

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. **DF-24-18010**

IN THE MATTER OF
THE MARRIAGE OF

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GWENDOLYN ULIJASZ-MCKEMIE

JASON MCKEMIE

IN THE DISTRICT COURT

254th JUDICIAL DISTRICT AND

DALLAS COUNTY, TEXAS

**EMERGENCY MOTION FOR TEMPORARY FINANCIAL RELIEF
DUE TO IMMINENT HOUSING LOSS, MEDICAL HARDSHIP, AND
REPEATED PATTERNS OF PROCEDURAL ABUSE AND NOTICE OF
DISCOVERY SERVICE OBSTRUCTION**

TO THE HONORABLE JUDGE OF SAID COURT:

Respondent, **Jason McKemie**, files this **Emergency Motion** requesting immediate temporary financial relief due to an imminent housing crisis and ongoing recovery from multiple medical emergencies. In support thereof, Respondent respectfully shows the Court:

**GROUND FOR FINANCIAL RELIEF AND PATTERNS OF LITIGATION
MISCONDUCT**

1. As of today, Respondent is facing imminent eviction due to non-payment of rent. A total of **\$5,000 (one month's rent)** is owed immediately to avoid the loss of housing.
2. Respondent was recently hospitalized and placed on antibiotic treatment for a **rapidly progressing case of cellulitis**, a serious bacterial infection that required emergency medical intervention to prevent systemic infection. This occurred while Respondent was still recovering from prior **invasive spinal surgery**, compounding the physical, emotional, and financial hardship already endured.

This condition has escalated over the past 40 days and has significantly impaired Respondent's ability to prepare legal filings, attend to medical needs, and manage basic daily functions.

- Petitioner has, once again, actively obstructed Respondent's access to medical care**—most notably by disabling the parties' shared HSA card, which Respondent spent **over six months** attempting to regain access to.

This most recent filing by Petitioner appears deliberately timed to **strike while Respondent is at his most medically and financially vulnerable**.

- Petitioner and her sister **knowingly committed aggravated perjury** to portray Respondent as a deadbeat and freeloader for financial gain—severing him from marital assets, spousal support, and legal fee relief. As a result, Respondent was left with a **\$25,000 monthly financial burden** and less than **\$300 to his name** while recovering from surgery.

Despite this, Respondent has worked relentlessly to comply with every obligation imposed by this Court. He maintained all required payments for **six consecutive months**, falling short **only this month** due to emergency hospitalization.

- Petitioner has engaged in a calculated and repeated pattern of weaponizing both civil and criminal court systems to gain advantage in personal disputes.** In this matter alone, Respondent is aware of between twelve and nineteen false police reports filed by Petitioner, resulting in at least five separate police investigations. At one point, four active investigations were pending against Respondent simultaneously—all stemming from Petitioner's false and defamatory allegations.

In a recent email exchange, Respondent pleaded with Petitioner to de-escalate, stating clearly:

“You can't do this to multiple people, across multiple states, with multiple protective orders, with multiple people accusing you of making fraudulent allegations—and think this isn't going to catch up with you.”

This was not a threat. It was a warning rooted in truth. Respondent has made every effort to avoid conflict while still defending himself with integrity.

The motion filed by Petitioner after midnight on June 23, 2025, is a **desperate response**—not only to further obstruct discovery, but to launch an all-out personal and legal assault through civil filings, criminal accusations, and strategic defamation.

Respondent has personally spoken to **four different detectives**, has had his **Miranda rights read on three separate occasions**, and continues to defend himself from ongoing false criminal allegations on a near-weekly basis. **In every instance, the underlying evidence has pointed back to Petitioner.** Respondent will be submitting a recorded call with the acting detective stating quite plainly that nothing points to me or any involvement by me, and the “all arrows point to her.”

Respondent will be submitting a recorded call with the acting detective assigned to the AirTag investigation, in which **the detective states plainly that there is no evidence linking Respondent to any wrongdoing, and that, quote, “all arrows point to her (Petitioner).”** This statement was made after Apple subpoena responses **confirmed, exactly what Respondent stated on the stand on Jan. 7th, that the AirTags in question were registered solely to Petitioner and had never been paired to any of Respondent’s devices, nor anyone else’s devices. They have always been, and remain, trackable only by Petitioner.** All the detective’s findings shared this same conclusion and directly contradict the narrative presented by Petitioner in her filings and in sworn testimony.

- The AirTags in question are **registered exclusively to Petitioner**
- They were **never paired to any of Respondent’s, nor anyone else’s, devices**
- They have been and remain to be **only trackable by Petitioner herself**

This is **not an isolated incident.** Respondent will present evidence establishing a long-standing behavioral pattern. Prior partners and third parties have independently shared consistent accounts of **manufactured fear, baseless legal action, and role-reversal abuse narratives**—all executed for personal gain, retaliation, or financial leverage.

The cumulative effect of this conduct has placed Respondent in a **permanent state of defense**—navigating false accusations, criminal suspicion, and reputational harm **while enduring serious physical and financial hardship** during medical recovery.

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6. Petitioner has publicly referred to the parties’ relationship as a “six-month marriage” even though the parties were legally married in **August 2023** and lived together as committed life partners for well over a year. This mischaracterization is a **deliberate attempt to minimize financial responsibility** and obscure the true nature of the relationship. The separation and surrounding allegations appear to be driven not by safety concerns, but by **infidelity and predatory financial opportunism.**
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7. Petitioner currently earns over **\$1.5 million per year**, with access to substantial restricted stock units (RSUs), family financial support, and employer bonuses. Despite this, she has **blocked Respondent's access to marital funds**, including those needed for medical recovery. Respondent cannot meet his basic living or medical needs without emergency assistance.

