

DF-24-18010

FILED

NO.

NOTICE:

CONTAINS SENSITIVE DATA

IN THE MATTER OF  
THE MARRIAGE OF

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2025 FEB 24 AM 9:00 IN THE DISTRICT COURT

GWENDOLYN ULIJASZ-MCKEMIE  
&  
JASON MCKEMIE

FELICIA PITRE  
DISTRICT CLERK  
DALLAS CO., TEXAS  
302 DEPT  
JUDICIAL DISTRICT  
DALLAS COUNTY, TEXAS  
FERNANDO GOMEZ DEPUTY

**VERIFIED MOTION TO RECUSE**  
(CONDITIONAL UPON DENIAL OF A STRUCTURAL CURE)

TO THE HONORABLE JUDGE OF SAID COURT:

Respondent, **Jason McKemie**, files this *Verified Motion to Recuse* not as an opening position, but only as a procedural safeguard.

Respondent does not seek recusal if the structural defects presently before this Court are acknowledged and cured. Respondent seeks only the minimum procedural relief necessary to make a fair trial legally possible:

- A continuance sufficient to allow meaningful review;
- Leave for narrowly tailored **third-party subpoena authority for certified, institution-origin financial records;**
- Leave to subpoena the **Accenture QLE submission and audit trail;**
- Leave to subpoena the **lease buyout contract and related landlord ledger;**
- Enforcement of the **Court's December 17 Reinstatement of Healthcare Order** which orders the reactivation of all of Respondent's benefits which were terminated on **October 31st, 2026**, through the submission of a false Qualifying Life Event (QLE) and a sworn attestation affirming that divorce proceedings had been finalized and that a divorce decree had been signed by a Judge of this Court. **No such decree exists.**
- **This order, if enforced by the District Judge, will provide Respondent with access back to critically needed Healthcare services & Prescription's which have been continually obstructed since December, 18, 2024.** This enforcement additionally reimburses Respondent for the lost Flexible Spending Account Benefits; and the allocated Health Spending Account funds; and removes Petitioner's control over benefits enrollment, card cancellations, and/or delays. This will permit Respondent to (1) resume the critically needed medications he has been obstructed from since December 18, 2024; (2) gain access to the needed MRI's so that he can reschedule the missed surgery from December 2025; and (3) will significant diminish Petitioner's ability to delay and obstruct Respondent's access to care and prescriptions; as the lump sum sill cover deductibles sufficient to proceed with surgical care.

If those structural defects are remedied through written rulings and enforceable compliance mechanisms, Respondent will proceed.

If they are not remedied, then there exists no procedural pathway to a fair adjudication, and recusal becomes mandatory to preserve due process.

This Motion is therefore filed in advance of the hearing to preserve Respondent's rights should the Court decline to cure the structural failures outlined below.

## **I. PRIOR RECUSAL & STRUCTURAL DISCOVERY COLLAPSE IN DISTRICT 254**

This case arrived in District 302 after a judicial recusal in District 254 precipitated by structural discovery failure.

In District 254:

- Respondent served discovery in good faith.
- Petitioner's legal team withdrew during the discovery period citing financial difficulty.
- Petitioner did not declare herself pro se.
- With approximately forty minutes remaining in discovery, counsel reappeared at 11:08 p.m., filed blanket objections to nearly every request, and declared discovery closed approximately one hour later.

Despite Respondent's Protests:

- Trial was forced despite discovery being completely skipped.
- Respondent was denied meaningful enforcement.
- Recusal followed.

These facts are reflected in the discovery-collapse submission .

## **II. SEPTEMBER 8 PRETRIAL CONFERENCE – DISTRICT 302**

At the September 8 pretrial conference, Respondent advised Judge Jackson that this case did not resemble a routine divorce matter and that meaningful discovery had never occurred in District 254.

Respondent explained that in District 254:

- He served discovery in good faith;
- Petitioner’s counsel moved to withdraw citing financial hardship;
- Petitioner did not formally proceed pro se, creating service ambiguity;
- With less than one hour remaining in the discovery period, counsel reappeared at 11:08 p.m., filed a notice of appearance, and simultaneously lodged blanket objections to nearly every discovery request;
- Approximately one hour later, discovery was declared closed;
- Trial proceeded despite unresolved discovery disputes and without complete financial disclosure.

Respondent further advised Judge Jackson that there could be no fair trial absent:

1. Third-party subpoena authority;
2. Institution-origin certified financial statements;
3. A neutral forensic accountant to reconstruct the estate.

Judge Jackson stated she could not grant subpoena authority at that procedural setting but assured Respondent that he would have ninety (90) days with certified financials to prepare. When Respondent expressed concern that prior counsel had obstructed discovery in District 254, Judge Jackson replied, “That was not my courtroom,” and directed Ethan Scroggins to release the certified financials. Counsel agreed.

Respondent relied upon that representation.

### **III. ON OCTOBER 31, 2026, RESPONDENT APPEARED BEFORE ASSOCIATE JUDGE TAMIKA ABENDROTH SEEKING REIMBURSEMENT FOR FINANCIAL BURDENS IMPOSED THROUGH FALSE FINANCIAL REPRESENTATIONS AND RELATED PROCEEDINGS.**

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At that hearing, Respondent informed the Court that Petitioner had produced less than fifteen percent of the necessary certified financial documentation. Respondent further stated that if he filed a Motion to Compel, Petitioner’s counsel would again move to withdraw, and that if withdrawal were permitted prior to compliance, discovery would collapse once more.

The following business day, Respondent filed his Motion to Compel. Petitioner’s legal team filed a Motion to Withdraw. Respondent objected, arguing that:

- The District Judge had already directed release of certified financials;

- Oral directives are binding;
- Withdrawal prior to compliance would nullify enforcement;
- There was no path to a fair trial without third-party custodian subpoena authority;
- Statement-only production cannot reconstruct accounts involving layered transfers and rotating credit facilities;
- A neutral forensic tracing mechanism remained necessary.

The Associate Judge permitted withdrawal. No complete certified financial production followed.

### **III. WHAT OCCURRED AFTER THE NINETY-DAY ASSURANCE**

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What followed was not compliance with a directive for complete, certified financials.

Instead, the production record reflects:

- Monthly statements missing transaction-detail pages (see Exhibit A deficiency chart);
- Editable CSV or activity exports substituted for institution-issued monthly statements;
- Duplicate documents containing identical transactions labeled as separate months;
- Promised “substantive responses” followed by recycled Bates productions;
- Production delivered in inaccessible format;
- Counsel withdrawal immediately after filing of the Motion to Compel;
- No uninterrupted sequence of institution-origin monthly statements sufficient for tracing.

These deficiencies are not isolated clerical errors. They are structural defects that prevent meaningful estate reconstruction.

### **IV. PRESENT STRUCTURAL IMPOSSIBILITY**

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The estate cannot be evaluated because:

- There is no uninterrupted monthly sequence for any account;
- Institution-origin statements have not been produced;

- Accounts have been rotated, renamed, and layered;
- Funds conceded in mediation were not escrowed;
- Healthcare enforcement remains incomplete;
- An active bankruptcy stay exists under Trustee oversight.

**These facts are extensively documented and;**

**Proceeding to trial under these conditions would:**

- Convert discovery collapse into adjudication;
- Freeze dissipation into final division;
- Render third-party verification impossible;
- Permanently impair Respondent's ability to challenge false or incomplete production.

## **V. CONDITIONAL NATURE OF THIS MOTION**

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Respondent does not seek recusal if:

1. The Court grants limited third-party subpoena rights;
2. The Court enforces its December 17 healthcare order through verified plan-administrator confirmation or escrow replacement;
3. The Court sets a sanctions/compliance hearing prior to trial;
4. The Court enters written rulings clarifying compliance.

If those actions occur, Respondent will proceed.

If they do not, Respondent has no procedural remedy remaining within this Court, and recusal becomes necessary to preserve due process and appellate review.

## **VI. VERIFIED UNSWORN DECLARATION (TEX. CIV. PRAC. & REM. CODE § 132.001)**

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My name is Jason McKemie. My date of birth is **April 8th, 1976**. My address is **539 W. Commerce St., Suite 2010, Dallas, Texas 75208**. I declare under penalty of perjury that the factual statements in this Motion are true and correct based on my personal knowledge and review of the documents referenced herein.

Executed in **Dallas County, Texas** on **February 24, 2026**.



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**Jason McKemie**  
539 W. Commerce St., Suite 2010  
Dallas, TX 75208  
214-868-4901  
[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

### **CERTIFICATE OF SERVICE**

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I certify that a true and correct copy of this Motion and proposed order were served on all counsel of record and/or parties entitled to notice in accordance with the Texas Rules of Civil Procedure and applicable e-service rules on the date of filing.



