #: MERS  
9505 5000 1793 8111 0001 84  
0 lb. 15.70 oz.

\* Expected Delivery Day Monday, April 23.  
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Total: \$44.85

Paid by:  
MasterCard \$44.85  
Account #: XXXXXXXXXXXXX8222  
Approval #: 042111  
Transaction #: 033  
4445023595397-99

SSK Transaction #: 18  
USPS® # 114922-9552

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CHICAGO, IL 60602-4087 \$7.45  
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Zone-5  
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9505 5000 1793 8111 0002 69  
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\* Expected Delivery Day Monday, April 23.  
Issue Postage: YOUNG (work) \$7.45  
CHICAGO, IL 60602-3596 \$7.45  
Zone-5  
Priority Mail 2-Day® with up to \$50.00 Insurance and USPS Tracking™ included  
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9505 5000 1793 8111 0002 76  
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\* Expected Delivery Day Monday, April 23.  
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Total: \$44.70

Paid by:  
MasterCard \$44.70  
Account #: XXXXXXXXXXXXX8222  
Approval #: 042112  
Transaction #: 035  
4445023595397-99



Gordon Watts &lt;gww1210@gmail.com&gt;

## Watts v. Flannery and Shelley (No.: 123481 IL Supreme Court), Motion for Supervisory Orders, and lower court filings

gww1210@aol.com &lt;gww1210@aol.com&gt;

Sat, Apr 21, 2018 at 7:36 PM

To: gww1210@aol.com, Law@cookcountycourt.com, Diane.Shelley@cookcountyiil.gov, James.Flannery@cookcountyiil.gov, Timothy.Evans@cookcountyiil.gov, Tim.Evans@cookcountyiil.gov, PAOBrien@cookcountycourt.com, ccc.LawCalendarW@cookcountyiil.gov, AndjelkoGalic@hotmail.com, AGForeclosureDefense@gmail.com, Anselm45@gmail.com, ThirstForJustice@yahoo.com, Pking@khl-law.com, Pking@kingholloway.com, RIndyke@sbcglobal.net, PMSA136@gmail.com, PLShelton@sbcglobal.net, JoeYounes@sbcglobal.net, RoJoe69@yahoo.com, Hugh@hughdhowardlaw.com, HowardHughD@gmail.com, HughHowardWeb@gmail.com, AmyM@merscorp.com, AmyM@mersinc.org, SandraT@mersinc.org, SandraT@merscorp.com, JanisS@merscorp.com, JanisS@mersinc.org, SharonH@mersinc.org, SharonH@merscorp.com, KarmelaL@mersinc.org, KarmelaL@merscorp.com, Gww1210@gmail.com

Cc: iTeam@abc.com, Jason.R.Knowles@abc.com, WLS.Desk@abc.com, Chuck.Goudie@abc.com, AssignmentDesk@nbcuni.com, isee@nbcchicago.com, tips@nbcchicago.com, tips@cbschicago.com, wbbmnewsradiohost@entercom.com, wbbmnewsradiohost@cbsradio.com, wbbmnewsradiotips@entercom.com, wbbmnewsradiotips@cbsradio.com, DRWhite@cbs.com, jilevine@cbs.com, DLBlom@cbs.com, wbbmtvdesk@cbs.com, HCPAHL@cbs.com, MMEsparza@cbs.com, dvsavini@cbs.com, pzekman@cbs.com, News@foxchicago.com, Amy.Matheson@foxtv.com, Dane.Placko@foxtv.com, Info@moody.edu, Kurt@moody.edu, Dan.Craig@moody.edu, ChicagoBreaking@chicagotribune.com, Asachdev@chicagotribune.com, Asachdev@tribpub.com, JsKass@tribune.com, tis-dnsadmin@tribpub.com, byerak@chicagotribune.com, WLee@chicagotribune.com, JsKass@chicagotribune.com, PKendall@chicagotribune.com, jskass@aol.com, WLee@tribune.com, GPapaJohn@chicagotribune.com, BBrown@chicagotribune.com, ctcNorthWest@chicagotribune.com, ChicagoLand@chicagotribune.com, tips@chicagotribune.com, Geoff.Dankert@cbsradio.com, Geoff.Dankert@entercom.com, Jmann@cbs.com, Julie.Mann@entercom.com, ron.gleason@cbsradio.com, ron.gleason@entercom.com, ssmiller@wbbm-am.com, Stephen.Miller@entercom.com, pbiasco2@gmail.com, Pbiasco@dnainfo.com, Tcox@dnainfo.com, steve@steveance.net, info@chicagocityscape.com, SRN\_News@yahoo.com, LenzVideo@yahoo.com, info@oneillinois.com

**\* Watts v. Flannery and Shelley (No.: 123481 IL Supreme Court), Motion for Supervisory Orders, with IFP motion, and lower court filings: Motion for Summary Judgment (1st. App. Ct., 1-18-0572, GMAC v. Watts, et. al.) and Motion for Clarification concurrent with Rule 321 motion to limit Contents of the Record on Appeal (07CH29738, Law Division)**

### Court and Counsel:

I have just filed a motion for Supervisory Orders in the Illinois Supreme Court, Pursuant to Supreme Court Rule 383, and, after several failed attempts, it has now been accepted for review in case number 123481, and was E-FILED & court-stamped on Friday, 4/20/2018, 10:38 AM, by Carolyn Taft Grosboll, SUPREME COURT CLERK, seeking full review of the GMAC-line of cases, in which I am a defendant. As required by Rules 9-12, I filed electronically with the Supreme Court, and am effecting service as indicated in the Certificates of Service, and including courtesy email copies of those court and counsel for whom I have email addresses. The lead document is a 142-page PDF file, has numerous exhibits (A-M), and is about 20.4 MB in file size, and is therefore too large to include as an attachment. **Pursuant to Rule 11(c), "If service is made by e-mail, the documents may be transmitted via attachment or by providing a link within the body of the e-mail that will allow the party to download the document through a reliable service provider."** You may pick up a copy at mirror 1, hosted by GoDaddy, in Mesa, AZ:

[http://GordonWatts.com/MortgageFraudCourtDocs/Court-Stamped\\_No.123481\\_Fri20Apr2018\\_MotionForSupervisoryOrder\\_with\\_Exhibits\\_GordonWayneWatts.pdf](http://GordonWatts.com/MortgageFraudCourtDocs/Court-Stamped_No.123481_Fri20Apr2018_MotionForSupervisoryOrder_with_Exhibits_GordonWayneWatts.pdf)

You may also pick up a copy at mirror 2, hosted by HostGator, in Austin, TX:



