

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Gordon Wayne Watts  
Plaintiff,

Case No.: 1:19-cv-03473

vs.

Judge Robert M. Dow, Jr.  
Magistrate Judge Susan E. Cox

CIRCUIT COURT OF COOK COUNTY,  
ILLINOIS, et al.,  
Defendants.

NOTICE OF MOTION

Pursuant to Local Rules 5.3 & 5.4, I'm hereby giving this court notice of my intent to present my motion ("Rule 59 motion to alter / amend judgment concurrent with Rule 60 motion for Relief from Judgment / Order) to the court for a telephone hearing (I live in Florida, and can't come to court) –and with notice “filed no later than 4:00 p.m. on the third business day preceding the day the motion is to be heard,” pursuant to Judge Dow's standing order, but also with the motion itself “not more than 14 days following the date on which the motion or objection is delivered to the court pursuant to LR78.1,” as Local Rule 5.3, quoted, requires. **Doing the math, that means** that my Rule 59 motion (*which is due on Friday, 28 June 2019, or 3 days later, since I'm filing my “mail” pursuant to Fed.R.Civ.P. 6(d), which falls on Monday, July 1, 2019*) **starts the 14-day time-clock at July 1, and precludes any hearing dates after July 15.** Moreover, Judge Dow's standing order, which requires that I must give at least three (3) business days' notice of my hearing date, only permits hearing dates **on or after after Thursday, July 4, 2019.** Lastly, Judge Dow's webpage states that: “The Honorable Robert M. Dow Jr. will be absent from the Court on the following date(s): July 3rd and July 4th. July 29th to and including August 9th.” Cite: <https://www.ILND.UsCourts.gov/judge-info.aspx?YcR9etkCy90> So, looking at all hearing dates **from the lower end (July 4) to the upper extreme (July 15)**, excluding July 3 & 4 (his days off notice) –and weekends (on which the court isn't open) –and looking at

Judge Dow's calendar (which is 'empty' on all dates from July 4 & afterward) to see if my chosen date/time has already been filled, it appears that the only days available for a hearing for my motion would be the following: **Friday, July 5, 2019; Mon-Fri: July 8—12, 2019; and, Monday, July 15, 2019.** Since the court's official hours are 8:30 A.M.—4:30 P.M., Mon– Fri, I'll pick the earliest date & time available (as a convenience for the court, in case it has to reschedule my hearing), and pick **Friday, 05 July, 2019, at 8:30 A.M. (CST)**, or 9:30 A.M. (EST, local time for me). *Whoops, I now see* <https://www.ILND.UsCourts.gov/JudgesMotionSchedule.aspx> which states that Judge Dow may only hold hearings on Tuesday, Wednesday, and Thursday, starting at 09:15 A.M. (CST). Given this new information, I now withdraw that time-slot (but I am leaving in my mathematical typo above – and not editing it out as a graphic illustration of the *actual* complexity of the so-called simple math involved, especially for *pro se* litigants). I therefore give notice of **intent** to present myself for telephone hearing to present my Rule 59 motion above, on the next following time/date, namely on **Tuesday, 09 July 2019 at 09:15 A.M. (CST) aka: 10:15 A.M. (EST, local time for me).** **CAVEAT:** Given the fact that I may also file a “judge's courtesy copy” this by “mail” pursuant to Fed.R.Civ.P. 6(d), there's a possibility that this time-slot may get “taken” in the interim (and/or that unforeseen calculation errors of a *pro se* litigant –or the court itself– or even unforeseen “Acts of God” may entangle the math). Therefore, I ask the court to be lenient and work with me in this regard. **NOTE:** While it would be an interesting experience for me to have a telephone hearing in Federal Court to prosecute serious Civil Rights violations (proven as valid within the “Four Corners” of my complain [1], my amended complain [13], and my Rule 59 motion (for which I am noticing up a hearing), it's not altogether necessary for this court to hold a hearing when deciding this motion, even one as “heavy” as this one. For example when I almost won the infamous “Terri Schiavo” **Page 2 of 3**

(Florida feeding tube girl) case – all by myself – in the Florida Supreme Court, I was not given any hearing. (It was all done by mail.)

\* *In Re: GORDON WAYNE WATTS (as next friend of THERESA MARIE 'TERRI' SCHIAVO)*, No. SC03-2420 (Fla. Feb.23, 2005), denied 4-3 on rehearing. (Watts got 42.7% of his panel)  
<http://www.FloridaSupremeCourt.org/clerk/dispositions/2005/2/03-2420reh.pdf>

\* *In Re: JEB BUSH, GOVERNOR OF FLORIDA, ET AL. v. MICHAEL SCHIAVO, GUARDIAN: THERESA SCHIAVO*, No. SC04-925 (Fla. Oct.21, 2004), denied 7-0 on rehearing. (Bush got 0.0% of his panel before the same court)  
<http://www.FloridaSupremeCourt.org/clerk/dispositions/2004/10/04-925reh.pdf>

• *Schiavo ex rel. Schindler v. Schiavo ex rel. Schiavo*, 403 F.3d 1223, 2005 WL 648897 (11th Cir. Mar.23, 2005), denied 2-1 on appeal. (Terri Schiavo's own blood family only got 33.3% of their panel on the Federal Appeals level)  
<http://media.ca11.uscourts.gov/opinions/pub/files/200511556.pdf>

Therefore, while a hearing would be a good opportunity to request a court-appointed attorney for other potential plaintiffs (who would need such help), as I'm not allowed to represent any party other than myself, a hearing is not totally necessary, and may be an unnecessarily use of precious judicial resources. Respectfully submitted, /s/ Mr. Gordon Wayne Watts

**Date:** Thursday, this 27th day of JUNE, 2019 /s/ \_\_\_\_\_  
(Day of Week) (Ink signature if printed and mailed)

**Certificate of Service**

I, GordonWayne Watts, hereby certify that I am, now, filing a copy of this notice of motion with the clerk of the Circuit Court, Northern District of Illinois, Eastern Division, via CM/ECF, this 27th day of JUNE, 2019, but on no one else, as Judge Dow's order of 5/31/2019 found me *In Forma Pauperis*. I shall attempt to mail a printed "courtesy copy" to Judge's Chamber, if able-- of as many filings as I can afford to print and mail.

**Respectfully submitted,**  
**Date:** \_\_\_\_\_ /s/ Mr. Gordon Wayne Watts

**Signature of Counsel:** /s/ \_\_\_\_\_  
(Ink signature if printed and mailed)

Typed Name of Counsel: Gordon Wayne Watts, non-lawyer, proceeding *pro se*  
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