

DF-24-18010

NO. _____

IN THE MATTER OF	§	IN THE DISTRICT COURT
THE MARRIAGE OF	§	
	§	
GWENDOLYN ULIJASZ-MCKEMIE	§	301st JUDICIAL DISTRICT &
	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

**RESPONDENT JASON MCKEMIE'S VERIFIED EMERGENCY
MOTION TO ABATE, STAY, OR CONTINUE TRIAL;
REQUEST FOR REMOTE APPEARANCE; REQUEST FOR DE NOVO TRIAL-READINESS
HEARING; REQUEST FOR HEALTHCARE PRESERVATION, TEMPORARY FINANCIAL RELIEF,
COURT REPORTER, NON-WAIVER, AND PROTECTION OF STOLEN EVIDENCE**

TO THE HONORABLE COURT:

Respondent, **Jason McKemie**, files this **Verified Emergency Motion** before any final trial evidence is taken on June 11, 2026. From this point forward, Jason McKemie is referred to as Respondent.

This is not a request for delay. It is an emergency request to stop a final trial from being conducted after a manufactured collapse that has destroyed Respondent's ability to appear, survive, present evidence, access healthcare, obtain surgery, use his trial materials, and reconstruct the marital estate.

The collapse is not sudden. It is the result of financial strangulation, healthcare obstruction, false QLE processing, litigation sabotage, evidence theft, hard-drive theft, stolen legal work product, stolen trial materials, stolen medications, source-record concealment, and a manufactured eviction that Respondent repeatedly warned the Court would be weaponized exactly this way.

EMERGENCY RELIEF REQUESTED

1. ABATE, STAY, OR CONTINUE the June 11, 2026 trial before any trial evidence is taken.
2. Conduct Respondent's timely requested de novo/trial-readiness hearing before trial, with evidence and witness presentation on the specified issues.
3. Permit Respondent to appear remotely by Zoom, Webex, Teams, email link, telephone alternative, or any available Wi-Fi method if trial is not abated, stayed, or continued, because Respondent's phone service is cut off and he is medically and financially unable to safely travel.

4. Do not treat Respondent's medical collapse, lack of transportation, no phone service, homelessness, no gas money, unsafe vehicle, lack of parking funds, broken laptop screen, hospitalization, inability to physically appear, or need to seek emergency medical care as waiver, abandonment, failure to prosecute, consent to trial, or consent to final orders.
5. Order that all proceedings occur on the record with a court reporter and that no off-record trial-readiness, de novo, recusal, healthcare, financial, or evidence-theft matters be resolved without a verbatim record.
6. Preserve healthcare and prevent any final order, trial event, or decree from terminating, impairing, waiving, or rewarding obstruction of Respondent's medical coverage, HSA, FSA, critical illness coverage, life insurance, AD&D, spouse AD&D, medication access, surgery access, or plan-administrator records.
7. Order immediate temporary support, litigation-expense funding, medical-access funding, transportation/communication funding, evidence-acquisition funding, and emergency survival relief necessary for Respondent to eat, obtain medication, restore phone communication, obtain safe transportation, preserve his vehicle, obtain records, obtain bodycam/video evidence, and participate meaningfully.
8. Authorize targeted third-party source-record subpoenas and written rulings for financial institutions, Accenture/Businessolver/Aetna/HSA-FSA administrators, landlord/lease-buyout records, SAPD/Dallas/constable records, U-Haul/payment records, Apple/device records, Blink/Google/Facebook/Dropbox/cloud-access records, and vendor/payment records.
9. Preserve all stolen hard drives, evidence repositories, legal work product, binders, paper files, printer, printer ink, litigation equipment, financial records, medical records, device evidence, Apple TV/device evidence, SAPD records, Dallas records, constable records, U-Haul/payment records, third-party payment records, security-camera footage, text messages, audio, video, cloud logs, and external chain-of-custody records.
10. Order that Gwendolyn Laura Ulijasz, her counsel, experts, vendors, investigators, agents, contractors, and anyone acting with or for her shall not have any access to, contact with, use of, control over, disclosure of, alteration of, deletion of, reliance upon, or benefit from Respondent's stolen hard drives, evidence repositories, legal work product, binders, paper files, financial records, medical records, trial materials, printer, printer ink, litigation equipment, medications, or device evidence. Those materials must be preserved away from Petitioner and her agents and returned to Respondent without access by Petitioner or her agents.
11. Deny in full any request by Petitioner or her counsel for fees, costs, protective expenses, vendor expenses, or sanctions against Respondent arising from this emergency. The delay is the product of Petitioner's concealment, noncompliance, theft, healthcare obstruction, and financial sabotage, not Respondent's bad faith.

