

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

GMAC Mortgage, LLC n/k/a: Bank of America, N.A.	)	<b>Case No.: 2007 CH 29738</b>
aka: “LaSalle Bank National Association,” aka “US Bank,	)	
NA,”as trustee for Morgan Stanley Loan Trust 2006-16AX,	)	Before:
Plaintiff	)	Hon. Sanjay T. Tailor,
vs.	)	Presiding Judge assigned –
	)	or whichever other judge
Richard B. Daniggelis,	)	may so preside in Law Div.
Defendant	)	

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**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 Wednesday, 10/7/2015, at 09:20am CST (10:20am EST), in Courtroom 1912, when you have your Case Management Conference, I shall[[\*\*]], via Teleconference, as the Rules of Civil Proceedings allow, appear “telephonically” before any judge sitting assigned to this case and present that which I have filed with This Court – namely: **“Affidavit of Gordon Wayne Watts,” “Motion for leave to file *Amicus Curiae* brief,”** with supporting Exhibits and an Index of said Exhibits – items which are on docket on “Activity Date: 9/14/2015.” Barring that, on such day and time: from today, Wed. 23 Sept 2015, until Mon. 01 Jan. 2017, as This Court deems appropriate, I shall so appear. 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.

**NOTE:** When I last attempted to invoke Art.II, R.185, (Telephone Conferences), R.Civ. Proc.Tr.Ct., by calling in to the Law Division for your 9/14/2015 Case Management Conference, I was unable; therefore, I'm constrained to provide suggestions to aid & abet This Court's efforts to comply with the Rules of Civil Proceedings: You may call me at home at (863)688-9880, or, in the alternative, on my cell at (863)409-2109, but my home number is preferred, as the more clear connection. Additionally, I endeavor to call into Judges Chambers at (312)603-5940 and/or to the main Law Division numbers at extensions 6930, or 5426. Moreover, should these methods be unavailable, This Court might either authorise/order a cell phone in the courtroom from a participant to put me on Speaker Phone and/or simply forgo my appearance, and merely consider my pleadings *In Absentia* – as is done in most courts, wherein no appearance is required.

[[\*\*]] 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. ***See Art. II, Rule 185 (Telephone Conferences), R.Civ. Proceedings in the Trial Court, Rule 206(h)(Remote Electronic Means Depositions), etc.***

[[\*\*]] 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.

**Prayer for Relief:** Please review and rule on the motions –even in if it be my absence (both that described in this notice and those which I filed earlier in this case).

**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 was delivered to the following parties as indicated:

LAW DIVISION – Room 801, Richard J. Daley Center: Attn: Iris Reynolds, Assistant Chief Deputy Clerk – Circuit Court, Cook County, IL, 50 West Washington Street, Chicago, Illinois 60602, PH: 312-603-5031 (6930, 5426: Law), Hours: 8:30am—4:30pm (CST)

Andjelko Galic, Esq. (atty for Defendant, Daniggelis) (Atty No.: 33013)  
134 N. LaSalle St., STE 1040 – Email: [AndjelkoGalic@Hotmail.com](mailto:AndjelkoGalic@Hotmail.com)  
CHICAGO IL, 60602 – (Cell: 312-217-5433, FAX: 312-986-1810, PH: 312-986-1510)

Mr. Robert J. More ([Anselm45@Gmail.com](mailto:Anselm45@Gmail.com)) (Former tenant of Daniggelis)  
P.O. Box 6926, Chicago, IL, 60680-6926 – PH: (608) 445-5181

PIERCE & ASSOCIATES (Atty. for GMAC) (PA0715886) PH: (312) 346-9088  
URL: [http://www.Atty-Pierce.com/index.php?option=com\\_content&view=article&id=223&Itemid=112](http://www.Atty-Pierce.com/index.php?option=com_content&view=article&id=223&Itemid=112)  
Attn: Joseph J. Knopic, II, Esq., 1 North Dearborn St., STE #1300 CHICAGO IL, 60602

Richard Indyke, Esq. (312-332-2828 Atty for LaSalle Bank Natl Assn),  
John K. Kallman, Esq. (312-578-1515, atty for STG: atty no: 25182)  
221 N. LaSalle St. STE 1200, Chicago, IL 60601-1305

