

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

**DF-24-18010**

NO. \_\_\_\_\_

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IN THE MATTER OF	§	IN THE DISTRICT COURT
THE MARRIAGE OF	§	
	§	
GWENDOLYN ULIJASZ-MCKEMIE	§	<u>254<sup>th</sup></u> JUDICIAL DISTRICT
&	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

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**EMERGENCY MOTION TO PRESERVE EVIDENCE AND  
CONTINUE TRIAL DUE TO PROCEDURAL SABOTAGE AND  
BREAKDOWN IN JUDICIAL OVERSIGHT**

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TO THE HONORABLE JUDGE OF THE 254TH DISTRICT COURT:

Petitioner, **Jason McKemie**, appearing **pro se**, respectfully submits this **EMERGENCY MOTION TO PRESERVE EVIDENCE AND CONTINUE TRIAL DUE TO PROCEDURAL SABOTAGE AND BREAKDOWN IN JUDICIAL OVERSIGHT**.

**Petitioner declares, he is not ready for trial.**

The legal process which has led to this point has been **strategically manipulated, procedurally obstructed**, and carried out in a manner that makes a **fair hearing impossible**.

The trial date remains intact **not because** discovery has been completed, **not because** due process has been upheld, and **not because** this Court has addressed pending motions—**but because the appearance of normalcy is being maintained at the expense of justice**.

At a pretrial setting, counsel for Respondent, representing Sullivan & Cook, told the Court there were **“no community assets in dispute”** and that the matter **“just needs to go away.”** That characterization reflects a **total disregard for the contested facts, the unresolved discovery, and the real consequences** Petitioner is enduring.

**Discovery was evaded.** Legal counsel was strategically severed. **Financial access was stripped.** Sworn evidence—including **video-documented perjury, asset concealment, and coordinated fraud**—remains unacknowledged, unruled upon, and unaddressed.

And now, the same legal team who disappeared for weeks during discovery—only to reappear minutes before the deadline and file blanket objections to every request—**claims they are “ready for trial.”**

Ready for what?

A performance? A sentencing without trial?

Petitioner is not ready for trial because this is not a trial. **This is an execution staged under the pretense of adjudication.**

**Sullivan & Cook’s role in this process has not been merely questionable—it has been sanctionable.** And while Petitioner reserves the right to pursue sanctions under Rule 215, this record must now **reflect the pattern of conduct that brought this case to the brink of collapse.**

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Petitioner, **Jason McKemie**, Pro Se, files this **EMERGENCY MOTION TO PRESERVE EVIDENCE AND CONTINUE TRIAL DUE TO PROCEDURAL SABOTAGE AND BREAKDOWN IN JUDICIAL OVERSIGHT** not only to continue trial proceedings but to **formally preserve key evidence** before it is buried under the weight of procedural fraud, judicial inertia, and calculated obstruction designed to sabotage truth.

Petitioner has lost all faith that justice is occurring inside this courtroom. This motion is submitted because the system has failed. **The fraud is not hidden—it is public.** And the **damage is no longer theoretical. It is catastrophic, visible, and irrefutable.**

Five days before Respondent filed a fraudulent protective order, **Petitioner warned both his attorney and a 911 operator that he was being set up.** The warning was recorded. The threat was clear. And the event unfolded exactly as predicted—because this was not a misunderstanding. **It was a premeditated legal ambush,** and not the first

of its kind. **Respondent has a documented history of leveraging false accusations and legal systems for personal advantage.**

The strategy was systematic and unmistakable:

- Cut off Petitioner's legal funding
- Manufacture allegations of stalking and abuse
- Isolate Petitioner from marital assets, healthcare access, and representation
- Introduce fabricated testimony under oath by a financially interested family member
- Initiate false criminal proceedings to justify a protective order and silence Petitioner going forward—a **pattern for which Respondent has a documented history**

In the months preceding this, Respondent **covertly diverted marital funds into a hidden Chase account, siphoning off hundreds of thousands of dollars while shifting significant marital debt onto Petitioner. She paid off over \$100,000 of her own personal debt using marital funds, severed Petitioner's access to shared accounts, and orchestrated a false narrative of financial hardship while actively earning over \$1.5 million per year.**

