

EXHIBIT A

notice to the defendant, Bobby W. Boye, appearing pro se in the matrimonial action having appeared telephonically, Joseph Rem, Esq., defendant's attorney in his criminal action having also appeared telephonically, the attorney for plaintiff Auleria Eakins, Chase and Chase (Seymour Chase, Esq.) having ^{WAIVED} ~~waiving~~ his appearance, and the Assistant U.S. Attorney Shirley Emehelu, Esq. having appearing ^{EA} ~~telephonically~~, the Court having executed plaintiff's Order to Show Cause on September 12, 2014 which permitted plaintiff to file an amended complaint to add the United States of America as a party defendant to address its judgment encumbering the marital property, and the Court having discussed a partial resolution of the issues presented with plaintiff's Order to Show Cause, ^{AND ALL PARTIES HAVING APPEARED} ~~and all parties present~~ ^{ON THE RETURN OF THE ORDER TO SHOW CAUSE IN PERSON OR TELEPHONICALLY} ~~with the exception that ASST. U.S. ATTY LEAH BYNON FARRELL APPEARED TELEPHONICALLY~~ having consented to certain relief, and for good cause shown;

IT IS on this ^{AS} 3 day of ^{OCTOBER} ~~September~~, 2014,

ORDERED as follows:

A. The United States of America shall execute any and all documents necessary to vacate the ^{LIED} ~~judgment~~ identified by Judgment Number RG-064784 in favor of the United States of America under United States District Court docket number 14-^(CLW) 7086 in connection with defendant's ^{UNAUTHORIZED} ~~illegal~~ pledge of the ~~MARITAL~~ ^{MARITAL} residence as security for his release from prison in the amount of \$1,500,000.00 within ten (10) days of being presented with the document(s) necessary to clear title. The

FILED

OCT 03 2014

BONNIE J. MIZDOL
P.J.F.P.

THE LAW OFFICE OF
LOUIS J. LAMATINA
South 105 Farview Avenue
Paramus, New Jersey 07652
(201) 291-1122
Attorney for Plaintiff in
Action # 1
ID # 007081983

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION:
BERGEN COUNTY, FAMILY PART
DOCKET NO. FM-02-786-14

-----X
EDILTRUDA KALIKAWA

Plaintiff

v.

BOBBY W. BOYE and THE UNITED
STATES OF AMERICA

Defendant

Civil Action

: ~~INTERIM ORDER~~
: **ADJUDICATING PLAINTIFF'S**
: **ORDER TO SHOW CAUSE**

: ~~ON CONSENT~~

-----X
AULERIA EAKINS

Plaintiff

v.

BOBBY AJIBOYE a/k/a
BOBBY W. BOYE

Defendant

: SUPERIOR COURT OF NEW JERSEY
: CHANCERY DIVISION: FAMILY PART
: BERGEN COUNTY
: DOCKET NO. FM-02-1402-14

-----X
This matter having been opened to the Court on September
12, 2014 with this Court's execution of an Order to Show Cause
Granting Immediate Relief by The Law Office of Louis J.
Lamatina (Louis J. Lamatina, Esq. appearing), attorney for
plaintiff, Ediltruda Kalikawe pursuant to Rule 4:52-1, on

document(s) that the United States will sign shall be provided by the title company which performed the title search that revealed the existence of the judgment. That document(s) shall be held in escrow by plaintiff's attorney until the closing of title, at which time they will be provided to the closing attorney previously designated by this Court, James Caporrino, Esq., so that the closing proceeds can be obtained. The net closing proceeds, which shall be for the benefit of Ediltruda Kalikawe, J. [REDACTED] and A. [REDACTED] P. [REDACTED] who shall be the owners of the trust, which shall not be invaded by any creditors of the defendant for any purpose, said trust having been established for the above beneficiaries subject only to Defendant's right to a share of any remaining trust proceeds by way of his equitable distribution interest, if any, as set forth in this Court's August 1, 2014 Order, shall then be paid to The Trust Account of Louis J. Lamatina, who shall immediately cause to be delivered his trust account check in the amount of \$500,000.00, representing the agreed upon replacement security to be provided by plaintiff Ediltruda Kalikawe under an amended order for defendant's release from custody in the matter entitled UNITED STATES v. Boye, MAG. NO. [REDACTED] (CLW) bearing docket # 14-7086, to the Clerk of the United States District Court for the District of New Jersey, located in Newark, New Jersey;

