

Law Offices of Ira C. Kaplan, Esq.
190 Moore Street, Suite 430
Hackensack, NJ 07601
(201) 457-9090
Attorney for Plaintiff
020741988

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION: FAMILY PART
BERGEN COUNTY

Keith Yonos

Plaintiff

vs.

Civil Action

Amy Weber-Yonos

Docket No. FM-02-1100-08

Defendant

NOTICE OF MOTION

VIA OVERNIGHT MAIL

Ms. Amy Weber Yonos
452 B North 86th Street
Fairview, New Jersey 07022

PLEASE TAKE NOTICE that on July 25, 2014 at 9:00 a.m. in the forenoon or soon thereafter as counsel may be heard, the undersigned attorney for Plaintiff shall move before the Judge of the Superior Court at the Bergen County Courthouse, Family Part, 10 Main Street, Hackensack, New Jersey for an Order:

1. Enforcement of court Order dated June 27, 2014 and for issuance of warrant for the arrest of Defendant, Amy Weber, and her incarceration pending full and complete compliance with her outstanding financial discovery obligations;

2. For attorney's fees and costs as a result of the Defendant's bad faith and unreasonable conduct;

3. For such other relief as the Court deems just, proper and equitable.

PLEASE TAKE NOTICE that annexed hereto is the Certification of Ira C. Kaplan.

PLEASE TAKE FURTHER NOTICE that annexed hereto is a form of Order

pursuant to R-1:6-2.

PLEASE TAKE FURTHER NOTICE that oral argument with regard to the Motion is requested given the nature of the relief sought

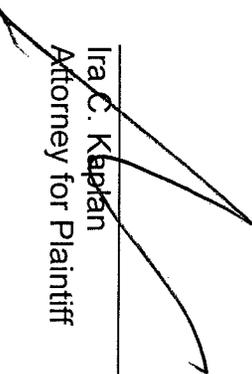
NOTICE TO LITIGANTS

IF YOU WANT TO RESPOND TO THIS MOTION YOU MUST DO SO IN WRITING.

This written response shall be by affidavit or certification. (Affidavits and certifications are documents filed with the Court. In either document the person signing it swears to its truth and acknowledges that they are aware that they can be punished for not filing a true statement with the Court. Affidavits are notarized and certifications are not). If you would also like to submit your own separate request in a motion to the Judge you can do so by filing a cross-motion. Your response and/or cross-motion may ask for oral argument. That means you can ask to appear before the court to explain your position. However, you must submit a written response even if you request oral argument. Any papers you send to the Court must be sent to the opposing side, either to the attorney if the opposing party is presented by one, or to the other party if they represent themselves.

The response and/or crossmotion must be submitted to the Court by a certain date. All motions must be filed 24 days (Tuesday) before the return date. A response

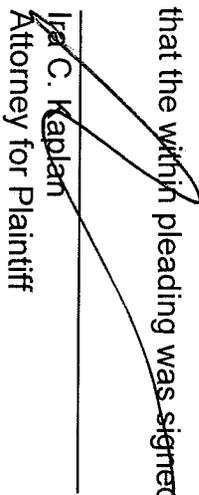
and/or crossmotion must be filed fifteen days (Thursday) before the return date. Answers or responses to any opposing affidavits and crossmotion shall be served and filed not later than eight days (Thursday) before the return date. No other response is permitted without permission of the court. If you mail in your papers you must add three day to the above time period. Response to motion papers sent to the Court are to be sent to the following address: 10 Main Street, Hackensack, New Jersey or the Family Division Manger's office if you have any questions on how to file a motion, cross motion or any response papers. Please note that the Family Division Manager's office cannot give you legal advice.



Ira C. Kaplan
Attorney for Plaintiff

Dated: July 9, 2014

The undersigned hereby certifies that the within pleading was signed with the time permitted by the rules.



Ira C. Kaplan
Attorney for Plaintiff

Dated: July 9, 2014

Law Offices of Ira C. Kaplan, Esq.
190 Moore Street, Suite 430
Hackensack, NJ 07601
(201) 457-9090/201-457-1414
Attorney for Plaintiff

Keith Yonos

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION: FAMILY PART
BERGEN COUNTY

Plaintiff (s),

vs.