THIS IS A MANUFACTURED COLLAPSE, NOT LATE NOTICE

Petitioner and her counsel will say this is late. That is false. Respondent has warned the Court for seventeen months that Petitioner was using false reports, protective-order narratives, healthcare obstruction, financial strangulation, discovery obstruction, housing sabotage, digital access, third-party vendors, and court process to destroy his ability to survive and defend himself.

The record already includes repeated requests for emergency financial relief, healthcare enforcement, HSA/FSA access, court reporter protection, source-record verification, subpoena authority, trial abatement, continuance, housing stability, due-process protection, and medical preservation. The record also shows the June 11, 2026 bench trial setting, prior inability-to-pay filings, prior emergency verified continuance/abatement filings, prior healthcare filings, prior discovery filings, prior court-reporter requests, and prior recusal history.

This filing is not late because Respondent slept on his rights. It is being filed under emergency physical collapse because the catastrophe Respondent warned about has now happened. Petitioner stole the evidence, stole the supplies, stole the printer, stole the hard drives, stole the legal work product, obstructed healthcare, kept the financial universe concealed, and now seeks final trial while Respondent is medically unstable, homeless, phoneless, bankrupt, without safe transportation, without a functioning laptop screen, without printer access, without trial materials, and without the source records necessary to divide the estate.

Respondent is currently bouncing between Houston, Dallas, and Bryan while living out of a vehicle with a broken laptop screen and no cell phone service, after repeated hospitalizations for congestive heart failure and after Petitioner obstructed access to healthcare. Respondent is attempting to obtain emergency medical care and will make the best available attempt to appear by Zoom or other remote means if the Court permits it.

PRE-LITIGATION WARNING, RETAINER FRAUD REPORTING, MEDICAL REHABILITATION FRAUD REPORTING, AND FINANCIAL AMBUSH

Beginning in August 2024, Respondent observed extreme behavioral changes in Petitioner, including extreme cruelty, threats, and repeated statements that Respondent was going to die. Respondent knew something was desperately wrong.

Respondent searched the marital residence and found documentation showing an extensive pattern of malicious litigation, false reporting, settlement conduct, and weaponized legal proceedings involving employers, former employers, and past romantic partners. Records concerning those matters, including employment-related settlements and disputes involving Petitioner's current employer and prior employers, have been submitted into the court record. Petitioner is on record denying or minimizing settlement-related matters involving Lines Bernstein, AIG, and Cognizant, despite documents in the court record showing otherwise.

Respondent also discovered documentation and evidence concerning malicious prosecution and malicious litigation conduct involving prior romantic partners, including Christopher McNally

and Jason Parro. Those matters are relevant because this case follows the same pattern: false narratives, police involvement, protective-order weaponization, financial strangulation, reputational destruction, healthcare interference, and litigation used as a method of control and destruction.

Before any protective-order proceeding was filed against him, Respondent called 911. Respondent told law enforcement that he feared for his safety and future because he had discovered extensive documentation showing a long pattern of malicious litigation and that Petitioner was going to file false police reports and a false protective order against him. Respondent asked that the warning be documented in the official record and told law enforcement that if officers were dispatched to his residence, they should be informed that he would not be armed.

