

**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 Monday, 09/14/2015, at 09:20am CST (10:20am EST), when you have your Case Management Conference, I shall[[\*\*]], via Teleconference, as the Supreme Court Rules allow, appear “telephonically” before any judge sitting assigned to this case and present the attached “**Motion for leave to file *Amicus Curiae* brief,**” with supporting Exhibits and an Index of said Exhibits. Barring that, on such day and time: from today, Wed. 09 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.

[[\*\*]] 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 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 and all attached pleadings were delivered to the following parties as indicated:

Dorothy Brown, Clerk of the Circuit Court, Richard J. Daley Center, Room 1001, 50 West Washington Street, Chicago, Illinois 60602, PH: 312-603-5031 (5133: Chancery / 5116: Civil / 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)

William D. and Linda D. Gerould  
(Owners of record of subject property, according to <http://CookRecorder.com>)  
49 Lorelei Lane, Menlo Park, CA 94025-1715

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)  
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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>  
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and: <http://www.martindale.com/Paul-Leslie-Shelton/941051-lawyer.htm>  
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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/6y8peee>

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

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:

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1595 Springhill Rd., STE 310, Vienna VA 22182, 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 and all attached pleadings (Affidavit of Gordon Wayne Watts, Notice of Motion, Motion for leave to file *Amicus Curiae* brief, *Amicus Curiae* of Gordon Wayne Watts in the above-captioned case, and related exhibits – with an Appendix of Exhibits) were served upon all parties listed above, this 9th day of September, 2015 by the following methods:

- **FedEx 3rd-party commercial Carrier:** Every party was served by FedEx [[with delivery confirmation and tracking, should it be necessary to verify service]] excepting the cases of a PO Box, which are not serviced by FedEx.
- 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.
- **United State Postal Service:** The party with a PO Box, Mr. More, was served by USPS.
- **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, 09 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