Civil Action

Docket No. FM-02-1100-08

Amy Weber-Yonos

Defendant(s)

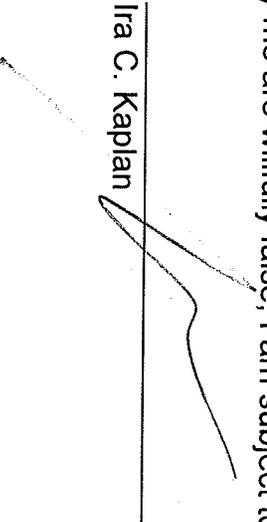
CERTIFICATION OF IRA C. KAPLAN

I, Ira C. Kaplan, being of full age do hereby certify as follows:

1. On July 3, 2014 at approximately 1:50 p.m. I commenced supplementary proceeding of Amy Weber. The examination terminated as of approximate 2:10 p.m. when Ms. Weber insisted she had to leave the court room because she needed to go to the bathroom. Approximately 10 minutes after Ms. Weber left, I walked into the hallway and observed Ms. Weber laughing with a friend who came with her to court that day. I also observed her on the telephone telling a third party as to her perception as to what was transpiring at the courthouse.
2. Annexed hereto as **EXHIBIT "A"** is true copy of Supplementary Examination Form that I was able to complete pursuant to the examination along with copy of paychecks produced by Ms. Weber. Because of Ms. Weber's absolute lack of cooperation during the examination and pursuant to a unilateral termination of same, I was unable to complete the examination. Likewise, Ms. Weber

- maintained certain financial documentation in her possession, yet the only documents she agreed to provide was a copy of her paycheck ending period of March 1, 2014. It is abundantly clear Ms. Weber has no regard for our legal system or any Orders issued by Your Honor or any other Judge of the Superior Court. She has made a total mockery of the system and continues to do so at every twist and turn. It is my understanding the court will be entering my request for fees and costs. In that regard I herewith attach July 3, 2014 correspondence along with Certification of Services annexed hereto as **EXHIBIT "B"**.
3. Based on the foregoing additional facts I request Your Honor award Mr. Yonos attorney's fees and costs to be paid by a date certain or for a warrant to issue.
 4. Likewise, as a result of Ms. Weber's failure to comply with this court's Order of June 27, 2014 I request Your Honor issue a bench warrant for her arrest pursuant to paragraph 1 of that Order.

I hereby certify that the foregoing statements made by me are true. I am aware if any of the foregoing statements made by me are willfully false, I am subject to punishment.



Ira C. Kaplan

July 9, 2014

EXHIBIT

A

Court Cherry Bergen
Docket No. FN-02-267-11
Judgment Entered 4/20/13
Amount \$26,364.00

~~Romy Weber~~ DEPD
V
KETH YARDS
Amy Weber

~~KETH YARDS~~
IMO. KAY

Date of Examination 7/31/14 Time 1:30 Examined by Lat Kaplan
Place Bergen County Courthouse Appearance: Amy Weber & KETH YARDS

IDENTITY - MARITAL STATUS - FAMILY

1. Full name Amy Maria Weber Birthdate 9/23/62 Soc. Sec. # 641-03-7521
2. Driver's License No. W207204074 ~~59622~~ State of NJ
3. Residence 452 B NORTH 8TH ST, FARMHILL NJ Phone cell only #
4. What other names have you used or been known by DO NOT Recall
3. Are you Married Single Divorced Separated Widow(er)
6. Name of spouse N/A
7. Names and ages of children living with you N/A

8. Does anyone living with you contribute toward household expenses? If so, provide name, age, relationship to you and amount contributed NEITHER WIFE OR DO NOT recall.
9. Name and address of spouse's employer HAD prior residence 090 plmo. Will NOT disclose name of employer
INVENTIVE HEALTH, 500 ATLSON A, SOMERSET NJ 326924 Spouse's weekly earnings: Gross \$ 3869.24 Take Home \$ 1682 biweekly
10. If divorced or separated state the name and address of former spouse KETH YARDS

