

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

GORDON WAYNE WATTS, individually, and  
on behalf of similarly situated persons (some, but  
not all, whom are named in the instant complaint),

Plaintiff,

v.

**Case No: 8:19-cv-829-T-36CPT**

CIRCUIT COURT OF COOK COUNTY, ILLINOIS, JAMES P. FLANNERY, JR., in his individual capacity and in his Official Capacity as Presiding Judge, DIANE M. SHELLEY, in her individual capacity and in her Official Capacity as Circuit Judge, MICHAEL F. OTTO, in his individual capacity and in his Official Capacity as Associate Judge, APPELLATE COURT OF STATE OF ILLINOIS, First District, DANIEL J. PIERCE, in his individual capacities and, in his Official Capacity as Justice for the First District Appellate Court of State of Illinois, MARY L. MIKVA, in her individual capacities and, in her Official Capacity as Justice for the First District Appellate Court of State of Illinois, JOHN C. GRIFFIN, in his individual capacities and, in his Official Capacity as Justice for the First District Appellate Court of State of Illinois, MARY ANNE MASON, in her individual capacities and, in her Official Capacity as Justice for the First District Appellate Court of State of Illinois, TERRENCE J. LAVIN, in his individual capacities and, in his Official Capacity as Justice for the First District Appellate Court of State of Illinois, MICHAEL B. HYMAN, in his individual capacities and, in his Official Capacity as Justice for the First District Appellate Court of State of Illinois, and CARL ANTHONY WALKER, in his individual capacities and, in his Official Capacity as Justice for the First District Appellate Court of State of Illinois,

Defendants.

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**NOTICE OF PENDENCY OF OTHER ACTIONS**

**aka:**

**“Notice of Pendency of Related Actions”**

Pursuant to The Order of This Court, dated Tuesday, 09 April 2019 (Hon. Charlene Edwards Honeywell, U.S. Dist. Judge, for The Court), and: In accordance with Local Rule 1.04(d), I certify that **the instant action** (*Watts, et. al., v. Cit. Ct. of Cook Cty., ILLINOIS, et. al., Case No: 8:19-cv-829-T-36CPT*) **is** related to pending or closed civil or criminal case(s) previously filed in this Court, or any other Federal or State court, or administrative agency as indicated below—namely seven (7) STATE COURT cases in Illinois, five (4) of which are closed, and

three (3) of which are pending. The “pending” cases are GMAC v. Watts, et. al., in the Law Division of the Circuit Court of Cook County, ILLINOIS (2007-CH-29738), it's appeal (1-18-0091), and the Code Violations case (Civil/Municipal) shown below:

**In other words, This Court is asking:** “Are there are any related cases.? If you have sued the same defendants in this or any other Court, write down the names of the judge(s) and case number(s).” – **ANSWER:**

[[1]] ***GMAC MORTGAGE LLC, et al. v. RICHARD DANIGGELIS, et al.***, Chancery Division Case #: **2007-CH-29738**, Circuit Court of Cook County, ILLINOIS

**\*\* Why related? -- ANSWER:** Because this is the case which enabled (aided/abetted) the illegal transfer of title from Rich Daniggelis to Joe Younes **without Due Process** or Equal Protection (and which has not, as yet, been reviewed on the merits by any appeals court). It was transferred from Chancery to the Law Division, where it's pending appeal in case no.: 1-18-0091 (ILLINOIS 1st App. Court), in which Plaintiff, Gordon W. Watts is a party.

[[2]] ***Atty. Joseph Younes v. Mr. Richard B. Daniggelis***, Civil (Municipal) Case #: **2014-M1-701473**, Circuit Court of Cook County, ILLINOIS

**\*\* Why related? -- ANSWER:** Because this case was simply a “FORCIBLE ENTRY AND DETAINER,” i.e., an “EVICTION” case, in which Younes used the holding in the Chancery case, above, as a legal basis to evict Daniggelis from his own house. Thus, as it was a byproduct of the illegal due process violations in the Chancery case, and not a case where the civil judge appeared to have much “discretion” to “do the right things,” the judge in this case, Hon. DIANA ROSARIO, is not being named as a defendant.