B. It is understood and agreed by all parties that this \$500,000.00 security is being posted by plaintiff Ediltruda Kalikawe, ~~and such funds shall remain her property in accordance with this Court's August 1, 2014 Order. These funds shall be deposited with the Clerk of the District Court pursuant to an amended order for defendant's release, which shall be negotiated between the United States attorney and defendant's criminal attorney, the terms of which shall be reviewed and consented to by plaintiff Ediltruda Kalikawe's counsel. That order shall contain a provision that upon release of the security, either after defendant's appearance at trial or the disposition of the charges prior to trial by plea, dismissal or otherwise, the full amount of the deposit shall immediately be returned to plaintiff by forwarding the sum of \$500,000.00 to plaintiff Ediltruda Kalikawe's counsel for deposit into the trust account established for the benefit of Ediltruda Kalikawe, [REDACTED] and A [REDACTED] B [REDACTED] as set forth in this Court's August 1, 2014 Order;~~

~~AS SURETY SUBJECT TO~~
~~A CONSENT ORDER MODIFYING DEFENDANT'S BAIL CONDITIONS~~
~~UPON DETERMINATION THAT THE TERMS OF BAIL HAVE BEEN FULLY SATISFIED, THE FUNDS SHALL BE RETURNED TO THE SURETY IN ACCORDANCE WITH THE POLICIES AND PROCEDURES OF THE UNITED STATES DISTRICT COURT.~~

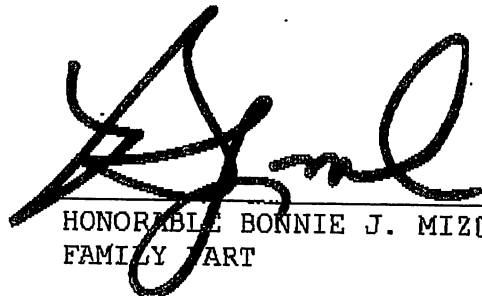
C. ~~The United States Attorney has represented that the \$500,000.00 to be deposited to insure defendant's appearance at trial in his criminal matter shall be returned in full once trial commences or a plead is entered, and that no part of that sum can be utilized, seized, forfeited or otherwise used, in whole or in part, to satisfy any of defendant's obligations to~~

~~the United States of America or any creditor of the defendant~~
as the funds being offered and deposited as part of this
Consent Order belong to plaintiff Ediltruda Kalikawe, J [REDACTED]
and A [REDACTED] B [REDACTED] This Consent Order is entered into in
reliance upon that representation and shall immediately become
void and the funds returned to plaintiff Ediltruda Kalikawe
should the United States seek to utilized such funds for any
~~purpose relating to the defendant;~~

LEAH BYNON FARRELL

D. Assistant U.S. Attorney Shirley Emehelu, Esq. shall
accept service of the Summons and Amended Complaint in this
matter by electronic mail, such service being deemed good and
proper service in accordance with all statutes and the rules of
court; and

E. A copy of this Order shall be served upon defendant,
his criminal counsel, Joseph Rem, Esq., counsel for plaintiff
Aurelia Eakins and Assistant United States Attorney Shirley U.
Emehelu, Esq. within ^{THREE (3)} ~~seven (7)~~ days of the date hereof.



HONORABLE BONNIE J. MIZDOL, P.J.S.C.,
FAMILY PART

F. PLAINTIFF'S APPLICATION TO BE DESIGNATED AS
RECEIVER TO COLLECT THE RENTS FROM THE THREE
(3) PARCELS OF REAL PROPERTY TITLED TO OPUS &
BEST, LLC, KNOWN AND DESIGNATED AS 25 CRESCENT
HOLLOW DRIVE, RAMSEY, NEW JERSEY, 36 ROSEWOOD
COURT, NORTH HALEDON, NEW JERSEY AND 140
GROVE STREET, ELIZABETH, NEW JERSEY, IS DENIED.

EXHIBIT B

THE LAW OFFICE OF
LOUIS J. LAMATINA
South 105 Farview Avenue
Paramus, New Jersey 07652
(201) 291-1122
Attorney for Plaintiff
ID # 007081983

FILED
AUG 01 2014
BONNIE J. MIZDOL
P.J.F.P.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION:
BERGEN COUNTY, FAMILY PART
DOCKET NO. FM-02-786-14

-----X
EDILTRUDA KALIKAWA

Plaintiff

v.

BOBBY W. BOYE

Defendant

Civil Action

ORDER ADJUDICATING
PLAINTIFF'S ORDER TO
SHOW CAUSE

-----X
AULERIA EAKINS

Plaintiff

v.