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Jason McKemie

## **EXHIBIT LIST (TO BE ATTACHED)**

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- Exhibit A: Respondent/Movant Pleadings Index by Category (100 filings / 1,110 pages).
- Exhibit B: Motion to Compel with Color Production Grid
- Exhibit D: Credit Card Over Payment
- Exhibit E: Signed Order to Reinstate Healthcare
- Exhibit F: Motion to Compel Docket Sheet
- Exhibit G: Benefits Summary generated February 2, 2026, reflecting multiple coverages waived.
- Exhibit H: Motion to Obtain Certified Transcript of January 7, 2025 Hearing (with proposed order).
- Exhibit I: Motion to Establish Conditions for Re-Entry of Counsel and Preserve Fair Trial.
- Exhibit K: Unified Proposed Order drafted at the Associate Judge's direction following the February 5 compliance hearing (pending).

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**RESPONDENT'S HISTORICAL PLEADINGS REQUESTING MEDICAL STABILIZATION, HOUSING STABILITY, ENFORCEABLE RELIEF, AND THIRD-PARTY VERIFICATION**

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Category	Count	Pages
1. Affidavits / Declarations / Character-type statements	7	135
2. Motions (all)	61	807
3. Motions seeking to "compel"	7	50
4. Healthcare / Medical / HSA / Abatement or Stay / Standing or Temporary Orders	41	507
5. Financial relief / reimbursements / fraud / rent / stabilization / Standing or Temporary Orders	39	354
6. Discovery obstruction / compel / subpoenas / enforcement	24	199
7. Due process / record / ex parte / court reporter / verbatim record / procedural fairness	43	516
8. Eviction / housing stability	10	108

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**1. AFFIDAVITS / DECLARATIONS / CHARACTER REFERENCES**

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**2025**

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- **07/10/2025** (Entry 81) — **43 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – DECLARATION OF CHRISTINA SEGURA IN SUPPORT OF JASON MCKEMIE
- **07/11/2025** (Entry 83) — **66 pages** — REQUEST FOR EMERGENCY HEARING TO PREVENT EVICTION DURING MEDICAL HARDSHIP WITH DECLARATION AND WITNESS STATEMENTS REQUEST FOR ER HEARING TO PREVENT EVICTION DURING MED. HARDSHIP WITH DECLARATION AND STATEMENTS
- **07/24/2025** (Entry 99) — **5 pages** — DECLARATION OF RESPONDENT'S DISASSOCIATION FROM BINDER INTRODUCED BY PETITIONER'S COUNSEL

- **07/24/2025** (Entry 96) — **3 pages** — ERRONEOUS PUBLIC FILING AND EMERGENCY MOTION TO SEAL PREVIOUSLY SUBMITTED DECLARATION
- **11/25/2025** (Entry 134) — **6 pages** — NOTICE OF FILING OF SWORN AFFIDAVIT - CORRECTING FALSE RECORDING ALLEGATIONS AND EX PARTE PREJUDICE

## **2026**

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- **01/12/2026** (Entry 176) — **8 pages** — AFFIDAVIT ON PUBLIC STORAGE THEFT ACCUSATIONS AND PETITIONERS ACQUISITION OF WEAPON DURING PROCEEDINGS AFFIDAVIT ON PUBLIC STORAGE THEFT ACCUSATIONS AND PETITIONERS ACQUISITION OF WEAPON DURING PROCEEDIN
- **01/12/2026** (Entry 166) — **4 pages** — AFFIDAVIT ON MANUFACTURED ALLEGATIONS & CONCERN FOR PROPERTY RETRIEVAL / CLEAN OUT AFFIDAVIT - MANUFACTURED ALLEGATIONS

## **2. Motions (all Respondent motions & motion-like applications)**

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### **2025**

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- **03/14/2025** (Entry 48) — **4 pages** — MOTION - AGREED - WITHDRAW ATTORNEY - BRANT WEBB
- **03/28/2025** (Entry 51) — **2 pages** — NOTICE OF FAILED MEDIATION AND MOTION FOR CONTINUANCE OF APRIL 7th, 2025, PRE-TRIAL HEARING MOTION FOR CONTINUANCE-NOTICE OF FAILED MEDIATION AND OF APRIL 7th, 2025, PRE-TRIAL HEARING
- **04/14/2025** (Entry 55) — **5 pages** — MOTION TO STRIKE IMPROPER EXPERT DESIGNATIONS AND TO LIMIT TESTIMONY OF OPPOSING COUNSEL
- **04/24/2025** (Entry 56) — **1 page** — MOTION FOR NOTICE PRIOR TO ANY DISMISSAL PROPOSED ORDER ON MOTION FOR NOTICE PRIOR TO ANY DISMISSAL
- **04/24/2025** (Entry 60) — **3 pages** — MOTION TO DESIGNATE PRO SE REPRESENTATION AND REQUEST FOR EQUAL ACCESS
- **04/24/2025** (Entry 57) — **4 pages** — MOTION FOR NOTICE PRIOR TO ANY DISMISSAL NOTICE PRIOR TO ANY DISMISSAL
- **04/24/2025** (Entry 58) — **1 page** — ORDER ON MOTION TO DESIGNATE PRO SE REPRESENTATION AND REQUEST FOR EQUAL ACCESS PROPOSED ORDER ON MOTION TO DESIGNATE PRO SE REPRESENTATION AND REQUEST FOR EQUAL ACCESS
- **04/24/2025** (Entry 59) — **1 page** — MOTION TO DESIGNATE PRO SE REPRESENTATION AND REQUEST FOR EQUAL ACCESS PROPOSED ORDER ON MOTION TO DESIGNATE PRO SE REPRESENTATION AND REQUEST FOR EQUAL ACCESS

- **06/24/2025** (Entry 66) — **8 pages** — EMERGENCY MOTION FOR TEMPORARY FINANCIAL RELIEF DUE TO IMMINENT HOUSING LOSS, MEDICAL HARDSHIP EMERGENCY M/FINANCIL
- **06/27/2025** (Entry 67) — **4 pages** — MOTION TO PRESERVE DISCOVERY RIGHTS AND COMPEL DISCOVERY RESPONSES MOTION TO PRESERVE DISCOVERY RIGHTS AND COMPELL DISCOVERY RESPONSES
- **06/27/2025** (Entry 69) — **5 pages** — OBJECT IN MATERIAL DISCOVERY NOTICE OF MATERIAL DISCOVERY NOTICE OF MATERIAL DISCOVERY
- **07/10/2025** (Entry 70) — **1 page** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – ESERVED COPY OF ORDER DENYING JASON MCKEMIE'S RELIEF
- **07/10/2025** (Entry 79) — **26 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – FINANCIAL RELIEF, CONTINUANCE, ENFORCEMENT OF STANDING ORDERS
- **07/10/2025** (Entry 80) — **149 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – EVIDENCE AND EXHIBITS
- **07/10/2025** (Entry 71) — **2 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – ESERVE COVER LETTER (ORDER DENYING JASON MCKEMIE'S RELIEF)
- **07/10/2025** (Entry 76) — **1 page** — ORDER TO ENFORCE STANDING ORDERS AND PREVENT LITIGATION INTERFERENCE PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 77) — **1 page** — ORDER GRANTING EMERGENCY MOTION TO STAY EXECUTION OF WRIT OF POSSESSION PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 78) — **1 page** — FINDING OF FACT AND FRAUD UPON THE COURT PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 75) — **2 pages** — ORDER TO PREVENT ANY FURTHER OBSTRUCTION AND TO COMPEL ACCESS TO HSA CARD/ FUNDS PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 81) — **43 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – DECLARATION OF CHRISTINA SEGURA IN SUPPORT OF JASON MCKEMIE
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- **07/16/2025** (Entry 84) — **4 pages** — ORDER GRANTING M/SANCTION AND REFERRAL PROPOSED MOTION SANCTION FOR AGGRAVATED PERJURY AND FRAUD UPON THE COURT
- **07/16/2025** (Entry 86) — **75 pages** — EMERGENCY M/PRESERVE EVIDENCE AND CONTINUE TRIAL DUE TO PROCEDURAL SABOTAGE AND BREAKDOWN IN JUDICIAL OVERSIGHT
- **07/16/2025** (Entry 87) — **4 pages** — TO SEEK DISPROPORTIONATE DIVISION OF MARITAL ESTATE NOTICE OF INTENT SEEK DISPROPORTIONATE DIVISION OF
- **07/17/2025** (Entry 85) — **5 pages** — ORDER GRANTING M/SANCTIONS AND REFERRAL PROPOSED MOTION SANCTION FOR AGGRAVATED PERJURY AND FRAUD UPON THE OCURT AGAINST
- **07/17/2025** (Entry 88) — **2 pages** — EMERGENCY NOTICE OF COUNSEL MISCONDUCT, PRIOR COMMUNICATIONS, AND DEMAND FOR IMMEDIATE COURT ACTION
- **07/24/2025** (Entry 91) — **8 pages** — RESPONDENT VERIFIED M/RECUSE
- **07/24/2025** (Entry 97) — **1 page** — RESPONDENT'S EMERGENCY MOTION FOR CONTINUANCE PROPOSED ORDER/JUDGMENT
- **07/24/2025** (Entry 96) — **3 pages** — ERRONEOUS PUBLIC FILING AND EMERGENCY MOTION TO SEAL PREVIOUSLY SUBMITTED DECLARATION
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- **07/24/2025** (Entry 100) — **11 pages** — EMERGENCY MOTION FOR IMMEDIATE RELIEF, OBJECTION TO TRIAL, AND REQUEST FOR ACKNOWLEDGEMENT
- **07/30/2025** (Entry 103) — **5 pages** — COVER PAGE OBJECTION INVENTORY PROCEDURAL NOTIFICATION 1801(b) COVER PAGE OBJECTION INVENTORY PROCEDURAL NOTIFICATION
- **08/06/2025** (Entry 104) — **7 pages** — EMERGENCY MOTION TO ABATE TRIAL SETTING AND WITHHOLD FINAL ORDERS PENDING RESOLUTION OF OUTSTANDING MOTIONS, PROCEDURAL VIOLATIONS, AND DISCOVERY COLLAPSE
- **08/07/2025** (Entry 105) — **11 pages** — JUDICIAL NOTICE OF UNRULED MOTIONS REQUIRING DETERMINATION PRIOR TO ANY PRETRIAL HEARING, TRIAL, OR FINAL JUDICIAL NOTICE OF UNRULED MOTIONS
- **10/02/2025** (Entry 119) — **6 pages** — MOTION FOR REINSTATEMENT OF WRONGFULLY REPORTED AND WITHHELD MARITAL FUNDS
- **10/02/2025** (Entry 120) — **6 pages** — WAITING FOR \$80.00- REQUEST
- **10/02/2025** (Entry 121) — **6 pages** — MOTION TO OBTAIN CERTIFIED TRANSCRIPT FOR JANUARY 7, 2025, HEARING AND REQUEST FOR PAYMENT FROM

