

In the Appellate Court of Illinois, First District

Docket Number: 1-18-0091

GMAC Mortgage, LLC,) 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.,) (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**

Motion for Extension of Time to file Record on Appeal
concurrent with: Judicial Notice of Address changes –and:
Motion to Expedite, and Motion for Mandamus Writ compelling compliance with the law

Appellant, Gordon Wayne Watts, gives judicial notice to Reviewing Court that the appeal in this case was on 08 January 2018, and Rule 326 mandates that the Record on Appeal “shall be filed in the reviewing court within 63 days after the filing of the notice of appeal,” which would put the due date on Monday, March 12, 2018. – Appellant represents to this court that he phoned this court on Tuesday, March 13, 2018, and spoke with an operator who notified him that the Record has not been filed by the March 12 due date—even though Appellant made *several* timely requests of the trial court to prepare the Record and transmit it to the reviewing court.

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 **or on motion filed within 35 days thereafter supported by a showing of reasonable excuse for failure to file the motion earlier.** The movant shall serve any motion for extension of time on the clerk preparing the record on appeal.” [Movant is doing so – see Certificate of Service – and Exhibit “E” – to verify.]

Movant, Gordon Wayne Watts, represents to This Court that there were numerous mitigating circumstances which caused him to be a few days late:

First, the trial court docketed Appellant's request to prepare record (see Exhibit C) way back on 01/22/2018, but trial court kept delaying, and did not rule (see Exhibit D) until 03/01/2018, less than 2 weeks before Due Date. Appellant is taking care of his elderly parents, and also had to take a physically-demanding (and low-paying) construction job, which has long

commute times (to help offset printing and mailing costs in this case), and Movant (due to poverty) has lost Internet at home (making research and online filing several “Orders of Magnitude” more difficult), when he finally got “time off,” he (a non-lawyer) had an “uphill” battle researching Mandamus law in Illinois to deal with the trial court's stubborn refusal to comply with several laws, not only regarding refusal to following This Court's case-law on Intervention, but also regarding insubordinate refusal to comply with State Law on 298 indigent status. – **PROOF:** Exhibit “D”, trial court's Order denying Waiver of court fees, not only disagrees with the Law of the Case (Exhibit “B”, this court's order), but it also disagrees with the plain-meaning of the statutory law: Appellant's name appears on docket, and is obviously a party (*who is both defending in Intervention and also suing in cross-suit fashion, subject to fee waiver to sue and/or defend*), and also appellant's status as Food Stamp recipient qualifies him, according to law. (Thus MANDAMUS might issue compelling trial court to grant fee waiver.)

However, trial court (Judge James P. Flannery, Law Division presiding Judge) alleges in his Order that trial court never granted leave to Intervene and participate in this case.

If trial court's claim is true, then this is an admission by the trial court that it refused to comply with This Court's holding on Intervention: Where intervention as of right is asserted, “the trial court’s jurisdiction is limited to determining timeliness, inadequacy of representation and sufficiency of interest; once these threshold requirements have been met, the plain meaning of the statute directs that the petition be granted.” *City of Chicago v. John Hancock Mutual Life Ins. Co.*, 127 Ill.App.3d 140, 144 (1st Dist. 1984). [See Exhibit “A”, documentation to Intervene as of right] Petitioner satisfies all 3 requirements, giving Watts the right to intervene under 735 ILCS 5/2-408(a)(3). Trial court's refusal to comply with its ministerial duty and This Court's holdings re Intervention is also subject to a MANDAMUS WRIT to force trial court to obey the law: See again, e.g., Exhibit “A”, which gives documentation to support the claim.

