

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. DF-24-18010

IN THE MATTER OF	§	IN THE DISTRICT COURT
THE MARRIAGE OF	§	
	§	
GWENDOLYN ULIJASZ-MCKEMIE	§	<u>302nd</u> JUDICIAL DISTRICT
&	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

**JUDICIAL NOTICE OF UNRULED MOTIONS REQUIRING DETERMINATION
PRIOR TO ANY PRETRIAL HEARING, TRIAL, OR FINAL ORDERS**

TO THE HONORABLE JUDGE RAY WHELESS:

Appearing as Pro Se, Not by choice*, Respondent, **Jason McKemie, respectfully files this formal judicial notice to the Court to identify multiple accepted and un rebutted motions that remain pending on the docket. These filings raise material issues of procedural obstruction, financial misconduct, medical harm, and denial of due process.

Respondent asserts that **no trial setting, pretrial conference, or final ruling** may lawfully proceed until the Court has addressed the relief requested in these pending matters.

I. PENDING AND UNRESOLVED MOTIONS (ACCEPTED BY EFILETEXAS)

As of August 5, 2025, the following motions have been accepted by the Court but remain unresolved:

1. Emergency Motion to Preserve Evidence and Continue Trial Due to Procedural Sabotage (Filed July 16, 2025)
2. Motion for Sanctions Based on Financial Fraud and Procedural Misconduct (Filed July 16, 2025)
3. Emergency Motion for Immediate Relief, Objection to Trial, and Request for Acknowledgment (Filed July 24, 2025)
4. Emergency Motion for Temporary Financial Relief Due to Imminent Housing Loss, Medical Harm (Filed June 24, 2025)
5. Motion for Continuance of Trial (Filed July 9 and July 10, 2025)
6. Notice of Intent to Seek Disproportionate Division of Marital Estate (Filed July 17, 2025)
7. Motion to Preserve Discovery Rights and Compel Discovery Responses (Filed June 27, 2025)
8. Motion to Designate Pro Se Representation and Request for Equal Access (Filed April 24, 2025)
9. Emergency Notice of Counsel Misconduct and Request for Court Review (Filed July 17, 2025)

Respondent further notes that there are several additional outstanding issues and forthcoming motions currently being finalized, including arguments related to procedural concealment, discovery obstruction, and financial manipulation that have not yet been entered into this list. A supplemental list of these motions and unresolved matters will be submitted no later than the afternoon of Friday,

August 8, 2025, to preserve judicial continuity and ensure all pending relief requests are reviewed together.

Respondent reserves the right to supplement this list and to request individual hearings, where necessary, to resolve each motion on its merits.

II. WHY TRIAL IS PROCEDURALLY IMPOSSIBLE

Discovery never occurred. Although discovery requests were properly served, Petitioner's counsel (Sullivan & Cook) filed a motion to withdraw citing nonpayment, then disappeared during the discovery window. Respondent was looped into communications with William Cook, revealing that shadow counsel involvement continued throughout this period. Then, 15 minutes before the deadline, Sullivan & Cook reappeared, submitted blanket objections to nearly every question, and claimed discovery was closed just after midnight.

None of the discovery that forms the foundation of trial occurred. There has been no mutual inventory of property, no classification or exchange of assets and debts, no tracing of investment accounts, no disclosures of marital or separate property, no declarations of liabilities, and no joint valuation of household items, furnishings, or jointly held goods. There was no production of unredacted account records. This failure obstructs any lawful trial.

III. PROCEDURAL IDENTITY THEFT

Additionally, Petitioner fraudulently seized procedural status as "Petitioner" by intercepting Respondent's lawful attempt to file for divorce. On December 11, 2024, Respondent retained legal counsel and paid a retainer. Petitioner saw the charge, falsely reported it as fraud, and withheld reinstatement until her own attorneys were positioned to file a fabricated protective order—securing a first-filing advantage and constructing a false narrative as the foundation of this case.

Although the protective order was ultimately denied due to glaring inconsistencies and a complete lack of admissible evidence—aside from the aggravated perjury committed by Petitioner's sister, Pam Woodman—it nonetheless resulted in the issuance of a mutual restraining injunction and, more critically, the wrongful denial of spousal support and legal fees to Respondent.

The perjury, aggravated perjury, fraud, and gross financial misrepresentations presented at the January 7 hearing have never been corrected or purged from the record. We cannot lawfully or ethically proceed until they are.

