

THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

STEPHEN MOKONE

-v-

JOYCE MUNKACSI et al

D.C.N.J. #79-3461

C.A. DOCKET #82-5521

I am a defendant in the above captioned matter. I wish to submit the following rebuttal against deliberate lies cited in Mr. Mokone's brief about me:

1. On October 16, 1976, my former husband drunk from a party, physically ejected me from our apartment following an argument about my clothes that he kept locked up in a trunk. I had to obtain police assistance to get my personal clothing out of the apartment.
- 2 I was compelled to leave behind our daughter, after Mr. Mokone refused that I take her with me and upon the police advice that I could not remove the child from her natural dwelling without a court order.
3. I engaged a lawyer, Ms. Ann Marie Boylan, and filed for custody in conjunction with a divorce against my former husband in November 1976.

4. On October 1977, my lawyer Ann Marie Boylan was assaulted with Sulphuric Acid outside her home in New York City. Mr. Mokone was found guilty by a jury in the assault case.
5. On November 1977, I was assaulted with LYE outside the home of friends in Piscataway N.J. where I lived. I informed the policeman who arrived at the scene of the assault, that Mr. Mokone had assaulted me. Mr. Mokone pleaded guilty to the assault on me.
6. On December 1977, Mr. Mokone was arrested on the assault on me. I was alerted about Mr. Mokone's arrest out of concern<sup>up</sup> for the child's welfare. I entered Mr. Mokone's Apartment to pick our daughter and to ensure for the safety of property, some of which belonged to both Mr. Mokone and I and our daughter.
7. I am not a lesbian, and do not have lesbian tendencies. Mr. Mokone has used this lie consistently in court papers, because he is preoccupied with a need to smear me as a monster.
8. Joyce Munkacsi was not known to me ever, until her involvement in the assault on me.
9. I do not have an abnormal relationship with Joyce Munkacsi, and never have.
10. I never conspired with any of the defendants mentioned in Mr. Mokone's brief and affidavit. Rather, Mr. Mokone denied me the right to pursue the settlement of the custody and divorce case in a timely fashion by

having my lawyer assaulted and then assaulting me. The rationale: to injure and disable us - this way, the cases would naturally be delayed indefinitely. It should be noted that Mr. Mokone took a very competitive stance in the custody and divorce hearings. He could not as such, handle the prospect of defeat as the hearings developed. Result: The hearings were postponed, and struggling with my healing scars I had to find a new lawyer, because my lawyer Ann Marie Boylan was blinded in the one eye and struggling with healing scars to her face and fear of Mr. Mokone could no longer continue with my case.

11. I was awarded custody and divorce from Mr. Mokone in July, 1978 at the Middlesex County Court, with the assistance of a new lawyer, Mr. Eugene Lynch.

I certify that the above statements made by me are true. I am aware that if the foregoing statements made by me are wilfully false, I am subject to punishment.

  
JOYCE MAAGA (MOKONE)

Dated: 7/21/83.

c.c Stephen Mokone  
Defendants.

I Joyce Maaga, being duly sworn according to law, depose and say:

On this day, via first class postage prepaid U.S. mail, I served upon the Clerk of the United States Court of appeals for the Third Circuit, 21400 U.S. Courthouse, Independence Mall West, 601 Market Street, Philadelphia Pa. 19106 original and copies of original to each of the following parties:

Linda E. Hatt  
Deputy County Counsel  
Plaza one  
303 George Street- 3rd. floor  
New Brunswick, N.J. 08901

Allen Schwartz Esq  
\$00 Church Street Room 6c-41  
NEW YORK, N.Y. 10007

Baer, Arbeiter & Pribish  
344 Main Street  
Metuchen, N.J. 08840

Gilbert Nelson, Esq  
~~Bayard~~ Street  
New Brunswick, N.J. 08903

Valerie F. Mauceri, Esq.  
Ass't U.S. Attorney  
Federal Building  
970 Broad Street  
Newark N.J. 07102

Stephen Mokone  
Lockbag R:62071  
Rahway N.J. 07065

Wilentz, Goldman & Spitzer  
900 Rt. 9  
P.O. Box 10  
Woodbridge, N.J. 07095

Lyle P Hough Jr; Esq.  
Deputy Attorney General  
Dept of Law & Public Service  
Division of Law  
Human Services & Correction  
Section

State Annex, CN 112  
Trenton N.J. 08625

Sworn before me this 24 day July  
July, 1983

Submitted by:  
*Joyce Maaga*

*[Handwritten signature]*  
Notary Public for New Jersey

JOYCE MAAGA  
85 Tices Lane #90  
East Brunswick, N.J. 08816