[http://GordonWayneWatts.com/MortgageFraudCourtDocs/Court-Stamped\\_No.123481\\_Fri20Apr2018\\_MotionForSupervisoryOrder\\_with\\_Exhibits\\_GordonWayneWatts.pdf](http://GordonWayneWatts.com/MortgageFraudCourtDocs/Court-Stamped_No.123481_Fri20Apr2018_MotionForSupervisoryOrder_with_Exhibits_GordonWayneWatts.pdf)

The other 3 filings (my Motion in forma pauperis, in the Supreme Court, my motion for summary judgment to the 1st Appellate court, and directions for record on appeal, to the circuit court) are attached as PDF's. Additionally, you may pick up all the latest filings in this case, under the 'Law Division' heading, at my online docket, at these 2 direct links (which are also linked in front-page news of my main, namesake web-ring):

<http://www.GordonWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html>

or here

<http://www.GordonWayneWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html>

**\*\* P.S.: Please note, in the cc line of this email, the current and updated service addresses all parties, as there have been a few additions/deletions, in recent times. \*\***

Besides (#1) the hard copies served via U.S. Postal Mail, and (#2) the electronic copy of my filing, served, hereto (and #3 via court-approved efilings), you can, for your convenience, also (#4) if you lose the link above, you can pick up your copies of the all the key filings, on my Open Source (free) online docket—which appears to be up-to-date—in the above-captioned case (and related cases), linked as front-page news on my namesake blogs, GordonWatts.com or GordonWayneWatts.com – or directly linked above – which, unlike the court's docket, has downloads available: [https://courtlink.lexisnexis.com/cookcounty/FindDock.aspx?NCase=2007-CH-29738&SearchType=0&Database=2&case\\_no=&PLtype=1](https://courtlink.lexisnexis.com/cookcounty/FindDock.aspx?NCase=2007-CH-29738&SearchType=0&Database=2&case_no=&PLtype=1) ;

Let me remind everyone that there's a CASE MANAGEMENT CALL in Court Room 1105, before Hon. Patrice Munzel Ball-Reed, Associate Judge, CIVIL DIVISION, in the related Housing/Code case, at 9:30am CST, on Thursday, 31 May 2018, the sister-case, **where Mr. Younes is also a defendant, City of Chicago v. Younes et. al., case #: 2017-M1-400775**. Here's the Court's docket to verify:

<https://courtlink.lexisnexis.com/cookcounty/FindDock.aspx?DocketKey=CABH0MB0EAAHHF0MD>

For your reference, this code violation case is the one which was featured in at least seven (7) recent DNAinfo stories, and other news sources—two of which are shown here for brevity:

\*\* "'Rotted' Historic Building In Old Town Triangle Could Be Seized By City," by Ted Cox, *DNAinfo*, March 30, 2017:

<https://www.dnainfo.com/chicago/20170330/old-town/rotted-historic-building-old-town-triangle-could-be-seized-by-city>

\*\* "'Rotted' Old Town House Owner Given 45 Days To Come Up With Repair Plan," by Ted Cox, *DNAinfo*, September

01, 2017: <https://www.dnainfo.com/chicago/20170901/old-town/rotted-old-town-house-owner-given-45-days-come-up-with-repair-plan>

—and several related stories *The Register*, for which I'm the editor-in-chief, & more-recently, *ChicagoCityScape*:

\*\* "Landmarks commission still threatening fines if house in historic district isn't worked on once building permit is issued," by Ted Cox, *ChicagoCityscape*, November 09, 2017:

<https://blog.ChicagoCityScape.com/landmarks-commission-still-threatening-fines-if-house-in-historic-district-isnt-worked-on-once-390f052a2ab2>

Both the Housing and Law Division filings are docketed on the Open-source docket above, on my personal blog. Or, you could wait for the hard copies, which are in the mail to you, as required by Court rules. Should you lose these links, above, my open-source docket is still linked through the front-page news item in question, on The Register, my namesake blogs.

Best,

Gordon Wayne Watts

821 Alicia Road, Lakeland, FL 33801-2113

PH: (863) 688-9880 [home] or (863) 409-2109 [cell]

Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>

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

Court filings attached in PDF format.///

---/

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**3 attachments**



**Court-Stamped\_No.123481\_Fri20Apr2018\_Motion-InFormaPauperis\_WATTS.pdf**  
2199K



**Fri20Apr2018\_1-18-0572\_Watts\_MotSummaryJudgment.pdf**  
172K



**Fri20Apr2018\_MotionClarification\_07CH29738\_LawDiv\_Watts.pdf**  
1567K

**Exhibit 'J' -- Gordon Wayne Watts filing**

<b>FL0130900</b>	Gang Related	<b>N</b>	<b>OFFENSE-INCIDENT REPORT</b>			Juvenile in Report	<b>N</b>	Juvenile Warn/Dismiss		1. Original		2. Supplement	<b>1</b>
ADM	Date of Supplement			<b>Miami Springs Police Department</b>				Agency Report Number		Primary Offense Description			
								<b>1800522</b>		<b>ASLT/BAT SIMP</b>			

<b>Event Information</b>																																
Original Day Reported		<b>MON</b>		Date		<b>04/09/2018</b>		Time (mil)		<b>1751</b>		Time Dispatched (mil)		<b>1751</b>		Time Arrived (mil)		<b>1751</b>		Time Completed (mil)		<b>1830</b>										
Incident Type			1. Felony			3. Misdemeanor			5. Ordinance			Incident: Day			Date			Time (mil)			Day			Date			Time (mil)					
2. Traffic Felony			4. Traffic Misdemeanor			9. Other			From			<b>FRI</b>			<b>04/06/2018</b>			<b>1800</b>			To			<b>FRI</b>			<b>04/06/2018</b>			<b>1815</b>		
OFFINC #1		Type		<b>3</b>		<b>BATT/SIMP</b>		A-Attempted		<input type="checkbox"/>		C-Committed		<input type="checkbox"/>		Statute Violation Number - Chapter, Section, Sub		<b>784 - 03</b>		NCIC/UCR Code		<b>130B</b>										
OFFINC #2		Type						A-Attempted		<input type="checkbox"/>		C-Committed		<input type="checkbox"/>																		
Incident Location (Street Number, Street, Apt.)													City			Zip			District			Grid			Area			Zone				
<b>5301 NW 36ST</b>													<b>MIAMI SPRINGS</b>			<b>33166</b>			<b>05</b>			<b>1012</b>			<b>1012</b>							
Business Name/Area Identifier													Forced Entry			Occupancy																
<b>CLARION INN (RM# 431)</b>													<b>N/A</b>			<b>N/A</b>																
Location Type													05. Convenience Store			10. Dept/Discount Store			15. Industrial/Mfg.			20. Religious Bldg.			25. Parking Lot/Garage			30. Other Mobile				
01. Residence Single													06. Gas Station			11. Specialty Store			16. Storage			21. Airport			26. Highway/Roadway			31. Other				
02. Apartment/Condo													07. Liquor Sales			12. Drug Store/Hospital			17. Gov't/Public Bldg.			22. Bus/Rail Terminal			27. Park/Woodlands/Field							
03. Residence-Other													08. Bar/Nightclub			13. Bank/Financial Inst.			18. School/University			23. Construction Site			28. Lake/Waterway							
04. Hotel/Motel													09. Supermarket			14. Commercial/Office Bldg.			19. Jail/Prison			24. Other Structure			29. Motor Vehicle			<b>Hotel/Motel</b>				
# OFFINC.		# Victims		# Offenders		# Prem. Ent.		# Veh. Stolen		Type of Weapon		02. Rifle		05. Knife/Cutting Instrument		07. Hands/Fist/Feet		10. Fire/Incendary		13. Drugs												
<b>01</b>		<b>01</b>		<b>01</b>		<b>00</b>		<b>00</b>		00. N/A		03. Shotgun		06. Blunt Object		08. Poison		11. Threat/Intimidation		88. Unknown												
										01. Handgun		04. Firearm		09. Explosives		12. Simulated Weapon		99. Other				<b>Hands/Fist/Feet</b>										