11. Amount you receive as support for yourself \$ N/A per N/A
12. Amount you receive as support for minor or handicapped children \$ N/A per N/A
13. Amount you pay to your former spouse for support \$ N/A per N/A
14. Amount you pay for support of minor or handicapped children \$ 384.00 per biweekly
15. Do you have any continuing extraordinary medical expenses for yourself or members of your family residing with you? Give details ALot of medical bills DO NOT have information
16. Do any of your children living with you attend private schools or colleges? If yes, state names and ages of each, name and location of schools or colleges, the tuition and other expenses N/A

EMPLOYMENT AND INCOME OF DEBTOR

17. If employed, state the name, address and phone number of employer and how long employed there Do NOT recall when started
Ventiv Commercial Services LLC employer name
18. Nature of employment SALES Job Title SALES
19. Hours Do NOT recall Day Do NOT recall Rate of pay (including overtime) Do NOT recall

30. Gross salary or wages \$ See Appendix Per
Take home pay

21. Itemize all mandatory deductions from your pay. Soc. Sec. \$ State Unemployment \$

State Income Tax \$ Fed. Income Tax \$ Other \$

22. Commissions, bonuses, gratuities or other emoluments DO NOT RECALL - DEPENDS

23. Expenses and drawing accounts HE PERFORMANCE RECEIVING

24. Terms of any contract of employment WILL NOT ANSWER

25. If you are in business by yourself or you are employed by or engaged in a business in which either you or a relative has an interest, state whether it is a: Sole Proprietor () Partnership () Corporation ()

26. Nature of business

27. Business or professional name and address

28. Names and addresses of principals, their relationship to you and extent of their interest

29. As to Corporations: Registered Agent

(a) Registered Office

(b) Shareholders

(c) Directors

(d) Officers

30. Location of books and records of business and name and address of person in charge of them

31. Name and address of accountant whose services are used

32. If there is a wage execution or order to pay out of income, how much is taken out of your earnings each week \$

33. Court Location Docket # Bal. Due \$

34. Name and address of person or company for whose benefit the execution was issued.

35. Year of last Federal income tax return 19 Gross income \$ Taxable income

36. If you are entitled to any income or other tax refund, give details, including place of filing returns

37. Itemize your income from pensions, annuities, inheritances, retirement plans, social security, lottery prizes, bank interest or stock dividends giving source, amount and frequency of each

38. If you have no source of income or if you claim your income is insufficient to meet your living expenses and other debts, how do you pay these expenses

39. Describe property or apt.
LIVING QUARTERS AND REAL ESTATE

40. With whom do you live and their relationship to you? Lived there how long?

41. Do you: Own () Rent by Lease () or Month to Month ()

43. Term of lease Expiration Date

Rent \$ per Heat \$ per Gas \$ per

Electricity \$ per Security Deposit \$ Other expenses

44. If you own the home in which you live:

(a) Describe property Date of Purchase

(b) Price paid \$ Amount of Mortgage \$ Balance due \$

(c) Name and address of mortgagee

45. If you own income property: Address

(a) Describe property Date of Purchase

(b) Price paid \$ Amount of Mortgage \$ Balance due \$

(c) Name and address of mortgagee

46. Name of tenant, apartment occupied and rent paid by each

47. As to property owned by you, or in which you have an interest, whether income producing or not, state:

(a) Taxes \$ Insurance \$ Heat \$

(b) Electricity \$ Gas \$ Water \$

(c) Light \$ Other \$

48. State names and addresses of co-owners, their relationship to you and extent of their interest

49. If any one contributes to the payment of expenses set forth in #43 or #47, what are their names, relationship to you and the amount contributed

GENERAL ASSETS

50. If you or your spouse own an automobile (), boat (), motorcycle (), airplane () or other type of motor vehicle (), identify each, giving make, model, year, present value and owner of each

51. List all accounts, such as savings, checking, Christmas or vacation club, credit unions, certificates of deposits and time deposits showing name and location of depository, in what name registered, account number, and amount on deposit

52. List all shares of stock, securities, bonds, bearer bonds, mortgages and any other type of investment showing the name of companies, number of shares held, in whose name registered and market value of each. As to mortgages, state amount, location of property and method of payment and balance of principal remaining unpaid

10-1

53. List all jewelry, silverware, antiques, works of art, photographic equipment and collectors items such as stamps, coins and other items of value and indicate value of each

54. List all your furniture, T. V. and stereo sets, musical instruments and indicate value of each

55. If any of the assets itemized in questions 50 thru 54 are subject to any security interests or liens state as to each, nature of lien, name and address of holder, balance due, amount and frequency of payments

