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FILED UNDER SEAL PURSUANT TO TEXAS
RULES OF CIVIL PROCEDURE AND
COURTS INHERENT AUTHORITY

DF-24-18010

NO. _____

IN THE MATTER OF §

IN THE DISTRICT COURT THE MARRIAGE OF §

§

GWENDOLYN ULIJASZ-MCKEMIE §

302th JUDICIAL DISTRICT &

§

JASON MCKEMIE §

DALLAS COUNTY, TEXAS

FILED UNDER SEAL

SUBMITTED FOR IN CAMERA REVIEW ONLY

URGENT: TIME SENSITIVE MOTION

Submitted to:

The Honorable Sandra Jackson
302nd District Court, Dallas County

Filed by:

Jason McKemie, Respondent (Pro Se)
539 W Commerce St., STE. # 2010
Dallas, TX 75208
jmckemie@mckemie.net | (214) 868-4901

Notice to Opposing Counsel:

This submission is filed under seal and is not being served with full content currently.
Counsel for Petitioner is notified of the existence of a sealed in-camera submission.
Copies of this filing may be requested by judicial order or upon further motion.

DF-24-18010

NO. _____

IN THE MATTER OF § IN THE DISTRICT
COURT THE MARRIAGE OF §

GWENDOLYN ULIJASZ-MCKEMIE § 302nd
JUDICIAL DISTRICT & §

JASON MCKEMIE § DALLAS
COUNTY, TEXAS

MOTION FOR PSYCHIATRIC EXAMINATION OF PETITIONER

MOTION FOR PSYCHIATRIC EVALUATION OF PETITIONER

- Filed pursuant to Tex. R. Civ. P. 76a, 192.5, and 194.2
- Contains confidential psychiatric, mental health, and privileged material submitted for in camera judicial review only.
- Not for public docket or disclosure to opposing counsel absent Court order.

URGENT: TIME SENSITIVE MOTION

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SUBMITTED FOR IN CAMERA REVIEW ONLY

CASE: DB-24-18010

302ND JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

JUDGE SANDRA JACKSON

PAGE 4: Motion for Psychiatric Examination of Petitioner

+ 160 PAGES OF SUPPORTING DOCUMENTATION AND EVIDENCE

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COURT THE MARRIAGE OF		§
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TO THE HONORABLE JUDGE OF THE 254th DISTRICT COURT:

Respondent, **Jason McKemie**, appearing pro se, respectfully files this submission under seal for in camera review. This motion is brought pursuant to Rule 204 of the Texas Rules of Civil Procedure and the Court's equitable authority under Texas Family Code §§ 6.502 and 6.503. The contents of this motion involve matters of psychiatric history, procedural misconduct, and evidentiary risk that materially affect the integrity of these proceedings and the safety of Respondent.

This filing is submitted in good faith and under seal for protection of all parties, and to ensure that the Court may evaluate the record in a secure and truthful manner.

NO. DF-24-18010

IN THE MATTER OF
MARRIAGE OF

§
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IN THE DISTRICT COURT THE

GWENDOLYN ULIJASZ-MCKEMIE
&
JASON MCKEMIE

302nd JUDICIAL DISTRICT
DALLAS COUNTY, TEXAS

MOTION FOR PSYCHOLOGICAL EVALUATION
FILED UNDER SEAL / IN CAMERA REVIEW

CHARACTER WITNESS EVIDENCE

Respondent has submitted thirty-four (34) sworn character witness affidavits in these proceedings, attesting to his stability, integrity, and non-violent history. One such affidavit has been included for the Court’s reference. **[Exhibit 0 – Character Reference for Jason McKemie]**

STATEMENT OF CIRCUMSTANCES

Petitioner has placed her mental and emotional condition directly in controversy by asserting a \$50,000 claim for Intentional Infliction of Emotional Distress (“IIED”) against Respondent. Independent, third-party records — including two life insurance denials from The Hartford and MetLife citing an undisclosed DSM-5 diagnosis — combined with a documented history of retaliatory, manipulative litigation, strongly indicate that an independent psychological evaluation is necessary for fair adjudication of her claim.