<b>Persons Information</b>																									
VW Code		Person Type		Race		Sex		Residence Type		Residence Status		Extent of Injury													
V - Victim		1. Juvenile		N-N/A		N-N/A		0. N/A		0. N/A		0. None													
W - Witness		2. L.E. Officer		W-White		M-Male		1. City		1. Full Year		1. Minor													
		3. Adult		B-Black		F-Female		2. County		2. Part Year		2. Serious													
		4. Business		O-Oriental/Asian		U-Unknown		3. Florida		3. Non-Resident		3. Fatal													
		5. Government		U-Unknown				4. Out-of-State																	
		6. Church																							
		9. Other																							
Injury Type		03. Laceration		07. Loss of Teeth		Victim Relationship To Offender		08. Parent		10. Step-Child		17. Friend		21. Employer											
00. N/A		04. Unconscious		08. Burns		00. N/A		09. Spouse		11. In-Law		14. Teacher		22. Landlord/Tenant											
01. Gunshot		05. Poss. Broken Bones		09. Abrasions/Bruses		01. Undetermined		04. Ex-Spouse		12. Other Family		15. Child of Boy/Girl Friend		18. Neighbor											
02. Stabbed		06. Poss. Internal Injury		99. Other		02. Stranger		05. Co-Habitant		09. Step-Parent		16. Boy/Girl Friend		19. Sister/Day Care											
												20. Employee		99. Other Known											
OFFINC Indicator		VW Code #		Person Type		Name (Last, First, Middle or Business)						Residence Phone													
1 - #1		<b>V</b>		<b>01</b>		<b>WATTS GORDON WAYNE</b>						<b>863 608-9880</b>													
2 - #2																									
3 - Both																									
Address (Street, Apt. Number)													City		State		Zip		Business Phone						
<b>821 ALICIA RD</b>													<b>LAKELAND</b>		<b>FL</b>		<b>33801</b>								
Other Contact Info. (Time Available, Interpreter, etc.)													Synopsis of Involvement												
<b>CELL# (863) 404-2109/ EMAIL: GWW1210@GMAIL.COM</b>													<b>V-1/ VICTIM OF BATTERY</b>												
If VW Code is V, W or C Fill in this Line		Dom. Violence		Race		Sex		Date of Birth		Age		Res. Type		Res. Status		Extent of Injury		Injury Type(s)		Relationship		Ethnicity		Will Victim prefer charge?	
		<b>N</b>		<b>W</b>		<b>M</b>		<b>04/19/1966</b>		<b>51</b>		<b>3</b>		<b>1</b>		<b>1</b>		<b>03 00</b>		<b>20</b>				Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

<b>ADMINISTRATIVE</b>	Signature of Officer Reporting			Name of Officer Reporting			I.D. Number/Locator Code			Unit#			Date		
				<b>ROBBINS, J</b>			<b>0163</b>			<b>216</b>			<b>04/09/2018</b>		
	Signature of Officer Reviewing			Officer Reviewing (If Applicable)			I.D. Number			Date					
				<b>LOPEZ, T</b>			<b>0170</b>			<b>04/09/2018</b>					
Case Status		CF - Filed with State Atty		I - Inactive		Clearance Type		A-Adult		Date Cleared		Arrest Number			
CA - Cleared by Arrest		CU - Cleared Unfounded		A - Active		1 Arrest		J-Juvenile							
CE - Cleared Exceptionally				P - Pending		2 Exceptional									
Exception Type		2. Arrest on Primary Offense		3. Death of Offender		5. Prosecution Declined		Related Report Number(s)		Number Arrested					
1. Extradition Declined		Secondary Offense Without Prosecution		4. V / W Refused to Cooperate		6. Juvenile/No Custody									

FL0130900		Gang Related	N	<b>OFFENSE-INCIDENT REPORT</b>				Juvenile in Report	N	Juvenile Warn/Dismiss	1. Original	2. Supplement	1				
ADM	Date of Supplement			<b>Miami Springs Police Department</b>				Agency Report Number		Primary Offense Description							
								1800522		ASLT/BAT SIMP							
CODES	Suspect Race		Suspect Sex		Hair Length		Hair Style		Complexion		Build		Facial Hair				
	N-NIA W-White B-Black		N-NIA F-Female M-Male U-Unknown		L-Long M-Medium S-Short		A-Afro B-Braided C-Curly		ACN-Acne DK-Dark MED-Medium		HEV-Heavy MED-Medium THN-Thin		B-Beard/Goatee C-Beard & Mustache E-Ear Ring(s)				
SUSPECT OR MISSING PERSONS	OFFINC Indicator		Suspect Code		Code		Susp. #		Juvenile		Name (Last, First, Middle)						
	1 - #1 2 - #2 3 - Both		S-Suspect A-Arrestee		E-Escaped R-Rec. Missing Z-Other		S		01		N		[REDACTED]				
	Maiden Name				Nickname/Street Name				Place of Birth		Residence Phone						
											863 [REDACTED]						
	Last Known Address (Street, Apt. Number)						City		State		Zip		Business Phone				
	[REDACTED] LANE						LAKELAND		FL		33813						
	Occupation				Employer/School				Address				Social Security Number				
	CONSTRUCTION																
	Driver's License State/Number				Immigration and Naturalization Number				Other ID. Number		OBTS Number		SCIC/NCIC				
	[REDACTED] FL																
Clothing (Describe)						Scars/Marks/Tatoos (Location/Describe)											
Race		Sex		Date of Birth or Age		Height		Weight		Eye Color		Hair Color		Hair Length		Hair Style	
W		M		[REDACTED]		509		170		BRO		BRO		S		W	
Complexion		Build		Facial Hair		Teeth		Speech/Voice		Social Identifiers							
LT		THN															

**Narrative**

Watts contacted MSPD and advised he was battered by his employer [REDACTED] on the listed date and between the listed times at the listed hotel. Watts stated he and [REDACTED] were staying at the Clarion Inn (rm# 431). Watts stated [REDACTED] then confronted him about talking about a subject that [REDACTED] did not want Watts talking about with other employees. [REDACTED] then became irate and pushed Watts onto the bed and then started slapping him numerous times in his face, causing a minor cut to Watt's right eyebrow. Watts stated he did not fight back or call the police because he was worried about not having transportation back to Lakeland the next day.

