

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

GMAC, )  
)  
Plaintiff, )  
)  
vs. )  
)  
JOSEPH YOUNIS, et. al., )  
)  
Defendants. )

No.: 07 CH 29738

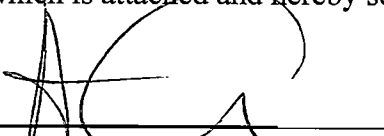
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DOROTHY BROWN  
CLERK OF CIRCUIT COURT  
LAW DIVISION

NOTICE OF FILING

TO: Erika Rhone  
9948 S. Normal  
Chicago, IL 60628

Shelton Law Group  
1010 Jori Blvd., Suite 144  
Oak Brook, IL 60523


You are hereby notified that on July 10, 2017 we filed with the Clerk of the Circuit Court of Cook County our Motion to Continue Trial Date, a copy of which is attached and hereby served upon you.

  
\_\_\_\_\_  
Andjelko Galic

Law Office of Andjelko Galic  
134 N. LaSalle Street, Suite 1040  
Chicago, Illinois 60602  
Tel. 312 986 1510  
Attorney No.: 33013

PROOF OF SERVICE BY MAIL

I, Andjelko Galic, an attorney, hereby state on oath that I served this Notice of Filing by mailing a copy to the above party at the above listed address by depositing same in the U.S. mail in Chicago, on July 10, 2017 with proper postage prepaid.

  
\_\_\_\_\_  
Andjelko Galic

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GMAC,	)	
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Plaintiff,	)	
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vs.	)	No.: 07 CH 29738
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JOSEPH YOUNIS, et. al.,	)	
	)	
Defendants.	)	

MOTION FOR CONTINUANCE

NOW COMES Counter-Plaintiff, Richard Daniggelis, by and through his attorney Andjelko Galic, and moves this court to continue the trial date. In support of his Motion Plaintiff states as follows:

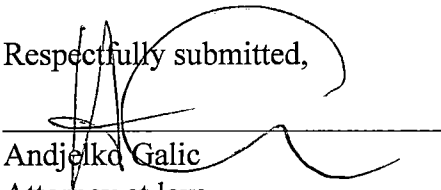
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 BOROTTA  
 CLERK OF COURT  
 LAW DIVISION

1. This matter is currently pending and set for trial on July 10, 2017.
2. None of the counter-defendants appeared before this court since this matter was assigned to Law Division.
3. Counter-Plaintiff Richard Daniggelis served subpoena for depositions of John LaRuque and John LaRuque failed to appear for his deposition. LaRuque was very instrumental in the scheme to defraud Counter-Plaintiff and without LaRuque's assistance the fraud would not have been perpetrated on the Counter-Plaintiff.
4. There is an active warrant for body attachment against John LaRuque but the Sheriff is unable to bring him to court for reasons that are beyond Counter-Plaintiff's control.
5. John LaRuque was involved in financing of the underlying real estate transaction and he may have valuable information regarding the source of the funds for the underlying transaction and also regarding the distribution of the funds after the underlying transaction was completed.
6. Since none of the Counter-Defendants has appeared in court to defend against allegations raised in Counter-Plaintiff's complaint it is very likely that these counter-defendant's are not solvent and obtaining a default judgment against them would not be of much help to Counter-Plaintiff.

7. Since counter-defendants have not appeared on this matter since it was transferred to Law Division there is no prejudice to any interested party if this matter is continued for trial until after the warrant for body attachment of John LaRuque is executed.
8. In addition, Counter-Plaintiff, Richard Daniggelis is taking care of his elderly brother John Daniggelis. He has been caring for his brother on a daily basis for approximately 12 years.
9. John Daniggelis is 82 years old and lives at 2150 N. Lincoln Park West in Chicago.
10. In recent past John Daniggelis suffered a heart attack and a stroke.
11. John's health condition has worsened during the last few week and as a result Richard Daniggelis must continuously be with his brother because no one else can take care of him at this critical point in his life.
12. John Daniggelis is refusing to go to a hospital and he is unable to feed himself or to take care of his very basic needs.
13. As a result Richard Daniggelis is unable to come to trial and testify in support of his claims against Counter-Defendants.
14. On information and belief these could be John Daniggelis's last days.

Wherefore, Defendant prays for an order granting his motion for continuance.

Respectfully submitted,

  
\_\_\_\_\_  
Andjelko Galic  
Attorney at law

ANDJELKO GALIC  
Attorney for Plaintiff  
134 N. LaSalle Street, Suite 1040  
Chicago, IL 60602  
(312) 986- 1510

## VERIFICATION

I, Richard Daniggelis , under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, certify that I have read this Motion for Continuance, and that statements given in this motion are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certify as aforesaid that they verily believe the same to be true.

July 10, 2017

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Richard Daniggelis

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134 N. LaSalle Street, Suite 1040  
Chicago, Illinois 60602  
Tel. 312 986 1510  
Attorney No.: 33013