

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
MUNICIPAL DEPARTMENT – FIRST DISTRICT**

Joseph Younes,	)	
Plaintiff	)	
	)	
vs.	)	<b>Case No.: 2014-M1-701473</b>
	)	
Richard B. Daniggelis,	)	
<u>Defendant</u>	)	

**Notice of Motion**

**To:** This Honourable Court and all parties being served (see attached service list, below)

**From:** Mr. Gordon Wayne Watts, LAKELAND, Fla. (full contact data, below)

**Notice Proper:** On such day and time as This Court deems appropriate, I shall[[\*\*]] appear “telephonically” before any judge sitting assigned to this case and present all of the attached pleadings requesting This Court's consideration of certain assertions of fact, documentation to verify, and arguments of law, more fully elucidated in the attached motion and proposed *Amicus* brief. My appearance, if it is required (it may not be[[\*\*]]) may **not** be in person, due to the fact that I reside in Lakeland, FL, which is too distant for me to reasonably travel from Lakeland (between Tampa & Orlando) to Cook County, IL.

[[\*\*]] I shall, to the best of my ability, make myself available to This Court by telephone, email, and standard postal mail, and will do so, barring an Act of God or other unpreventable disaster.

[[\*\*]] While I would like to appear “in person,” as is usually done in cases like this, I can not; however, many motions are considered by printed form only, so I trust that my travel handicap should not impair the wheels of justice or frustrate Due Process.

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

The undersigned, hereby certifies under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above notice and all attached pleadings were delivered to the following parties as indicated:

Dorothy Brown, Clerk of the Circuit Court (Main clerk email:

[CourtClerk@CookCountyCourt.com](mailto:CourtClerk@CookCountyCourt.com))

Chancery clerk emails: [MZSaldivar@CookCountyCourt.com](mailto:MZSaldivar@CookCountyCourt.com),

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PH: 312-603-5031 (5133: Chancery / 5116: Civil)

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Richard B. Daniggelis (Defendant)  
1720 N. Sedgwick  
Chicago, IL 60614-5722

William D. and Linda D. Gerould  
(Owners of record of subject property, according to <http://CookRecorder.com>)  
49 Lorelei Lane  
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William D. and Linda D. Gerould (Owners of record of subject property)  
(Owners of record of subject property, according to <http://CookRecorder.com>)  
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Mr. Robert J. More ([Anselm45@Gmail.com](mailto:Anselm45@Gmail.com)) (Former tenant of Daniggelis)  
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I, Gordon Wayne Watts, the undersigned, hereby certify under penalties of perjury as provided by law pursuant to 735 ILCS 5/1-109, that the above notice and all attached pleadings (Affidavit of Gordon Wayne Watts, Notice of Motion, Motion for leave to file *Amicus Curiae* brief, *Amicus Curiae* of Gordon Wayne Watts in the above-captioned case, and related exhibits – with an Appendix of Exhibits) were served upon all parties listed above, this 3rd day of August, 2015 by the following methods:

- **FedEx 3rd-party commercial Carrier:** Every party was served by FedEx [[with delivery confirmation and tracking, should it be necessary to verify service]] excepting the cases of a PO Box, which are not serviced by FedEx.
- **United State Postal Service:** Those parties with PO Boxes were served by USPS.
- **Facsimile:** I am not serving any parties by FAX. [[I am neither willing nor able to receive FAX transmissions.]]
- **Electronic Mail:** In every case where I could obtain an email address (see above) for a party, I am effecting service by email, and attaching said documents in PDF form. [[I consent to service by email at the email addresses listed below.]]
- **Electronic Filing:** If I am able to successfully register an account with the Cook County, IL Clerk of the Circuit Court, I shall effect service electronically therewith.
- **Internet:** I shall, when practically possible, post a TRUE COPY of this filing – and related filings – online at my official websites, *infra*.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Gordon Wayne Watts, Amicus Curiae\*

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Date: Monday, 03 August 2015

\* *Watts, acting counsel of record, is not a lawyer. Per Local Rule 2.1, "Notice of Hearing of Motions," Watts, appearing pro se, is giving notice of his motion*