The following day Watts and [REDACTED] were traveling back to Lakeland in [REDACTED]'s vehicle, at which time [REDACTED] back handed Watts in the face because Watt's was talking to much. It is unknown if the battery inside the Watt's vehicle occurred in Miami Springs jurisdiction. Watts stated he took photos of his injuries and e-mail them to the Miami Springs CPO. This report was taken over the telephone since victim is back in Lakeland.

ADMINISTRATIVE	Signature of Officer Reporting		Name of Officer Reporting		I.D. Number/Locator Code		Unit#		Date		
			ROBBINS, J		0163		216		04/09/2018		
	Signature of Officer Reviewing		Officer Reviewing (If Applicable)		I.D. Number				Date		
			LOPEZ, T		0170				04/09/2018		
Case Status		CF - Filed with State Atty		I - Inactive		Clearance Type		Date Cleared		Arrest Number	
CA - Cleared by Arrest CE - Cleared Exceptionally		CU - Cleared Unfounded		A - Active P - Pending		1 Arrest 2 Exceptional					
Exception Type		1. Extradition Declined		2. Arrest on Primary Offense Secondary Offense Without Prosecution		3. Death of Offender 4. V / W Refused to Cooperate		5. Prosecution Declined 6. Juvenile/No Custody		Related Report Number(s)	
										Number Arrested	

**In the Appellate Court of Illinois, First District****Docket Number: 1-18-0572**

**GMAC Mortgage, LLC, Plaintiffs,** ) Appeal from the Circuit Court of Cook County, IL  
**vs.** ) County Department, Law Division  
) **Trial Court No.: 07CR29738**  
**Gordon Wayne Watts, et. al., Defendants.** ) (Transfer into **Law Division** from Chancery)  
) **Trial Judge:** Hon. James P. Flannery, Jr. (#1505)  
**Gordon Wayne Watts,** ) **Notice of Appeal date:** Friday, 16 March 2018  
**Appellant/Counter-Plaintiff,** ) **Judgment Date:** Thursday, 01 March 2018  
**vs.** ) **Date of Post-judgment Motion:** None  
) **Order:** #6  
**Hon. Diane M. Shelley and Hon. James** ) Supreme Court Rule(s) which confer(s) jurisdiction  
**P. Flannery, Jr., Counter-Defendants.** ) upon the reviewing court: **Ill.Sup.Ct. R.301, 303**

**Motion for Summary Judgment**

**Appellant, Gordon Wayne Watts, gives judicial notice to Reviewing Court** that the appeal in this case was on 16 March 2018, and Rule 326 mandates that the Record on Appeal “shall be filed in the reviewing court within 63 days after the filing of the notice of appeal,” making Friday, 18 May 2018 the due date for the Record on Appeal. However, as the matter being appealed (1-18-0572, the instant appeal) is the circuit court's refusal to prepare the Record on Appeal in the sister case, 1-18-0091, due to 'alleged' lack of rights to Intervene, and subsequent lack of rights to Fee Waiver, the preparation of **any** preparation of the record in these case is moot: The trial court refuses to comply with the law, forcing this appeal. However, as the 7-7-2017 Motion to Intervene (Exhibit A, which was filed with the docketing statement and fee waiver in this case) gives sufficient, even overwhelming, rights to Intervene, no further record is needed, and the matter is ripe for Summary Judgment is favour of movant.

A motion for summary judgment should be granted only when the pleadings, depositions, admissions, and affidavits on file, if any, show that there is no genuine issue of material fact and that the moving party is entitled to judgment as a matter of law. **735 ILCS 5/2-1005 (West 1994)** Summary judgment is a drastic measure and should be used only when the right of the moving party is clear and free from doubt. *Loyola Academy v. S & S. Roof Maintenance, Inc.*, 146 Ill.2d 263, 271, 166 Ill.Dec. 882,586 N.E.2d 1211 (1992). This court reviews summary judgment orders *de novo*. *Zoeller v. Augustine*, 271 Ill.App.3d 370, 374,208 Ill.Dec. 17, 648 N.E.2d 939 (1995); *Demos v. National Bank of Greece*, 209 Ill.App.3d 655, 659,153 Ill.Dec. 856, 567 N.E.2d 1083 (1991).

Appellant, Gordon Wayne Watts, elects to allow his docketing statement & exhibits to stand as his initial brief of the appellant, as no new material facts are needed to decide this appeal—and now moves for Summary Judgment vacating the order being appealed.

*Respectfully submitted,**/s/Gordon Wayne Watts***Page 1**



GMAC v. Watts, et al., 1-18-0572 (ILLINOIS First Appellate Court)

**Verification by Certification**

I, Gordon Wayne Watts, the undersigned Movant, under penalties as provided by law pursuant to 735 ILCS 5/1-109, Section 1-109 of the ILLINOIS Code of Civil Procedure, hereby certify that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and, as to such matters, the undersigned certifies as aforesaid that he verily believes the same to be true: “Any pleading, affidavit or other document certified in accordance with this Section may be used in the same manner and with the same force and effect as though subscribed and sworn to under oath.” Source: 735 ILCS 5/1-109: <http://www.ILGA.gov/legislation/ilcs/documents/073500050K1-109.htm>

**Nonetheless, This Court has on record several of my sworn, witnessed, and notarised affidavits, just to remove any and all doubt hereto.**

Date: **Friday, 20 April 2018**

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

NO. 1-18-0572

**IN THE APPELLATE COURT OF ILLINOIS  
FIRST DISTRICT**

GMAC Mortgage, LLC, Plaintiff	)	Appeal from the Circuit Court of Cook County, IL
vs.	)	No. <b>07CR29738</b>
Gordon W. Watts, et. al.,	)	<b>(Transfer into <u>Law</u> Division from Chancery)</b>
Defendants	)	Hon. James P. Flannery, Jr., Judge Presiding

**ORDER**

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

**IT IS HEREBY ORDERED that** the Circuit Court of Cook County shall vacate its order in *GMAC Mortgage, LLC v. Watts*, case No. 2007-CH-29738 (03/01/2018), denying Gordon Wayne Watts leave to intervene. The circuit court is instructed to grant Mr. Watts a Fee Waiver, and prepare the selected Record on Appeal items listed in Watts' draft order in his 03/16/2018 Motion for Extension of Time to file Record on Appeal in case no. 1-18-0091 and transmit the record to this court by electronic means.