- [Exhibit 1 – Hartford Life Insurance Denial Letter \(2023\)](#)
- [Exhibit 2 – MetLife Life Insurance Denial Letter \(2024\)](#)

In August 2024, Petitioner abruptly ceased her six prescribed psychiatric medications. This immediately preceded an escalation in aggressive litigation tactics, medical abandonment of Respondent during post-surgical recovery, and deliberate financial sabotage. These behaviors were not isolated — they match documented patterns from prior relationships and coincide with her history of extracting confidential settlements from multiple employers.

This motion is narrowly tailored to the IIED claim and the credibility issues it raises. It is submitted under seal and in camera to avoid unnecessary prejudice. Respondent requests that the costs be paid from marital estate funds under Petitioner’s control. Respondent does not believe a reciprocal evaluation is necessary but will comply under identical conditions should the Court require it, with all costs likewise paid from the marital estate.

Marriage Timeline & Documentary Proof

Respondent and Petitioner were married in September 2023. On October 23, 2023, they made their first joint financial investment — a \$50,000 contribution to Advantigen Biosciences — to celebrate their marriage. As evidence, Respondent has attached the sworn affidavit of Elizabeth Bender ([Exhibit 5](#)), who can personally attest to this investment and its significance and symbolism.

In the months that followed, they executed:

- Co-Mingled Finances, Co-Habitation, & Presented Themselves to Others as a Married Couple (Aug 2023) ([Exhibit 3](#))
- Joint Investments & Retirement Accounts (Oct 2023) ([Exhibit 4](#))
- A signed Domestic Partnership Agreement (Jan 2024) ([Exhibit 6](#))
- Reciprocal Powers of Attorney (April 2024) ([Exhibit 7](#))
- Ameriprise Beneficiary Designation (May 2024) listing them as spouses ([Exhibit 8](#))

These records directly contradict Petitioner’s altered timeline of the relationship and confirm the marriage and joint commitments well before the date she now claims.

- [Exhibit 3 – Chase Bank Account and Cohabitation \(Aug 2023\)](#)
- [Exhibit 4 – Joint Ameriprise Investment Accounts \(Oct 2023\)](#)
- [Exhibit 5 – Affidavit of Elizabeth Bender \(Sept 2023\)](#)
- [Exhibit 6 – Domestic Partnership Agreement \(Jan 2024\)](#)
- [Exhibit 7 – Reciprocal Powers of Attorney \(April 2024\)](#)
- [Exhibit 8 – “Spouses” Ameriprise Beneficiary Documentation \(May 2024\)](#)

GOOD CAUSE FOR EVALUATION

1. August 2024 Turning Point

Observed Medication Changes and Behavioral Shift

In July 2024, I began noticing subtle but consistent changes in Petitioner's demeanor — she was less open, quicker to irritation, and more sensitive in general. One significant change stood out: she no longer appeared to need the prescription stimulant she had regularly taken for over a year to address reported daytime fatigue.

Previously, Petitioner represented to both me and our family physician that she was taking only two antidepressants, concealing the fact that she had been prescribed a total of six psychiatric medications as of June 2024 — including two antipsychotics. Based on my observations and her documented prescription history, it appears that by late July she had discontinued four of these medications, leaving only Wellbutrin and Lexapro. This coincided with the first time I observed her no longer requiring her prescribed daytime stimulant to function, which was a marked and unusual change. In the past, if she ran out of her stimulant, she would request or take one of my prescribed Adderall tablets, as she could not make it through the day without significant difficulty staying awake. I now understand that this unexplained daytime sleepiness was a side effect of the additional psychiatric medications she had concealed.

In mid-August, Petitioner informed me she intended to stop taking her two remaining SSRIs — the only two medications I believed she was on at the time. I expressed genuine concern, as I had already witnessed concerning behavioral shifts in the weeks prior and did not feel comfortable with her discontinuing medications at a time, I was already witnessing concerning behaviors and volatility. We were scheduled to attend a wellness retreat in Costa Rica (Soltara), which prohibits all prescription medications. Petitioner assured me she would simply come off the medication for the week preceding, and the week of the retreat, and resume it on the last day there. She claimed she had not missed a single dose in 18 years, a statement I found difficult to believe given our shared history as recovering alcoholics and my understanding of the challenges of strict daily compliance over such a long period.