IV. THE RECORD IS FACTUALLY BANKRUPT

The falsehoods entered into the record on January 7, 2025, created a procedurally fatal foundation for every ruling that followed:

1. Misrepresentation of a six-month fling instead of an actual marriage.
2. False claim that there was no commingling of assets or shared future.
3. Labeling Respondent as a deadbeat or leech.
4. Asserting Respondent was a non-contributor.
5. Alleging Respondent was abusive and spying on Petitioner.
6. Claiming the house was bugged with surveillance devices.
7. Testimony that Petitioner's sister confirmed the surveillance story.
8. Claim that Pam Woodman barely knew Respondent.
9. False claim that Petitioner was destitute.
10. Misrepresentation that she gave Respondent \$8,400 while financially strangling him.
11. Accusation that Respondent financially abused her — despite Petitioner taking \$422,000 of \$522,000 in income during the relevant period.
12. Claim that Petitioner lacked a functional car.
13. Story that she arrived at the hearing on a Greyhound bus, when she in fact stayed in a luxury hotel and called in false police reports.
14. Representation that she took out loans to make rent (which were actually used to fund VEIP).
15. Claim that she could afford only rent in San Antonio, while applying for the Dallas home simultaneously.
16. Omission that San Antonio rent was reimbursed by her employer.
17. Omission of multiple transactions proving liquidity and asset movement.
18. Failure to disclose her \$1.5M annual compensation plan, \$198K paycheck, \$32.5K monthly salary, \$92K in stock options, and six-figure reimbursements.
19. False claim that a surveillance device was found.
20. False claim that dozens of listening devices were discovered by off-duty officers.
21. Pam Woodman falsely identified which cameras were "new" without ever having entered the home.
22. False statements that Petitioner never received confidential exit settlements from AIG or Alliance Bernstein, and that she was not seeking one from Cognizant.

These lies directly led to the wrongful denial of spousal support and legal fees. The factual foundation of the January 7 record is bankrupt. Opposing counsel may resist revisiting the hearing based on procedural momentum, but they will not dispute these facts — because they cannot. The record is the inverse of reality.

IV. FOUNDATIONAL FRAUD: RETAINER SABOTAGE, COUNSEL OBSTRUCTION, AND PROCEDURAL ABUSE

The chain of irreparable harm began on December 11, 2024, when Respondent placed a **911 call** reporting that he did not feel safe and believed the civil and criminal justice systems were imminently at risk of being weaponized against him. He expressed specific concern that **false police reports and a fraudulent protective order** were about to be filed. The operator advised that no active criminal matter existed at the time and instructed Respondent to contact legal counsel. Respondent did so immediately — paying a legal retainer that same day. What followed in the hours, days, and months thereafter was a coordinated effort by Petitioner to sever Respondent's access to counsel, weaponize legal process, and entrench a false narrative to conceal her own misconduct.

1. On Dec. 12th, 2024, Petitioner Gwen Ulijasz-McKemie **saw a charge at a credit card charge at a family law practice**. She immediately texted and called Respondent, who confirmed the charges legitimacy. Despite this legitimacy, petitioner **reported Respondent's legal retainer**, a \$30k funds transfer for living expenses while recovering from surgery, and his rehabilitation equipment charges all **as fraud**. Severing him from counsel, and survival funds.
2. This act deliberately **severed Respondent's access to legal representation** during a critical procedural window, in direct violation of Respondent's **right to secure counsel and due course of law protections under the Texas Constitution**.
3. Despite Respondent's repeated pleas, Petitioner **deliberately delayed repayment** of the cancelled legal retainer until late Friday afternoon — fully aware that Respondent's attorneys would be unable to reengage until the following Monday. This delay was not incidental; it was a calculated maneuver designed to secure procedural advantage and **to file a protective order based on knowingly false allegations** while Respondent remained unrepresented.
4. This foundational act constitutes a knowing obstruction of legal defense, and **weaponized financial control to deny Respondent representation**, disrupt case parity, and irreparably alter the trajectory of litigation.
5. Everything Petitioner and her counsel have done since that sabotage **has been intended to keep Respondent separated from legal counsel**, including assigning housing debt solely to Respondent, fabricating destitution to evade spousal support and legal fee obligations, and manipulating financial disclosures.
6. Petitioner has **knowingly diverted substantial marital funds into a Voluntary Equity Investment Program (VEIP)**, an equity fund which bears penalty's for early withdrawals (prohibited by the standing and temporary orders) which yields an annual return over 50%.
7. These investments are **falsely classifying those contributions as "extra tax withholding" on her certified financial statements**. This is an egregious act of intentional misrepresentation, designed to conceal assets, evade responsibility, and further isolate Respondent financially.
8. These acts are not accidental. They represent a pattern of sustained financial and procedural abuse, Certified and Endorsed by Sullivan & Cook, who have approved and advanced these misrepresentations despite **clear evidence of fraud and obstruction**. Their complicity in this misconduct has directly contributed to ongoing harm, including medical danger and legal imbalance.
9. **Respondent further requests that this Court immediately stay or prohibit the disbursement of any additional marital funds to Sullivan & Cook, LLP, pending a formal ethics and procedural misconduct investigation into their role in concealing fraud, obstructing relief, and deliberately contributing to the denial of due process in this case.**
10. Prior to the January bench trial, Respondent intended to call Petitioner's ex-husband as a witness. This individual has publicly stated he was the victim of false allegations and a wrongful protective order by Petitioner. He was prepared to testify regarding Petitioner's pattern of using protective orders to silence her victims. However, the week before trial, Petitioner