BOBBY AJIBOYE a/k/a
BOBBY W. BOYE

Defendant

-----X
: SUPERIOR COURT OF NEW JERSEY
: CHANCERY DIVISION: FAMILY PART
: BERGEN COUNTY
: DOCKET NO. FM-02-1402-14

-----X
This matter having been opened to the Court on June 23, 2014 with this Court's execution of an Order to Show Cause Granting Immediate Relief by The Law Office of Louis J. Lamatina (Louis J. Lamatina, Esq. appearing), attorney for plaintiff, Ediltruda Kalikawe pursuant to Rule 4:52-1, on notice to the attorney for the defendant, Bobby W. Boye, then

represented by the Law Offices of Robert T. Corcoran (Robert T. Corcoran, Esq. appearing) but now appearing pro se, and the attorney for plaintiff Auleria Eakins, Chase and Chase (Seymour Chase, Esq. appearing), and this Court having adjourned the initially scheduled return date of July 3, 2014 at the request of counsel for defendant Bobby W. Boye, and the Court having scheduled an appearance for 3:30 PM on July 9, 2014 to address the effect of the defendant's pledge of the real property located at 720 Apple Ridge Road, Franklin Lakes, New Jersey as a condition of his release from custody on his pending criminal charges in the matter of United States v. Boye upon plaintiff's pending requests for relief, and this Court having found, as a matter of fact, that the plaintiff filed a Notice of Lis Pendens with the Bergen County Clerk on March 5, 2014 in accordance with this Court's February 27, 2014 Order permitting such filing, with a filed copy of that Notice having been served upon defendant Bobby W. Boye's counsel by letter dated March 12, 2014, this Court having found that defendant Bobby W. Boye has pledged the premises located at 720 Apple Ridge Road, Franklin Lakes, New Jersey as security as a condition of his release from custody in violation of three (3) prior court orders prohibiting him from encumbering that property dated October 4, 2013, December 23, 2014 and April 9, 2014, and the parties having appeared, through counsel on July 9, 2014 with

Assistant United States Attorney Shirley U. Emehelu, Esq. having appeared by phone, who placed the position of the United States on the record and having acknowledged the existence of a filed Notice of Lis Pendens against the real property located at 720 Apple Ridge Road, Franklin Lakes, New Jersey, and this Court having entered an Interim Order Partially Adjudicating Plaintiff's Order to Show Cause dated July 11, 2014, the contents of which are incorporated by reference herein and which Order remains in full force and affect unless the terms of this Order conflict with the terms of the July 11, 2014 Order, the parties having appeared at 11:00 AM on July 30, 2014 for the return date of this Order to Show Cause, plaintiff Ediltruda Kalikawe having appeared together with her counsel, Louis J. Lamatina, Esq., plaintiff Auleria Eakins having appeared by counsel, Seymour Chase, Esq. and defendant Bobby Boye, now appearing pro se, having appeared telephonically, with the United States' Attorneys Shirley U. Emehelu, Esq. and Evan Weitz, Esq. having neither appeared nor submitted any pleadings with regard to any aspect of plaintiff's application, and plaintiff Auleria Eakins, through counsel having requested that this Court reconsider its decision not to proceed with entry of her uncontested divorce, the Court having considered the argument of counsel and pro se defendant Bobby Boye, and having reviewed the Certifications of Ediltruda Kalikawe, Louis

J. Lamatina, Esq. and Bobby Boye, together with Letter Memoranda of Law submitted by the plaintiff and defendant Boye, and a letter dated July 9, 2014 from plaintiff's counsel addressing the Lis Pendens issue and providing a copy of the Order Setting Conditions of Release dated June 20, 2014 in the matter of United States v. Boye, and it appearing that immediate and irreparable harm may result if this interim relief is not granted, and/or in the alternative, this Court's intervention was necessary to maintain the status quo, and for good cause shown;

IT IS on this ^{1st} day of August, 2014, ORDERED as follows:

A. Plaintiff shall continue to maintain exclusive possession of the marital home pending trial of this matter;

B. ^{The parties} ~~Plaintiff~~ shall continue to enjoy ^{joint} ~~temporary sole~~ custody of the parties' two (2) infant children, ~~pending trial of this matter.~~ The Custody and Parenting Time Order dated May 6, 2014 be and it hereby is amended to provide that defendant may enjoy visitation with the children two (2) days per week, on Tuesdays and Sundays, from 10:00 AM to 12 noon at the defendant's present residence at [REDACTED] New Jersey, contingent upon defendant providing proof to plaintiff's counsel that he has the authority from pre-trial services to exercise such parenting time, with the plaintiff to pick up and appear for the children's return until further

order of this Court. Defendant will immediately report any emergency with either child by either text message or email to the plaintiff, who will remain in the area. Defendant and the children shall not leave the defendant's residence during the visitation and no one else shall be permitted in the residence during visitation;

