

In the Appellate Court of Illinois, First District

Docket Number: 1-18-0091

GMAC Mortgage, LLC, Plaintiffs,) Appeal from the Circuit Court of Cook County, IL
Plaintiffs,) County Department, Law Division
vs.) **Circuit Court Case No.:** 2007-CH-29738
Gordon Wayne Watts, et. al., Defendants.) (Transfer into **Law Division** from Chancery)
_____) **Trial Judge:** Hon. Diane M. Shelley (#1925)
Gordon Wayne Watts,) **Notice of Appeal date:** Monday, 08 January 2018
Appellant/Counter-Plaintiff,) **Judgment Date:** Wednesday, 07 December 2017
vs.) **Date of Post-judgment Motion:** None
_____) **Order:** #5
Joseph Younes, Hon. Diane M. Shelley,)
Hon. James P. Flannery, et al.,) Supreme Court Rule(s) which confer(s) jurisdiction
Counter-Defendants.) upon the reviewing court: **Ill.Sup.Ct. R.301, 303**

Motion – En Banc – for Extension of Time to file Record on Appeal

This matter comes before the Court on motion of Movant for extension of time to file the Record on Appeal.

NOTE: As administrative note, Movant represents to This Court that a clerk informed him that “concurrent” (combined) motions aren't permitted, so this motion is **only** to extend time (and doesn't include a concurrent “Rule 321” motion to reviewing court to limit record). However, the court is free to “*sua sponte*”—on its own motion, both limit record (as Movant is asking circuit court), and also issue summary judgment based on existing record, which appears to not need further argument for reviewing court to figure out that summary judgment is appropriate & probably most convenient use of judicial resources—a short-cut to solution, removing harmful & tedious steps. Good arguments for both of these options is in **the R.321 Motion** to limit record, which Appellant, Watts, filed yesterday in the circuit court, **and which is included in exhibits today to show he complied with the Oct.25 Order, from This Court, quoted below...**

Rule 326 addresses circumstances such as this: “Extensions of time for filing the record may be granted by the reviewing court or a judge thereof on motion made before the expiration of the original or extended time...The movant shall serve any motion for extension of time on the clerk preparing the record on appeal.” [Movant is doing so – see e.g., Service List.] [This motion also seeks an *En Banc* reviewing court review, as the title indicates.]

In its last order, dated October 25, 2018, this court ordered that: “The motion for extension of time is GRANTED, with the record to be filed on or before February 28, 2019. Any further request for extension must be supported by affidavit showing that Appellant complied with prior orders of this court, including the order of March 28, 2018, that "Appellant must direct inquiries on the content of [the] record on appeal to [the] clerk of the circuit court of Cook County.” – I seek another extension of time, and in compliance with the order, above, here is my

affidavit, with regard to the above-cited order, *supra*:

AFFIDAVIT

I, Gordon Wayne Watts, the Appellant-Defendant-Movant in this case, did in fact comply with all prior orders of this court, to the best of my ability and knowledge, including, of course, that portion of the Oct.28, 2018 order, above, asking me to: “Appellant must direct inquiries on the content of [the] record on appeal to [the] clerk of the circuit court of Cook County.”

While I did not inquire near as much as I'd like, I most certainly have done my dead-level best to ensure that the Civil Appeals Division of the Cook County, ILLINOIS circuit court (headed by Deputy Chief, Patricia O'Brien, at last check) has compiled a record on appeal of this case, and send it to This Reviewing Court.

This affidavit is NOT notarised, as I don't have a notary handy (and as I've done in the past when I submitted Signed, Witnessed, and Notarised affidavits, made official by licensed Notaries Public—and said AFFIDAVITS having been FILED into this case by the undersigned Movant). However, ILLINOIS STATE law allows me to use a non-notarised affidavit, so long as I comply with 735 ILCS 5/1-109, and include a Verification by Verification of my court briefs. To that end, I am including such a required verification below, in this brief—and, not merely for “technical” or “legal” reasons, but because I genuinely am doing my dead-level best to be honest and complete with the judicial system, so that it may most accurately balance the Scales of Justice, and be blind (impartial) as the “Lady Justice” statue implies.