56. If you or your spouse have a safe deposit box, state name and location of bank, box number, in whose name registered, its contents and value

57. If any property is being held by someone else for your benefit or interest, describe the property, its value and give the name and address of the person holding it

58. Names and addresses of any person or firm who owes you money and amount owed

59. List all life insurance policies, giving as to each the amounts of coverage, beneficiaries, present cash value and extent of any loans on each and who pays the premiums

60. Do you own any judgments against any persons and firms? If so, give details

61. Are there any judgments against you? If so, give details

62. Are you a party to any action pending in any court? If so, give details

63. Have you suffered any injury or loss from fire, theft, casualty or other cause for which you are receiving or expect to receive compensation? If so, give details

STATE OF
COUNTY OF

}
SS:

....., being duly sworn according to law, upon my oath depose and say:
I am the Judgment Debtor in the above entitled cause of action, and the answers to the foregoing questions were given by me personally and are true.
Subscribed and Sworn to before me this

..... day of 19

CO. FILE DEPT. CLOCK NUMBER 120
BMZ 059454 000622 0035278044 1

VENTIV COMMERCIAL SERVICES LLC
500 ATRIUM DRIVE
SOMERSET NJ 08873

Earnings Statement



Period Beginning: 02/16/2014
Period Ending: 03/01/2014
Pay Date: 03/07/2014

Taxable Marital Status: Single
Exemptions/Allowances:
Federal: 0
NJ: Table A

AMY WEBER
452-B NORTH 8 STREET
FAIRVIEW NJ 07022

Social Security Number: XXX-XX-7521

Earnings	rate	hours	this period	year to date
Regular	3269.24	80.00	3,269.24	16,346.20
	Gross Pay		\$3,269.24	16,346.20

Other Benefits and Information	this period	total to date
Group Term Life	8.28	41.40
Hc Comp	3,269.24	16,346.20
Plan Comp	3,269.24	16,346.20
414S Comp	3,269.24	16,346.20

Deductions	Statutory	Federal Income Tax	Social Security Tax	Medicare Tax	NJ State Income Tax	NJ SUI/SDI Tax	Other
		-602.26	-194.76	-45.55	-139.62	-17.16	Child Support -384.00
		973.81	973.81	227.75	698.10	85.82	Dental -23.79*
		3,011.30	973.81	227.75	698.10	85.82	Fleet Car -67.50
		3,011.30	973.81	227.75	698.10	85.82	Medical -110.73*
		3,011.30	973.81	227.75	698.10	85.82	Vision -1.68*
		3,011.30	973.81	227.75	698.10	85.82	Net Pay \$1,682.19
		3,011.30	973.81	227.75	698.10	85.82	Net Check \$1,682.19

* Excluded from federal taxable wages

Your federal taxable wages this period are
\$3,133.04

EXHIBIT

B

LAW OFFICES OF IRA C. KAPLAN, P.C.

180 MOORE STREET, SUITE 480
HACKENSACK, NJ 07601
TELEPHONE: (201) 457-9090
FACSIMILE: (201) 457-1414
ICKLEGAL@AOL.COM
WWW.IRAKAPLANLAW.COM

IRA C. Kaplan, Esq.
NJ & FL BARS
Court Appointed Family Mediator

July 3, 2014

VIA HAND DELIVERY

Bergen County Justice Center
10 Main Street – Room 262
Hackensack, New Jersey 07601
Honorable Peter J. Melchionne, JSC

RE: Yonos vs Yonos
Docket No.: FM-02-1100-08

Dear Judge Melchionne:

Enclosed herewith please find Certification of Services of the undersigned as submitted on behalf of Plaintiff, Keith Yonos. Also enclosed is proposed form of Order. Upon considering the Certification of Services, I request Your Honor note the following.

On April 13, 2013 Mr. Yonos recovered Judgment against Ms. Weber in the sum of \$26,364.00.

In January, 2014, Mr. Yonos obtained a court Order for turnover of two (2) separate bank accounts maintained by Ms. Weber with JPMorgan Chase Bank in the sum of \$3,031.28. Mr. Yonos recovered these monies despite Ms. Weber just again coming before this court to reduce her child support obligation. That application was again denied by Your Honor on June 27, 2014.