Respondent then hired counsel. While Respondent was recovering from spinal surgery, counsel reviewed the documentation and advised Respondent that he was in serious danger and needed to transfer enough money to provide survival funds for approximately three months while recovering and preparing for the collapse counsel believed was coming.

On December 10, 2024, Respondent underwent spinal surgery. On December 11, 2024, Respondent paid a \$5,750 legal retainer to obtain counsel and protect himself. On December 12, 2024, on advice of counsel, Respondent transferred \$30,000 for survival funds while recovering from spinal surgery and purchased rehabilitation equipment and rehabilitation services necessary for spinal-surgery recovery.

Petitioner was notified of the transfer. She texted Respondent and asked whether the transfer was legitimate. Respondent confirmed that it was legitimate and told her not to touch it. Petitioner then reported the transactions as fraud, including the \$30,000 survival-funds transfer, the \$5,750 legal retainer, and Respondent's spinal-surgery rehabilitation equipment and rehabilitation services.

That fraud reporting stripped Respondent of counsel, survival funds, rehabilitation access, and medical recovery resources while Respondent was partially paralyzed, recovering from spinal surgery, without income, and financially dependent on access to marital resources.

At the same time, Petitioner was earning approximately \$125,000 per month, had siphoned approximately \$650,000 from marital accounts, and left Respondent burdened with approximately \$25,000 per month in marital-estate obligations with no income, no counsel, no survival funds, and no functional ability to pay for housing, food, medical care, transportation, litigation costs, evidence, or recovery. That was not ordinary financial stress. It was an orchestrated financial ambush.

FINANCIAL STRANGULATION AND CURRENT SURVIVAL COLLAPSE

Petitioner's financial strangulation has become absolute. Respondent is homeless, in bankruptcy, without phone service, without money for gas, without money for food, without money for medication, without money for parking, without money for printing, without a working printer,

without printer ink, without a functioning laptop screen, and without the hard drives, binders, paper files, and legal work product Petitioner stole.

Respondent has been living out of a vehicle and moving between Houston, Dallas, and Bryan under medical instability. Respondent's vehicle is in repossession status and unsafe. Respondent cannot safely drive four hours without phone service, gas money, headlights, parking funds, trial materials, evidence repositories, or medical stability.

Respondent's parents are now also in bankruptcy. Respondent understands their separate claims may belong in separate civil litigation, but the collapse of two generations is relevant to the severity, foreseeability, and scope of Petitioner's financial sabotage and to the Court's assessment of temporary relief, fee denial, sanctions, trial readiness, and due process.

HEALTHCARE OBSTRUCTION, FALSE QLE, SOURCE RECORDS, AND INABILITY TO STABILIZE IF TRIAL CONTINUES

Healthcare is not a collateral issue. It is a life-safety issue.

Petitioner has obstructed Respondent's access to healthcare since at least December 18, 2024. Respondent has been repeatedly hospitalized with congestive heart failure. Respondent has been without consistent access to heart medications and has suffered repeated medical deterioration while Petitioner represented compliance to the Court.

A signed healthcare order exists from December 17, 2025 which has never been complied with despite Petitioner's declarations. Petitioner has not functionally complied with that order. Petitioner has repeatedly represented compliance while functional access remained obstructed. Petitioner even presented a canceled HSA card while representing compliance. Respondent contests any representation that benefits, HSA access, FSA access, critical illness coverage, life insurance, AD&D, spouse AD&D, medication access, or surgery access has been functionally restored. Source records from the plan administrator and benefit vendors are required before the Court can credit any representation by Petitioner concerning healthcare compliance.

Respondent's healthcare was cut off through a false divorce-based QLE on October 31, 2025, despite the absence of any divorce decree. Respondent's HSA, FSA, critical illness coverage, life insurance, AD&D, spouse AD&D, and related benefits remain unresolved or nonfunctional. Respondent needs shoulder surgery, bicep repair, tendon repair, spine treatment, and ongoing heart-failure care.

