

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 Reconsideration of Dismissal for alleged Want of Lack of Prosecution
Concurrent with Motion for Summary Judgment

This matter comes before the Court on motion (*en banc*) of Movant for reconsideration of its August 08, 2019 order dismissing this case for alleged want of prosecution—concurrent with a motion for summary judgment in favour of the Movant.

This court dismissed the case for alleged want of prosecution because the Record on Appeal was not compiled and transmitted to this court in a timely manner. However, this court was the very obstacle which prevented the record from being compiled, and now punishes the plaintiff for its own act—and, in doing so, commits serious Federal Civil Rights violations:

The court required plaintiff, Watts, to produce decades and decades of the Common Law Record on appeal, even though he clearly met the guidelines for indigent status. The court might rightly be concerned had Watts asked the circuit court to transmit the entire record to the reviewing court—and then failed to prosecute the case—in the same manner that Atty. Andjelko Galic did. While Galic's actions were not illegal, they were very, very, very immoral—insofar as the Circuit Court spent probably hundreds of “man hours” of labour on a wasted effort. But, unlike Galic, Watts' request was merely for a “Rule 321” limited record (translation: costs lots less, and easier for this court to read, due to its brevity & short length), sufficient to prove title-theft based on a felony forgery photocopy fraud—in this case, in which Watts intervened because he had unrepresented interests.

This court broke Federal law in its refusal to make the record on appeal affordable: See, e.g., *Griffin v. Illinois*, 351 U.S. 12, 18-20 (1956) (holding that requiring indigent defendants to pay for transcript of trial in order to appeal denies FEDERAL Equal Protection even though there is no absolute right to appeal). Basically, what was done to Plaintiff, WATTS, was even worse: Griffin, as the court held, did not have an absolute right to appeal. Watts, however, did have an

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absolute right under ILLINOIS State Law: “Rule 301. Method of Review [] Every final judgment of a circuit court in a civil case is appealable as 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.” Source: http://www.illinoiscourts.gov/supremecourt/rules/art_iii/artiii.htm

There were numerous other Federal Civil Rights violations—to numerous to elucidate here, but suffice it to say that this court blatantly and willfully lied when it alleged that it did not have mandamus jurisdiction over lower courts (in spite of clear case law and Constitutional Provisions to the contrary) – and this court was also blatantly erroneous when it claimed that it lacked appellate jurisdiction regarding an adverse lower court decision by Presiding Judge James P. Flannery, Jr., which was appealed. [The word 'lied', above, is not meant as any insult to this court, from whom I am asking Redress: It is merely a logical and precise description of the facts and truth. Indeed, lying is not necessarily illegal, but it unnecessarily gives this court's many fine judges and staff a bad name & damages their reputation necessarily. The egregious constitutional violations, however, are a different matter, insofar as the court has used its might to protect the guilty, in this case, those who stole a house, land, and hundreds of thousands of dollars in documented equity from an elderly man, making him homeless, and making him unable to pay others whom he owed—prompting one of them, Plaintiff, Watts, to intervene to protect his interests.]

While Judicial Immunity protects state court judges to a wide degree of latitude, these blatant insurrections and rebellion against plainly obvious State and Federal Civil Rights (including Redress, Equal Protection, and Due Process) place this court in the same position as Judge Gladys Pulliam, a state Magistrate in Culpeper County, Va., who, in her official capacity, issued an order – to order the “practice of incarcerating persons waiting trial for nonincarcerable offenses.” (*Pulliam v. Allen*, 466 US 522 at 526, (1984)) She was not immune from being sued for this, and not only were her actions not protected by judicial immunity, these unprotected actions included unconstitutional orders, eventually resulting in stiff attorneys fees and other fines against this judge.

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

“Petitioner took an appeal from the order awarding attorney's fees against her. She argued that, as a judicial officer, she was absolutely immune from an award of attorney's fees. The Court of

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

Previous filings to this court were generous, insofar as Plaintiff, Gordon Wayne Watts, offered to pay for the limited “Record on Appeal,” and suggested a short list of documents to prove that Mr. Daniggelis, into whose case he intervened, to protect his interest, did indeed have his house stolen via a photocopied (duplicate) signature title theft. But that ship has already sailed, and given the inactivity and negligence of this court, victim Daniggelis is approximately eighty (80) years old, and still quite homeless—and awaiting this court for justice. While I would love nothing more than to afford This Court a sufficient record on appeal to decide the case, on the merits, I am realistic and see the time-sensitive nature of events, as victims are growing old and approaching death from old-age and natural causes. (And, now, am unable to pay for any record.) Moreover, while the “official” record on appeal was not complied (because this court chose to violate the holdings of *Griffin v. Illinois*, cited above—regarding making sure that records are cost-prohibitively expensive), nonetheless, it is the belief of the undersigned movant that this court has (whether or not it officially indicated on record) reviewed enough of the lower court records to know that there was indeed title-theft. (Many, if not most, filings are posted online to my online docket—and available to this court, should it desire to exercise its “Rule 321” authority. Therefore, it is appropriate for this court to issue summary judgment, where the facts are clear, and the case law and statutory law is unambiguous, and give Daniggelis back his house—with an award for attorney's fees, pain, suffering, interest on the monies owed, and losses due to having been homeless, and having to place his belongings in expensive paid storage. (Indeed, were this court's justices the victim of title theft, he or she would want justice, and those lower on the totem pole are just as deserving of justice.)