**The trial court shall speedily prepare the selected record, so notify this court, and transmit it to this court by electronic means, on accelerated docket.**

**IT IS SO ORDERED.**

\_\_\_\_\_  
Justice

\_\_\_\_\_  
Justice

\_\_\_\_\_  
Justice

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

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

**Docket Number: 1-18-0572**

<b>GMAC Mortgage, LLC, Plaintiffs,</b> vs.	)	Appeal from the Circuit Court of Cook County, IL County Department, Law Division <b>Trial Court No.: 07CR29738</b>
<b>Gordon Wayne Watts, et. al., Defendants.</b>	)	(Transfer into <b>Law Division</b> from Chancery) <b>Trial Judge:</b> Hon. James P. Flannery, Jr. (#1505)
<b>Gordon Wayne Watts,</b> <b>Appellant/Counter-Plaintiff,</b> vs.	)	<b>Notice of Appeal date:</b> Friday, 16 March 2018 <b>Judgment Date:</b> Thursday, 01 March 2018 <b>Date of Post-judgment Motion:</b> None <b>Order:</b> #6
<b>Hon. Diane M. Shelley and Hon. James P. Flannery, Jr., Counter-Defendants.</b>	)	Supreme Court Rule(s) which confer(s) jurisdiction 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, **Friday, 20 April 2018**, I am causing to be filed with the ILLINOIS 1<sup>st</sup> Appellate Court my **Motion for Summary Judgment**, copies of which are attached hereto and herewith served upon you.

Respectfully submitted,

\_\_\_\_\_  
 (Actual Signature, if served upon clerk)  
**Gordon Wayne Watts**

/s/ Gordon Wayne Watts  
 (Electronic Signature)  
**Gordon Wayne Watts**

Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]  
 821 Alicia Road, Lakeland, FL 33801-2113  
 PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
 Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
 Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)

*GMAC v. Watts, et al.*, 1-18-0572 (ILLINOIS First Appellate Court)

**SERVICE LIST**

\* **CIVIL APPEALS DIVISION: Cook County, IL Circuit Court**, 312-603-5406, Richard J. Daley Center, 50 West Washington St., Room 801, Chicago, IL 60602 – Attention: Deputy Chief, Patricia O'Brien, [PAOBrien@CookCountyCourt.com](mailto:PAOBrien@CookCountyCourt.com) Hours: 8:30a-4:30p, Mon-Fri, Excl. Holidays, **[served by email only, as a courtesy, since they are not a party proper]**

\* **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 only, as a courtesy, since he is not a party proper]**

\* **Hon. James P. Flannery, Jr.**, Circuit Judge–Presiding Judge, Law Division 50 W. Washington St., Room 2005, Chicago, IL 60602, Ph:312-603-6343, Courtesy copy via: [James.Flannery@CookCountyIL.gov](mailto:James.Flannery@CookCountyIL.gov) **[served in all ways, as Judge Flannery is a defendant]**

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

\* **Richard B. Daniggelis** [true owner of 1720] 312-774-4742, c/o John Daniggelis, 2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652

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

\* **Robert J. More** ( [Anselm45@Gmail.com](mailto:Anselm45@Gmail.com) ) [Note: **More's** name is **misspelled** on docket as: “**MOORE ROBERT**”] P.O. Box 6926, Chicago, IL, 60680-6926, PH: (708) 317-8812 [[Mr. More has made a formal request by email to receive service solely by email, and waives hard-copy service.]]

\* **Associated Bank, N.A.**, 200 North Adam Street, Green Bay, WI 54301-5142

\* **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

GMAC v. Watts, et al., 1-18-0572 (ILLINOIS First Appellate Court)

**SERVICE LIST (continued)**

Holdings, Inc. – PH: (703) 761-1270, FAX: (703) 748-0183, [SharonH@MersInc.org](mailto:SharonH@MersInc.org) ;  
[SharonH@MersCorp.com](mailto:SharonH@MersCorp.com) Cc: Janis Smith, 703-738-0230, VP, Corp. Comm. is no longer with  
MersCorp, and Amy Moses ([AmyM@MersCorp.com](mailto:AmyM@MersCorp.com) ; [AmyM@MersInc.org](mailto:AmyM@MersInc.org)) has replaced her  
as an email contact; Sandra Troutman 703-761-1274, E: [SandraT@MersInc.org](mailto:SandraT@MersInc.org) ;  
[SandraT@MersCorp.com](mailto:SandraT@MersCorp.com)) Dir, Corporate Communications, Karmela Lejarde, Communications  
Manager, Tel~ 703-761-1274, Mobile: 703-772-7156, Email: [KarmelaL@MersInc.org](mailto:KarmelaL@MersInc.org) ;  
[KarmelaL@MersCorp.com](mailto:KarmelaL@MersCorp.com) C/o: **MERS (Mortgage Electronic Registration Systems, Inc.),  
1901 East Vorhees Street, Suite 'C', Danville, IL 61834-4512**

\* **COHON RAIZES®AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)**

Attn: Carrie A. Dolan, pPh:(312) 726-2252  
208 S LASALLE, Suite #1860, CHICAGO IL, 60604

\* **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]

\* **Richard Indyke, Esq.** Atty. No. 20584, ([RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net) ; 312-332-2828 ; 773-593-  
1915 most recent “Attorney of record” for LaSalle Bank Natl. Assn.), 111 South Washington  
Ave., Suite 105, Park Ridge, IL 60068-4292 [[Mr. Indyke claims to not represent any party in the  
instant appeal, but the undersigned can not find any more recent atty of record for defendant,  
LaSalle Bank, and reluctantly will keep Mr. Indyke on the service list, unless excused by The  
Court.]]