obtained an extension of her protective order against him and inserted new language specifically barring him from discussing her with third parties. This act effectively silenced a key witness and prevented his testimony. **It constitutes direct witness tampering and represents irrefutable proof of the very behavior he intended to testify about.** By preemptively gagging a known victim-witness, Petitioner provided the Court with stronger proof than any live testimony could have produced.

V. SUPPRESSION OF EMERGENCY RELIEF AND JUDICIAL ACCESS

10. Since that filing, Respondent has made over **22 formal efforts to be heard by the Court on emergency relief**, spousal support, legal fees, and discovery misconduct.
 11. Each attempt was **either ignored, blocked by Sullivan & Cook's refusal to appear**, or procedurally undermined.
 12. As a result, **Respondent has been denied access to every form of emergency relief to which he is entitled under Texas law**, including spousal support, financial discovery, and protective judicial review.
 13. No judge has ruled on these motions, and **Respondent has never been granted an evidentiary hearing on any core issue in this divorce.**
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VII. ESCALATING MEDICAL HARM CAUSED BY DENIAL OF HSA ACCESS

14. **Respondent continues to be denied access to his HSA card for prescription medications, despite over 26 documented requests since December 18.**
15. The result has been permanent physical damage: untreated infections that left scars, interrupted tapering of medically dangerous medications, and visible skin lesions and **systemic effects due to denied antibiotics.**
16. Respondent has submitted **photographic evidence of these injuries.**
17. Respondent acknowledges that he made emotional mistakes in the relationship—mistakes he has taken ownership of repeatedly and worked to repair. However, those mistakes have been met not with accountability or boundary-setting, but with a prolonged campaign of psychological destabilization, financial sabotage, and direct harm.

Respondent believes—based on repeated lived experience—that Petitioner is not merely attempting to 'win' this case or inflict emotional pain. Her actions reflect a sustained, intentional pattern of behavior designed to destroy Respondent's ability to survive, to function, and, ultimately, to exist.

While Respondent does not make this allegation lightly, he respectfully asks the Court to examine Petitioner's conduct in this context:

- **Stripping Respondent of financial access during medical emergencies**
- **Revoking medications following hospitalization for life-threatening infection**
- **Cancelling access to legal counsel while stating she wanted to "support" him**
- **Isolating him from health insurance, housing, and representation**
- **Falsely weaponizing institutions to criminalize his behavior without cause**

These are not reactive or impulsive acts. They are deliberate. And they are meant to leave Respondent **not just silenced—but dismantled**.

18. **Make no mistake:** there is only one conclusion that can be drawn after nine months and over twenty-six separate refusals to provide a healthcare benefits card—despite protections afforded by the Standing and Temporary Orders. That conclusion is this:

Petitioner is deliberately trying to harm Respondent through resource starvation.

She has buried him in marital debt and severed his access to all marital assets. Through fraud, perjury, and aggravated perjury, she has had the entire burden of the marital residence placed squarely on Respondent's back—even though he is not, and has never been, a financially obligated party on the lease.

She left him two days after invasive spinal surgery and reported his legal retainer, living expenses, and rehabilitation equipment as "fraud." Twenty-six separate attempts have been made to secure something as basic as a healthcare benefits card so Respondent could access necessary antibiotics. This effort has been obstructed for **nine consecutive months**.

This is not oversight. This is not miscommunication.

This is deliberate, sustained sabotage.

Petitioner is not merely a threat to Respondent's health and safety—her actions pose **significant legal exposure for herself**. Respondent believes that because of the abandonment of her 6 psychiatric medications in August 2024, that she's incapable of considering the impact of such actions. These behaviors appear to be driven by narrative creation, identity, erasure, and psychological cruelty. They appear to be far more impulsive than logical.

They have been copied directly on photographic evidence of the harm Respondent sustained from a spreading staph infection—a direct consequence of this obstruction. And yet, they stood by their client and did nothing to intervene.