In either case (whether Watts was deemed a 'party' as the docket indicates – or whether he was not considered a 'party' as trial court – Judge Flannery presiding – asserts), Mandamus may issue to compel trial court to [a] grant intervention, [b] grant fee waiver, and [c] prepare the Record on Appeal. (But, in any case, if you think that *reading* this motion is hard, imagine a poor nonLawyer *researching* obscure Mandamus case-law, *writing* it – and *printing* & *mailing* fifteen (15) or so service copies – *much more difficult* – so a request for extension of time is “**supported by a showing of reasonable excuse for failure to file the motion earlier.**”)

Playing the Devil's Advocate

Before we come down too hard on Judge Flannery for his refusal to comply with the law, let's look at mitigating circumstances: His court, previously, prepared a huge record in a related case, which Atty. Galic (Daniggelis' attorney), and his court “got burned” badly, insofar as the preparation of the huge record was a wasted effort, when This Court (see Exhibit “H”) dismissed the case for Galic's repeated refusals to prosecute the case. (See the IL Supreme Court's “Supervisory Order” next page to verify, & see Movant's Docketing Statement for details.) Sadly, this was before “electronic” record standards, and trials court's efforts were not preserved.

So, while Judge Flannery is in open disobedience to the the law, his tacit concerns are genuine (and appellant's motion, here, will offer a compromise to get around the risk of a repeated mistake here).

Important Law addressing these matters

[[#1]] – First, while MANDAMUS is usually an “original” writ, filed as a separate case to the Supreme Court or trial court, it is appropriate to file it “as a motion,” since this is already an ongoing case. (But it may also be filed separately, so as to not put all our eggs in 1 basket.)

[[#2]] – Secondly, while we don't normally think of MANDAMUS being issued by an Appellate Court (such as This Court), Article VI, Sec. 6, of the Illinois Constitution actually does grant this power to this reviewing court:

SECTION 6. APPELLATE COURT - JURISDICTION

Appeals from final judgments of a Circuit Court are a matter of right to the Appellate Court in the Judicial District in which the Circuit Court is located except in cases appealable directly to the Supreme Court and except that after a trial on the merits in a criminal case, there shall be no appeal from a judgment of acquittal. The Supreme Court may provide by rule for appeals to the Appellate Court from other than final judgments of Circuit Courts. **The Appellate Court may exercise original jurisdiction when necessary to the complete determination of any case on review.** The Appellate Court shall have such powers of direct review of administrative action as provided by law. (Source: Illinois Constitution.)

Translation: This Court may issue Writs of **Mandamus**, Prohibition, Habeas Corpus, or any other writ, in an exercise of its “original jurisdiction” if needed to complete review of a case properly before it.

[[#3]] – **Third, and last: This Court violated a direct command of the Illinois Supreme Court, here recently, in a related case:**

[Date: 5/6/2015] No. 118434 - GMAC Mortgage, LLC, et al., respondents, v. Richard Daniggelis, petitioner. Leave to appeal, Appellate Court, First District. (1-14-2751)

Petition for leave to appeal denied.

In the exercise of this Court's supervisory authority, the Appellate Court, First District, is directed to vacate its order in GMAC Mortgage, LLC v. Daniggelis, case No. 1-14-2751 (09/24/14), denying Richard Daniggelis leave to file a late notice of appeal. The appellate court is instructed to allow Richard Daniggelis to file a late notice of appeal and hear the case. (27 N.E.3d 610 (2015))

Let's look again at the ORDER rendered here: Notice that it doesn't say “hear” the case only if Atty. Galic files his merits briefs. Notice, please, it says to “hear the case.” Period. Now, no one will hold it against the appellate court judges for being human and getting side-tracked.

(Movant is human, and asks for forgiveness for a late motion above, no?) However, when this case inevitably wends its way to the Supreme Court again (*no matter the outcome, some party will lose, and will be an unhappy camper, and appeal, OK?*), the Supreme Court will remember that this reviewing court disobeyed its last standing order to fully-and-completely review this case on the merits, hear it, and render a decision (which it did not do).

The trial court (and the other litigants) do not care if This Court is embarrassed or misses an opportunity to correct an honest, and human, mistake. However, even though Movant admits that he sometimes disagrees with this court's rulings, in the past, refusing to give Daniggelis justice, and even though Movant is also human (and makes mistakes), Movant, Watts, will make a Herculean effort to move heaven & earth, in order to grant This Court a "Second Chance" to finish the job given to it by the Illinois Supreme Court. **To be clear, if This Court does not obey The Supreme Court's last order to hear the merits, four (4) parties will suffer harm:**

