



NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA  
NO. **DF-24-18010**

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

**MOTION FOR DE NOVO DISTRICT JUDGE REVIEW OF PRIOR RULINGS**  
(UNDER TEXAS FAMILY CODE §201.015)  
AND  
**EMERGENCY APPLICATION FOR TEMPORARY RESTRAINING ORDER**  
(Ex Parte – Immediate and Irreparable Harm)

**FILED UNDER SEAL** FOR IN CAMERA REVIEW

**TO THE HONORABLE SANDRA JACKSON, DISTRICT JUDGE:**

Respondent **Jason McKemie** invokes the original jurisdiction of the District Court under **Texas Family Code §201.015**, which mandates that the District Judge shall hear this Motion for De Novo Review. This filing is **not** subject to associate judge referral. Respondent further applies for an **Emergency Temporary Restraining Order** (“TRO”) to prevent imminent dissipation of community assets **today**.

**I. PRIOR ASSOCIATE JUDGE RULINGS SUBMITTED FOR DE NOVO REVIEW**

Respondent submits the following prior rulings for mandatory District Judge review under Tex. Fam. Code §201.015:

**1. Ruling Permitting Counsel Withdrawal**

The associate judge permitted Petitioner’s counsel to withdraw despite (a) a direct on-the-record instruction issued by **Judge Sandra Jackson** on **September 9, 2025**, requiring Petitioner’s counsel to complete financial disclosures, and (b) Respondent’s warning that this withdrawal pattern had previously been used in the **254th District Court** to evade discovery deadlines. Immediately after withdrawing, counsel re-appeared for less than one hour solely to deny all discovery requests and then closed discovery—replicating the exact pattern Respondent warned would occur.

## 2. Rulings Denying Access to Emergency Funds Necessary for Survival

The associate judge denied Respondent's emergency filings seeking access to marital funds required to preserve Respondent's employment, vehicle, housing, and access to **HSA-funded medication**. These rulings left Respondent without medical access, housing stability, or legal representation.

## 3. Rulings Denying Reinstatement of Legitimate Marital Purchases Wrongfully Reported as Fraud

The associate judge denied Respondent's motions seeking reinstatement of legitimate marital transactions—including Respondent's legal retainer, survival funds, and medical equipment—despite Petitioner confirming their legitimacy and later reversing them to cut Respondent off from counsel and medication.

Respondent respectfully requests that the **District Judge set these matters for hearing** at the earliest date the Court permits.

## II. PRIOR NOTICE OF TODAY'S DEPOSIT IGNORED IN MULTIPLE EMERGENCY FILINGS

Respondent further notes that the community deposit scheduled for **today** has been repeatedly brought to the Court's attention through multiple filings—including the *Motion for Reinstatement of Wrongfully Reported & Withheld Marital Funds* and the *Directive Regarding Impending Bonus Payment*. Each filing warned of the impending deposit and the significant risk of dissipation. Each was denied or routed incorrectly without substantive review. The urgency of this filing is not of Respondent's making; it is the direct result of repeated non-hearings of these prior emergency warnings.

## III. PROCEDURAL IRREGULARITIES AND DENIAL OF EVIDENCE ACCESS

A hearing was scheduled for **October 27, 2025**. The day before that hearing, Respondent's laptop was accessed without authorization and multiple evidentiary files were deleted. When the hearing was reset for **October 31**, Respondent's laptop was compromised again the night before, resulting in loss of key exhibits.

At the October 31 hearing, Respondent was labeled a "recording threat" based on an **ex parte narrative** never raised in Respondent's presence and unsupported by any evidence. Respondent has **never** been reprimanded by any court for recording proceedings. No other participant was barred from using electronic devices. Respondent alone was prevented from accessing exhibits

stored on his mobile device, effectively eliminating his ability to present evidence on discovery, financial disclosures, and emergency relief.

This use of an unchallenged ex parte narrative to restrict Respondent's evidence access further supports the need for **immediate District Judge oversight** under §201.015.

#### IV. RULE 10 NO-CONTACT CONTRADICTIONS AND SAFETY CONCERNS

##### **False Safety Narrative, AirTag Evidence, and Pattern of Manufactured Allegations**

Petitioner previously sought a protective order alleging abuse, stalking, and safety risks; that application was denied as unfounded. Despite this, Petitioner has continued to claim fear—securing more than **\$24,000** in off-duty police escorts and asserting she was “living out of her car” to justify a second residence. In reality, the San Antonio property was a **planned employer-related rental**, openly discussed in advance and **100% reimbursed by her employer**, a fact Petitioner admitted at the January 7 hearing but did not disclose in any financial statements. This reflects a pattern of reframing ordinary circumstances as “safety measures” to support a victim narrative.

Petitioner and her counsel have rejected every attempt by Respondent to enter a neutral **Rule 10 No-Contact Order**, leaving Respondent unprotected. Counsel's recent withdrawal—an identical tactic previously used in the 254th District Court to evade discovery obligations—removes any procedural buffer. Respondent has repeatedly sought third-party-only communication because in-person contact has consistently resulted in manufactured allegations.