Subsequent evidence now confirms this statement was untrue. Her prescription records and observable history show that each time she discontinues these medications, the result is a severe and destructive behavioral escalation. In every instance, someone close to her has suffered significant harm during or immediately after these cessations.

This cessation coincided with a sharp escalation in volatility, impulsive decision-making, and retaliatory behavior — consistent with accounts provided by a former husband, who reported a similar pattern when she abruptly discontinued psychiatric medication during their marriage.

From March 2023 through June 2024, our life together was filled with unforgettable memories, laughter, and genuine love. Our ceremonial wedding — a destination event we

spent months planning — was extraordinary. Friends and family described it as magical, and I felt the same.

In July 2024, I began noticing subtle but troubling changes. Petitioner seemed more distant, less engaged, and her usual confidence gave way to insecurity. She sought validation but was also more volatile, her moods shifting unpredictably.

In August, when she discontinued her prescribed psychiatric medications, the change was immediate and unmistakable. Her demeanor shifted sharply — emotional instability deepened into retaliatory behavior, and moments of coldness hardened into deliberate cruelty. Each day, the volatility escalated. That decision marked a clear turning point — the genesis of the destructive conduct now before this Court.

2. Pattern of Psychological and Emotional Abuse

From August–December 2024, Petitioner engaged in a sustained pattern of abuse, including:

- **Sleep deprivation as a control tactic:** Waking Respondent by leaning close to his face and screaming “DIE!” to induce fear.
- **Psychological cruelty:** Repeatedly and aggressively insisting Respondent had OCD, Asperger’s, or autism; demanding he “admit” it; punishing him when he did not.
- **Out-of-character behavior with volatility:** Alternating between walking around the home naked and speaking with extreme hostility; inability to express or tolerate emotions other than joy or laughter — all others triggering rage.
- **Medical abandonment:** Refusing care, assistance, or support during Respondent’s recovery from invasive spinal surgery.
- **Financial control and exploitation:** Hoarding all marital funds, creating destabilizing conditions to exploit medical vulnerabilities, and using access to resources as leverage.
- **Punishment despite compliance:** Assigning daily tasks with detailed instructions, then declaring them “wrong” even when completed exactly as directed, resulting in verbal abuse. On one occasion, Respondent reviewed security footage proving his compliance; Petitioner reacted with extreme anger — an incident that convinced Respondent her behavior was dangerous and destabilized by medication cessation.
- **Constant perception management:** Obsessively shaping how others viewed her, with fixation on money, status, and ego.

- **Fear of escalation to physical harm:** Respondent began ensuring home cameras were functional at all times, fearing Petitioner might fabricate or stage a violent incident to frame him.
- **Death declarations, interference with therapy, and denial of medical care:** Over several months, Petitioner repeatedly told Respondent he was “going to die soon,” claiming both his mother and his therapist (David) had said so. When Respondent’s mother denied it, and he prepared to confirm with his therapist, Petitioner intervened — promising to “make it right.” She then sent the therapist an “apology” letter ([Exhibit 9](#)), which the therapist later described as “dissonant and emotionally destabilizing.”

Shortly afterward, Petitioner booked a “joint” session with Respondent’s therapist through his website — but attended alone, without Respondent’s knowledge. In that private session, she gave explicit instructions on what the therapist could and could not discuss with Respondent, forbidding discussion of:

- Petitioner’s medications
- Her withdrawal symptoms
- Her volatility and temper
- Whether she should resume psychiatric treatment

The therapist described this as crossing a “significant line” and subsequently became difficult for Respondent to reach.

After Petitioner left the marital home on December 13, Respondent resumed therapy ~45 days later, struggling with severe insomnia and trauma resurfacing. Despite Temporary Orders requiring access to marital HSA benefits, Petitioner has denied Respondent the HSA prescription card **26 times**. This has included photographic proof of harm, hospitalization, and repeated formal requests.

In December 2024, Respondent was hospitalized for six days with a rapidly escalating staph infection. Upon discharge, his HSA card was briefly reactivated, allowing him to fill one \$41 antibiotic prescription. Hours later, Petitioner deactivated the card again, preventing him from filling the remainder of the antibiotics. MetLife confirmed the card was reported “lost” despite \$6,000 in available funds. The infection has since recurred for more than two months due to the denied treatment.