\* **Peter King (Atty. for Joseph Younes)** (Atty. No.: 48761)

(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221  
<http://www.KingHolloway.com/contact.htm> ; Attn: Peter M. King, Esq. [PKing@khl-law.com](mailto:PKing@khl-law.com) or:  
[PKing@KingHolloway.com](mailto:PKing@KingHolloway.com) ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

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

\* **Joseph Younes** (Atty#:55351) Law Offices / <http://ChicagoAccidentAttorney.net>

312-635-5716, per website, Ph: 312-372-1122 ; 312-802-1122 ; Fax: 312-372-1408 E:  
[RoJoe69@yahoo.com](mailto:RoJoe69@yahoo.com) 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596

\* **Paul L. Shelton, Pro Se,** (Atty. #15323, disbarred per IARDC)

E: [PMSA136@Gmail.com](mailto:PMSA136@Gmail.com) ; [PLShelton@SBCGlobal.net](mailto:PLShelton@SBCGlobal.net) – 3 Grant Square, SUITE #363,  
Hinsdale, IL 60521-3351

\* **Erika R. Rhone** 22711 Southbrook Dr., Sauk Village, IL 60411-4291





NO. 1-18-0572

IN THE APPELLATE COURT OF ILLINOIS  
FIRST DISTRICT

GMAC Mortgage, LLC, Plaintiff	) Appeal from the Circuit Court of Cook County, IL
vs.	)
	) No. 07CR29738
	) (Transfer into Law Division from Chancery)
Gordon W. Watts, et. al., Defendants	)
	) Hon. James P. Flannery, Jr., Judge Presiding

**ORDER**

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

**IT IS HEREBY ORDERED** that the ~~Circuit Court of Cook County shall vacate its order in GMAC Mortgage, LLC v. Watts, case No. 2007-CH-29738 (03/01/2018), denying Gordon Wayne Watts leave to intervene. The circuit court is instructed to grant Mr. Watts a Fee Waiver, and prepare the selected Record on Appeal items listed in Watts' draft order in his 03/16/2018 Motion for Extension of Time to file Record on Appeal in case no. 1-18-0091 and transmit the record to this court by electronic means.~~ *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)*

~~The trial court shall speedily prepare the selected record, so notify this court, and transmit it to this court by electronic means, on accelerated docket.~~

*Motion Denied.*

IT IS SO ORDERED.

**ORDER ENTERED**

MAY 03 2018

**APPELLATE COURT, FIRST DISTRICT**

*James P. Flannery, Jr.*  
Justice

\_\_\_\_\_  
Justice

\_\_\_\_\_  
Justice

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

THOMAS D. PALELLA  
CLERK OF THE APPELLATE COURT 1ST DISTRICT  
160 NORTH LASALLE STREET, RM 51400  
CHICAGO, ILLINOIS 60601

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1-18-0572

GORDON WAYNE WATTS  
821 ALICIA ROAD  
LAKELAND FL 33801

*Rec'd*  
*Sat. 07 May 2018*  
*[Signature]*

33801-211321



**From:** Tumialán, Rosa M. <RTumialan@dykema.com>  
**To:** gww1210 <gww1210@aol.com>  
**Subject:** Re: GMAC v Watts - Atty's Indyke, Tumialán, and Williams: Questions about who is to be served filings...  
**Date:** Wed, May 2, 2018 9:21 pm

---

I received a similar long winded voicemail. Tread carefully. And perhaps only in writing.

On May 2, 2018, at 7:49 PM, "[gww1210@aol.com](mailto:gww1210@aol.com)" <[gww1210@aol.com](mailto:gww1210@aol.com)> wrote:

**\*\*\* SUBJECT: "GMAC v Watts - Atty's Indyke, Tumialán, and Williams: Questions about who is to be served filings..."**

**\*\*\* To: Rosa M. Tumialán, Esq.** ([RTumialan@Dykema.com](mailto:RTumialan@Dykema.com)) c/o DYKEMA GOSSETT, PLLC  
 10 South Wacker Drive, Suite 2300, Chicago, IL 60606-7407 ; Phone: 312-876-1700 ; Direct: 312-627-2139  
**\*\*\* To: Dawn N. Williams, Esq.** ([DWilliams@Dykema.com](mailto:DWilliams@Dykema.com)) c/o DYKEMA GOSSETT, PLLC  
 300 Ottawa Ave., N.W., Suite 700, Grand Rapids, MI 49503-2306 ; Phone: 616-776-7518  
**\*\*\* Cc: Richard Indyke, Esq. Atty. No. 20584.** ([RIndyke@SBCGlobal.net](mailto:RIndyke@SBCGlobal.net)) -- most recent "Attorney of record"  
 for LaSalle Bank Natl. Assn. --until now) -- 111 South Washington Ave., Suite 105, Park Ridge, IL 60068-4292 ; Phone: 312-332-2828 ; 773-593-1915

### **Attorneys Tumialán and Williams:**

I am in receipt of your e-filing, earlier today, in ***GMAC v. Watts, 1-18-0091***, in the Illinois 1st Appellate Court (and which I've attached as a PDF to my email, here). There are a few confusing issues that need addressing.

[[#1]] -- First off, I got an email from Atty, Richard Indyke (who is a cc recipient here), and he claims that he is not representing any party in my appeal, but he was the last attorney of record for LaSalle Bank. So, I kept him in my "Service List" to comply with IL Supreme Court Rule 11(a), regarding service of parties. However, now that I see you enter an appearance for GMAC, and call it "aka LaSALLE BANK NATIONAL ASSOCIATION" in the case style of your appearance brief (which is attached as a PDF file to my email here), I would like clarification on Mr. Indyke's concern: Is he correct in asserting that a new attorney or firm took over representation of the plaintiff?

I ask this because he strongly implied in his last email that he didn't want me to bother with serving him Service Copies of my pleadings, as I thought I was required to do. (I inferred this from his request to not respond to his email.) If either, or, both of you can certify that you all (and not Mr. Indyke) now represent the plaintiff, then I will (in any future Certificates of Service and/or Service Lists) note that Mr. Indyke no longer is on my Service list due to not representing any party any longer. (I am advocating on Mr. Indyke's behalf, as a professional courtesy, and because my religion -- whatever it is -- compels me to seek the easiest, and most peaceful, solution for all.)

[[#2--a]] Secondly, you made 2 typos in your brief: First off, my zip code isn't 3380, but rather 33801, as zip codes are either 5-digit, or, in my case, a 9-digit upgrade is applicable, which is 33801-2113, if you like.

[[#2--b]] Your other typo is a bit tricky.. while Judge Flannery is indeed the presiding judge of the Law Division, he is NOT the presiding judge of the underlying case from which I appeal in 1-18-0091 (as you indicate in your appearance brief), but rather, as the docket shows, Judge Diane M. Shelley, Circuit Judge (Law Division, Cook County, IL Circuit Court) is the presiding judge, at present. Now, in 1-18-0572, a sister case, where I appealed Judge Flannery's denial of a fee waiver, he might be considered a 'presiding' judge, and, in fact, both appeals derive from the same Law Division case (which was transferred from Chancery, and bears the same style and case number), so I can see why you might have gotten confused. (No worries, as this is -- legally-speaking, "*de minimus*," LOL).