Respondent recently spent four days hospitalized with a spinal injury and left the hospital against medical advice only to attempt to save survival items from the manufactured eviction. Respondent did not complete recommended rehabilitation. Respondent is now in the process of seeking readmission with heart palpitations, dizziness, shortness of breath, pain, and medical instability after months of healthcare obstruction and noncompliance with the healthcare order.

If trial proceeds today and final orders terminate or impair healthcare coverage, Respondent may lose the surgeries and medical care that Petitioner's healthcare obstruction already delayed. Final trial today would reward healthcare obstruction and place Respondent's survival at risk.

EVIDENCE THEFT, NOT A PROPERTY DISPUTE

Petitioner was not authorized to enter the residence. She was barred from entering and had been repeatedly identified as a risk for theft, destruction, manufactured allegations, law-enforcement escalation, and evidence sabotage.

This was theft. Petitioner unlawfully entered a residence she was barred from entering, stole Respondent's hard drives, stole Respondent's evidence repositories, stole Respondent's legal work product, stole Respondent's trial materials, stole Respondent's binders, stole Respondent's paper files, stole Respondent's printer, stole Respondent's printer ink, stole Respondent's medications, stole Respondent's device evidence, and destroyed Respondent's trial readiness.

Petitioner engineered an eviction through a concealed lease buyout with the landlord while she was the financial guarantor on the lease. Respondent left the residence only because of improper service and emergency court proceedings. Respondent would never have voluntarily left during an eviction without securing his hard drives, medications, paper files, evidence, trial materials, printer, music studio, and personal property.

Within minutes of Respondent leaving, Petitioner arrived at the residence despite living approximately five hours away. She had coordinated resources, a moving operation, and a 26-foot U-Haul. Two people entered the residence and disabled a 15-camera security system. Petitioner then entered and stole Respondent's hard drives, evidence repositories, legal work product, trial materials, paper files, binders, printer, printer ink, financial records, medical records, medications, device evidence, litigation equipment, livelihood hardware, and personal records.

Petitioner destroyed or stole the equipment necessary for Respondent's livelihood, including computer hardware and items already sold or committed to buyers. Respondent is now without the product, without the hardware, and facing refund obligations while in bankruptcy.

Respondent has video from Petitioner's own camera in which she states she has to "get more evidence." That statement directly supports Respondent's position that Petitioner entered to obtain, steal, control, destroy, manipulate, or manufacture evidence for use in these proceedings and related proceedings.

The opposing party stole the evidence needed to try the case against her.

After the writ/eviction activity was challenged because Respondent had not been properly served, the judge personally called the constable and directed that the activity stop. The constable entered the residence and told Petitioner to stop what she was doing and remove everything from her vehicle. Petitioner then fled the scene against the officer's orders.

Petitioner stole Respondent's Apple TV/device evidence and then used or attempted to use that stolen device to manufacture a false stalking/surveillance narrative with San Antonio Police Department. A device stolen from Respondent was turned into a false accusation against Respondent. Respondent's police reports and report numbers regarding the Dallas theft were stolen from his desk. Respondent has requested open records but has not had time to receive them before today's trial.

SOURCE FINANCIAL RECORDS AND HEALTHCARE RECORDS REMAIN UNAVAILABLE

The financial universe necessary for trial remains concealed. The estate cannot be reconstructed, valued, traced, characterized, divided, or tested without source financial records. Petitioner and her counsel burned months and produced virtually nothing of substance. The two pages produced contained the same transactions, same dates, and same amounts under different monthly headers, showing that one or both documents are false, altered, unreliable, or unusable without third-party source verification.

Respondent contests any representation by Petitioner concerning account values, transfers, compliance, healthcare restoration, HSA/FSA functionality, lease buyout, income, bonuses, equity, VEIP, or source-record completeness unless supported by institution-origin source records and plan-administrator records.