- **10/31/2025** (Entry 124) — **1 page** — JASON MCKEMUE'S RELIEF ORDER - DENYING JASON MCKEMIE'S RELIEF
- **11/04/2025** (Entry 125) — **8 pages** — EMERGENCY OBJECTION TO MOTION TO WITHDRAW AS COUNSEL AND REQUEST FOR EXPEDITED HEARING (INCLUDES
- **11/10/2025** (Entry 130) — **4 pages** — EMERGENCY M/ VACATE SETTING BEFORE ASSOCIATE JUDGE AND RESET ENFORCE EMERGENCY MOTION TO VACATE
- **11/21/2025** (Entry 133) — **6 pages** — MOTION FOR DE NOVO DISTRICT JUDGE REVIEW OF PRIOR RULINGS AND EMERGENCY APPLICATION FOR TEMPORARY RESTRAINING ORDER MOTION - MISCELLANEOUS
- **12/12/2025** (Entry 136) — **25 pages** — EMERGENCY MOTION FILING SEEKING IMMEDIATE RELIEF REQUIRING MEDICAL ACCESS
- **12/19/2025** (Entry 143) — **26 pages** — MOTION TO COMPEL (ENVELOPE #109297794 DOC001)
- **12/19/2025** (Entry 145) — **18 pages** — EMERGENCY ENFORCEMENT ORDER FOR MEDICAL PRESERVATION ORDER - MISC.
- **12/23/2025** (Entry 146) — **2 pages** — TEMPORARY RESTRAINING ORDER PROPOSED ORDER/JUDGMENT
- **12/23/2025** (Entry 148) — **2 pages** — TEMPORARY RESTRAINING ORDER HEALTHCARE REINSTATEMENT & CONTINUITY PROPOSED ORDER/JUDGMENT
- **12/23/2025** (Entry 150) — **3 pages** — TO ISSUE SUBPOENA REGARDING LEASE BUYOUT AND ASSOCIATED PAYMENTS MOTION - LEAVE
- **12/23/2025** (Entry 151) — **181 pages** — MOTION - SEALED SUBMISSION FOR IN CAMERA REVIEW ONLY (CONFIDENTIAL) MOTION SEAL SUBMISSION FOR CAMERA REVIEW
- **12/29/2025** (Entry 152) — **13 pages** — SUPPLEMENTAL SUBMISSION IN SUPPORT OF MOTION TO COMPEL (REQUEST FOR CUSTODIAN CONTINUITY RECORDS / SUBPOENA LEAVE) SUPPLEMENTAL SUBMISSION IN SUPPORT OF MOTION TO COMPEL

## **2026**

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- **01/12/2026** (Entry 164) — **6 pages** — EMERGENCY MOTION ON MEDICAL HARM
- **01/12/2026** (Entry 175) — **7 pages** — EMERGENCY MOTION TO STAY EVICTION PROCEEDINGS
- **01/12/2026** (Entry 173) — **10 pages** — EMERGENCY MOTION TO TEMPORARY STAY OR IN THE ALTERNATIVE, IMPOSE PROTECTIVE CONDITIONS ON COURT-AUTHORIZED PROPERTY RETRIEVAL DUE TO MEDICAL INCAPACITY
- **01/12/2026** (Entry 180) — **11 pages** — MOTION TO ABATE TRIAL, ENFORCE DISCOVERY ORDERS AND HEALTHCARE REINSTATEMENT

- **01/15/2026** (Entry 182) — **4 pages** — RESPONDENT'S MOTION TO ESTABLISH CONDITIONS FOR RE-ENTRY OF COUNSEL AND TO PRESERVE FAIR TRIAL
- **01/26/2026** (Entry 185) — **5 pages** — NOTICE OF PRESERVATION OF WITNESSES, & LARGE DISCOVERY PRODUCTION IN FINAL HOUR NOTICE OF PRESERVATION OF WITNESSES, & LARGE DISCOVERY PRODUCTION IN FINAL HOUR

### **3. Motions seeking to "compel" something**

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#### **2025**

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- **06/27/2025** (Entry 67) — **4 pages** — MOTION TO PRESERVE DISCOVERY RIGHTS AND COMPEL DISCOVERY RESPONSES MOTION TO PRESERVE DISCOVERY RIGHTS AND COMPELL DISCOVERY RESPONSES
- **07/10/2025** (Entry 75) — **2 pages** — ORDER TO PREVENT ANY FURTHER OBSTRUCTION AND TO COMPEL ACCESS TO HSA CARD/ FUNDS PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 72) — **1 page** — ORDER ON MOTION TO COMPELL DISCOVERY AND REQUEST FOR SANCTIONS PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 73) — **1 page** — ORDER ON MOTION TO COMPEL DISCOVERY AND REQUEST FOR SANCTIONS PROPOSED ORDER/JUDGMENT
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#### **2026**

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- **01/08/2026** (Entry 159) — **4 pages** — ORDER ON MOTION TO COMPEL PROPOSED ORDER ON MOTION TO COMPEL

### **4. Healthcare / medical / HSA / abatement or stay to stabilize / standing or temporary orders**

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#### **2024**

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- **12/27/2024** (Entry 24) — **3 pages** — REQUEST FOR TEMPORARY ORDERS NOTICE OF COURT PROCEEDING - REQUEST FOR TEMPORARY ORDERS

## **2025**

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- **06/24/2025** (Entry 66) — **8 pages** — EMERGENCY MOTION FOR TEMPORARY FINANCIAL RELIEF DUE TO IMMINENT HOUSING LOSS, MEDICAL HARDSHIP EMERGENCY M/FINANCIL
- **07/10/2025** (Entry 70) — **1 page** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – ESERVED COPY OF ORDER DENYING JASON MCKEMIE'S RELIEF
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- **08/06/2025** (Entry 104) — **7 pages** — EMERGENCY MOTION TO ABATE TRIAL SETTING AND WITHHOLD FINAL ORDERS PENDING RESOLUTION OF OUTSTANDING MOTIONS, PROCEDURAL VIOLATIONS, AND DISCOVERY COLLAPSE
- **11/21/2025** (Entry 132) — **2 pages** — ORDER FOR DE NOVO REVIEW AND TRO PROPOSED ORDER/JUDGMENT
- **11/21/2025** (Entry 133) — **6 pages** — MOTION FOR DE NOVO DISTRICT JUDGE REVIEW OF PRIOR RULINGS AND EMERGENCY APPLICATION FOR TEMPORARY RESTRAINING ORDER MOTION - MISCELLANEOUS
- **11/25/2025** (Entry 134) — **6 pages** — NOTICE OF FILING OF SWORN AFFIDAVIT - CORRECTING FALSE RECORDING ALLEGATIONS AND EX PARTE PREJUDICE
- **12/12/2025** (Entry 136) — **25 pages** — EMERGENCY MOTION FILING SEEKING IMMEDIATE RELIEF REQUIRING MEDICAL ACCESS
- **12/15/2025** (Entry 137) — **2 pages** — NOTICE OF SERVICE - MOTION FOR THE REINSTATEMENT OF HEALTHCARE - CERT MAIL
- **12/17/2025** (Entry 138) — **3 pages** — ORDER ON EMERGENCY REINSTATEMENT OF HEALTHCARE PROPOSED ORDER/JUDGMENT
- **12/19/2025** (Entry 141) — **2 pages** — NOTICE OF NONCOMPLIANCE WITH 24-HOUR HEALTHCARE REINSTATEMENT ORDER
- **12/19/2025** (Entry 145) — **18 pages** — EMERGENCY ENFORCEMENT ORDER FOR MEDICAL PRESERVATION ORDER - MISC.
- **12/19/2025** (Entry 140) — **4 pages** — NOTICE REGARDING OF HEALTH COVERAGE, QUALIFYING LIFE EVENT AND REQUEST FOR LEAVE TO ISSUE SUBPOENA TO EMPLOYER HR NOTICE REGARDING OF HEALTH COVERAGE, QUALIFYING LIFE EVENT AND REQUEST FOR LEAVE TO ISSUE SUBPOENA
- **12/22/2025** (Entry 147) — **2 pages** — TEMPORARY RESTRAINING ORDER PROPOSED ORDER/JUDGMENT
- **12/23/2025** (Entry 148) — **2 pages** — TEMPORARY RESTRAINING ORDER HEALTHCARE REINSTATEMENT & CONTINUITY PROPOSED ORDER/JUDGMENT
- **12/23/2025** (Entry 149) — **2 pages** — ORDER GRANTING LEAVE TO SERVE SUBPOENAS PROPOSED ORDER GRANTING LEAVE TO SERVE SUBPOENAS
- **12/23/2025** (Entry 150) — **3 pages** — TO ISSUE SUBPOENA REGARDING LEASE BUYOUT AND ASSOCIATED PAYMENTS MOTION - LEAVE
- **12/23/2025** (Entry 151) — **181 pages** — MOTION - SEALED SUBMISSION FOR IN CAMERA REVIEW ONLY (CONFIDENTIAL) MOTION SEAL SUBMISSION FOR CAMERA REVIEW
- **12/29/2025** (Entry 152) — **13 pages** — SUPPLEMENTAL SUBMISSION IN SUPPORT OF MOTION TO COMPEL (REQUEST FOR CUSTODIAN CONTINUITY RECORDS / SUBPOENA LEAVE) SUPPLEMENTAL SUBMISSION IN SUPPORT OF MOTION TO COMPEL

