

from

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SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
MIDDLESEX CO.
Docket No. M-6175-76

JOYCE MOKONE,)
Plaintiff)
vs.)
STEPHEN MOKONE,)
Defendant-)

Civil Action
CERTIFIED PETITION

JOYCE MOKONE certifies:

1. I am the Petitioner in this matter and I make this certification in support of my application for a warrant of imprisonment to be issued against my husband, the Defendant and for the scheduling of a hearing at which the parties and witnesses could be heard.
2. The Court Orders which I claim that my husband's conduct has violated are:

Order of Jan. 19, 1977 ^{/6.} Neither party shall make inquiry at the other party's place of employment, it being the intention of the Court that no further contact between the parties is to be made, with the exception of contacting made through the respective parties' attorneys or through the telephone call to arrange for visitation; It is the further order of the Court that neither the party, any agent, or friend of the party are to contact the other party, agents of the other party, or friends of the other party.

Order of Jan. 19, 1977 4. Visitation is to be arranged so that Plaintiff and defendant do not encounter each other.

Order of July 1, 1977 Ordered that the previous Court Orders in this matter remain in effect except as modified below; and it is further Ordered . . . on ex parte certification and application by the Plaintiff, an order for imprisonment may issue for violation of, or interference with, Plaintiff's visitation rights and right to non-contact (as set forth in

the Court Order of January 19, 1977)

3. In addition to the incidents in my accompanying Certification, another very recent interference with my job was that at 9pm on Aug. 17, a private detective went to the home of one of the administrators of the hospital where I am employed, a Mr. Bruno, and stated that he was investigating Mr. Schwartz, asking questions about Mr. Schwartz who is my supervisor and the man with whom my husband alleges, falsely, that I am having an affair. When I obtained the Jan. 19 Order prohibiting any inquiry at my place of employment or contact by any agent it was similar interference at my job by a private detective that I presented to the Court in the hope of avoiding repetition. I cannot count on keeping my job if because of me, hospital executive employees are disturbed at home or even at work.

4. Besides the other reasons stated in the accompanying Certification I believe my husband to have been responsible for the phone call to the owner of the hospital because of the stress placed in that phone call on my husband's greatness as a soccer player which is an obsession of his. To show the similarity of the content of the phone call with his own preoccupation with his sports triumphs of years ago, I attach the relevant portions of two psychiatric reports which my husband has tried to submit to the Court on his own behalf. Although much in the reports was not truthful, they do show my husband's obsession with his own glory, so similar to the content of the phone call that even the same detail of his claim to have been named with royalty is mentioned. For convenience, I have marked the relevant portions.

5. To show my husband's continuing readiness to defy Court Order

and thus my need for the protection of his imprisonment to coerce him to obey them, my husband has recently caused me trouble at visitation. On Aug. 15, at 6pm when I returned the child after visitation, my husband was waiting for us in the parking lot of his building. When I was not ready to talk to him, which I consider my right, especially under the Court Order against contact, he repeatedly yelled my name, tried to get into the car by reaching in and trying to force my arm off the car door lock, ran around the car as I tried to drive away so that I would have to stop the car and talk to him, and made me very nervous because of this and because I do not want my daughter exposed to such scenes.

6. Recently, there have also been additional phone calls to me, my friends and acquaintances, trying to find out where I live, what I am doing, etc.

7. If the Court granted a hearing in this matter at which witnesses could be heard it would allow me to subpoena material which I cannot obtain without a scheduled hearing where it can be presented, for example, telephone records, which would be likely to support my claim as to my husband's responsibility for these events which are costing me both my job and my peace of mind. Such documentary evidence is important to me because some of the possible witnesses or people who would otherwise sign certifications refuse to get involved. Since my job is at stake just because my husband has already involved them in our problems, I cannot press them to become further involved because of my fear of losing my job. However, such a hearing would allow subpoenaed evidence.

8. I therefore ask that the Court issue an Order:

A. Scheduling a hearing at which the parties may be heard and may present witnesses and evidence.

Joyce Mokone certifies:

My employer Mr. Richard Zirinsky who is a partner in the ownership of Gracie square Hospital where I work as Director of Nursing; and Mr. Lawrence Schwartz who is the administrator of the hospital, today informed me that they will be forced to terminate my employment if my husband's harrassement of me involving the hospital continued. I have in the past already received a warning about my husband's telephone ^{calls} in which he harrased my secretary and the switchboard operator.