Petitioner asserted that Respondent tracked or stalked her and submitted **multiple AirTags** to law enforcement as supposed evidence. The **San Antonio Police Department Fusion Center subpoenaed Apple**, which confirmed that **every AirTag Petitioner provided** was registered to **Petitioner's iPhone and iCloud account**, and that Respondent has never had access to the tracking data. Additionally, prior filings show that **three AirTags were found on Respondent's person or property**, all registered to Petitioner's account. Petitioner has made **more than 19 police reports** alleging unlawful tracking, stalking, harassment, and breaking and entering—none of which were supported by investigative findings. Respondent was repeatedly interrogated and Mirandized based on these allegations, all of which were determined to lack merit. Law-enforcement personnel noted indicators of “*contrived distress*”, and the Fusion Center indicated Petitioner may require a referral for mental-health monitoring due to the volume of unsupported filings.

The record demonstrates that Petitioner's accusations are unfounded and that the **inverse** of her allegations is true: Respondent has been the subject of tracking behavior originating from Petitioner's devices. Petitioner also has a documented history of similar conduct toward prior partners, including a protective-order petition filed by her former husband—now part of this Court's record—alleging false police reports, fraudulent protective-order claims, and reputational

and professional harm, including loss of his children after unsupported allegations were made to child-welfare authorities.

Despite claiming fear, Petitioner has voluntarily approached Respondent and attempted to return to the marital residence, which Respondent has consistently denied to prevent further incidents. In her most recent request, Petitioner wrote: *“Let’s not make this complicated.”* Given the repeated false reports and denied protective order, any in-person contact is unsafe.

Petitioner previously instructed Respondent to “leave the cameras on” so he would “feel safe” and “see what was taken.” Respondent does not manually operate the cameras, which activate automatically by sound and motion. When preparing for her visit, Respondent requested only that Petitioner not enter his private office. Petitioner forcibly entered the locked office and positioned herself in front of a camera to accuse Respondent of “improperly recording” her—despite instructing him earlier to leave the cameras active. Each in-person interaction with Petitioner has resulted in new fabricated allegations and manufactured scenarios presented to law enforcement and the Court.

Respondent also has reason to believe Petitioner recently obtained access to a weapon. With counsel withdrawn and repeated false allegations on record, Respondent faces an immediate and substantial risk of further manufactured incidents. **Immediate no-contact restraints and District Judge oversight are required** to ensure Respondent’s safety and the integrity of these proceedings.

## V. PATTERN OF FALSE FILINGS ALREADY IN THE COURT RECORD

The Court’s record already contains the sworn protective-order petition filed by Petitioner’s former husband, documenting false reports, retaliatory accusations, and misuse of law enforcement. This long-standing pattern reinforces the immediate safety and procedural concerns presented here.

## VI. PATTERN OF RAPID DISSIPATION OF COMMUNITY ASSETS

Petitioner has repeatedly dissipated large community assets within days of receipt. In the months preceding her departure, more than **\$700,000** in salary, bonuses, reimbursements, and withdrawals were removed from community access while Petitioner simultaneously shifted community debts onto Respondent’s personal credit. At mediation, Petitioner’s own counsel acknowledged that the **first \$150,000 installment** of Petitioner’s sign-on bonus—paid in 2024—was community property of which Petitioner kept **100%**, and further stated that the **second installment** should be allocated entirely to Respondent to restore his share.

Petitioner also received a **Cognizant settlement**, which she represented as a tort recovery to avoid division. However, the underlying agreement—later reviewed—shows the payment was **compensation for work**, not tort damages. Her own financial disclosures list the settlement simply as “used to pay bills,” with no accounting of where the funds went. This settlement, like the prior bonuses, was dissipated in full without disclosure or allocation to Respondent.

This financial pattern was compounded by Petitioner’s false testimony at the January 7 hearing, which resulted in Petitioner retaining **100% of all community assets**, while Respondent—recovering from spinal surgery and unemployed at the time—was burdened with **100% of the community debts** and a \$25,000-per-month financial obligation he never agreed to and could not meet.

A substantial community deposit is being paid **today**. Given Petitioner’s demonstrated history of immediate dissipation of bonuses and settlement proceeds, and the lack of any accounting for prior community assets, there is a substantial and immediate risk that today’s deposit will likewise be removed before Respondent can complete briefing following emergency medical evaluation. Immediate restraints are necessary to preserve the estate.

## **VII. RELIEF REQUESTED**

### **A. De Novo Hearing on Prior Rulings**

Respondent respectfully requests that the District Judge set a **De Novo hearing** under Tex. Fam. Code §201.015 on the rulings identified above.

### **B. Immediate Temporary Restraining Order (No Hearing Required)**

Respondent applies for an **Emergency Temporary Restraining Order**, effective immediately upon signing, restraining Petitioner from:

- Transferring, withdrawing, spending, dissipating, concealing, or disposing of **any funds** in any account in her name or under her control, including the second \$150,000 installment of Petitioner’s sign-on bonus, which Petitioner’s prior counsel acknowledged in mediation should be allocated entirely to Respondent after Petitioner retained 100% of the first installment paid in 2024.
- Making any transfers, withdrawals, payments, or expenditures **exceeding \$100**, except for ordinary food and basic personal necessities.

Respondent requests that this TRO remain in effect until the Court reviews the De Novo matters and Respondent is medically able to file the full consolidated motion.

**Respectfully submitted,**

**Jason McKemie**

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**Date:** November 21, 2025

**Signature:** \_\_\_\_\_

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