- [Exhibit 9 – Petitioner’s Letter to Respondent’s Therapist](#)

3. Systemic Financial Fraud & Asset Concealment

Petitioner's sworn financial disclosures contain deliberate misrepresentations — including the intentional disguise of \$10,000/month VEIP (Employer Equity Fund with a 50% return in one year) contributions as “extra tax withholding” — and omit significant assets and accounts. Bank records further show large, unexplained transfers to undisclosed accounts and concealment of substantial marital funds.

- [Exhibit 10 – Accenture Payroll Deduction for VEIP](#)
- [Exhibit 11 – Sullivan Cook Certified Financials – “Extra Tax Withholding”](#)
- [Exhibit 12 – VEIP Program Summary](#)
- [Exhibit 13 – VEIP Balance](#)

4. False Police Reports & Misuse of Law Enforcement

December 11–14, 2024 Timeline of Events

December 11, 2024 – Respondent called 911 and informed the operator that he was retaining an attorney for divorce and believed his wife was preparing to file a fraudulent protective order and false police reports. He expressly stated that he was not armed. Later that day, while preparing to format the shared Mac computer used for camera hard drives, Respondent found that Petitioner was still signed into her iCloud account and text messages were coming through. The content was alarming — Petitioner was telling different people entirely different versions of events, all designed to maximize sympathy and damage Respondent's reputation. These included false claims that he was using drugs, drinking, suffering from OCD, and having “major issues.”

December 12, 2024 – Respondent's financial situation was dire, with his checking account nearly empty. Under significant financial pressure, he took an Uber to Chase Bank and withdrew the only accessible marital funds — \$2,000 from a joint account that required a \$2,000 minimum balance, effectively zeroing out the account. That night, during a recorded call, Petitioner threatened annulment but promised Respondent he could remain in the marital residence “for months” and that she would keep him on health insurance plus “six months of COBRA after separation.” In reality, she had already begun severing his access to all marital assets, leaving him destitute just days after invasive spinal surgery.

During this period, Respondent — increasingly alarmed by Petitioner's erratic behavior, repeated statements that he was “going to die,” and refusal to resume psychiatric medication — installed a keylogger on the shared Mac. The software was openly visible on the desktop and remained for only four days. Respondent's sole intent was defensive: to verify whether civil or criminal processes were being weaponized against him and whether police might come to the house armed. The captured information confirmed his fears —

Petitioner was actively coordinating an offensive legal campaign against him. Once this was clear, he shut the program down.

December 13, 2024 – Petitioner fully cut off Respondent from all marital funds, cancelled his last credit card, blocked a survival funds transfer, and reported his prescribed spinal rehabilitation equipment as fraud. She told him he was not welcome at the family Christmas and left him with just \$107 to his name.

December 14, 2024 – Petitioner called Dallas 911 ([Exhibit 14](#)) claiming Respondent had attempted suicide two days earlier, that he was unstable, and that he was armed. She then began calling friends and neighbors in the middle of the night with the same narrative. Evidence suggests she had already been lining up someone to pick up their dog because she believed — or wanted others to believe — Respondent “might not be alive anymore.”

Dec 14th, 2024, claim that Respondent had attempted suicide the Thursday prior — a night that Petitioner was with respondent, and both text messages and security cameras directly contradicted this reported event. SAPD records ([Exhibit 15](#)) show over a dozen unfounded reports after leaving the marital residence, despite Respondent not having been to San Antonio in years.

Petitioner turned in multiple AirTags claiming Respondent was tracking her. Respondent testified at the January 7 hearing that he installed these at her request between December 2023 and January 2024 and that they were all registered to her iCloud account and devices. The San Antonio Police Department subpoenaed all of these AirTags; all were confirmed as registered to Petitioner’s iCloud account, with only Petitioner having access to the tracking data. Apple confirmed that no one else could — or did — track these devices.