**Respondent's increase in earnings from Aug 2023 through October 2024 was not achieved independently.** During the year we worked together—professionally and personally—her compensation increased by almost **400%. That growth was not incidental. It was the result of a shared strategy and coordination,** co-created deliverables, and coordinated positioning which Petitioner directly contributed to. To now erase that contribution while framing Petitioner as financially dependent is not only dishonest—it's **weaponized revisionism.**

Petitioner has submitted **irrefutable video evidence that directly contradicts sworn testimony** presented in this courtroom. That video is **clear, admissible, and already in the record.** The Court's refusal to acknowledge such direct and material contradiction is alarming. It raises serious questions about either a **breakdown in judicial oversight or conscious indifference.**

Simultaneously, Respondent has filed more than a **dozen false police reports** and orchestrated staged distress incidents, including repeated false claims that Petitioner

was suicidal, armed, and dangerous. She has sent police and emergency personnel to Petitioner's residence under fabricated pretexts and claimed he was tracking her with AirTags.

Those devices were turned over to the San Antonio Police Department. Subpoenas issued to Apple confirmed that **Petitioner never had access to or control over any of the AirTags**—exactly as he stated. The result of no fewer than six separate law enforcement investigations into Respondent's allegations? **She was referred to their mental health group for monitoring by the San Antonio Police Department's Fusion Investigative Center.**

**These are not hypotheticals. These are procedural facts, and they are in the record. And they have been ignored.**

This is not an isolated mistake. It is a pattern. **Respondent uses the courts as a tool of destruction: fabricate threat narratives, liquidate assets, crush opposition, and leave behind devastation before relocating and repeating the cycle.**

The result? Petitioner—who had always maintained good credit, never defaulted on a credit card or loan, and was never delinquent on his car payments—has now been **stripped of legal counsel, denied due process, and forced to shoulder \$25,000 per month in expenses for a lease he is not contractually obligated under.** Days after undergoing invasive spinal surgery, Respondent reported multiple critical charges—including **his rehabilitative orthopedic chair, legal retainer, and recovery support funds—as fraudulent.** At that time, Petitioner had less than \$300 in his account and fighting through partial paralysis.

This was not a coincidence. It was the result of **a deliberate strategy of financial starvation and obstruction of healthcare access**—a pattern that continued for over seven months. While working night and day to survive, Petitioner was **branded a "deadbeat" by a legal team of six attorneys and a hired risk mitigation firm. He is now facing immediate eviction, medical collapse, and bankruptcy. He cannot afford food. He cannot access medication. He suffers from recurring medical infections—documented, visible, and untreated.**

Meanwhile, Respondent is receiving **"sweetheart loans"** from her sister—the same individual who testified falsely under oath and whose financial interest in the outcome

of this case is undisputed. These loans are structured on **30-year terms at 2% interest, with no enforceability, no documentation resembling commercial standards, no realistic expectation of repayment, and no bank statements to substantiate funds transfers.**

Simultaneously, Respondent is investing over **\$130,000 annually into a VEIP equity fund yielding a 50% vested return within a single calendar year**—a vehicle from which both she and her sister directly benefit.

These “loans” are then dumped on the community estate as **artificial liabilities**, designed to **devalue the estate** and suppress Petitioner’s share in the marital division. This is not a financial hardship—it is **coordinated asset concealment, fraud upon the estate, and bad faith fiduciary conduct** of the highest order.

Even as this scheme plays out, Respondent is undergoing **boutique cosmetic enhancement procedures at one of the most expensive aesthetic clinics in the state**—while simultaneously representing to this Court that she:

- **Lacks a functional vehicle**
- **Relies on public transportation**
- **Took a Greyhound bus to appear at the January 7 hearing, and**
- **Is borrowing money just to pay her rent**

**These are not conflicting circumstances. They are conflicting narratives—**manufactured for court advantage, **with no regard for the truth or for Petitioner’s survival.**

This evidence has been submitted. It is in the record. It is not difficult to understand. And yet, **not one ruling, footnote, or judicial acknowledgment** has been made. The silence has become complicity—**and the damage has now reached the point of irreparable harm. What could have been corrected has now metastasized. The cost is no longer procedural—it is human, financial, and constitutional.**

The procedural record speaks for itself: Respondent’s legal team filed a motion to withdraw for non-payment—despite representing a client earning over \$1.5 million per year. During that time, they refused to engage, Respondent declined to declare herself pro se, and Petitioner was left without a clear party to serve. Then, **at 11:45 PM on the**

**final day of discovery**, the same legal team reappeared—armed with a stack of pre-drafted motions and filed **blanket objections to every single request**.