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VERIFIED MOTION TO RECUSE

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- **01/02/2026** (Entry 154) — **10 pages** — NOTICE REGARDING ORDER FOR HEALTHCARE REINSTATEMENT AND IMMINENT ESCALATION DUE TO MEDICAL NECESSITY AND NON-COMPLIANCE NOTICE REGARDING ORDER FOR HEALTHCARE REINSTATEMENT AND IMMINENT ESCALATION DUE TO MEDICAL NECESSITY
- **01/08/2026** (Entry 161) — **3 pages** — ORDER ON MOTION TO COMPEL PROPOSED ORDER/JUDGMENT
- **01/08/2026** (Entry 160) — **2 pages** — ORDER ON EMERGENCY TRO PROPOSED ORDER/JUDGMENT
- **01/12/2026** (Entry 176) — **8 pages** — AFFIDAVIT ON PUBLIC STORAGE THEFT ACCUSATIONS AND PETITIONERS ACQUISITION OF WEAPON DURING PROCEEDINGS AFFIDAVIT ON PUBLIC STORAGE THEFT ACCUSATIONS AND PETITIONERS ACQUISITION OF WEAPON DURING PROCEEDIN
- **01/12/2026** (Entry 175) — **7 pages** — EMERGENCY MOTION TO STAY EVICTION PROCEEDINGS
- **01/12/2026** (Entry 174) — **3 pages** — PROPOSED ORDER ON EMERGENCY MOTION TO STAY EVICTION PROCEEDINGS
- **01/12/2026** (Entry 173) — **10 pages** — EMERGENCY MOTION TO TEMORARY STAY OR IN THE ALTERNATIVE, IMPOSE PROTECTIVE CONDITIONS ON COURT-AUTHORIZED PROPERTY RETRIEVAL DUE TO MEDICAL INCAPACITY
- **01/12/2026** (Entry 172) — **5 pages** — PROPOSED ORDER ON EMERGENCY MOTION TO TEMPORARILY STAY OR, IN THE ALTERNATIVE, IMPOSE PROTECTIVE CONDITIONS ON COURT-AUTHORIZED PROPERTY RETRIEVAL DUE TO MEDICAL INCAPACITY
- **01/12/2026** (Entry 170) — **4 pages** — ORDER ON EMERGENCY TRO PROPOSED ORDER FOR EMERGENCY TRO
- **01/12/2026** (Entry 169) — **5 pages** — ORDER ON EMERGENCY MOTION FOR MEDICAL PRESERVATION, INTERIM MAKE-WHOLE RELIEF, JUDICIAL FINDINGS MISREPRESENTATION/IMPOSSIBILITY, CONDITIONAL SANCTIONS, AND THIRD-PARTY SUBPOENA AUTHORITY (QLE RECORDS) PROPOSED ORDER
- **01/12/2026** (Entry 168) — **3 pages** — ORDER ON EMERGENCY MOTION TO STAY EVICTION PROCEEDINGS EXTEND RENT REGISTRY DEADLINE, AND PRESERVE PROPERTY PROPOSED ORDER ON EMERGENCY MOTION TO STAY EVICTION PROCEEDINGS
- **01/12/2026** (Entry 166) — **4 pages** — AFFIDAVIT ON MANUFACTURED ALLEGATIONS & CONCERN FOR PROPERTY RETRIEVAL / CLEAN OUT AFFIDAVIT - MANUFACTURED ALLEGATIONS
- **01/12/2026** (Entry 164) — **6 pages** — EMERGENCY MOTION ON MEDICAL HARM
- **01/12/2026** (Entry 162) — **4 pages** — ORDER ON EMERGENCY TRO PROPOSED ORDER/JUDGMENT
- **01/12/2026** (Entry 180) — **11 pages** — MOTION TO ABATE TRIAL, ENFORCE DISCOVERY ORDERS AND HEALTHCARE REINSTATEMENT

- **01/20/2026** (Entry 184) — **34 pages** — RESPONDENT'S NOTICE OF DISCOVERY AND HEALTHCARE COMPLIANCE, REQUEST FOR REMOTE APPEARANCE, REQUEST FOR ACCESS TO PERSONAL PROPERTY, REQUEST FOR CONSOLIDATION & HEARING LIMITS, AND CASE MANAGEMENT CLARIFICATION

## **5. Financial relief / reimbursements / fraud / rent & stabilization / standing or temporary orders**

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### **2025**

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- **06/24/2025** (Entry 66) — **8 pages** — EMERGENCY MOTION FOR TEMPORARY FINANCIAL RELIEF DUE TO IMMINENT HOUSING LOSS, MEDICAL HARDSHIP EMERGENCY M/FINANCIL
- **07/10/2025** (Entry 70) — **1 page** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – ESERVED COPY OF ORDER DENYING JASON MCKEMIE'S RELIEF
- **07/10/2025** (Entry 71) — **2 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – ESERVE COVER LETTER (ORDER DENYING JASON MCKEMIE'S RELIEF)
- **07/10/2025** (Entry 79) — **26 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – FINANCIAL RELIEF, CONTINUANCE, ENFORCEMENT OF STANDING ORDERS
- **07/10/2025** (Entry 80) — **149 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – EVIDENCE AND EXHIBITS
- **07/10/2025** (Entry 78) — **1 page** — FINDING OF FACT AND FRAUD UPON THE COURT PROPOSED ORDER/JUDGMENT
- **07/16/2025** (Entry 85) — **5 pages** — ORDER GRANTING M/SANCTIONS AND REFERRAL PROPOSED MOTION SANCTION FOR AGGRAVATED PERJURY AND FRAUD UPON THE OCURT AGAINST
- **08/07/2025** (Entry 113) — **10 pages** — EMERGENCY EX PARTE MOTION TO AUTHORIZE WITHDRAWAL FROM IRA
- **10/02/2025** (Entry 115) — **1 page** — LETTER
- **10/02/2025** (Entry 119) — **6 pages** — MOTION FOR REINSTATEMENT OF WRONGFULLY REPORTED AND WITHHELD MARITAL FUNDS

- **10/02/2025** (Entry 120) — **6 pages** — WAITING FOR \$80.00- REQUEST
- **10/02/2025** (Entry 118) — **6 pages** — WAITING FOR \$80.00- REQUEST
- **10/19/2025** (Entry 121) — **6 pages** — MOTION TO OBTAIN CERTIFIED TRANSCRIPT FOR JANUARY 7, 2025, HEARING AND REQUEST FOR PAYMENT FROM
- **11/25/2025** (Entry 133) — **6 pages** — MOTION FOR DE NOVO DISTRICT JUDGE REVIEW OF PRIOR RULINGS AND EMERGENCY APPLICATION FOR TEMPORARY RESTRAINING ORDER MOTION - MISCELLANEOUS
- **12/19/2025** (Entry 145) — **18 pages** — EMERGENCY ENFORCEMENT ORDER FOR MEDICAL PRESERVATION ORDER - MISC.
- **12/23/2025** (Entry 150) — **3 pages** — TO ISSUE SUBPOENA REGARDING LEASE BUYOUT AND ASSOCIATED PAYMENTS MOTION - LEAVE
- **12/23/2025** (Entry 151) — **181 pages** — MOTION - SEALED SUBMISSION FOR IN CAMERA REVIEW ONLY (CONFIDENTIAL) MOTION SEAL SUBMISSION FOR CAMERA REVIEW
- **12/29/2025** (Entry 152) — **13 pages** — SUPPLEMENTAL SUBMISSION IN SUPPORT OF MOTION TO COMPEL (REQUEST FOR CUSTODIAN CONTINUITY RECORDS / SUBPOENA LEAVE) SUPPLEMENTAL SUBMISSION IN SUPPORT OF MOTION TO COMPEL