Details on these matters can be found in the filings in the following case, which is presently pending in Federal Court: 1:19-cv-03473 ** ***Watts v. Circuit Court of Cook County, Illinois et. al.***, before the Eastern Division Federal District Court, Northern District of ILLINOIS. I shall attempt to attach key filings from that case as exhibits for my motion in this case—in order to more-fully help this court understand the nuances of what was once a simple case (but has now spiraled and spun out of control). See below.

Conclusion: For the reasons stated in this motion, and in the exhibits being filed concurrently with this motion, Movant/Plaintiff/Intervenor, Gordon Wayne Watts, asks for *En Banc* review and reconsideration of this dismissal order, and specifically, for summary judgment in favour of allowing Watts to intervene—which would force a review of this entire case—likely resulting in an aware of Daniggelis' house (plus damages) being returned to him. Summary Judgment is the right tool at this stage of the case, to right the wrongs done to Daniggelis, Watts, and other parties. *En Banc* review is warranted, given the gravity, and quantity, of Civil Rights violations.

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 affidavits, just to remove any and all doubt hereto.

Date: Tuesday, 13 August 2019

/s/Gordon Wayne Watts
Gordon Wayne Watts

INDEX TO THE EXHIBITS

<u>Instrument</u>	<u>Docket/Tab#</u>
AMENDED VERIFIED COMPLAINT AND REQUEST FOR Declaratory and Injunctive relief [Editor's Note: The amended complaint supersedes the original one.]	Exhibit-A
ORDER TO SHOW CAUSE [centered mainly on <i>Rooker-Feldman</i>]	Exhibit-B
Reply to the Order of That Court, dated April 10, 2019, to Show Cause	Exhibit-C
ORDER to Transfer Venue [but admitting that the court had over-zealously erred and possibly misapplied <i>Rooker-Feldman</i>]	Exhibit-D
05/31/2019 Order dismissing with prejudice [based mainly on Judicial Immunity Grounds]	Exhibit-E
Motion to Alter Judgment [disputing the legal analyses of that federal court]	Exhibit-F
Order on Motion to Alter Judgment [The court tacitly admits it might be wrong, and takes the motion under consideration.]	Exhibit-G

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 <u>Law</u> 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 reconsideration of its most recent order, dismissing for alleged want of prosecution, and, notice having been given, and the Court being fully advised in the premises:

IT IS HEREBY ORDERED that title to the house and land commonly known as 1720 North Sedgwick Street, Chicago, ILLINOIS, shall transfer back to Richard B. Daniggelis, and an aware of __\$_____ shall be paid by Attorney Joseph Younes for damages above and beyond the initial title theft of the house. Furthermore, Movant, Gordon Wayne Watts' motion to intervene, is granted, and he is awarded __\$_____, which is to be paid by Mr. Younes to cover his losses, primarily monies owed to him by Daniggelis. Lastly, Attorney Andjelko Galic (who previously represented Daniggelis) and Robert J. More (who was once a tenant of Daniggelis) shall be awarded __\$_____ and __\$_____, respectively.

IT IS SO ORDERED.

Justice

Justice

Justice

Prepared by:
Gordon Wayne Watts
2046 Pleasant Acre Drive
Plant City, FL 33566-7511
Phones: (863)687-6141 or (863)688-9880

In the Appellate Court of Illinois, First District

Docket Number: 1-18-0091

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Gordon Wayne Watts,) Trial Judge: Hon. Diane M. Shelley (#1925)
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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

NOTICE OF FILING

To: See attached Service List

PLEASE TAKE NOTICE that today, Tuesday, 13 August 2019, I am causing to be filed with the ILLINOIS 1st Appellate Court my Motion *En Banc* for Reconsideration of Dismissal for alleged Want of Lack of Prosecution Concurrent with Motion for Summary Judgment –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

GMAC v. Watts, et al., 1-18-0091 (ILLINOIS First Appellate Court) Tue. 12 Mar. 2019

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 – Hours: 8:30a-4:30p, Mon-Fri, Excl. Holidays ; E-Mail: CivilAppeals@CookCountyCourt.com, Acting Chief Deputy Clerk, Sue L. Welfeld E-Mail: SLWelfeld@cookcountycourt.com, Assistant Chief Deputy Clerk, Gretchen L. Peterson E-Mail: GLPeterson@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: Erika_Rhone@Yahoo.com, ERhone@AFLAC.com,
RhoneE@gmail.com on information and belief (see Verification by Certification), and via trial and error from returned email process of elimination

* **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]

***** UPDATE ***** -- * "**Atty. Justine A. Lewis, Esq.**" (JLewis@Dykema.com), Senior Manager, Recruiting and Professional Development ** Justine Lewis, the person who owns the email above, informed me via email that she is neither an attorney nor a party to this case, and was entered into this case in error, based on an Internet Support Team (tech) error. My parse of the IARDC website confirms her claims that she is not an attorney, and a view of the style confirms she is not a party.

There is not such person as "Attorney A. Justine Lewis" in ILLINOIS, and such person does not exist. **Accordingly, I am removing the Non-Attorney manager who owns this email.**

**** SO NOTED AND UPDAED.**

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, JanisS@MersCorp.com 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@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.**]]

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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 En Banc for Reconsideration of Dismissal for alleged Want of Lack of Prosecution Concurrent with Motion for Summary Judgment,” 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 Tuesday, 13 August 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*]
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>
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