These filings were prepared **while the attorneys were allegedly withdrawn**, and at no point did they cease operating in Respondent's interest. **The entire withdrawal was a procedural mirage—a tactic to prevent discovery and disable opposition**. They never actually left. The court witnessed this. It was raised in filings. It was detailed in motions. And yet, **no action was taken**. Due process was obstructed. The rule of law was openly violated **without a single footnote acknowledging it had even occurred**.

Petitioner respectfully asks the Court to consider: **Who requires six attorneys and a risk mitigation firm to litigate against a medically vulnerable, financially severed, pro se party?** Respondent is represented by a **legal army**—while Petitioner has been left without food, housing stability, legal representation, or even access to prescribed medication.

The Standing Orders in this district are intended to create procedural balance and **preserve fairness**. But there is no balance here. There is no fairness. This is **litigation asymmetry by design**—and it has been carried out in plain sight, without interruption. **If standing orders cannot protect the unrepresented from weaponized legal firepower, what purpose do they serve at all?**

Trial remains scheduled to proceed—**with not a single question answered, not a single motion ruled upon, and not a single safeguard enforced**.

**This is not adjudication. This is an execution. And by its silence, this Court has allowed itself to appear complicit**. Petitioner no longer files in the hope of intervention—**but in the necessity of preserving the record**. If justice is not delivered in this forum, it must at least be **documented for the ones that follow**.

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**ACCORDINGLY, PETITIONER RESPECTFULLY REQUESTS THAT THE COURT:**

**1. IMMEDIATELY CONTINUE THE BENCH TRIAL**

To prevent further procedural and constitutional harm resulting from discovery obstruction, strategic denial of counsel, and active deprivation of due process.

**2. IMMEDIATELY APPROVE EMERGENCY FINANCIAL RELIEF**

Approve Petitioner’s emergency request for **\$20,000 in immediate housing and survival support** as detailed in the separately filed *Request for Hearing to Prevent Eviction During Medical Hardship*.

**Petitioner will be rendered homeless if this request is not ruled upon this week.**

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**3. PRESERVE THE FOLLOWING MATERIALS AND RECORDS**

To ensure a complete and permanent record for **appellate, oversight, and investigative purposes**:

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***A. Court and Judicial Metadata***

Petitioner formally requests preservation of all relevant **eFileTexas and internal court administrative metadata** associated with each motion and emergency filing submitted in this case, including:

- Date and time of filing and clerk acceptance;
- First view or access timestamp by any judicial officer, clerk, or court staff;
- Internal routing history, docket reassignment, and notations;
- Any annotations or changes made to the document’s status;
- Documentation of **any motion that was opened, routed, or reviewed but never ruled upon.**

*If the Court declines to take further action, Petitioner reserves the right to request a full audit trail of when this Court chose not to intervene—not only in what it ruled on, but in what it allowed to stand unaddressed.*

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### ***B. Records and Conduct of Respondent, Counsel, and Associated Parties***

Preserve the following:

- All discovery responses (or lack thereof) from Respondent’s legal team;
- The full record of attorney withdrawal and re-entry prior to the discovery deadline;
- Petitioner’s discovery requests and associated service notices;
- All protective orders and sworn allegations filed by Respondent;
- Respondent’s financial disclosures, amendments, and omissions;
- All of Petitioner’s documented medical records and motions relating to hardship;
- Any audio, video, or written evidence referenced by either party;
- All affidavits and sworn statements submitted by Petitioner under penalty of perjury;
- The full transcript (if available) of the **January 7, 2025** hearing;
- All filings, correspondence, and declarations from Respondent regarding:
  - Spousal support
  - Legal fees
  - Settlement concealment
  - Personal loans between Respondent and affiliated parties
- Any involvement or correspondence by risk mitigation firms, private security teams, or off-duty police officers contracted by Respondent in connection with this litigation.