Specifically, I submitted and filed to the court (Ex-A) a R.321 Motion to limit and compile the record on appeal & send it to you. I accidentally chose the Chancery Division (Ex-A), when filing this Law Division case, but it was accepted and filed over to the Law Division (Ex-B). A court-stamped copy of said motion appears below in these exhibits (Ex-C). When I discovered my error, I refiled & resubmitted this to the Law Division (Ex-D), and it was accepted & filed in the Law division again , resulting in an accidental duplicate of that filing (Ex-E). Below is a court-stamped copy of the duplicate R.321 Motion (Ex-F). When I discovered the duplicate, I recalled that Dep. Chief O'Brien told me that the common law record of this Law Division case included that which was in the Chancery record, the underlying case (by the same case number) from which it was transferred, and I contacted both divisions by telephone earlier today, but was informed that my motion belonged in Law, not Chancery.

While this court did not lay down a specific thresh-hold for “how much” I should inquire or contribute to the compilation of the record on appeal, it was an unspoken understanding that I not wait until the last minute (like is the case). However, after my father's death, and my own death (which I've previously documented to This Court—and which ARE INCLUDED in the R.321 Motion to the courts below), we were summarily evicted, and had to replace our well-water pump THREE (3) times—meaning, we are on our fourth (4th) pump, as I speak...write. I DOCUMENT THESE MATTERS in my R.321 Motion to the courts below, and, included as exhibits in this filing, today – Ex-C and Ex-F, the duplicate.

As a result, for weeks, if not months, on end, we could not take showers, do laundry, flush the lavatory toilets, have running water to drink (meaning mom and I had to buy bottled water). This cost us dearly financially, and also (more-so) time-wise. As a result of these

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hardships, I barely could meet my “regular” daily responsibilities, much less effectively convincing a lower court to compile the record on appeal.

There were ***many more*** hardships, which delayed me, but, for the sake of space, I shall only refer to them by reference, as they are detailed (and documented) in my R.321 Motion to the Law Division, below.

One other impediment showed me down: The trial court (and this court, to be honest) egregiously violated my Federal Civil Rights, specifically several Federal Procedural Due Process standards elucidated in the R.321 Motion below. I do not purposely attempt to insult any court (especially given I'm making requests for redress to both courts), but I must be honest, if I am to be accurate and show honour to all parties: The egregious picture painted in my arguments below might appear or seem insulting if the reader is not careful, but that is not the writer's intention. That said, both the STATE and FEDERAL LAW violations enumerated (and documented) in the R.321 motion below (Ex-C, Ex-F) are so beyond the pale, that it would be helpful to this court if it (at least some of the justices and/or clerks who review these filings) give careful, if not cursory, review to the very short R.321 Motion filed. (The Exhibits included with my R.321 Motion are very lengthy, but as much of them are merely courtesy copies of that which is **already** filed, they can be ignored, so long as the court trusts that I did not alter or doctor the filings I included in my exhibits—I did not.)

Thus, the very difficult matters addressed in my motion are a “difficult” read, but the motion is relatively short, and to the point—and only addresses these matters because of the grave importance and serious nature, something which justifies the “difficult” legal arguments (which I fear may offend a reader, if he/she is not careful). But, the legal arguments raised are an interesting read (even if charged with legal emotion).

FINANCIAL ISSUES: While I qualify for indigent status, within the meaning of ILLINOIS state law (and also qualify for Intervention, as case law and statutory law allow), I will swear or attest in my AFFIDAVIT, here, that I am not blind to the financial stress under which Illinois has found itself of recent, and regret that I can not “pay” for the record on appeal myself. But, to assure This Court that I am acting “in good faith,” I will first remind you to look at my 7-7-2017 Motion to Intervene (included in the exhibits of my R.321 Motion, which I filed yesterday, and in these exhibits, below). Looking at “Page 4 of 6” (Motion to Intervene by Intervenor, Gordon Wayne Watts, filed and court-stamped on 7-7-2017 in the Law Division, below), we see I document hundreds, if not thousands, of dollars I PAID TO THIS COURT for “Public Records,” when researching this case to consider whether to Intervene or file an *Amicus*.

