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OF COUNSEL
JON J. AUTY

November 27, 2012

VIA E-MAIL ONLY

Amy Weber
452 North 8th Street, Apt. B
Fairview, NJ 07022

Re: In Re: Yonos

Dear Ms. Weber:

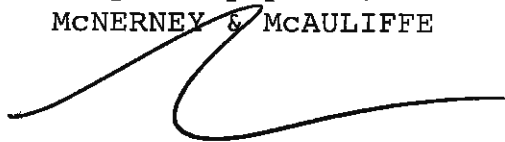
I enclosed for your information and reference a copy of a Notice of Motion that has been filed on behalf of Keith Yonos by Attorney Ira Kaplan.

As you are aware, I have filed an application to the Court seeking to be relieved as your attorney for reasons stated therein.

I will be writing to the Court advising that I do not believe that I have authority to respond to this Notice of Motion based upon my pending application to be relieved.

I will keep you apprised on the Court's position relative to same.

Very truly yours,
McNERNEY & McAULIFFE



Mark P. McAuliffe

MPM:ps
Enclosure

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

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Ira C. Kaplan, Esq.
NJ & FL Bars
Court Approved Family Mediator

November 21, 2012

VIA HAND DELIVERY

Bergen County Superior Court
10 Main Street, Room 119
Hackensack, New Jersey 07601

RE: DCPD vs Yonos
Docket No.: FN-02-267-11
RE: Yonos vs Yonos
Docket No.: FM-02-1100-08

Dear Sir/Madam:

Enclosed please find original and one copy of Notice of Motion, Letter Brief, Certification of Keith Yonos, Certification of Service and proposed Order along with this firm's check in the sum of \$30.00 for your fee.

Please return stamp filed copy of the enclosed in the self-addressed, stamped envelope provided.

Respectfully submitted,

Ira C. Kaplan

ICK/cd
Encl.

cc: Mr. Keith Yonos (w/encl. via electronic mail)
Mark McAuliffe, Esq. (w/encl. via hand delivery)
Karen Stalter, Esq. (w/encl. via hand delivery)
Monique D'Errico (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 Keith Yonos**

Division of Child Protection
& Permanent

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

Plaintiff (s),

vs.

Civil Action

Amy Weber-Yonos &
Keith Yonos

Docket No. FN-02-267-11
Spirit Case No: 10148267

Defendant(s)

Keith Yonos

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

Plaintiff (s),

vs.

Docket No.: FM-02-110-08
CS: 90137180A

Amy Weber-Yonos

Defendant (s).

NOTICE OF MOTION

VIA HAND DELIVERY

Division of Child Protection & Permanency
240 Frisch Court - 2nd Floor
Paramus, New Jersey 07652
Monique D'Errico, Esq.
Deputy Attorney General

Karen Stalter, Esq.
Office of the Law Guardian
60 State Street
Hackensack, New Jersey 07601

McNerney & McAuliffe
20 Court Street
Hackensack, New Jersey 07601
Mark McAuliffe, Esq.

PLEASE TAKE NOTICE that on December 18, 2012 at 1:30 p.m. in the forenoon or soon thereafter as counsel may be heard, the undersigned, attorney for Plaintiff, shall move before the Honorable Frances A. McGrogan of the Superior Court at the Bergen County Courthouse, Family Part, 10 Main Street, Hackensack, New Jersey for an Order:

1. Awarding Keith Yonos sole physical and legal custody of the minor child, Keith Yonos;
2. Barring Amy Weber from having an direct or indirect contact or communication with the minor child pending further Order of the court;
3. Compelling Amy Weber to obtain appropriate treatment and therapy and to provide ongoing disclosure and proof of compliance with treatment, therapy and medication, if any;
4. Barring Amy Weber from filing any future applications for modification of custody, parenting time or child support for a requisite period of time and/or until a demonstrable "change of circumstance" shall occur;
5. Compelling Amy Weber and/or the offices of Robert Corcoran, Esq. to turnover to Keith Yonos the minor child's passport;
6. Enforcing Amy Weber's child support obligation to Keith Yonos;

7. For lump sum payment of child support arrears and imposition of two week warrant status;
8. Terminating Keith Yonos' obligation to continue his personal therapy;
9. For reimbursement of all costs, fees and expenses incurred with respect to litigation and costs incurred with respect to Keith's Yonos' parenting time supervision all incurred as a result of Amy Weber's willful and deliberate misconduct.
10. For such other relief as the Court deems just, proper and equitable.

PLEASE TAKE NOTICE that annexed hereto is the Certification of Keith Yonos.

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.

Dated: 11/21/12

Ira C. Kaplan
Attorney for Plaintiff

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

Dated: 11/21/12

Ira C. Kaplan
Attorney for Plaintiff