On December 20, 2013 Your Honor ordered the Defendant to produce certain financial documentation.

On April 25, 2014 Your Honor then ordered the Defendant was not required to produce certain financial documentation, but rather, she was served an Information Subpoena in open court and she had 14 days to respond.

As to Ms. Weber's assertion she did not know what form had to be returned to the undersigned, with a date certain, Your Honor should recall Ms. Weber was represented by counsel on April 25, 2014. Certainly counsel advised her of her obligations pursuant to governing court rules. Nevertheless, it is Ms. Weber's

LAW OFFICES OF IRA C. KAPLAN, P.C.

Yonos vs Yonos
July 2, 2014
Page 2

obligation to be familiar with court rules as she has decided to represent herself. The Order itself expressly states the parties were to adhere to the rules of court.

Further, it appears Ms. Weber knew when the Information Subpoena was due because she filed a motion to extend the time period to respond. Nevertheless, Ms. Weber still has not complied with the obligation which was due as of May 9, 2014 or May 23, 2014 with a 14 day extension. Simply put, Ms. Weber has and continues to play fast and loose with the court which results not only a waste of the court's time, but a waste of Mr. Yonos' time and it has caused him to incur unnecessary fees and costs.

Now, Ms. Weber has been ordered to appear in court on July 3, 2014 to submit to Supplementary Proceeding, under oath, and to produce requisite financial documentation. As Your Honor indicated, we will have to await the outcome of that aspect of the matter before proceeding with the consideration of this fee application and I reserve the right to amend based upon Ms. Weber's conduct and disclosures (or lack thereof) on July 3, 2014.

Your Honor made it clear on the record that Ms. Weber has conducted herself in "bad faith". Because of that conduct Mr. Yonos was awarded in excess of \$26,000.00 in attorney's fees. Unfortunately, the games continue. Based upon numerous reports on file with the court, it appears Ms. Weber is suffering from psychological conditions which appear to be going untreated as is demonstrated by the facts and proofs set forth in the last application she brought before Your Honor. Mr. Yonos and other third parties should not have to pay for Ms. Weber's outright refusal to obtain treatment, which has been recommended to her on numerous occasions. Instead, Ms. Weber continuously seeks to avoid any sort of responsibility or accountability; all to Mr. Yonos' financial detriment.

As to the applications heard on April 25th and again June 27, 2014, Ms. Weber was not successful. With respect to Ms. Weber's request for modification of her child support obligation, Ms. Weber failed to produce most basic information and documentation necessary for the court to consider such an application. Also, it appears Ms. Weber is now a serial filer. As pointed out by Your Honor, Ms. Weber continuously repeated herself and proceeded to argue incoherently, thus causing the court, the undersigned and Mr. Yonos to waste time in open court on the record.

LAW OFFICES OF IRA C. KAPLAN, P.C.

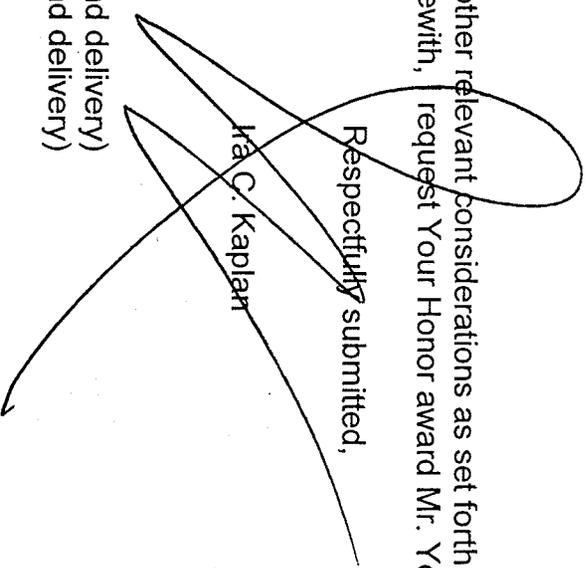
Yonos vs Yonos

July 2, 2014

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Based upon the foregoing and other relevant considerations as set forth in the Certification of Services submitted herewith, request Your Honor award Mr. Yonos additional fees and costs.

