

FILED

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

2019 APR -8 PM 3:10

U.S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA, FLORIDA

**Gordon Wayne Watts, Individually,  
and on behalf of similarly situated  
persons** (some, but not all, whom are  
named in the instant complaint)

**Lead Plaintiff,**

vs.

Case No.: 8:19 cv 829 T 36 9T

\* Circuit Court of Cook County, Illinois ; et. al.,

**Defendants.**

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**MOTION FOR LEAVE TO FILE COMPLAINT  
IN EXCESS OF TWENTY-FIVE PAGES**

Plaintiffs, Gordon Wayne Watts, et. al., by and through undersigned counsel, and pursuant to Middle District Local Rule 3.01(d), hereby move This Honourable Court for leave to file their complaint in excess of twenty-five (25) pages, and in support thereof, state as follows:

1. Given the **significance of the issues involved**, as alleged—and documented— withing the “Four Corners” of the Complaint, it will exceed the limit by fifteen (15) pages, meaning complaint will be forty (40) pages total. Lead plaintiff isn't a lawyer, thus is trying his best to “follow the rules,” in order to get heard on the merits—to compensate for lowly standing, so this court can be assured this motion isn't made in frivolous or bad faith fashion.

2. One of the plaintiffs harmed is **elderly, and was made homeless** by the title-theft Mortgage Fraud, based on what even the Illinois State courts admitted was basically a forged

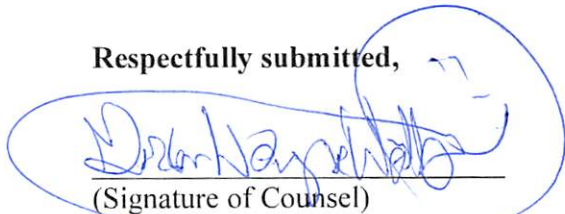
signature. Failure to overcome the state's unconstitutional denial of appellate review of the one-remaining live case redressing this would cause grave, and irreparable, harm to this man.

3. Moreover, lead plaintiff, Watts, was harmed in many documented ways (financial, emotional, etc.), and his appeal, which “hangs by a thread,” will be dismissed on 28 May 2019 for reasons that are out of his control—purposely put out of his control so-as-to deny him appeal review—if This Court declines to force ILLINOIS state courts to grant basic civil rights, as elucidated in said 40-page Complaint.

4. An Illinois State law (IL Sup.Ct. Rule 321) is very unconstitutional, and as many other unconstitutional acts were done, down through the decades, squeezing them into a 25-page complaint is more-than-impossible. Plaintiff was “lucky” to be able to “word-smith” these torts into one forty-page complaint—even more-so, given that he is not a lawyer.

Wherefore, Plaintiffs respectfully request This Honourable Court to enter an order granting plaintiffs leave to file a complaint in excess of twenty-five pages, pursuant to Local Rule 3.01(d).

Date: Monday (Day of Week),  
the 8th day of April, 2019

Respectfully submitted,  
  
(Signature of Counsel)


Typed Name of Counsel: Gordon Wayne Watts, non-lawyer, proceeding *pro se*  
Florida Bar Identification Number (if admitted to practice in Florida): – N/A  
Firm or Business Name: **The Register** (non-profit, online blog: links below)  
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Official website(s): <https://GordonWatts.com> and <https://GordonWayneWatts.com>

**Certificate of Service**

I, **GordonWayne Watts**, hereby certify that I have filed a copy of this motion (“MOTION FOR LEAVE TO FILE COMPLAINT IN EXCESS OF TWENTY-FIVE PAGES”) with the clerk of the Circuit Court, Middle District of Florida, Tampa Division, this 8<sup>th</sup> day of April, 2019, but on no one else, as I am filing *In Forma Pauperis*, and am depending – with full faith and credit – upon The Court to authorise and order the U.S. Marshall Service to serve all other parties of record.

Date: Monday (Day of Week),  
the 8<sup>th</sup> day of April, 2019

Respectfully submitted,

  
(Signature of Counsel)

Typed Name of Counsel: Gordon Wayne Watts, non-lawyer, proceeding *pro se*  
Florida Bar Identification Number (if admitted to practice in Florida): – N/A  
Firm or Business Name: **The Register** (non-profit, online blog: links below)  
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