This is not a breakdown in procedure. It is a **breakdown of basic humanity**.

And where Petitioner may have a dianosis which makes empathy impossible, and humanity out of reach—**what's Sullivan & Cook's excuse?**

Every day that this obstruction continues, the damages increase — medically, financially, and legally.

VIII. AGGRAVATED PERJURY AND MANIPULATED PROTECTIVE ORDERS

19. At the January 7 hearing and other procedural checkpoints, Petitioner and her attorneys submitted false sworn testimony that has never been adjudicated despite direct video and documentary evidence to the contrary.
 20. These statements formed the foundation for rulings that denied Respondent legal fees, support, and representation.
 21. Until these acts of perjury and procedural fraud are addressed by the Court, no meaningful or lawful resolution of this divorce is possible.
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IX. REQUEST FOR HEARING AND RELIEF

22. Respondent requests a formal emergency hearing on the following issues:
 - a. Medical harm resulting from the obstruction of HSA access
 - b. Suppression of judicial access and emergency relief
 - c. Foundational perjury and retainer sabotage
 - d. Denial of evidentiary review for all pending fraud claims
 - e. Obstruction of Respondent's right to legal counsel
 - f. Witness tampering by Petitioner through procedural abuse of protective orders
23. Respondent requests that the Court levy sanctions against Petitioner and her legal representatives at Sullivan & Cook for coordinated fraud, obstruction, and procedural abuse.
24. Respondent further seeks retroactive spousal support and retroactive reimbursement of legal fees, as well as a legal fee equalization order sufficient to allow Respondent access to necessary expert services and professional support, including forensic accounting.
25. Respondent also demands immediate reimbursement of the \$50,000 loan from Respondent's father, which was obtained under financial duress directly caused by Petitioner's fraudulent

conduct. That repayment must be made as an early, court-ordered distribution from the marital estate to prevent the wrongful foreclosure of Respondent's parents' home.

26. Respondent further affirms that **no Final Decree of Divorce may be entered until these issues have been formally ruled upon**, and Respondent has been made whole through equitable, financial, and evidentiary relief.

X. DUE PROCESS IS DEAD WITHOUT LEGAL COUNSEL

Respondent is pro se not by choice. There can be no fair trial under current conditions. One party has a six-person legal team, a high-end risk mitigation firm, and unlimited resources—while the other was abandoned with \$107 just days after spinal surgery, bearing \$25,000/month in expenses for a house he does not own or lease. Respondent was not earning income at the time and has been financially strangled from legal representation ever since. Petitioner and her attorneys have denied access to healthcare, including prescription benefits, since December 18, 2024. More than 26 requests for HSA access have been ignored while Respondent's infection worsens.

This is not a fair or lawful environment for trial. It would be absurd to continue as if it were.

XI. REQUEST FOR CONFIRMATION

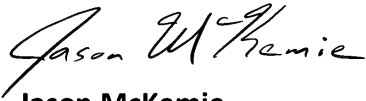
Respondent respectfully requests that the Court:

Respondent respectfully requests that the Court issue an order granting the following relief:

1. **Acknowledge and confirm** that all outstanding motions previously filed by Respondent—including, but not limited to, motions for sanctions, evidentiary review, financial fraud, and discovery violations—are currently pending and must be formally ruled upon prior to any trial setting or final judgment.
2. **Confirm and clarify** that no final orders, rulings, or trial settings will proceed until such time as these outstanding motions are addressed on the record, in accordance with Respondent's procedural and due process rights.
3. **Permit Respondent** to file supplemental notices of newly submitted motions, and to update the Court with a consolidated, numbered list of all pending filings as a living record—ensuring full judicial visibility and eliminating procedural ambiguity.
4. **Set a hearing** specifically to revisit the rulings issued on January 7, 2025, which Respondent asserts have irreparably compromised the fairness of these proceedings. Respondent alleges that these rulings were based on misrepresented financial documents, procedural fraud, and multiple counts of perjury and aggravated perjury. These rulings require formal correction and judicial review to preserve due process and ensure that the factual record reflects truth—not manufactured narrative.

Failure to address these filings before trial risks prejudicial harm and may result in voidable rulings.

Respectfully submitted,

A handwritten signature in black ink that reads "Jason McKemie". The signature is written in a cursive style with a large, stylized initial "J".

Jason McKemie

Pro Se Respondent

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RESPONDENT'S MISCLAIMER:

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 unresolved 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.

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REQUIRING DETERMINATION PRIOR TO ANY PRETRIAL HEARING,
TRIAL, OR FINAL ORDERS

Status as of 8/7/2025 8:11 AM CST

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