There were six separate investigations sparked from her allegations, with four detectives working different cases at once. Respondent was read his Miranda rights three times due to the seriousness of the accusations. Because of the volume of reports and subpoenas yielding the same findings, SAPD referred Petitioner to their mental health division for monitoring. No tracking, spying, or stalking has been substantiated in any of the six investigations that followed her complaints. In total, somewhere between fifteen and nineteen police reports were filed between SAPD and DPD for accusations ranging from breaking and entering, unlawful installation of tracking devices, hacking her Wi-Fi and Ring doorbell, installing AirTags in luggage, harassment, and more.

- [Exhibit 14 – Dallas PD False Report Records & Investigative Findings](#)
- [Exhibit 15 – San Antonio PD False Report Records & Investigative Findings](#)

5. Pattern of Weaponizing Protective Orders & Witness Tampering

Petitioner's misuse of protective orders is not limited to Respondent — it is a repeated pattern extending to prior relationships. Her former husband has alleged that Petitioner:

- Filed a fraudulent protective order against him.
- Caused him to be terminated from his job.
- Left him destitute and evicted him from his home.
- Caused his children to be removed from his custody through false allegations to the Department of Children and Families.

That former husband also filed for a protective order against Petitioner. [\(Exhibit 16\)](#)

In the present case, Respondent intended to call this former husband as a witness in the July 23 bench trial to testify specifically about Petitioner's weaponization of protective orders to silence and economically destroy her targets. One week before trial, Petitioner obtained an ex parte modification of the protective order against him, prohibiting him from speaking about her through third parties — thereby barring his testimony.

This last-minute maneuver amounted to witness tampering. The excluded testimony was directly relevant: it would have shown Petitioner engaging in the exact pattern of misconduct the witness was prepared to describe — weaponizing protective orders to suppress damaging testimony and shield herself from accountability.

- [Exhibit 16 – Christopher McNally Protective Order](#)

6. Objective Psychiatric Evidence

Two separate life insurance denials — The Hartford (2023) and MetLife (2024) — explicitly cited an underlying DSM-5 diagnosis as the basis for denial. In each case, Petitioner circumvented independent review by obtaining forms from a personal acquaintance rather than a treating psychiatrist.

7. Material Financial Inconsistencies & Concealment

From Sept-Dec 2024, Petitioner concealed over \$489,000 while directing Respondent to take on debt, telling him to “conserve all cash” and even instructing him to buy expensive, personalized gifts for her family on his credit cards. Between June and December 2024,

Petitioner siphoned away nearly a half-million dollars while only \$22,000 went to Respondent. Despite this, Petitioner now claims she was financially abused by Respondent.

Key Timeline:

- **Dec 10** – Respondent undergoes invasive spinal surgery (6-day hospitalization, 2 days paralysis).
 - **Dec 11** – Respondent calls 911, states he is hiring an attorney and fears Petitioner will file false police reports and a fraudulent protective order; confirms to operator he is not armed so it is recorded. ([Exhibit 17](#))
 - **Dec 12** – Respondent pays divorce retainer, transfers \$30,000 survival funds (per attorney advice), purchases post-surgery rehab equipment, and buys a Christmas gift for Petitioner’s sister-in-law at her request.
 - Petitioner sees these charges, calls/texts Respondent, who confirms legitimacy. ([Exhibit 18](#))
 - Petitioner **reports all major charges as fraud**, canceling the retainer, equipment, and survival funds — but **allows the Christmas gift** to go through. Cancels the last active card without issuing a replacement, leaving Respondent without access to funds.
 - That night, on a recorded call, Petitioner promises in an emotional outpouring that she would never leave him with nothing to live on, offers 6 Month COBRA coverage, that he can stay in the marital residence “for months,” that she’ll pay rent “in advance”, and that she’s going to get a short-term rental in San Antonio.
 - Petitioner then communicates once again, that she doesn’t desire for him to be scared and that if he wants an attorney, he can have one and be states, “That is exactly what I want, and I would appreciate it if you would reinstate my retainer.” She then changes posture dramatically, stating that claims her “hands are tied” because he “didn’t tell [her] in advance” about the attorney, and hangs up.
- [Exhibit 17 – 911 Call Logs](#)
 - [Exhibit 18 – Dec 12th Retainer Cancellation](#)

Strategic Maneuvers:

- Canceled Respondent’s representation, rushed her attorneys to file for a protective order and annulment on Monday, securing petitioner status first.
- Embedded abuse/stalking allegations into her annulment petition to create a **procedural trap door** if spousal support or legal fees were contested.
- **Litigation as a Business Model** – Petitioner has turned litigation into a revenue strategy, having secured confidential settlements from her last three employers — a fact she denied under oath on January 7. Petitioner spends over \$100,000 per year on legal actions and is highly experienced in courtroom tactics. She understands that once perjury is embedded in the record, overturning it is extraordinarily difficult. Her method relies on delivering false statements convincingly, then creating procedural “trap doors” — for example, by embedding allegations of abuse and stalking into the Petition of Annulment. Any appeal of spousal support or legal fees would necessarily reopen those very allegations, allowing her to introduce new “evidence” under the guise of rebuttal.

When I was represented by counsel, my attorney warned me that contesting spousal support or legal fees would be “legal suicide,” with potential criminal ramifications — a calculated risk given Petitioner’s documented history of obtaining criminal verdicts against past romantic partners. This pattern reflects not only financial manipulation, but also the deliberate use of legal process as a weapon, underscoring the need for a comprehensive psychological evaluation.

Financial Reality vs. Claims:

At the Jan 7 hearing, Judge Brown asked Petitioner about her financial position: specifically in regard to spousal support. Petitioner testified she is living in San Antonio and rented a house just days prior. She said her financial position is “not good” and that she could not afford costs beyond her current rental obligation of \$3,800/mo. Petitioner stated she was having to take out loans for these basic living expenses (rent).

Pam Woodman, sister of Petitioner, testified that:

- She had met Respondent once over coffee
- That there were new cameras installed at the marital residence that were “in every room”, “so intimidating”.
- That there were “listening devices all over the house.” “I would say there were dozens.”

- That a listening device was found in a plant”
-
-
-
- Spousal Support and Legal Fees were Denied.

Petitioner then stated that she had given Respondent \$8,400 in the prior month and provided Judge Brown a bank statement showing a \$3,400 transfer. She stated this money was provided on top of paying his legal retainer of \$5,000 and that she is not a piggy bank for his spending. Petitioner dramatically pleaded that the relationship was no more than a 6-month fling and she needed a protective order.

In reality:

- The couple have been married since Sept 2023 and have deeply intertwined financials, health insurance, rental properties, and jointly manage finances.
-

Encouraging Respondent to carry marital expenses on credit cards from Sept-Dec, promising repayment from a \$300,000 sign-on bonus.

- Forbidding him from taking a \$250,000 job weeks prior.
- Cutting off all marital funds, leaving him with \$107.
- Knowing he was post-surgery and without income.

Certified Financials Show:

- **No rent expense** for San Antonio.
- Only **\$30,000 paid to Sullivan & Cook** out of \$260,000-\$480,000 billed; remainder unaccounted for.
- ~\$500,000 in pre-hearing transfers to undisclosed accounts.
- \$94,000 luxury vehicle under warranty while claiming no functional automobile.
- Employer-reimbursed San Antonio rent.
- \$10,000/month VEIP contributions mislabeled as “extra tax withholding.”

- Cosmetic procedures & luxury lodging while denying Respondent antibiotics, heart medication, and basic living resources.
- **Current status:** Respondent facing imminent eviction, negative accounts, maxed credit cards since Dec, unable to afford prescriptions — separate relief request forthcoming.

Petitioner's destitution narrative is irreconcilable with her \$1.5M/year compensation and documented spending. These contradictions alone justify a psychological evaluation.

8. IIED Claim as Ultimate Projection

Against this backdrop, Petitioner's \$50,000 IIED claim against Respondent is an ultimate projection, underscoring the necessity of independent psychiatric assessment.

PRAYER FOR RELIEF

Respondent respectfully requests the Court:

1. Order a psychological evaluation of Petitioner under Tex. R. Civ. P. 204.1 by a neutral, court-appointed examiner.
2. Order that all costs be paid from marital estate funds presently in Petitioner's control.
3. Deny any reciprocal evaluation unless the Court finds it necessary, in which case it shall be conducted under identical conditions.
4. Impose procedures set forth in the Proposed Order to ensure fairness, accuracy, and non-retaliation.
5. Grant all other relief to which Respondent is justly entitled.