- (1) This Court will risk censure, embarrassment, & failure to obey the IL Supreme Court.
- (2) Mr. Daniggelis, who is elderly (about 79 or 80, as I write), and was made homeless, & living in his rental van, is still suffering loss of his house, land, and hundreds of thousands of dollars of equity, *which I documented in prior filings*.
- (3) Oh, and as I am owed monies for much work done, only about 10% which was documented in my Intervention motion, since many new costs have accrued, I wouldn't get paid, in this Intervention, which is, legally, similar to a Mechanic's Lien, but without the lien filing fee. [I filed Intervention vs. Lien, in order to save paying said fee.]
- (4) The Rule of Law would suffer, and who else would get denied a fair hearing, simply because he's a poor, out-of-state nonLawyer?

Therefore, I ask This Court to pay close attention to what follows, as I shall (to the best of my human ability) give a "road map" so we all escape unharmed in this legal maze and trek.

THEREFORE – I move This Court to:

((A)) Extend Time for filing the Record on Appeal three (3) months, to June 12, 2018. But, at the same time, **EXPEDITE PROCEEDINGS for the elderly & all parties.**

((B)) Issue a Writ of Mandamus compelling the trial court to grant intervention (see Exhibit "A"), and grant fee waiver (see Exhibits "B", "C", and "D" which cite to statutory law).

((C)) If preparation of the entire record seems unfeasible (remember: Trial Court got burned on this in the past), I'd recommend This Court issue a MANDAMUS Writ compelling trial court to prepare 'selected' record items, only: ONLY filings by Movant, responsive filings, & selected "representative" filings by Galic & opposing attorneys, for the Record on Appeal.

((D)) Since "less than 100%" of the Record on Appeal would be prepared (for the sake of time /&/ brevity), Due Process would require that This Court give Joseph Younes & other defendants "one last chance" to make their case for innocence or ask that selected items be added to the Record. (*A "Writ of Show Cause" might play into the mix.*)

((E)) Then, unless you disagree with my legal arguments (you should not), I ask that you give Daniggelis' house back to him, and order repayment for damages to those aggrieved, including myself. *After ((D)) above, Summary Judgment would be appropriate. Please do so.*

Conclusion:

Please grant my motion to extend time, by 3 months, to file the Record on Appeal, to June 12, 2018, and then, please grant my motion to expedite (to make up for lost time for our combined human mistakes), and please compel the trial court to prepare a sufficient (even if not complete) record so this court can have documentation of the claims (my factual and my legal claims) which I have made in my filings to this court and the court below. (This, I admit, it not politically easy, but when we all signed up for our jobs, we knew that hard work—including hours I've lost researching, writing, printing, & mailing these briefs—would be asked of us, and we said 'yes' to that request.)

I'm including both my Docketing Statement (Exhibit “G”) and Judge Otto's 3-8-2013 ORDER in this case (Exhibit “F”), because my Docketing Statement is a good snapshot (summary), and, ironically, the judge who issued the 'worst' of the rulings, documents the case 'the best' for Daniggelis' claims of having his house/land/equity stolen via Mortgage Fraud. This short ORDER by Judge Otto is an eye-opener, as I discuss in my filings.

The trial court said, in so many words, that I was “an outsider” and to “butt out,” did it not? Even the Chicago, IL Police, when getting a call for 'abuse,' do NOT tell the caller to “butt out” if he's not a party to the case, so why does your trial court think they can do this? (Actually, I AM a party to the case, but even if I weren't, the elderly man made homeless is a matter of great public importance, and the trial court should have listened to my call for help and acted, when Daniggelis' attorney fell down on the job.)

Then, please, after hearing “one last time” from those I am counter-suing, please speedily issue a Summary Judgment with prejudice, and once-and-for-all finish the job which the IL Supreme court charged you with doing: My filings ****alone****, as referenced in my Docketing Statement, are more than enough to justify Summary Judgment: If even an outsider, such as myself, can see this, even more easily can this court likewise see the legal mess and address it. In other news (bookkeeping), I give “Judicial Notice” to this court of the most current Service List: See Exhibit “E”, which has returned mail to show which addresses are outdated.