8. Respondent respectfully requests that the Court order an emergency payment of **\$15,000**, payable either:

- **\$15,000 deposited directly into the parties' joint checking account (ending in xx6893);**

(OR)

- **\$10,000 paid directly to Respondent's landlord, with \$5,000 deposited into the joint checking account for survival and medical expenses.**
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9. Respondent will be filing a comprehensive evidentiary motion within **48 hours**, which will include:

- Perjury by Petitioner and third-party witnesses
 - Financial concealment and misrepresentation
 - Violations of standing orders and post-surgical obstruction
 - Fraudulent allegations embedded in Petitioner's June 23, 2025, amended filing
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Discovery Service Obstruction and Procedural Gamesmanship

Respondent also notes that Petitioner is attempting to exploit procedural ambiguity to avoid valid discovery obligations. Respondent timely served formal discovery requests on **May 27, 2025**—well before the Rule 190.3(b) deadline of **June 23, 2025**—and promptly filed a **Notice of Discovery Service** with the Court. Petitioner raised no objection at the time.

It was only **after the 30-day discovery window closed** that Petitioner, through counsel, claimed service was defective and untimely. This calculated delay reflects a deliberate strategy: to allow the discovery window to expire without objection, then retroactively argue that service was invalid. This approach is procedurally dishonest and fundamentally unfair.

At the time of service, Petitioner had not formally declared herself as **pro se**, nor had all attorneys of record filed motions to withdraw. Although only the lead attorney formally withdrew, other attorneys from the same firm remained listed in eFileTX until they were quietly removed—without notice of substitution or withdrawal. Petitioner failed to clarify her representation status despite multiple written requests, and the eFileTX system still reflects her as **pro se**.

To ensure proper notice, Respondent served discovery on **all known counsel, Petitioner directly, and filed notice with the Court**. Petitioner has since acknowledged receipt and even filed full responses to discovery—demonstrating she received service and benefitted from it.

Respondent respectfully requests that the Court **reject Petitioner’s procedural objection** and confirm that service was timely and proper. Allowing parties to obscure representation status, delay objections, and then weaponize technical deadlines would invite abuse. The Court should make clear that discovery was validly served and must be answered in full.

Violation of Rule 8 and Concealment of Counsel

Respondent respectfully calls the Court’s attention to a serious procedural violation that strikes at the heart of due process and fair litigation. Petitioner’s lead counsel filed a motion to withdraw citing non-payment. Petitioner never declared herself **pro se**, nor did any remaining attorney of record file a notice of substitution or reappearance.

Despite this, Petitioner has now re-engaged the same law firm—without notice to the Court, without notice to Respondent, and without correcting the eFileTX record, which still lists Petitioner as **pro se**. During this silent reengagement, her attorneys drafted and filed lengthy discovery responses and an amended petition containing new tort allegations—all while evading formal service and allowing Respondent’s discovery deadline to expire unchallenged.

This is a textbook violation of Texas Rule of Civil Procedure 8. Counsel cannot withdraw, disappear, secretly return, and then assert procedural objections against an opposing party who had no clear way to serve them. This conduct amounts to **willful concealment, bad-faith litigation, and a denial of due process**.

Respondent respectfully requests that the Court:

- **Strike Petitioner’s First Amended Petition and all discovery responses** as procedurally invalid unless and until counsel of record formally re-enters and

acknowledges representation;

- **Consider sanctions** against Sullivan & Cook, LLC under Texas Rule of Civil Procedure 215 and the Court's inherent authority to deter deliberate gamesmanship;
- **Make a finding of bad faith**, as this conduct has materially prejudiced Respondent's right to timely discovery, procedural clarity, and access to the Court.

If there has ever been a violation of Rule 8 worthy of Court intervention, **this is that case.**

It is clear to Respondent that Petitioner has found legal counsel as ruthless and unrestrained as she is. The firm of Sullivan & Cook, LLC has enabled and amplified the same pattern of procedural abuse, emotional coercion, and disregard for truth that defines Petitioner's conduct. Together, they have demonstrated a **willingness to twist facts, ignore deadlines, and inflict reputational and financial harm without concern for the human cost.**

They are not interested in truth. They are interested in winning—by any means necessary. And that is exactly why this Court's intervention is required.

This motion is submitted **solely to prevent immediate and irreparable harm**, pending full evidentiary review.

PRAYER FOR RELIEF

Respondent respectfully asks this Court to:

1. **Order an immediate emergency financial payment of \$15,000**, payable in full by Petitioner;
2. **Direct all or part of such payment to Respondent and their landlord/property manager** to prevent eviction;
3. **Provide Respondent with no less than \$5,000** in cash for essential medical, housing, and survival expenses;

4. **Set an expedited hearing** to address not only this motion for emergency relief, but to allow sufficient time for argument on the following matters in full:
 1. Retroactive spousal support and legal fee reconsideration
 2. Enforcement of financial disclosures and compelled discovery
 3. Ongoing obstruction and compliance with Texas Rules of Civil Procedure
 5. Issue sanctions against Sullivan & Cook, LLC for bad-faith litigation conduct, including concealment of counsel, procedural manipulation, and obstruction of discovery, pursuant to Texas Rule of Civil Procedure 215 and the Court's inherent authority.
 6. **Grant all other relief** to which Respondent may be justly entitled.
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Respectfully submitted,

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