Moreover, Daniggelis' attorney, Andjelko Galic, ordered THE WHOLE record, and yet kept missing deadlines. I only sought (and seek) a R.321 “limited” record -with only the twelve (12) items I list in my proposed motion. (Because the court changed systems, the record that was compiled last time is unusable here, as we are now in an electronic format system). So, Daniggelis' attorney was “bad,” and yet was rewarded with his fair day in court (which he wasted by failing to file briefs, get extensions of time, etc.)—By contrast, I have been “good” to this

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court, and it is not appreciated. (And, as I explain to the trial courts, below, the defendant who took Daniggelis' house, based on what Judge Otto documented as a duplicate or forged signature—and as I argue elsewhere—was “bad” to the court by embarrassing the courts when he got into huge trouble for VERY SERIOUS code violations, which resulted in, I'm guessing, at least 10 or 15 embarrassing investigative news stories, by DNAinfo, CityScape, The Register, and reminders of the ABC Local and Chicago Tribune stories on his law partner, for mortgage fraud.

The ramifications of this are manifold, but the key take-a-way is that the courts are making people hate them, and giving the Judicial System a bad name, when it protects known criminals like Joseph Younes, who first took a house in documented title theft, then proceeded to get into serious “Code Violations” trouble in his attempt to destroy it, and get written up in the papers—and this not until his law partner, Paul Shelton, got written up by the Chicago Tribune's John Kass for precisely the same mortgage fraud.

So, I swear, affirm, say, and aver all this to point out to the court that the trial courts (and so some extent, this court) are at fault for any delays here, as I explain in my “State vs. Federal” legal analyses in the R.321 Motion below.

ARGUMENT

While I am partly at fault for not prosecuting this case as much as I'd like, I have prosecuted it STRONGLY since its inception, serving all parties in at least four (4) way:

- (1) electronically (see Exhibits A—F, below), via court-filing systems
- (2) by email (similar to #1, but distinct) (See Exhibit-G)
- (3) by Postal Mail and/or FedEx—when I could afford it (Exhibit-H)
- (4) And even by posting to my own online docket: See the “Open Source” docket link at front-page news of www.GordonWatts.com or www.gordonWAYNEwatts.com or, directly linked here: <https://GordonWatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html> on the GoDaddy server and <https://gordonWAYNEwatts.com/MortgageFraudCourtDocs/DOCKET-MortgageFraudCase.html> on the HostGator server.

Moreover, most of the fault for the delay in filing the record on appeal lies with other parties, and to the extent that I am at fault, most of the delays were a result of extenuating circumstances, which—themselves—not my fault (tho I bear responsibility, even if not fault). **As we can see from #1—4, above, The Courts below were FULLY AWARE of their duties, and appellant can not be blamed for their ignorance or lack of action.**

Conclusion: Movant formally requests extension of time, to May 28, 2019, to file the record on appeal. This court may, on its own motion, seize the limited record below, described in the proposed order in the R.321 motion below (enumerating twelve items), and issue summary judgmental, which would serve judicial economy—and avoid egregious Federal and State Due Process issues. But that decision is left of to this court, and not made a formal request here (though it was formally requested elsewhere). *Respectfully submitted,*

/s/Gordon Wayne Watts

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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: Thursday, 28 February 2019

/s/Gordon Wayne Watts
Gordon Wayne Watts

INDEX TO THE EXHIBITS

<u>Instrument</u>	<u>Docket/Tab#</u>
Envelope Number 4091689 Filing SUBMITTED	Ex-A
Envelope Number 4091689 Filing Accepted	Ex-B
Envelope Number 4091689 FILING PROPER	Ex-C
Envelope Number 4092052 Filing SUBMITTED	Ex-D
Envelope Number 4092052 Filing Accepted	Ex-E
Envelope Number 4092052 FILING PROPER	Ex-F
Service by e-mail 10-19-2018	Ex-G
GMAC v WATTS Fri. 20 July 2018 Proof of Service (U.S. Postal Mail)	Ex-H

NO. 1-18-0091

IN THE APPELLATE COURT OF ILLINOIS
FIRST DISTRICT

GMAC Mortgage, LLC,) Appeal from the Circuit Court of Cook County, IL
Plaintiff)
vs.) No. 07 CH 29737
) (Transfer into Law Division from Chancery)
Gordon W. Watts, et. al.,)
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:

IT IS HEREBY ORDERED that the time for filing the Record on Appeal is extended to May 28, 2019, 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**

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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 satisfy Due Process, to give ALL parties opportunity 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))].