Mr. Zirinsky told me that on August 17th. 1977 at about 12noon, he received a telephone call from a man identifying himself as Richard Shibure, a free lance reporter from Johannesburg South Africa. The man (reporter) told Mr. Zirinsky that he was in the United States to cover a story on Stephen Mokone and the break-up of his marriage. The reporter wanted Mr. Zirinsky to know that his hospital was in trouble because Mr. Mokone was obtaining a divorce on grounds that his wife's alienation of affection was caused by Mr. Schwartz the administrator of the hospital. The repoter asked if Mr. Zirinsky knew where I lived? The reporter further told Mr. Zirinsky that he should know that Mr. Mokone was a very famous soccer player next to Pele - that Mr. Mokone met Kings and Queens of Europe.

Mr. Schwarz told me that another employee at the hospital by the name of Miss Davis had also received a phone call today August 18th. 1977 at about 11a.m. from a man who told her that he was a reporter and and wanted to do a story on Mr. Mokone and could she give him some information about what she knows of Mr. Schwartz and Mrs. Mokone. He told her that Mr. Schwartz was being sued for 2million dollars. He gave a number where Ms. Davis could reach him (201) 567-5042.

At about 5:30 p.m. today August 18th. 1977, I received a message from the switch board operator at Gracie Square Hospital that a Detective Sparrow had just called stating that I had been a witness to a homicide on 77th street, and did she know where I could be reached.

I know that the callers in all these instances are agents or people connected with my husband because of the consistent pattern of the phone calls received. In all instances the caller is obsessed with my exact place of residence a thing that my husband has insisted upon eversince he threw me out of our apartment. I also know that the call to Mr. Zirinsky about Mr. Scwratz is connected to my husband because he has accused me of having an affair with Mr. Scwartz. I do not have an affair with Mr. Schwarz and have consitently told my husband so. As to the phone call to the switch board operator about the incident on 77th. street; my husband called the probation office in New York telling them that he suspects that I live on 77th. street.

I am most upset that my husband has again involved my place of employment, and so placing my job in jeopardy.

I certify that the foregoing statements made by me are true. I am aware

that if any of the foregoing statements made by me are wilfully false
I am subject to punishment.

8/19/77

Dated


Joyce Mokone

I Nonceba Lubanga certify that on August 11th, 1977 about 8:30p.m. I received a call from a man identifying himself as a security guard working at Gracie Sqaure Hospital. The man told me that he was holding a man at Gracie Square Hospital who said that he was looking for a Joyce Barber and also gave my number stating that I knew who Joyce Barber was. The man who said he was the security guard asked me to please come to the hospital to identify the man he w^{as} holding. The man (security guard) asked me if I had been harrassed by a man before? also, did I ever call the police for harrassement? I answered that I had been harrassed by a man before and that I had called the police to intervene. I further told the man om the telephone that I did not wish to come to the hospital to identify 'a man'. Itold him that I only knew one Joyce Mokone at Gracie Square Hospital, a friend of mine. The man (security Guard) recognized the name Joyce Mokone and asked she if lived at my place. I told the man on the phone that Joyce Mokone did not live at my place. The man proceeded to ask if I knew where he could find Joyce Mokone.

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

8/18/77
Date

Nonceba Lubanga
Ms. Nonceba Lubanga.

I Eustas Williams Certify that on August 11th, 1977 I was the security guard on duty at Gracie Square Hospital. I never spoke to Ms. Lubanga, and furthermore there was no incident which required the detention of a man.

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

8/18/77
Date

Eustas G. Williams
Special

I Denise Parker certify that at about 5:30 p.m. August 18th. 1977 I received a phone call from a man while relieving at the switch board at Gracie Square Hospital. The man identified himself as detective Sparrow. He told me that he was looking for Mrs. Mokone who had witnessed a homicide on 77th. street. I told him that Mrs. Mokone had left the hospital. He asked me where he could find Mrs. Mokone. I told him I did not know.

I certify that the above statements made by me are true. I understand that if any of the above statements made by me are wilfully false I am subject to punishment.

8-19-77

Dated

Denise Parker

Denise