STONE MCGUIRE SIEGEL, P.C. (Atty for JOHN LAROCQUE) PH: (847) 239-7555  
Attn: Carlo E. Poli, Esq., 801 SKOKIE BLVD, STE #200, NORTHBROOK IL, 60062

KROPIK PAPUGA AND SHAW (Atty for 'MERS' aka Mortgage Electronic Registration Systems, Inc.) Attn: Charanne M. Papuga, <http://Kropik.net/contact.html> / [Kropik@Kropik.net](mailto:Kropik@Kropik.net)  
120 South LaSalle Street #1500, CHICAGO IL, 60603, PH: (312) 236-6405

COHON RAIZES@AL LLP (90192) (Atty for STEWART TITLE ILLINOIS)  
Attn: Carrie A. Dolan, 208 S LASALLE#1860, CHICAGO IL, 60604, PH: (312) 726-2252

Stewart Title, Attn: Leigh Curry  
<http://www.Stewart.com/en/stc/chicago/contact-us/contact-us.html>  
2055 W. Army Trail Rd., STE 110, Addison, IL 60101, PH: (630) 889-4050

Peter King (Atty. for Joseph Younes) (Atty. No.: 48761)  
c/o: King Holloway LLC, 101 N. Wacker Dr., STE 2010, Chicago, IL 60606

KING HOLLOWAY LLC (Atty. for Joseph Younes) <http://www.KingHolloway.com/contact.htm>  
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and: <http://www.avvo.com/attorneys/60521-il-paul-shelton-1115009.html>  
and: <http://www.martindale.com/Paul-Leslie-Shelton/941051-lawyer.htm>  
and: <http://www.lawyer.com/paul-leslie-shelton.html>  
and: <http://www.lawyer.com/paul-shelton-il.html>  
and: <http://www.lawyer.com/firm/shelton-law-group.html>

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–address per: <https://www.idfpr.com/banks/resfin/discipline/LO2009/2009-LO-26.pdf>  
and: <https://www.idfpr.com/News/newsrsls/05072009SheltonOrder.pdf>  
and: <https://www.idfpr.com/banks/resfin/discipline/2009/MBR-128-bandLO-26-b.pdf>  
and per: [http://chicago.blockshopper.com/property/09-02-422-012/10\\_n\\_adams](http://chicago.blockshopper.com/property/09-02-422-012/10_n_adams)  
and: <http://www.whitepages.com/search/FindNearby?utf8=✓&street=10+N+Adams+St&where=Hinsdale,+IL>  
and: <http://www.whitepages.com/name/Mike-Shelton/Hinsdale-IL/6y8peece>

David J. Cooper  
3622 N. Fremont St.  
Chicago, IL 60613

MERS (Mortgage Electronic Registration Systems, Inc.)  
P.O. Box 2026  
Flint, MI 48501-2026

MERS (Mortgage Electronic Registration Systems, Inc.)  
1901 East Voorhees St, Suite 'C'  
Danville, IL 61834-4512 – Hours: 8a-430p (CST)

MERS (Mortgage Electronic Registration Systems, Inc.)  
<https://www.mersinc.org/about-us/about-us>  
a nominee for HLB Mortgage, Janis Smith – (703) 738-0230 – Email: [JanisS@mersinc.org](mailto:JanisS@mersinc.org)  
Vice President, Corporate Communications, Sandra Troutman – (703) 761-1274 – Email:  
[SandraT@mersinc.org](mailto:SandraT@mersinc.org) – Director, Corporate Communications  
1818 LIBRARY ST, STE 300 – Reston, VA 20190-6280– PH: (703) 761-0694 / (800)-646-6377

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 was served upon all parties listed above, this 23rd day of September, 2015 by the following methods:

- **United State Postal Service:** Every party was served by USPS First Class Mail by depositing the service copies into the mail at the local post office.
- See e.g., <http://GordonWatts.com/MortgageFraud-Court-Filings/> or <http://GordonWayneWatts.com/MortgageFraud-Court-Filings/> for FedEx and USPS receipts of past, present, and future filings in this cause.
- **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: Wednesday, 23 September 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