The trial court shall speedily prepare the selected record, 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
2046 Pleasant Acre Drive
Plant City, FL 33566-7511
(863) 687-6141 (h), (863) 688-9880 (c)

In the Appellate Court of Illinois, First District

Docket Number: 1-18-0091

GMAC Mortgage, LLC, Plaintiffs, vs. Gordon Wayne Watts, et. al., Defendants.) Appeal from the Circuit Court of Cook County, IL) County Department, Law Division)) Circuit Court Case No.: 2007-CH-29738) (Transfer into Law Division from Chancery))) Trial Judge: Hon. Diane M. Shelley (#1925)
Gordon Wayne Watts, Appellant/Counter-Plaintiff, vs. Joseph Younes, Hon. Diane M. Shelley, Hon. James P. Flannery, et al., Counter-Defendants.) Notice of Appeal date: Monday, 08 January 2018) Judgment Date: Wednesday, 07 December 2017) Date of Post-judgment Motion: None) Order: #5)) Supreme Court Rule(s) which confer(s) jurisdiction) upon the reviewing court: Ill.Sup.Ct. R.301, 303

NOTICE OF FILING

To: See attached Service List

PLEASE TAKE NOTICE that today, Thursday, 28 February 2019, I am causing to be filed with the ILLINOIS 1st Appellate Court my Motion for Extension of Time, Verification by Certification, Exhibits –with an Index to exhibits, Proposed Order, this NOTICE OF FILING, an updated/corrected SERVICE LIST, and my Certificate of Service, 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*]
2046 Pleasant Acre Drive
PH: (863) 687-6141 [home] or (863) 688-9880 [cell]
Web: <http://www.GordonWatts.com> / <http://www.GordonWayneWatts.com>
Email: Gww1210@aol.com / Gww1210@gmail.com

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: 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 Hours: 8:30a-4:30p, Mon-Fri, Excl. Holidays Cc: CivilAppeals@CookCountyCourt.com

* **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 [**served, 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 [**served, as Judge Flannery is a defendant in the Mandamus proceedings**]

* **Law Division and Hon. Diane M. Shelley, Circuit Judge, Daley Center, 50 W. Washington St., Rm. 1912, Chicago, Illinois 60602** Law@CookCountyCourt.com ; ccc.LawCalendarW@CookcountyIL.gov ; Diane.Shelley@CookCountyIL.gov [**served, as Judge Shelley is a defendant in the Mandamus proceedings**] Cc: Michael.Otto@CookCountyIL.gov as a courtesy since he made key rulings in the underlying Chancery case, by the same case number—two of which were directed to defendant, Watts

* **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 [**Not served, as Mr. Daniggelis has asked that service copies not be sent to him, which is permissible, since he has an attorney of record.**]

* **Richard B. Daniggelis** (who receives mail, via USPS mail-forwarding at his old address) 1720 North Sedgwick St., Chicago, IL 60614-5722 [**Not served, as Mr. Daniggelis has asked that service copies not be sent to him, which is permissible, since he has an attorney of record.**]

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

* **Joe Younes**: 2625 West Farewell Avenue, Chicago, IL 60645-4522 JoeYounes@SbcGlobal.net

SERVICE LIST (continued)

- * **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 166 West WASHINGTON ST, Ste. 600, Chicago, IL 60602-3596

- * **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 or:
PKing@KingHolloway.com ; One North LaSalle Street, Suite 3040, Chicago, IL 60602

- * **Paul L. Shelton, Pro Se**, (Atty. #15323, disbarred per IARDC) E: PMSA136@Gmail.com ;
PLShelton@SBCGlobal.net – 3 Grant Square, SUITE #363, Hinsdale, IL 60521-3351

- * **Erika R. Rhone** 22711 Southbrook Dr., Sauk Village, IL 60411-4291, last known emails (see **Exhibit-G**) are as follows: ERRegi@mail2.tread.net, Erika.Rhone@SbcGlobal.net,
Erhone@Mindspring.com, Erika@GrandKahn.com, ErikaRhone@sbcglobal.net,
ER5526199@aol.com and per: https://www.FastPeopleSearch.com/ms-erika-r-rhone_id_G-5317261083665188477