## **2026**

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- **01/02/2026** (Entry 154) — **10 pages** — NOTICE REGARDING ORDER FOR HEALTHCARE REINSTATEMENT AND IMMINENT ESCALATION DUE TO MEDICAL NECESSITY AND NON-COMPLIANCE NOTICE REGARDING ORDER FOR HEALTHCARE REINSTATEMENT AND IMMINENT ESCALATION DUE TO MEDICAL NECESSITY
- **01/12/2026** (Entry 169) — **5 pages** — ORDER ON EMERGENCY MOTION FOR MEDICAL PRESERVATION, INTERIM MAKE-WHOLE RELIEF, JUDICIAL FINDINGS MISREPRESENTATION/IMPOSSIBILITY, CONDITIONAL SANCTIONS, AND THIRD-PARTY SUBPOENA AUTHORITY (QLE RECORDS) PROPOSED ORDER
- **01/14/2026** (Entry 180) — **11 pages** — MOTION TO ABATE TRIAL, ENFORCE DISCOVERY ORDERS AND HEALTHCARE REINSTATEMENT

## **6. Discovery obstruction / compel / subpoena requests**

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### **2025**

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- **06/27/2025** (Entry 67) — **4 pages** — MOTION TO PRESERVE DISCOVERY RIGHTS AND COMPEL DISCOVERY RESPONSES MOTION TO PRESERVE DISCOVERY RIGHTS AND COMPELL DISCOVERY RESPONSES

- **06/27/2025** (Entry 69) — **5 pages** — OBJECT IN MATERIAL DISCOVERY NOTICE OF MATERIAL DISCOVERY NOTICE OF MATERIAL DISCOVERY
- **07/10/2025** (Entry 72) — **1 page** — ORDER ON MOTION TO COMPELL DISCOVERY AND REQUEST FOR SANCTIONS PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 73) — **1 page** — ORDER TO REOPEN A LIMITED DISCOVERY DUE TO PROCEDURAL MISCONDUCT AND OBSTRUCTION PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 72) — **1 page** — ORDER ON MOTION TO COMPELL DISCOVERY AND REQUEST FOR SANCTIONS PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 73) — **1 page** — ORDER ON MOTION TO COMPEL DISCOVERY AND REQUEST FOR SANCTIONS PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 75) — **2 pages** — ORDER TO PREVENT ANY FURTHER OBSTRUCTION AND TO COMPEL ACCESS TO HSA CARD/ FUNDS PROPOSED ORDER/JUDGMENT
- **08/06/2025** (Entry 104) — **7 pages** — EMERGENCY MOTION TO ABATE TRIAL SETTING AND WITHHOLD FINAL ORDERS PENDING RESOLUTION OF OUTSTANDING MOTIONS, PROCEDURAL VIOLATIONS, AND DISCOVERY COLLAPSE
- **08/07/2025** (Entry 105) — **11 pages** — JUDICIAL NOTICE OF UNRULED MOTIONS REQUIRING DETERMINATION PRIOR TO ANY PRETRIAL HEARING, TRIAL, OR FINAL JUDICIAL NOTICE OF UNRULED MOTIONS
- **08/08/2025** (Entry 106) — **4 pages** — NOTICE OF PROCEDURAL BAR TO PRETRIAL OR TRIAL SETTING AND PRESERVATION OF OBJECTION
- **08/08/2025** (Entry 108) — **2 pages** — EXHIBITS
- **12/19/2025** (Entry 140) — **4 pages** — NOTICE REGARDING OF HEALTH COVERAGE, QUALIFYING LIFE EVENT AND REQUEST FOR LEAVE TO ISSUE SUBPOENA TO EMPLOYER HR NOTICE REGARDING OF HEALTH COVERAGE, QUALIFYING LIFE EVENT AND REQUEST FOR LEAVE TO ISSUE SUBPOENA
- **12/23/2025** (Entry 149) — **2 pages** — ORDER GRANTING LEAVE TO SERVE SUBPOENAS PROPOSED ORDER GRANTING LEAVE TO SERVE SUBPOENAS
- **12/23/2025** (Entry 150) — **3 pages** — TO ISSUE SUBPOENA REGARDING LEASE BUYOUT AND ASSOCIATED PAYMENTS MOTION - LEAVE
- **12/29/2025** (Entry 152) — **13 pages** — SUPPLEMENTAL SUBMISSION IN SUPPORT OF MOTION TO COMPEL (REQUEST FOR CUSTODIAN CONTINUITY RECORDS / SUBPOENA LEAVE) SUPPLEMENTAL SUBMISSION IN SUPPORT OF MOTION TO COMPEL

## 2026

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- **01/12/2026** (Entry 169) — **5 pages** — ORDER ON EMERGENCY MOTION FOR MEDICAL PRESERVATION, INTERIM MAKE-WHOLE RELIEF, JUDICIAL FINDINGS MISREPRESENTATION/IMPOSSIBILITY,

- **07/10/2025** (Entry 80) — **149 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – EVIDENCE AND EXHIBITS
- **07/24/2025** (Entry 91) — **8 pages** — RESPONDENT VERIFIED M/RECUSE
- **07/24/2025** (Entry 100) — **11 pages** — EMERGENCY MOTION FOR IMMEDIATE RELIEF, OBJECTION TO TRIAL, AND REQUEST FOR ACKNOWLEDGEMENT
- **08/06/2025** (Entry 104) — **7 pages** — EMERGENCY MOTION TO ABATE TRIAL SETTING AND WITHHOLD FINAL ORDERS PENDING RESOLUTION OF OUTSTANDING MOTIONS, PROCEDURAL VIOLATIONS, AND DISCOVERY COLLAPSE
- **08/07/2025** (Entry 105) — **11 pages** — JUDICIAL NOTICE OF UNRULED MOTIONS REQUIRING DETERMINATION PRIOR TO ANY PRETRIAL HEARING, TRIAL, OR FINAL JUDICIAL NOTICE OF UNRULED MOTIONS
- **08/08/2025** (Entry 106) — **4 pages** — NOTICE OF PROCEDURAL BAR TO PRETRIAL OR TRIAL SETTING AND PRESERVATION OF OBJECTION
- **10/29/2025** (Entry 123) — **3 pages** — STANDING REQUEST FOR COURT REPORTER FOR OCTOBER 31, 2025 HEARING AND ALL SUBSEQUENT PROCEEDINGS REQUEST FOR COURT REPORTER FOR HEARING AND ALL SUBSEQUENT PROCEEDINGS
- **10/29/2025** (Entry 121) — **6 pages** — MOTION TO OBTAIN CERTIFIED TRANSCRIPT FOR JANUARY 7, 2025, HEARING AND REQUEST FOR PAYMENT FROM
- **11/04/2025** (Entry 125) — **8 pages** — EMERGENCY OBJECTION TO MOTION TO WITHDRAW AS COUNSEL AND REQUEST FOR EXPEDITED HEARING (INCLUDES
- **11/10/2025** (Entry 130) — **4 pages** — EMERGENCY M/ VACATE SETTING BEFORE ASSOCIATE JUDGE AND RESET ENFORCE EMERGENCY MOTION TO VACATE
- **11/11/2025** (Entry 131) — **2 pages** — ORDER FOR DE NOVO REVIEW AND TRO PROPOSED ORDER/JUDGMENT
- **11/21/2025** (Entry 132) — **2 pages** — ORDER FOR DE NOVO REVIEW AND TRO PROPOSED ORDER/JUDGMENT
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- **11/25/2025** (Entry 134) — **6 pages** — NOTICE OF FILING OF SWORN AFFIDAVIT - CORRECTING FALSE RECORDING ALLEGATIONS AND EX PARTE PREJUDICE

2026

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- **01/02/2026** (Entry 154) — **10 pages** — NOTICE REGARDING ORDER FOR HEALTHCARE REINSTATEMENT AND IMMINENT ESCALATION DUE TO MEDICAL NECESSITY AND NON-COMPLIANCE NOTICE
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VERIFIED MOTION TO RECUSE

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REGARDING ORDER FOR HEALTHCARE REINSTATEMENT AND IMMEDIATE ESCALATION DUE TO MEDICAL NECESSITY