Respectfully submitted,



Ira C. Kaplan

ICK/lcd

Encl.

cc: Mr. Keith Yonos (w/encl. via hand delivery)

Ms. Amy Weber (w/encl. via hand delivery)

Law Offices of Ira C. Kaplan, Esq.
190 Moore Street, Suite 430
Hackensack, NJ 07601
(201) 457-9090
Attorney for Plaintiff

Keith Yonos

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION: FAMILY PART
BERGEN COUNTY

Plaintiff (s),

vs.

Civil Action

Docket No. FM-02-1100-08

Amy Weber-Yonos

Defendant(s)

CERTIFICATION OF SERVICES

I, Ira C. Kaplan, Esq. being of full age do hereby certify as follows:

1. I am attorney for Plaintiff, Keith Yonos.
2. I submit this Certification of Services with regard to motion heard on June 27, 2014.
3. I have been practicing law in the State of New Jersey for approximately 25 years. I received my B.A. from the University of Miami, my J.D. from Nova University and my L.L.M from Columbia University.
4. The majority of my practice is in the area of family law. I am a court appointed family mediator, Pro Bono counsel for Alternatives to Domestic Violence, past Chair of my local Fee Arbitration Committee and I serve on the Ethics Committee. I also serve on the Early Settlement Panel.
5. The services set forth below were required as a result of Defendant's filing of the subject application. The corresponding motion sets forth the relevant facts and circumstances which are incorporated herein by reference.
6. The following are services rendered in this aspect of the matter:

05/20/14	Review file, review motion regarding financial discovery, legal research and prepare Brief, prepare form of Crossmotion and related documentation and provide to client for review.	2.0
05/21/14	Review and revise motion papers, letter to court filing crossmotion.	.5
06/13/14	Review incoming from Ms. Weber, provide to client and review reply.	.2
06/16/14	Telephone call to client.	.1
06/16/14	Correspondence to Judge Melchionne with regard to Motion to Vacate Orders and quash subpoena and request for Guardian Ad Litem.	.2
06/24/14	Review incoming of June 22, 2014 as issued by Amy Weber to Judge Melchionne and client's comments with respect thereto.	.2
06/27/14	Preparation for and attendance at court.	2.5
07//03/14	Appearance at Supplementary Proceeding. Preparation of Certification with regard to Ms. Weber's conduct at Supplementary Proceeding.	1.6

TOTAL HOURS

6.9 + TBD

COSTS:

Superior Court of New Jersey (Crossmotion)	\$30.00
Blue Dog Graphics (photocopy of motion and exhibits)	\$64.52
FedEx	<u>\$20.00</u>

TOTAL COSTS:

\$114.52

TOTAL SERVICES 6.9 @ \$300.00 per hour

\$2,184.52 + TBD

7. Pursuant to Rule 5:3-5(c), upon determining the amount of a fee award, the court should consider additional information required to be submitted pursuant to Rule 4:2-9 and the following factors:

- a. **The financial circumstances of the parties** – While Ms. Weber claims insufficient funds, Mr. Yonos did recently attach two bank accounts. She does not appear to have any debt per her Case Information Statement. She had obtained near/better employment since the filing of her Case Information Statement.
- b. **The ability of the parties to pay their own fees or contribute to the fees of the other party** – As Ms. Weber is representing herself, she has monies available. Since she is not incurring attorney's fees.
- c. **The reasonableness and good faith of the positions advanced by the parties both during and prior to trial.** As the court noted on the record, Ms. Weber proceeds to act in bad faith.
- d. **The extent of the fees incurred by both parties** – Submitted herewith is my Certification of Services which represents only a small portion of services rendered to date.
- e. **Any fees previously awarded** –Mr. Yonos was awarded approximately \$26,000.00.
- f. **The amount of fees previously paid to counsel by each party** – Ms. Weber has not voluntarily paid, thus causing Mr. Yonos to incur costs of collection.
- g. **Results obtained** – Plaintiff has prevailed on all applications.

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3
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h. **The degree to which fees were incurred to enforce existing order or to compel discovery** – Mr. Yonos' entire applications deals with enforcement of court order and rights to discovery.

i. **Any other factor bearing on the fairness of the award** – Mr. Yonos has sole physical and legal custody of the parties' child. The expenses incurred by Mr. Yonos have had a direct impact on what he has available for the parties son. Ms. Weber's ongoing conduct is offensive to all concerned. In essence she is taking money from the minor child. The court should make Mr. Yonos (and the parties son) whole.