[[#3]] -- Lastly, however, speaking of Rule 11(a)... No disrespect meant to any of you ... but I plainly notice that you all are egregiously violating this rule, as you claim, in your Certificate of Service, to have served ONLY myself. I'm not trying to insult or offend any of you, but I respectfully ask: Am I missing something, here? Is there some rule, statute, or case law, which allows you to serve only 1 or 2 of the parties... and not "all" of the parties as the rules clearly require?

**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.

Also, in case you didn't notice, your client, LaSalle aka GMAC, is a party to all five (5) cases in which I am litigating for justice: (1) the circuit court case, GMAC v Daniggelis, Watts, Younes, Shelton, et al. 2007-CH-29738, (2) THREE cases in the 1st Appellate Court, 1-18-0091 (appealing Judge Shelley's last order), 1-18-0572 (appealing the subsequent order by Judge Flannery in that case), and 1-18-0538 (an Art. 6, Sec. 6, Original Jurisdiction MANDAMUS action in this reviewing court, and, yes, they do have jurisdiction under Art. VI, Sec. 6), and lastly, a Rule 383 Motion for Supervisory Orders in case number: 123481, in the Illinois Supreme Court.

As I am the guy who nearly won the infamous 'Terri Schiavo' case -- all by myself -- in \*my\* state's supreme court (losing 4-3, and doing than former Gov. Jeb Buch, who lost 7-0 before the same panel), I think I have a chance of getting a fair shake in \*this\* state's supreme court.

In case you didn't get the note, regarding these filings, and don't want to pay huge Public Records fees to the courts, you may download a True Copy of most or all filings in these - and related - cases, on my own on-line docket, for free. Mirror 1, here, is hosted by GoDaddy, based in Mesa AZ:

<http://GordonWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html>

Mirror 2, here, is hosted by HostGator, based in Austin, TX:

<http://GordonWayneWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html>

Should you lose the links, my docket is linked in front-page news, of my namesake blogs, [GordonWatts.com](http://GordonWatts.com) and [GordonWayneWatts.com](http://GordonWayneWatts.com), as indicated in my Certificates of Service. If I may be of any further service to you, please don't hesitate to contact me.

By the way, in case you're curious, I will spill: I don't have any beef, gripes, complaints, or grievances with or against your client, GMAC, as I think they were just as much an innocent victim, here. Thank you for exercising your 1st Amendment Rights of Redress in these matters: This is what makes Democracy work in our Republic.

Please clarify me on these matters, above. Thank you, in advance, for your help here. With kind regard, I am,

Sincerely,

Gordon Wayne Watts  
 821 Alicia Road, Lakeland, FL 33801-2113  
 PH: (863) 688-9880 [home] or (863) 409-2109 [cell]  
 Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>  
 Email: [Gww1210@aol.com](mailto:Gww1210@aol.com) / [Gww1210@gmail.com](mailto:Gww1210@gmail.com)  
 Court filings attached in PDF format.///

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**Gordon Wayne Watts, editor-in-chief, [The Register](#)**

[www.GordonWayneWatts.com](http://www.GordonWayneWatts.com) / [www.GordonWatts.com](http://www.GordonWatts.com)

## **ALWAYS FAITHFUL - To God**

**BS, The Florida State University, Biological & Chemical Sciences**

**AS, United Electronics Institute**

**821 Alicia Road, Lakeland, FL 33801-2113**

**Home: (863) 688-9880 Work: (863) 686-3411 Voice&FAX: (863) 687-6141 Cell: (863)409-2109**

**See also: [http://Gordon\\_Watts.Tripod.com/consumer.html](http://Gordon_Watts.Tripod.com/consumer.html)**

**[Gww1210@aol.com](mailto:Gww1210@aol.com) ; [Gww12102002@Yahoo.com](mailto:Gww12102002@Yahoo.com)**

**Truth is the strongest, most stable force in the Universe**

**Truth doesn't change because you disbelieve it**

**TRUTH doesn't bend to the will of tyrants**

[www.GordonWayneWatts.com](http://www.GordonWayneWatts.com) / [www.GordonWatts.com](http://www.GordonWatts.com)

**Get Truth.**

**"First, they [Nazis] came for the Jews. I was silent. I was not a Jew. Then they came for the Communists. I was silent. I was not a Communist. Then they came for the trade unionists. I was silent. I was not a trade unionist. Then they came for me. There was no one left to speak for me." (Martin Niemöller, given credit for a quotation in The Harper Religious and Inspirational Quotation Companion, ed. Margaret Pepper (New York: Harper & Row, 1989), 429 -as cited on page 44, note 17, of Religious Cleansing in the American Republic, by Keith A. Fornier, Copyright 1993, by Liberty, Life, and Family Publications.**

**Some versions have Mr. Niemöller saying: "Then they came for the Catholics, and I didn't speak up, because I was a Protestant"; other versions have him saying that they came for Socialists, Industrialists, schools, the press, and/or the Church; however, it's certain he DID say SOMETHING like this. Actually, they may not have come for the Jews first, as it's more likely they came for the prisoners, mentally handicapped, & other so-called "inferiors" first -as historians tell us -so they could get "practiced up"; however, they did come for them -due to the silence of their neighbors -and due in part to their own silence. So: "Speak up now or forever hold your peace!"-GWW**

<Wed02AMay2018\_1-18-0091\_GMAC\_NoticeOfAppearance.pdf>

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**Rosa M. Tumialán**  
Member

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312-627-2139 Direct

312-876-1700 Main

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10 South Wacker Drive, Suite 2300

Chicago, Illinois 60606

[www.dykema.com](http://www.dykema.com)



Gordon Watts &lt;gww1210@gmail.com&gt;

---

**GMAC v Watts - Atty's Indyke, Tumialán, and Williams: Questions about who is to be served filings...**

---

**gww1210@aol.com** <gww1210@aol.com>  
To: RTumialan@dykema.com  
Cc: gww1210@gmail.com, gww1210@aol.com

Wed, May 2, 2018 at 11:09 PM

You are correct: I left you a similar, somewhat lengthy, voicemail. Thank for your suggestions, atty Tumialan. I hope to do as you suggest. As soon as you are able to look into my questions, you would have my gratitude for clarifying these gray areas.

I know normally email suffices, but the last matter looked important, and I thought maybe it wouldn't inconvenience you when you might know the answer easily, so I called before it got too late in the central time zone, where you are. But as important as the service matter may be (and I admit frustration with the system, tho not with your client), take your time if you need more time to get clear answers yourself. Thank you in advance in this regard.

Ps: what are gmac's interests in this matter, as they apparently suffered less losses than myself and Mr. Daniggelus, if I may ask?