- * **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) (DPeacock@KentLaw.iit.edu) Note: Served to work address, as she has NOT been excused by Court as an attorney of record—but not served to personal email, as a courtesy, as she claims, via auto-responder email, to no longer work at DYKEMA. 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]

- * **Atty. Justine A. Lewis, Esq.** (JLewis@Dykema.com), Senior Manager, Recruiting and Professional Development ** Note: Now included on service list per official email from Dykema – see **Exhibit-H**. Phone: 312-876-1700, FAX: 866-771-2154 or 312-876-1155, 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] Chicago office address per: <https://www.Dykema.com/www.dykema.com/careers-associates-opportunities.html>

SERVICE LIST (continued)

* **Robert J. More** (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 Adams Street, Green Bay, WI 54301-5142
Web: <https://www.AssociatedBank.com/about-us> PH: (920)433-3200, (800)236-8866, or (800)682-4989, Email address: WeCare@associatedbank.com per: view-source:<https://www.AssociatedBank.com/contact> and: ShareHolders@AssociatedBank.com per: <http://Investors.EquityApartments.com/drip.aspx?iid=100135> and ColleagueCare@AssociatedBank.com per: <https://AllHispanicJobs.com/s/find-associated-bank-jobs-in-usa>

* **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. – PH: (703) 761-1270, FAX: (703) 748-0183, SharonH@MersInc.org ; SharonH@MersCorp.com Cc: Janis Smith, 703-738-0230, VP, Corp. Comm. is no longer with MersCorp, and Amy Moses (AmyM@MersCorp.com ; AmyM@MersInc.org) has replaced her as an email contact; Sandra Troutman 703-761-1274, E: SandraT@MersInc.org ; SandraT@MersCorp.com) Dir, Corporate Communications, Karmela Lejarde, Communications Manager, Tel~ 703-761-1274, Mobile: 703-772-7156, Email: KarmelaL@MersInc.org ; 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)**

Removed from service list, and not served, as the court excused them as parties: **“As a result of the dismissal of Counts X and XI, Third party Stewart Title of Illinois n/k/a Stewart Title Company is no longer a party to this litigation.”** [See the 11/09/2012 ORDER for Voluntary Dismissal by Agreement in *GMAC v. Daniggelis*, 2007-CH-29738, the Chancery case underlying this case]

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

Removed from service list, and not served, as the court excused them as parties—see above.

* **Richard Indyke, Esq.** Atty. No. 20584, (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.**]]

In the Appellate Court of Illinois, First District

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Plaintiffs,) County Department, Law Division
vs.)
) **Circuit Court Case No.:** 2007-CH-29738
Gordon Wayne Watts, et. al.,) (Transfer into **Law Division** from Chancery)
Defendants.)
) **Trial Judge:** Hon. Diane M. Shelley (#1925)
) **Notice of Appeal date:** Monday, 08 January 2018
Gordon Wayne Watts,) **Judgment Date:** Wednesday, 07 December 2017
Appellant/Counter-Plaintiff,) **Date of Post-judgment Motion:** None
vs.) **Order:** #5
Joseph Younes, Hon. Diane M. Shelley,)
Hon. James P. Flannery, et al.,) Supreme Court Rule(s) which confer(s) jurisdiction
Counter-Defendants.) upon the reviewing court: **Ill.Sup.Ct. R.301, 303**

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

* The undersigned **Defendant-Appellant, 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 Extension of Time, Verification by Certification, Index to exhibits, Proposed Order, NOTICE OF FILING, an updated/corrected SERVICE LIST, and this Certificate of Service, and attached EXHIBITS**, copies of which are attached hereto are being herewith served upon you—and upon the parties listed in the attached Service List, above – **today, this Thursday, 28 February 2019**, via **the Odyssey eFileIL (TylerHost.net) Electronic Filing system** if they're e-file registered.

* I am NOT any parties via **First Class U.S. Postal Mail** –*as I customarily do (due to financial constraints), as Rule 11 does not require hard-copy service if email is used.*

* Additionally, 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—see e.g., the “Open Source Docket” link in said news item.

* Lastly, I am concurrently effecting service via **e-mail**. ***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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