PROPOSED ORDER

(attached in full with estate-pays, no-reciprocal-unless-required, sealed report, video recording, collateral interviews, malingering testing, permanent possession of results, and non-retaliation clauses)

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JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

EXHIBIT LIST

FILED UNDER SEAL / IN CAMERA REVIEW

EXHIBIT LIST (Filed Under Seal / In Camera)

0. Character Reference of Jason McKemie
 1. Hartford Life Insurance Denial Letter (2023)
 2. MetLife Life Insurance Denial Letter (2024)
 3. SAPD false report records & investigative findings
 4. DPD false report records & investigative findings
 5. Apple/iCloud records confirming AirTag registration to Petitioner
 6. Former husband's protective order filing against Petitioner
 7. Certified financial disclosures by Petitioner
 8. Bank records showing undisclosed transfers & mislabeled VEIP contributions
 9. Photographic/documentary evidence of cosmetic procedures & luxury lodging
 10. Recorded call transcripts (Dec 12, 2024)
 11. Evidence
-

RESPONDENT'S DISCLAIMER:

PRO SE NOT BY CHOICE

PRO SE **NOT** BY CHOICE (PROCEDURAL IDENTITY THEFT DISCLAIMER)

Petitioner did not merely file first — she intercepted Respondent's filing by fraudulently reversing his attorney retainer the day after his spinal surgery, she severed his access to counsel and funds. She withheld the retainer reinstatement until Friday to block re-engagement, then had attorneys work through the weekend to file first with a fabricated protective order — a calculated seizure of Petitioner status to construct a false narrative of abuse and victimhood, consistent with her documented legal history of doing so across multiple institutions.

Respondent was left destitute, forced to sell plasma for medication. Over the prior 4 months, Petitioner had funneled hundreds of thousands into hidden accounts and buried him in marital debt through emotional manipulation under the pretense of a "short term cash crunch". In reality, large volumes of cash were flowing in yet she informed Respondent they were at risk of bouncing utility payments, encouraging him to get another credit card or to put groceries on 6mo payment plans. SAPD referred her to the Mental Health Division after the fourth AirTag she turned in — just as the prior 3 — was registered solely to her iCloud, effectively killing the "stalking" narrative. Despite 25 Motions, 5 Emergency Motions, 22 Ex Parte Judicial Requests for Relief, a Judge Recusal, over nine months... no court has ruled on the perjury, aggravated perjury, fraud, asset concealment, witness tampering,—or corrected the false "six-month marriage" narrative that was weaponized to deny Respondent spousal support, legal fees, and due process.

Truth is an absolute defense to defamation.

—NOTICE TO THE COURT AND RECORD—

This document is submitted with a standing constitutional and procedural reservation of rights. Respondent has previously notified this Court in writing of un rebutted allegations of discovery abuse, evidentiary suppression, financial coercion, and litigation misconduct—all of which remain unrul ed upon at the time of this filing.

Any entry of decree, final ruling, or trial-based judgment prior to formal rulings on these motions constitutes a willful denial of due process under both the Texas Constitution and the 14th Amendment to the U.S. Constitution.

This reservation is hereby entered into the permanent record and incorporated by reference into all prior and future filings, without waiver.

"THE RIGHT TO DUE PROCESS WITHOUT ACCESS OR ENFORCEMENT IS AN ILLUSION OF JUSTICE—NOT JUSTICE ITSELF.

This notice also preserves Respondent's right to seek redress under 42 U.S.C. §1983 or there applicable remedies if fundamental rights violations are not corrected.



Trial May Not Proceed Until Outstanding Motions Are Ruled On

Trial WOULD CONSTITUTE A PROCEDURAL FAILURE IF COMMENCED PRIOR TO THE Court's ruling on all pending motions, including those relating to discovery violations, financial concealment, and procedural fraud. Proceeding without resolving these matters would not only violate due process but would also allow the foundation of trial to rest on un rebutted falsehoods and un resolved evidentiary conflicts.

Respondent respectfully requests that the Court confirm, on the record, that no trial setting or final ruling will occur until all outstanding motions have been fully adjudicated.

JASON MCKEMIE | jmckemie@mckemie.net
DB-24-18010 | (214) 868-4901

A handwritten signature in black ink that reads "Jason McKemie".