Gordon W. Watts

Sent from AOL Mobile Mail

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On Wednesday, May 2, 2018 Tumialán, Rosa M. <RTumialan@dykema.com> wrote:

I received a similar long winded voicemail. Tread carefully. And perhaps only in writing.

[Quoted text hidden]

<Wed02AMay2018\_1-18-0091\_GMAC\_NoticeOfAppearance.pdf>

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No. 1-18-0091

IN THE APPELLATE COURT OF ILLINOIS  
FIRST JUDICIAL DISTRICT

GMAC MORTGAGE LLC k/n/a BANK OF AMERICA,  
N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka  
U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust  
2006-16AX,

Plaintiff/Appellee,

vs.

GORDON WAYNE WATTS,

Defendant/Appellant

and

RICHARD B. DANIGGELIS, JOSEPH YOUNES,  
MORTGAGE ELECTRONIC REGISTRATION SYSTEMS  
(MERS), PAUL L. SHELTON, ERIKA R. RHONE,  
STEWART TITLE ILLINOIS, JOHN P. LaROCQUE,  
ROBERT J. MORE, LEGATEES AND NON-RECORD  
CLAIMANTS, UNKNOWN HEIRS, UNKNOWN  
OWNERS,

Defendants.

Appeal from the Circuit Court  
of Cook County, Illinois

Case No. 2007 CH 29738

Honorable James P. Flannery, Judge  
Presiding

**APPEARANCE**

We hereby enter the Appearance of Dykema Gossett PLLC as attorneys for Appellee, **GMAC MORTGAGE LLC k/n/a BANK OF AMERICA, N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust 2006-16AX**, in the above-entitled cause.

DATED: May 2, 2018

Respectfully submitted,

Rosa M. Tumialán ([rtumialan@dykema.com](mailto:rtumialan@dykema.com))  
DYKEMA GOSSETT PLLC  
10 South Wacker Drive, Suite 2300  
Chicago, IL 60606-7407  
(312) 876-1700

By: Rosa M. Tumialán  
Attorney for Appellee, GMAC MORTGAGE  
LLC k/n/a BANK OF AMERICA, N.A. aka  
LaSALLE BANK NATIONAL  
ASSOCIATION aka U.S. BANK N.A., as  
trustee for Morgan Stanley Loan Trust 2006-  
16AX

Dawn Williams ([dwilliams@dykema.com](mailto:dwilliams@dykema.com))  
DYKEMA GOSSETT PLLC  
300 Ottawa Ave., N.W., Suite 700  
Grand Rapids, MI 49503-2306  
Phone: 616-776-7518

No. 1-18-0091

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IN THE APPELLATE COURT OF ILLINOIS  
FIRST JUDICIAL DISTRICT

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GMAC MORTGAGE LLC k/n/a BANK OF AMERICA,  
N.A. aka LaSALLE BANK NATIONAL ASSOCIATION aka  
U.S. BANK N.A., as trustee for Morgan Stanley Loan Trust  
2006-16AX,

Plaintiff/Appellee,

vs.

GORDON WAYNE WATTS,

Defendant/Appellant

and

RICHARD B. DANIGGELIS, JOSEPH YOUNES,  
MORTGAGE ELECTRONIC REGISTRATION SYSTEMS  
(MERS), PAUL L. SHELTON, ERIKA R. RHONE,  
STEWART TITLE ILLINOIS, JOHN P. LaROCQUE,  
ROBERT J. MORE, LEGATEES AND NON-RECORD  
CLAIMANTS, UNKNOWN HEIRS, UNKNOWN  
OWNERS,

Defendants.

Appeal from the Circuit Court  
of Cook County, Illinois

Case No. 2007 CH 29738

Honorable James P. Flannery, Judge  
Presiding

**NOTICE OF FILING**

TO: Gordon Wayne Watts  
821 Alicia Road  
Lakeland, FL 3380

PLEASE TAKE NOTICE that on **May 2, 2018**, we caused to be filed with the Clerk of the Appellate Court of Illinois, First District, the attached **Plaintiff/Appellee's Appearance**, a copy of which is served on you.

Rosa M. Tumialán ([rtumialan@dykema.com](mailto:rtumialan@dykema.com)) Respectfully submitted,  
DYKEMA GOSSETT PLLC  
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Chicago, IL 60606-7407  
(312) 876-1700

Dawn Williams ([dwilliams@dykema.com](mailto:dwilliams@dykema.com))  
DYKEMA GOSSETT PLLC  
300 Ottawa Ave., N.W., Suite 700  
Grand Rapids, MI 49503-2306  
Phone: 616-776-7518

By: Rosa M. Tumialán  
One of the Attorneys for Plaintiff/ Appellee,  
Attorney for Appellee, GMAC MORTGAGE  
LLC k/n/a BANK OF AMERICA, N.A. aka  
LaSALLE BANK NATIONAL  
ASSOCIATION aka U.S. BANK N.A., as  
trustee for Morgan Stanley Loan Trust 2006-  
16AX

**PROOF OF SERVICE**

The undersigned, an attorney, states on oath that she served a copy of the foregoing to the above counsel of record at the above mailing addresses by depositing a copy of same in the U.S. mail at 10 South Wacker Drive, Chicago, Illinois 60606 on May 2, 2018.

[X] Under penalties as provided by law pursuant to 735 ILCS 5/1-109 I certify that the statements set forth herein are true and correct.

*Rosa M. Tumialán*





Gordon Watts &lt;gww1210@gmail.com&gt;

## Filing Returned for Envelope Number: 1526622 in Case: 1-18-0091, GMAC Mortgage, LLC v. Watts, Gordon Wayne for filing Motion - Extension of Time

1 message

no-reply@tylerhost.net <no-reply@tylerhost.net>  
To: gww1210@gmail.com

Wed, Jul 18, 2018 at 9:49 AM



## Filing Returned

Envelope Number: 1526622  
Case Number: 1-18-0091  
Case Style: GMAC Mortgage, LLC v. Watts, Gordon Wayne

The filing below has been reviewed and has been returned for further action. **Please refile with the corrections outlined below.** Please, contact the appropriate court help center for further information.

### Return Reason(s) from Clerk's Office

<b>Court</b>	File & Serve
<b>Returned Reason</b>	Multiple filings Submitted as One Document
<b>Returned Comments</b>	you must file your motions separately.

### Document Details

<b>Case Number</b>	1-18-0091
<b>Case Style</b>	GMAC Mortgage, LLC v. Watts, Gordon Wayne
<b>Date/Time Submitted</b>	7/17/2018 4:24 PM CST
<b>Filing Type</b>	EFile
<b>Filing Description</b>	Mot Ext time concurrent with Mot Clarification
<b>Activity Requested</b>	Motion - Extension of Time
<b>Filed By</b>	Gordon Watts
<b>Filing Attorney</b>	