

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
MUNICIPAL DEPARTMENT – FIRST DISTRICT**

Joseph Younes,)	
Plaintiff)	
)	
vs.)	Case No.: 2014-M1-701473
)	
Richard B. Daniggelis,)	
<u>Defendant</u>)	

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 such day and time as This Court deems appropriate, I shall[[**]] appear “telephonically” before any judge sitting assigned to this case and present all of the attached pleadings requesting This Court's consideration of certain assertions of fact, documentation to verify, and arguments of law, more fully elucidated in the attached motion and proposed *Amicus* brief. 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.

[[**]] 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.

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 (Main clerk email:

CourtClerk@CookCountyCourt.com)

Chancery clerk emails: MZSaldivar@CookCountyCourt.com,

RDMcMiller@CookCountyCourt.com, CMEdington@CookCountyCourt.com,

SDLevy@CookCountyCourt.com

Richard J. Daley Center, Room 1001, 50 West Washington Street, Chicago, Illinois 60602

PH: 312-603-5031 (5133: Chancery / 5116: Civil)

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

Richard B. Daniggelis (Defendant)
1720 N. Sedgwick
Chicago, IL 60614-5722

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

William D. and Linda D. Gerould (Owners of record of subject property)
(Owners of record of subject property, according to <http://CookRecorder.com>)
P.O. Box 1053
Genoa, NV 89411-1053

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

KING HOLLOWAY LLC (Atty. for Joseph Younes) <http://www.KingHolloway.com/contact.htm>
Attn: Peter M. King, Esq. PKing@khl-law.com
One North LaSalle Street, Suite 3040
Chicago, IL 60602
(312) 780-7302 / (312) 724-8218 / Direct: (312) 724-8221

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

Perry Perelman (Atty no: 57398) (PPerelman@PerelmanDorf.com) (Atty. for Joseph Younes)
PERELMAN | DORF, LLC <http://PerelmanDorf.com/contact/> Email: Info@PerelmanDorf.com
2059 W. Chicago Ave.
Chicago, IL 60622
PH: (312) 888-9608 / FAX: +1-312-674-7644

Craig A. Cronquist, Esq., c/o: Maloney & Craven, P.C. (Attys. for Joseph Younes)
2093 Rand Road
DesPlaines, IL 60016

Joseph Younes Law Offices / <http://ChicagoAccidentAttorney.net>
120 W Madison St Ste 1405
Chicago, IL 60602-4128
Phone: (312) 372-1122 ; Fax: (312) 372-1408
Email is thought to be: RoJoe69@yahoo.com per <http://www.ZoomInfo.com/p/Joseph-Younes/599467626>

Paul L. Shelton, Shelton Law Group, LLC
700 E. Ogden Ave., STE 101
Oak Brook, IL 69559

Paul L. Shelton (PLShelton@SBCGlobal.net) (PMSA136@aol.com)
<http://www.il-reab.com/agents/26812-paul-l-shelton-shelton-associates-hinsdale-il-60523>
c/o: Shelton Law Group, LLC, <https://www.youtube.com/user/PaulSheltonLawGroup>
1010 Jorie Blvd. #144
Oak Brook, IL 60523
(630) 993-9999, (630) 333-4009, (630) 286-5100

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 3rd day of August, 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.
- **United State Postal Service:** Those parties with PO Boxes were served by USPS.
- **Facsimile:** I am not serving any parties by FAX. [[I am neither willing nor able to receive FAX transmissions.]]
- **Electronic Mail:** In every case where I could obtain an email address (see above) for a party, I am effecting service by email, and attaching said documents in PDF form. [[I consent to service by email at the email addresses listed below.]]
- **Electronic Filing:** If I am able to successfully register an account with the Cook County, IL Clerk of the Circuit Court, I shall effect service electronically therewith.
- **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*

821 Alicia Road, Lakeland, FL 33801-2113 ; PH: (863) 688-9880

Web: www.GordonWatts.com / www.GordonWayneWatts.com

Email: Gww1210@aol.com / Gww1210@gmail.com

Date: Monday, 03 August 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*