- **01/05/2026** (Entry 155) — **8 pages** — NOTICE OF PRIOR STANDING REQUEST FOR COURT REPORTER/OFFICIAL RECORD NOTICE PRIOR COURT REPORTER REQUEST & OBJECTION TO OFF RECORD HEARING
- **01/20/2026** (Entry 183) — **3 pages** — NOTICE OF PRIOR STANDING REQUEST FOR COURT REPORTER/VERBATIM RECORD
- **01/20/2026** (Entry 184) — **34 pages** — RESPONDENT'S NOTICE OF DISCOVERY AND HEALTHCARE COMPLIANCE, REQUEST FOR REMOTE APPEARANCE, REQUEST FOR ACCESS TO PERSONAL PROPERTY, REQUEST FOR CONSOLIDATION & HEARING LIMITS, AND CASE MANAGEMENT CLARIFICATION
- **01/15/2026** (Entry 182) — **4 pages** — RESPONDENT'S MOTION TO ESTABLISH CONDITIONS FOR RE-ENTRY OF COUNSEL AND TO PRESERVE FAIR TRIAL
- **01/20/2026** (Entry 183) — **3 pages** — NOTICE OF PRIOR STANDING REQUEST FOR COURT REPORTER/VERBATIM RECORD
- **01/20/2026** (Entry 184) — **34 pages** — RESPONDENT'S NOTICE OF DISCOVERY AND HEALTHCARE COMPLIANCE, REQUEST FOR REMOTE APPEARANCE, REQUEST FOR ACCESS TO PERSONAL PROPERTY, REQUEST FOR CONSOLIDATION & HEARING LIMITS, AND CASE MANAGEMENT CLARIFICATION
- **01/15/2026** (Entry 182) — **4 pages** — RESPONDENT'S MOTION TO ESTABLISH CONDITIONS FOR RE-ENTRY OF COUNSEL AND TO PRESERVE FAIR TRIAL

## 8. Eviction / housing stability

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### 2025

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- **06/24/2025** (Entry 66) — **8 pages** — EMERGENCY MOTION FOR TEMPORARY FINANCIAL RELIEF DUE TO IMMEDIATE HOUSING LOSS, MEDICAL HARDSHIP EMERGENCY M/FINANCIL
- **07/10/2025** (Entry 77) — **1 page** — ORDER GRANTING EMERGENCY MOTION TO STAY EXECUTION OF WRIT OF POSSESSION PROPOSED ORDER/JUDGMENT
- **07/11/2025** (Entry 83) — **66 pages** — REQUEST FOR EMERGENCY HEARING TO PREVENT EVICTION DURING MEDICAL HARDSHIP WITH DECLARATION AND WITNESS STATEMENTS REQUEST FOR ER HEARING TO PREVENT EVICTION DURING MED. HARDSHIP WITH DECLARATION AND STATEMENTS
- **12/23/2025** (Entry 150) — **3 pages** — TO ISSUE SUBPOENA REGARDING LEASE BUYOUT AND ASSOCIATED PAYMENTS MOTION - LEAVE

### 2026

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VERIFIED MOTION TO RECUSE  
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- **01/12/2026** (Entry 176) — **8 pages** — AFFIDAVIT ON PUBLIC STORAGE THEFT ACCUSATIONS AND PETITIONERS ACQUISITION OF WEAPON DURING PROCEEDINGS AFFIDAVIT ON PUBLIC STORAGE THEFT ACCUSATIONS AND PETITIONERS ACQUISITION OF WEAPON DURING PROCEEDIN
- **01/12/2026** (Entry 175) — **7 pages** — EMERGENCY MOTION TO STAY EVICTION PROCEEDINGS
- **01/12/2026** (Entry 174) — **3 pages** — PROPOSED ORDER ON EMERGENCY MOTION TO STAY EVICTION PROCEEDINGS
- **01/12/2026** (Entry 172) — **5 pages** — PROPOSED ORDER ON EMERGENCY MOTION TO TEMPORARILY STAY OR, IN THE ALTERNATIVE, IMPOSE PROTECTIVE CONDITIONS ON COURT-AUTHORIZED PROPERTY RETRIEVAL DUE TO MEDICAL INCAPACITY
- **01/12/2026** (Entry 168) — **3 pages** — ORDER ON EMERGENCY MOTION TO STAY EVICTION PROCEEDINGS EXTEND RENT REGISTRY DEADLINE, AND PRESERVE PROPERTY PROPOSED ORDER ON EMERGENCY MOTION TO STAY EVICTION PROCEEDINGS
- **01/12/2026** (Entry 166) — **4 pages** — AFFIDAVIT ON MANUFACTURED ALLEGATIONS & CONCERN FOR PROPERTY RETRIEVAL / CLEAN OUT AFFIDAVIT - MANUFACTURED ALLEGATIONS

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. **DF-24-18010**

IN THE MATTER OF THE MARRIAGE OF  GWENDOLYN ULJASZ  JASON MCKEMIE	§ § § § § §	IN THE DISTRICT COURT  302 <sup>ND</sup> JUDICIAL DISTRICT &  DALLAS COUNTY, TEXAS
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EMERGENCY MOTION TO  
COMPEL FINANCIAL DISCOVERY

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**COVER PAGE**  
**CONFIDENTIAL - FILED UNDER SEAL**

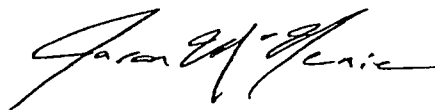
**TO THE HONORABLE JUDGE OF THE 302<sup>ND</sup> DISTRICT COURT:**

Pursuant to the Court’s inherent authority over confidential family-law records, Respondent Jason McKemie respectfully submits the enclosed documents UNDER SEAL. These materials contain sensitive and confidential information involving protected health data, financial records, and sealed evidence that cannot be placed on the public docket.

Respondent requests that the Clerk of Court:

1. Accept the enclosed materials as a sealed submission;
2. Restrict access to judicial personnel only; and
3. Deliver the sealed packet directly to the Court for review.

Respectfully submitted,



**Jason McKemie**  
 Pro Se Respondent  
 539 W. Commerce St., Ste. 2010  
 Dallas, Texas 75208  
[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)  
 214-868-4901

NO. **DF-24-18010**

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

IN THE MATTER OF  
THE MARRIAGE OF

§  
§  
§  
§  
§

GWENDOLYN ULIJASZ

JASON MCKEMIE

IN THE DISTRICT COURT

302<sup>ND</sup> JUDICIAL DISTRICT &

DALLAS COUNTY, TEXAS

---

EMERGENCY MOTION TO  
**COMPEL FINANCIAL DISCOVERY**

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**CONFIDENTIAL - FILED UNDER SEAL**

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TO THE HONORABLE JUDGE OF THE 302<sup>ND</sup> DISTRICT COURT:

Respondent Jason McKemie respectfully files this Emergency Motion to Compel, and shows:

**I. BACKGROUND**

Full financial discovery has never occurred in this case. In the prior court (254th District), opposing counsel withdrew on the eve of their discovery deadline while still drafting and filing objections behind the scenes, and Petitioner did not declare herself pro se during that period. This created a service gap that prevented any meaningful discovery before the case transferred to this Court following recusal. The same discovery-avoidance patterns used in the 254th District have now resurfaced here.

At the **September 9 pre-trial conference**, I informed Judge Sandra Jackson that discovery had been materially skipped in the prior court and that the same issues were reappearing here, including counsel withdrawal, shadow filings, and Petitioner refusing to declare herself pro se. Judge Jackson responded that those issues had not occurred in her courtroom and that she expected disclosure to proceed properly in the 302nd.

At that hearing, I requested:

1. subpoena authority,
2. a court-appointed forensic accountant for tracing, and
3. legal fees so I could secure representation after losing counsel during discovery.

Judge Jackson stated she could not grant those requests at that procedural stage. She then directed opposing counsel, **Ethan Scroggins**, to immediately release the missing financial statements. After hesitation, she repeated the directive and he agreed.

Judge Jackson further stated that although she could not grant the relief I requested that day, **I should have a minimum of 90 days with complete, certified financials before trial exhibits were due.** I told her that timeline would materially assist me.

That 90-day window never materialized.

**Following Judge Jackson's directive, I immediately provided opposing counsel with a detailed list of every missing page, missing month, missing account, and continuity failure, along with a full deficiency inventory and demonstratives.** In response, Ethan Scroggins stated he would provide a "substantive response" by October 7, 2025. When his response arrived, it consisted only of a list of Bates numbers from prior productions — simply restating the same GU000001–GU001668 materials I had already audited and identified as incomplete. No new statements, no missing pages, and no corrected financials were provided. The only documents produced after the Court's directive were **two pages**, not two statements, each containing identical transactions but labeled with different months, indicating that one or both were altered. No further documents have been produced. Following this, opposing counsel again withdrew, Petitioner again refused to declare herself, and I still do not have a **single complete account.**

Without institution-origin financial records, I cannot comply with the timeline the Court established for pre-trial preparation.

## II. SUMMARY OF DEFICIENCIES

The deficiencies summarized here are **only examples**, not a complete list. Across every account and every production cycle, I have not received a single complete, consecutive, unaltered monthly statement.

Every account produced contains:

- missing months,
- missing pages,
- mixed-year page inserts,
- unexplained gaps,
- out-of-sequence statements, or
- substituted one-day "snapshot" balance pages.