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: Friday, 16 March 2018

/s/Gordon Wayne Watts

Gordon Wayne Watts

INDEX TO THE EXHIBITS

<u>Instrument</u>	<u>Docket/Tab#</u>
** Motion for Intervention (in 2 file formats: Court-Stamped Image & text-searchable)	Exhibit "A"
** Fee Waiver ORDER (Granted by This Court)	Exhibit "B"
** Fee Waiver application (to trial court) with verified request to prepare the Record on Appeal	Exhibit "C"
** Fee Waiver ORDER (Denied by Trial Court)	Exhibit "D"
** Returned Mail & web-tracking (to document updated addresses & Service of filings)	Exhibit "E"
** Judge OTTO's 3-8-2013 ORDER	Exhibit "F"
*** Docketing Statement (bundled with Court-Stamped Fee Waiver app)	Exhibit "G"
** June 16, 2016 ORDER by this court in 1-14-2751, chewing out Galic, the attorney for Daniggelis, to verify Watts' interests were not being represented by Galic, thus justifying Intervention	Exhibit "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 June 12, 2018, 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**

ORDER – *GMAC v. Watts, et al.*, 1-18-0091 (ILLINOIS First Appellate Court)

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
821 Alicia Road
Lakeland, FL 33801-2113
(863) 688-9880 (h), (863) 409-2109 (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, Friday, 16 March 2018, 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*]
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>
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:** Richard J. Daley Center, 50 West Washington St., Room 801 Chicago, IL 60602 – (312) 603-5406, Hours: 8:30a.m.-4:30p.m., Mon-Fri, Excl. Holidays
Attention: Deputy Chief, Patricia O'Brian, PAOBrien@CookCountyCourt.com **[served by all means, as Rule 326 requires for Motions for Extension of Time]**
- * **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 by email / electronic service only, as a courtesy, since this is an appeal]**
- * **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 by email / electronic service only, as a courtesy, since this is an appeal]**
- * **Law Division and Hon. Diane M. Shelley, Circuit Judge, [served by email / electronic service only, as a courtesy, since this is an appeal]** Law@CookCountyCourt.com ;
ccc.LawCalendarW@CookcountyIL.gov ; Diane.Shelley@CookCountyIL.gov
- * **Richard B. Daniggelis** [true owner of 1720] 312-774-4742, c/o John Daniggelis 773-327-7198
2150 North Lincoln Park West, Apartment #603, Chicago, IL 60614-4652
- * **Richard B. Daniggelis (who receives mail, via USPS mail-forwarding at his old address)**
1720 North Sedgwick St., Chicago, IL 60614-5722
- * **Andjelko Galic** (Atty#:33013) Cell:312-217-5433, Fax:312-986-1810, Phone:312-986-1510
845 Sherwood Road, LaGrange Park, IL 60526-1547 **(Please take note of Mr. Galic's new address)** Email: AndjelkoGalic@Hotmail.com ; AGForeclosureDefense@Gmail.com
- * **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
- * **Associated Bank, N.A.**, 200 North Adam Street, Green Bay, WI 54301-5142

SERVICE LIST (continued from above)

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. – Telephone No.: (703) 761-1270, Facsimile No.: (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**

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* **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]

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In the Appellate Court of Illinois, First District

Docket Number: 1-18-0091

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Plaintiffs,)	County Department, Law Division
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Counter-Defendants.)	Supreme Court Rule(s) which confer(s) jurisdiction
<hr style="border-top: 3px double #000;"/>		
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 Friday, 16 March 2018**, via **the Odyssey eFileIL (TylerHost.net) Electronic Filing system** if they're e-file registered.

* I'm concurrently serving all parties via **First Class U.S. Postal Mail** –*except The Appeals Court (which only accepts eFiling), or as otherwise indicted in the Service List.*

* 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.

* Lastly, I may, later, cc all parties via **e-mail**, if I am able. ***Respectfully submitted,***

<hr style="width: 30%; margin: 0 auto;"/> (Actual Signature, if served upon clerk) Gordon Wayne Watts		<u>/s/ Gordon Wayne Watts</u> (Electronic Signature) Gordon Wayne Watts
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Gordon Wayne Watts, *pro se* [Code: '99500' = Non-Lawer, *pro se*]
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