6. With respect to Rule 4:42-9, it expressly provides fees are allowed in a family action, both *Pendente Lite* and on final determination. Fee awards may be made pursuant to Rule 5:3-5(c) pursuant to the factors which are set forth above.

7. Rule 4:42-9(b) expressly provides fee applications shall be supported by an Affidavit of Services. The Affidavit is to include a recitation of other factors pertinent in the evaluation of services rendered, the amount of the allowance applied and an itemization of disbursements for which reimbursement is sought.

8. Pursuant to RPC 1.5, it is respectfully requested that the court consider the following factors in determining that the fees incurred and time expended are reasonable:

a. **The time and labor required, novelty and difficulty of the questions involved; and the skill requisite to perform the legal service properly:**

The time incurred was necessary due to Defendant's contemptuous conduct and bad faith, unreasonable behavior. The issues presented are not difficult or novel.

b. **The likelihood, if apparent to the client, that the acceptance of the particular employment will preclude other employment by the Lawyer:** N/A

c. **The fee customarily charged in the locality for similarly legal services.**

Based upon my experience and upon considering fee customarily charged in the locality, I submit the charge of \$300.00 per hour is well within the acceptable range. In fact, my normal rate is \$350.00 per hour. The rate is an accommodation to Mr. Yonos.

d. **The amount involved and the results obtained:** Defendant was successful on all applications.

e. **The time limitations imposed by the client or by the circumstances:** N/A

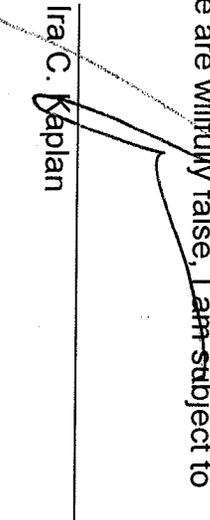
f. **The nature and length of the professional relationship with the client:** The undersigned has represented Mr. Yonos for approximately 8 years.

g. **The experience, reputation and ability of the lawyer or lawyers performing the services:** As set forth above, the undersigned has been practicing law in the State of New Jersey for approximately 25 years. I also maintain an LLM in Taxation. For the past 20 years my practice has been primarily in the area of family law. I regularly serve as Mediator and as an Early Settlement Panelist. I also serve as Guardian *Ad Litem*, Mediator and Arbitrator in family matters.

h. **Whether the fee is fixed or contingent:** The billings are at the rate of \$300.00 per hour.

10. Based on the foregoing, it is respectfully submitted the undersigned has complied with RPC 1:5(a), Rule 5:3-5 and Rule 4:42-9.

I hereby certify that the foregoing statements made by me are true. I am aware if any of the foregoing statements made by me are willfully false, I am subject to punishment.


Ira C. Kaplan

Dated

Law Offices of Ira C. Kaplan, Esq.
190 Moore Street, Suite 430
Hackensack, NJ 07601
(201) 457-9090
Attorney for Plaintiff
020741988

Keith Yonos
SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION: FAMILY PART
BERGEN COUNTY

Plaintiff

vs.

Civil Action

Docket No. FM-02-1100-08

Amy Weber-Yonos

Defendant

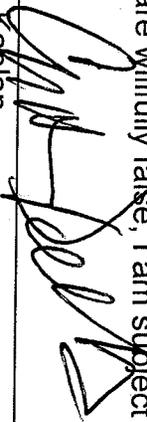
PROOF OF SERVICE

I, Ira C. Kaplan does hereby certify as follows:

1. I am legal secretary to Ira C. Kaplan, Esq. and as such I am familiar with the proceedings in the above matter.
2. On July 9, 2014I sent via overnight mail to the following a true copy of Notice of Motion Certification of Ira C. Kaplan, Esq, Certification of Service and Order to:

Ms. Amy Weber Yonos
452 B North 86th Street
Fairview, New Jersey 07022

I hereby certify that the foregoing statements made by me are true. I am aware if any of the foregoing statements made by me are willfully false, I am subject to punishment.


Ira C. Kaplan

Dated: July 9, 2014