DE NOVO AND TRIAL-READINESS ISSUES MUST BE HEARD BEFORE TRIAL

Respondent timely requested de novo review and trial-readiness relief. Respondent objects to the Court treating de novo/trial-readiness issues as a brief pretrial argument immediately before a few-hour trial. Respondent requests an actual de novo/trial-readiness hearing before trial evidence begins, including the ability to present testimony and evidence on the specified issues.

The specified issues include stolen hard drives, stolen evidence repositories, stolen legal work product, stolen trial materials, unavailable source financial records, unresolved healthcare/QLE records, nonfunctional HSA/FSA access, pending surgery, repeated rejected or unresolved adequate-trial-time requests, lack of court reporter/transcripts, inability to present electronic evidence, homelessness, no phone service, no transportation, no trial materials, hospitalization, and physical impossibility of meaningful participation.

NO WAIVER

Respondent is not abandoning his case, refusing to appear, or consenting to final trial. Respondent is medically unstable, financially collapsed, without phone service, without trial materials, without evidence repositories, without source records, and without the ability to safely travel or present evidence. Any inability to appear physically or participate fully today is the

product of medical emergency, financial strangulation, evidence theft, healthcare obstruction, and transportation impossibility - not waiver.

Respondent preserves mandamus, appeal, de novo, recusal, due-process, discovery, healthcare, source-record, financial-relief, court-reporter, stolen-evidence, and trial-readiness complaints.

REQUEST

Respondent requests that the Court grant the relief requested above, abate, stay, or continue trial, preserve healthcare, preserve stolen evidence, prohibit Petitioner and her agents from accessing or benefiting from stolen evidence, authorize source-record subpoenas, permit remote appearance, deny all fee shifting against Respondent, and grant all other relief to which Respondent is entitled.

Respectfully submitted,

A handwritten signature in black ink that reads "Jason McKemie". The signature is written in a cursive, flowing style with a long horizontal stroke at the bottom.

Jason McKemie

539 W. Commerce St., Ste. 2010

Dallas, TX 75208

214-868-4901

jmckemie@mckemie.net

UNSWORN DECLARATION OF JASON MCKEMIE

My name is Jason McKemie. My date of birth is April 8, 1976. My address is 539 W. Commerce St., Ste. 2010, Dallas, Texas 75208.

I declare under penalty of perjury that the factual statements in this Verified Emergency Motion are true and correct based on my personal knowledge, documents, videos, audio, court filings, records reviewed by me, and matters stated on information and belief where the basis for that belief is identified.

Executed in Texas on June 11, 2026.



Jason McKemie

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this filing was served on all counsel of record by e-service and/or email on June 11, 2026.



Jason McKemie

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

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Filing Code Description: Motion - Miscellaneous

Filing Description: VERIFIED EMERGENCY MOTION TO ABATE, STAY OR CONTINUE TRIAL

Status as of 6/12/2026 8:58 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Rebecca LArmstrong		rebecca@armstronglawtexas.com	6/11/2026 1:17:47 PM	SENT
Terra Aguirre		terra@armstronglawtexas.com	6/11/2026 1:17:47 PM	SENT
Lauren N.Shaw		lauren@armstronglawtexas.com	6/11/2026 1:17:47 PM	SENT
Jason McKemie		jmckemie@mckemie.net	6/11/2026 1:17:47 PM	SENT
Gwendolyn Ulijasz McKemie		GUlijasz@gmail.com	6/11/2026 1:17:47 PM	SENT
Gwendolyn Ulijasz		gulijasz@gmail.com	6/11/2026 1:17:47 PM	SENT
JONATHAN STEEL		jsteele@beermannlaw.com	6/11/2026 1:17:47 PM	SENT
REBECCA LARMSTRONG		REBECCA@ARMSTRONGLAWTEXAS.COM	6/11/2026 1:17:47 PM	SENT
JASON EMORYMCKEMIE		jason@callvital.com	6/11/2026 1:17:47 PM	SENT