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**Petitioner submits this motion with the full awareness that justice is no longer presumed in this case. It must now be demanded, documented, and preserved—for whatever comes next.**

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## PETITIONER'S REQUEST

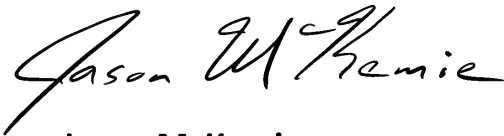
**Petitioner respectfully requests that this Court issue a Statement of Fact regarding the contradictory sworn testimony and the video evidence submitted as Exhibit A. The contradiction is not nuanced—it is direct, visible, and undeniable.**

Should the Court decline to acknowledge the evidence or rule upon it, Petitioner reserves the right to seek judicial review, oversight, or formal complaint through all appropriate administrative and appellate channels. The procedural integrity of this Court—and the dignity of its rulings—depend on its willingness to engage with the truth in the record.

**(EXHIBIT A CAN BE FOUND DIRECTLY BELOW THIS DOCUMENT)**

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Respectfully Submitted,



**Jason McKemie**

***Petitioner, Pro Se***

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## Exhibit A – Perjury Under Oath by Pamela Woodman

Petitioner challenges this Court to watch the video and issue a **Statement of Fact**. The contradiction is direct, visible, and already in the record.

If no such statement is issued, Petitioner reserves the right to raise this omission in all appellate and judicial oversight forums as a failure to acknowledge material fraud upon the Court.

At the January 7, 2025, hearing, **Pamela Woodman**—Respondent’s sister and a financially interested party in this litigation—testified under oath that a “former police officer” discovered a hidden surveillance device in a plant at the marital residence. Her exact words were:

*“There were some visible cameras in every room of the house. Some were hidden, some were in plants. There were listening devices throughout the house. I would estimate that there were dozens. Completely intimidating.”*

When asked how she knew the object was a listening device, she replied:

*“The former police officer found that one.”*

The Court sustained an objection to hearsay regarding what the officer allegedly said but permitted testimony about the officer’s “actions.” However, this entire line of testimony was **false**.

### **ACTUAL EVENTS – OFF DUTY POLICE OFFICER FINDS AND INQUIRES ABOUT HIDDEN ELECTRONIC DEVICE IN A PLANT**

#### **CLICK TO PLAY - [EXHIBIT A - SURVEYLANCE PLANT](#)**

The device in question was not a listening device. It was a **smart hydrometer**—a commercially available soil moisture sensor that notifies plant owners when watering is needed. Petitioner submitted **video evidence**—already accepted into the record—showing Respondent herself identifying the device, laughing about it, and mocking Petitioner for his inability to keep the plant alive. Pamela Woodman is **physically**

**present in the video**, and her voice is clearly heard instructing Respondent to stop speaking to Petitioner through the security camera system.

Both women **knew what the device was**. Respondent mocked Petitioner for buying it. They acknowledged it. And then they coordinated a perjured exchange in open court to suggest the device was part of a criminal surveillance setup. This was not misinterpretation. It was **intentional fabrication**.

Woodman's motive was clear: she had provided Respondent with over \$60,000 in below-market personal loans while Respondent diverted her income into shielded investment accounts to avoid financial scrutiny and spousal support. The perjury served three purposes:

- To justify the issuance of a retaliatory protective order;
- To depict Petitioner as emotionally and physically dangerous;
- And to manipulate the Court's financial determinations through fear.

The effects of this false testimony were catastrophic. Based on this coordinated lie, Petitioner was stripped of access to marital accounts, denied legal representation, and ultimately cut off from critical medical benefits while recovering from spinal surgery.

This was not exaggeration. It was **aggravated perjury**, performed in tandem by two individuals with shared motive, coordinated opportunity, and material gain.

Petitioner demands that this Court:

- Review the submitted video evidence in full;
- Issue a **Statement of Fact** acknowledging the contradiction;
- And weigh this act of perjury as a direct challenge to the integrity of this courtroom.

### Automated Certificate of eService

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Filing Description: EMERGENCY M/PRESERVE EVIDENCE AND CONTINUE TRIAL DUE TO PROCEDURAL SABOTAGE AND BREAKDOWN IN JUDICIAL OVERSIGHT

Status as of 7/17/2025 8:29 AM CST

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