Less than **20%** of required financial statements exist, and even those are structurally unusable. Petitioner remains responsible for providing complete financial discovery for **all accounts**, not just those listed here.

### III. STRUCTURAL DEFECTS THAT MAKE SUPPLEMENTATION IMPOSSIBLE

- **The credit-card records are functionally unusable.**

Nine different card numbers route into a single undisclosed Chase source account, making continuity impossible. Entire months are missing, pages are fragmented, and early-cycle payments repeatedly wipe unsettled transactions. On Chase Sapphire x2372 alone, more than **\$70,000** in 2024 overpayments artificially inflated balances and masked transfers. As shown in the attached inventory, only the green-coded items are actual monthly statements; the red items are missing, incomplete, or snapshot pages that cannot be used for tracing. No accountant could reconstruct spending, reimbursements, or estate value from this. **Only native institution-origin records will resolve these gaps.**

- **These disclosures were structured, not sloppy.**

Pages from different years appear inside the same monthly statement. Consecutive pages are removed and replaced with unrelated months. Statements that should download sequentially appear as spliced, mixed-year PDFs. These patterns required planning, time, and coordination; they are not clerical mistakes but deliberate document fragmentation.

- **The GLU Distribution LLC account was withheld for eight months.**

Petitioner produced nothing but a screenshot of a login-error page while claiming she could not obtain statements. No monthly statements, no historical activity, and no CSV data were produced. Only after multiple deficiency notices did Petitioner supply a single “current balance” page with no historical information. This account cannot be traced without institution-origin statements.

- **Petitioner’s projected legal-fee disclosures appear intentionally structured.**

Her financial-planning documents include a **\$260,000–\$480,000** projected legal-fee range with no corresponding invoices or billing records. A \$220,000 variation cannot be reconciled with counsel’s prior claim of two-week billing. These figures appear strategically embedded for fee-shifting or estate-allocation positioning, not reflective of actual expenses.

- **The burden imposed on me shows why supplementation is futile.**

I have spent days without sleep trying to identify missing pages, missing months, and continuity gaps across more than ten accounts. The issue is not missing documents — **the issue is deliberate structural manipulation.** These records cannot be reconstructed by any pro se litigant, attorney, or forensic accountant without native institution-issued statements.

- **These disclosures were built to prevent tracing and cannot be repaired.**

The effort required to break apart statements, reorder pages, mix years, and substitute one-day snapshots demonstrates intentional, methodical obstruction. No amount of supplementation can cure disclosures engineered to obscure continuity. **Only institution-origin records will allow accurate evaluation of the marital estate.**

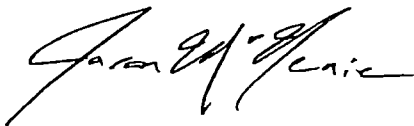
#### IV. REQUEST FOR RELIEF

I respectfully request that the Court:

1. **Grant this Motion** and recognize that the financial disclosures produced to date are materially incomplete and unusable;
2. **Acknowledge that further supplementation cannot cure the structural defects** documented in this Motion;
3. **Preserve my right to immediately seek third-party subpoenas** for native, institution-issued financial statements and transaction histories;
4. **Set a short deadline** for any remaining documents Petitioner can realistically produce, with the understanding that such production cannot replace institution-origin records; and
5. **Reserve the Court's authority to impose sanctions or other appropriate relief** if Petitioner continues to obstruct discovery or withhold required financial information.

I request any additional relief the Court deems appropriate.

Respectfully submitted,



**Jason McKemie**  
539 W. Commerce St., Suite 2010  
Dallas, TX 75208  
[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)  
[214-868-4901](tel:214-868-4901)

NO. **DF-24-18010**

**IN THE MATTER OF  
THE MARRIAGE OF**

**GWENDOLYN ULIJASZ-MCKEMIE  
&  
JASON MCKEMIE**

§  
§  
§  
§  
§  
§

**IN THE DISTRICT COURT**

**302<sup>nd</sup> JUDICIAL DISTRICT**

**DALLAS COUNTY, TEXAS**

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**LETTER TO THE COURT**

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**To:** **The Honorable Judge Sandra Jackson**  
302nd District Court  
Dallas County, Texas

**From:** **Jason McKemie**  
539 W. Commerce St., #2010  
Dallas, TX 75208  
jmckemie@mckemie.net

**Date:** October 9<sup>th</sup>, 2025

**Subject:** Expression of Appreciation Regarding the September 9, 2025, Pre-Trial Conference

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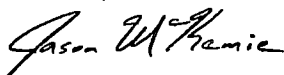
**Dear Judge Jackson:**

I wanted to thank you for the way you conducted the pre-trial conference on September 9, 2024. At that time, I was frightened and overwhelmed. After months of filings and hearings, I felt as if I had spent nine months writing motions that no one would ever read, much less rule on. When I spoke too quickly, trying to explain too much, you stayed calm. When I mentioned how many motions I had filed, you said, "That was not in my courtroom." When comments were made over what I was trying to share, you stayed present with me, let me finish, and then said that in your courtroom it is your intention that everyone—especially on their first day—feels heard.

In that instant, I understood what it truly meant to stand before a judge. It was the first time in this process that I felt heard and understood, and I left the courtroom that day with a calm I hadn't felt in months. And on that day, I needed that. Thank you.

It takes effort to stay present and attuned in a courtroom that moves as fast as yours does. That calm focus mattered to me. You have my respect, and I hope others follow your example. If that becomes part of your legacy, it's a meaningful one – its steadiness will certainly stay with those of us who have witnessed it.

With Respect & Gratitude,



**Jason Emory McKemie**  
Respondent, Pro Se' (\*nbc)

(\*nbc) = **\*Nor**by Choice

GRATITUDE LETTER \* JUDGE SANDRA JACKSON

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<b>P2P PAYMENT SERVICE PROVIDERS</b>
<b>VENMO</b>
PAYPAL
APPLEPAY
CASHAPP
GOOGLEPAY
<b>CHECKING ACCOUNTS</b>
Chase Checking xx3898 (~9259)
Chase Checking xx9259 (~3898)
Chase Checking xxREDACTED
Chase GLU Checking xx8627
Chase Checking xx9941
Chase Checking xx6893
Chase Checking xx2110
<b>CREDIT CARDS</b>
Chase Sapphire xx2372
Chase Sapphire xx4005 (~7555, ~3444)
Chase Sapphire xx7555 (~4005, ~3444)
Chase Sapphire xx3444 (~4005, ~7555)
Chase Sapphire xx4400
Chase Sapphire xx8801
Chase Sapphire xx7496 (~7396)
Chase Sapphire x7396 (~7496)
AMEX PLATINUM xx5000 (~6008, ~7006)
AMEX PLATINUM xx6008 (~5000, ~7006)
AMEX PLATINUM xx7006 (~5000, ~6008)
CITI Advantage xx2295
<b>INVESTMENT AND RETIREMENT ACCOUNTS</b>
AIG 401k
E*TRADE STOCK / Morgan Stanley at Work / Grant number: A44637 / AUG 16TH, 2024
Empower Cognizant Technology Solutions 401k Savings Plan
Vanbguard Value Index Fund / Vanguard Growth Index
Accenture 401k
Voya - Cognizant 401(k) Retirement Savings Plan
E-Trade x8274
E-Trade x5029
E-Trade x6977
E-Trade x6587
E-Trade x201
Cognizant Tecnology 401(k) Savings Plan
E-Trade Roth IRA
Traditional IRA Account #7
Vanguard IRA
Advantigen Biosciences, LLC shares

9 CARD NUMBERS FOR 1 ACCOUNT

**Subject:** Discovery  
**Date:** Friday, October 10, 2025 at 1:33:20 PM Central Daylight Time  
**From:** Ethan Scroggins <escroggins@sullivancook.com>  
**To:** Jason McKemie <jmckemie@mckemie.net>, Jason McKemie <mckemie76@gmail.com>  
**CC:** Will Cook <wcook@sullivancook.com>, Chandler Alt <calt@sullivancook.com>  
**Attachments:** 2025-10-09 Exhibit A - Discovery Log.xlsx, Dec 2024 Page 3.pdf, Nov 2024 Page 3.pdf

Mr. McKemie,

Your “exhibits” to your requests for information appear to be based only on the 2024-02-24 production and the issues are addressed in the subsequent production from 2025-06-23. We do not have to explain every item or statement to you. We have produced what you requested. That said, still see the below regarding some of the discovery:

- Statements for Chase x7369 –See GU001599, GU001639 for the first pages of previous statements (different account number transfer) that show the previous account balance transferring over
- Chase x2372 – See GU001648 for Jan 2025 3<sup>rd</sup> page
- VEIP statements – See GU000615-648 and GU000492-521.
- AIG 401(k) - See GU000595-614. These statements show all transactions and complete information regarding deposits, withdrawals, etc. Also show loan repayments.
- Chase x3898 – See “Statements” GU001598-1650
- Chase x2372 – See “Statements” GU001598-1650
  - Nov 2024 page 3 attached
  - Dec 2024 page 3 attached

Sincerely,

**ETHAN SCROGGINS**  
Sullivan & Cook LLC

*Attorney*  
600 East Las Colinas Blvd, Suite 1300  
Irving, TX 75039  
(214) 520-7494  
[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)

The following four pages includes everything produced by opposing counsel since receiving Judge Sandra Jackson’s directive to release the missing financials. Please note that the first two pages are the same document, simply titled Nov for one and Dec for the other. And the third document is simply a list of all the documents submitted in prior discovery releases, which I spent a significant amount of time itemizing all of the deficiencies only to wait 2 months to receive the list again with no response for all the deficiencies.