[[3]] ***GMAC MORTGAGE LLC, et al. v. DANIGGELIS, WATTS, et al.***, Law Division Case #: **2007-CH-29738**, Circuit Court of Cook County, ILLINOIS

**\*\* Why related? -- ANSWER:** Because this is the same exact case as #1, above, but was “transferred” from the Chancery Division to the Law Division—for reasons unknown to everybody by the judge, himself. This case is currently pending appeal before the ILLINOIS First Appellate Court, in case number 1-18-0091, in which Plaintiff, Gordon Watts, is a party—but, as the complaint details, defendant, First Appellate Court of ILLINOIS, promises to dismiss this case for want (lack) of prosecution if the record on appeal (the ENTIRE common law record) is not filed and sent to their court by May 28, 2018—next-to-impossible absent a miracle—and loads and loads of money. (See case-law in complaint addressing this.)

[[4]] ***City of Chicago, IL v. 1720 N. SEDGWICK ST., Atty. JOSEPH YOUNES, et al.***, Municipal (Civil) Division, Case#: **2017-M1-400775** (City of Chicago, IL v. 1720 N. SEDGWICK ST., Atty. JOSEPH YOUNES, et al.)

**\*\* Why related? -- ANSWER:** Because this case involves Joseph Younes, Daniggelis' former lawyer, who stole his house via title-theft-based Mortgage Fraud. In this suit, The City of Chicago is alleging that Younes purposely allowed the house to fall into disrepair in order to “get around” Historic District & Landmark deed restrictions, that would, otherwise,

prohibit him from razing the house to the ground via a demolition crew. Since Younes was allowed title to a house that isn't his, Daniggelis' house was unnecessarily damaged by the title-thief, Atty. Younes.

[[5]] **GMAC v. Watts, et. al., Case #:1-18-0091, ILLINOIS First Appellate Court**

**\*\* Why related? -- ANSWER:** Because this is the only “live” case, not counting the code/housing case above, all others having been dismissed for a number of reasons. But the code case does not address the Mortgage Fraud, so This Court should not put its hopes on that head.

[[6]] **Watts v. Flannery, et. al., Case #:1-18-0538, ILLINOIS First Appellate Court**

**\*\* Why related? -- ANSWER:** Because this was a mandamus proceeding, which was illegally dismissed based on alleged lack of authority/jurisdiction to hear the case, a bald-faced lie, and thus deprivation of one's procedural due process.

[[7]] **GMAC v. Watts, et. al., Case #:1-18-0572, ILLINOIS First Appellate Court**

**\*\* Why related? -- ANSWER:** Because this was simply an appeal of Judge Flannery's fee-waiver denial order, nothing more. It, too, was dismissed for alleged lack of authority/jurisdiction to hear the case, a bald-faced lie, and thus deprivation of one's procedural due process.

Beyond that, I'm aware of no active judicial or administrative actions, anywhere – at either the state or federal level – that are related to this pending complaint which I have filed, here.

I further certify that I will serve a copy of this NOTICE OF PENDENCY OF OTHER ACTIONS upon each party no later than fourteen days after appearance of the party.

**Date:** \_\_\_\_\_ (Day of Week),     **Respectfully submitted,**

**the** \_\_\_\_\_ **day of** \_\_\_\_\_, 2019

\_\_\_\_\_  
[Signature of Counsel of  
Record or *Pro Se* Party]

Typed Name of Counsel:                     Gordon Wayne Watts, non-lawyer, proceeding *pro se*

Florida Bar Identification Number (if admitted to practice in Florida): – N/A

Firm or Business Name:                     **The Register** (non-profit, online blog: links below)

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Official website(s):                     <https://GordonWatts.com> and <https://GordonWayneWatts.com>

**Certificate of Service**

I, **GordonWayne Watts**, hereby certify that I have filed a copy of this notice ('NOTICE OF PENDENCY OF OTHER ACTIONS aka: "Notice of Pendency of Related Actions"') with the clerk of the Circuit Court, Middle District of Florida, Tampa Division, this \_\_\_\_\_ day of \_\_\_\_\_, 2019, but on no one else, as I am filing *In Forma Pauperis*, and am depending – with full faith and credit – upon The Court to authorise and order the U.S. Marshall Service to serve all other parties of record.

**Date:** \_\_\_\_\_ (Day of Week) ,

the \_\_\_\_\_ day of \_\_\_\_\_, 2019

**Respectfully submitted,**

\_\_\_\_\_  
[Signature of Counsel of  
Record or Pro Se Party]

Typed Name of Counsel: Gordon Wayne Watts, non-lawyer, proceeding *pro se*  
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