C. The marital premises, known and designated as 720 Apple Ridge Road, Franklin Lakes, New Jersey 07417, together with the contents thereof (including but not limited to home furnishings, artwork, collections, ~~remaining automobile~~, etc.) shall be sold as soon as possible by plaintiff in accordance with the terms of this Court's July 11, 2014 Interim Order pursuant to N.J.S.A. 2A:34-23 as a method to enforce defendant's present and future support obligations, defendant's present and future medical and educational obligations, defendant's present and future counsel fee/expert fee obligations to the plaintiff and the parties' two (2) infant children and for the establishment of a fund to pay plaintiff's future litigation expenses pursuant to Rule 5:3-5. A trust funded by the sale of the marital premises shall be established from the proceeds of the sale of the marital premises, to be administered by plaintiff and held by plaintiff's counsel, pursuant to N.J.S.A. 2A:34-23, for payment of defendant's present and future support obligations, defendant's present and

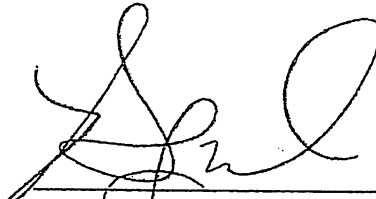
future medical and educational obligations and defendant's present and future counsel fee/expert fee obligations to the plaintiff and the parties' two (2) infant children, and for payment of plaintiff's ongoing legal fees, expert's fees and disbursements. The trust shall be "For the benefit of Edi Kalikawe, [REDACTED] and [REDACTED] B[REDACTED]" who shall be the owners of the trust, which shall not be invaded by any creditors of the defendant for any purpose, said trust having been established for the above beneficiaries ^{subject only to Defendant's} ~~only with defendant retaining no present ownership interests in the funds but still maintaining~~ the right to a share of any remaining trust proceeds by way of his equitable distribution interest, if any, at the conclusion of this matter or upon further order of this Court; *

D. Judgment be and hereby is entered against the defendant and in favor of the plaintiff and Louis J. Lamatina, Esq. in the amount of \$50,000.00, representing this Court's second fee allocation against defendant for services, already rendered pursuant to Rule 5:3-5 (c). The judgment shall be paid out of the proceeds of the sale of the marital home and both this \$50,000.00 payment and the previously paid \$25,000.00 shall be a debit against the defendant's share of equitable distribution, if any. As to the remainder of plaintiff's legal fees and disbursements due after satisfaction of this Judgment, counsel shall apply by letter to this Court, on notice to the

* The trust proceeds shall be maintained in an interest bearing attorney trust account of Louis J. Lamatina, Esq, and shall be disbursed to Plaintiff in accordance with this Court's Pendente Lite support order of April 15, 2014, with monthly accounting to Defendant and the Court.

to plaintiff Edi Kalikawe; and

I. A copy of this Order shall be served upon defendant Auleria Eakins's counsel, defendant and Assistant United States Attorney Shirley U. Emehelu, Esq. within seven (7) days of the date hereof.



HONORABLE BONNIE J. MIZDOL, P.J.S.C.,
FAMILY PART

EXHIBIT C

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA :

v. :

Case No. _____

Affidavit re: Appearance Bond
(Cash Surety)

AFFIDAVIT BY OWNER OF CASH SURETY

I, EDI KALITANE, both, individually and on behalf of J [REDACTED]
on oath say that I reside at 410 Louis J. Lammant Esq
and that the \$ 500,000 cash deposited as security on the foregoing bond is owned by me and is to be

returned to me at the above address upon exoneration of this bond. Subject to the terms & conditions of the August 1, 2014 Order of the Honorable
Bonnie J Mizdol, P.J.S.C. the terms & conditions of which are
incorporated into this Affidavit
I hereby subject said funds to the provision of Local Cr. Rule 46.1 and consent and agree that in case

of default or contumacy on the part of the principal, the Court may proceed summarily and render judgment against said cash security in accordance with my obligation herein and award execution thereon.

Sworn to and subscribed before me

this ___ day of ___, 20

Deputy Clerk

Signature of Cash Security