ACCOUNT ACTIVITY (CONTINUED)

Date of Transaction	Merchant Name or Transaction Description	\$ Amount
10/25	WWW.WAGGINWATER.COM WWW.WAGGINWAT IL	69.00
10/25	EATZI'S - OAK LAWN DALLAS TX	166.19
10/26	NOHEMY TEAROOM DALLAS TX	16.78
10/25	TM *LANE 800-653-8000 CA	105.70
10/26	7-ELEVEN 32924 DALLAS TX	11.78
10/26	7-ELEVEN 32924 DALLAS TX	39.95
10/25	& SLING.COM 888-363-1777 CO	79.01
10/26	FORESTWOOD ANTIQUE MALL DALLAS TX	150.47
10/27	& KASA YOGA DALLAS 972-7465991 TX	280.00
10/28	VZWRLSS*APOCC VISN 800-922-0204 FL	321.60
10/28	7-ELEVEN 50711 HTTPSWWW.7ELE TX	40.00
10/29	CELEBRATION RESTAURANT D DALLAS TX	65.21
10/30	SQ *BEYOND THE DOOR AND M gosq.com TX	571.07
10/29	CVS/PHARMACY #07742 800-746-7287 TX	101.25
10/30	Prime Video Channels amzn.com/bill WA	14.06
10/28	TOM THUMB #2990 DALLAS TX	109.82
10/29	KROGER #0528 DALLAS TX	36.27
10/29	CVS/PHARMACY #07742 DALLAS TX	6.81
10/29	BRK PARKING DALLAS TX	5.00
10/29	APPLE.COM/BILL 866-712-7753 CA	64.94
10/29	& KASA YOGA DALLAS 972-7465991 TX	220.00
10/31	APPLE.COM/BILL 866-712-7753 CA	1.07
10/30	TARGET.COM WWW.TARGET.CO MN	14.06
10/30	APPLE.COM/BILL 800-275-2273 CA	3.24
10/29	TOM THUMB #2990 DALLAS TX	4.99
10/30	APPLE.COM/BILL 866-712-7753 CA	21.65
10/29	CVSEExtraCare 8007467287RI 800-746-7287 RI	5.00
10/30	TARGET 00008755 DALLAS TX	13.78
10/30	NORDSTROM DIRECT #0808 800-285-5800 IA	16.18
10/31	APPLE.COM/BILL 866-712-7753 CA	3.24
10/31	APPLE.COM/BILL 866-712-7753 CA	7.57
10/30	RACETRAC569 00005694 DALLAS TX	49.63
10/31	APPLE.COM/BILL 866-712-7753 CA	6.48
10/30	RACETRAC569 00005694 DALLAS TX	54.11
10/31	ALTO PHARMACY HTTPSSALTO.COM CA	107.78
10/30	PARKPLACE DAL 17 HHND DALLAS TX	10.00
11/01	Idolize Brows and Bea Dallas TX	47.50
11/01	APPLE.COM/BILL 800-275-2273 CA	19.47
11/01	7-ELEVEN 37329 DALLAS TX	18.71
11/02	KROGER #0528 DALLAS TX	27.09
11/01	SERVICE FEE 888-658-5465 TN	148.14
11/02	APPLE.COM/BILL 866-712-7753 CA	42.20
11/01	US TREAS TAX PYMT 888-658-5465 TN	7,922.00
11/02	UPS*1Z588YT70391781825 800-811-1648 GA	13.09
11/02	UBER *ONE HELP.UBER.COM CA	9.99
11/02	NORDSTROM #0738 DALLAS TX	204.01
11/02	USPS KIOSK 4822229553 DALLAS TX	21.05
11/02	NFG*EZEKIEL TAYLOR SCH 888-284-7978 DC	257.50
11/01	HOLLYWOOD STAR NAILS & S UNIVERSITY PA TX	63.25
11/01	EATZI'S - LOVERS DALLAS TX	127.81
11/02	RAISING CANES 0295 DALLAS TX	21.20
11/02	KASA YOGA DALLAS DALLAS TX	75.00
11/03	APPLE.COM/BILL 866-712-7753 CA	40.00
11/03	NORDSTROM DIRECT #0808 800-285-5800 IA	138.56
11/02	TLF*SURROUNDINGS EVENTS A 608-8457888 WI	229.99
11/03	WHATABURGER 176 Q26 DALLAS TX	19.23
11/05	CHILDREN INTERNATIONAL HTTPSWWW.CHIL MO	87.00
11/05	APPLE.COM/BILL 866-712-7753 CA	27.03
11/05	APPLE.COM/BILL 866-712-7753 CA	2.99
11/06	SP EMPORIUM PIES HTTPSWWW.EMPO TX	110.00
11/07	APPLE.COM/BILL 866-712-7753 CA	31.36
11/06	APPLE.COM/BILL 866-712-7753 CA	8.65
11/07	STUBHUB, INC. 866-788-2482 CA	215.00
11/06	PARKWHIZ, INC. 888-472-7594 IL	40.60
11/06	TEXAS BB CONCESSIONS ARLINGTON TX	15.55
11/08	APPLE.COM/BILL 866-712-7753 CA	29.99
11/09	APPLE.COM/BILL 866-712-7753 CA	6.4

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ACCOUNT ACTIVITY (CONTINUED)

Date of Transaction	Merchant Name or Transaction Description	\$ Amount
10/25	WWW.WAGGINWATER.COM WWW.WAGGINWAT IL	69.00
10/25	EATZI'S - OAK LAWN DALLAS TX	166.19
10/26	NOHEMY TEAROOM DALLAS TX	16.78
10/25	TM *LANE 800-653-8000 CA	105.70
10/26	7-ELEVEN 32924 DALLAS TX	11.78
10/26	7-ELEVEN 32924 DALLAS TX	39.95
10/25	& SLING.COM 888-363-1777 CO	79.01
10/26	FORESTWOOD ANTIQUE MALL DALLAS TX	150.47
10/27	& KASA YOGA DALLAS 972-7465991 TX	280.00
10/28	VZWRLSS*APOCC VISN 800-922-0204 FL	321.60
10/28	7-ELEVEN 50711 HTTPSWWW.7ELE TX	40.00
10/29	CELEBRATION RESTAURANT D DALLAS TX	65.21
10/30	SQ *BEYOND THE DOOR AND M gosq.com TX	571.07
10/29	CVS/PHARMACY #07742 800-746-7287 TX	101.25
10/30	Prime Video Channels amzn.com/bill WA	14.06
10/28	TOM THUMB #2990 DALLAS TX	109.82
10/29	KROGER #0528 DALLAS TX	36.27
10/29	CVS/PHARMACY #07742 DALLAS TX	6.81
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10/29	APPLE.COM/BILL 866-712-7753 CA	64.94
10/29	& KASA YOGA DALLAS 972-7465991 TX	220.00
10/31	APPLE.COM/BILL 866-712-7753 CA	1.07
10/30	TARGET.COM WWW.TARGET.CO MN	14.06
10/30	APPLE.COM/BILL 800-275-2273 CA	3.24
10/29	TOM THUMB #2990 DALLAS TX	4.99
10/30	APPLE.COM/BILL 866-712-7753 CA	21.65
10/29	CVSEExtraCare 8007467287RI 800-746-7287 RI	5.00
10/30	TARGET 00008755 DALLAS TX	13.78
10/30	NORDSTROM DIRECT #0808 800-285-5800 IA	16.18
10/31	APPLE.COM/BILL 866-712-7753 CA	3.24
10/31	APPLE.COM/BILL 866-712-7753 CA	7.57
10/30	RACETRAC569 00005694 DALLAS TX	49.63
10/31	APPLE.COM/BILL 866-712-7753 CA	6.48
10/30	RACETRAC569 00005694 DALLAS TX	54.11
10/31	ALTO PHARMACY HTTPSALTO.COM CA	107.78
10/30	PARKPLACE DAL 17 HHND DALLAS TX	10.00
11/01	Idolize Brows and Bea Dallas TX	47.50
11/01	APPLE.COM/BILL 800-275-2273 CA	19.47
11/01	7-ELEVEN 37329 DALLAS TX	18.71
11/02	KROGER #0528 DALLAS TX	27.09
11/01	SERVICE FEE 888-658-5465 TN	148.14
11/02	APPLE.COM/BILL 866-712-7753 CA	42.20
11/01	US TREAS TAX PYMT 888-658-5465 TN	7,922.00
11/02	UPS*1Z588YT70391781825 800-811-1648 GA	13.09
11/02	UBER *ONE HELP.UBER.COM CA	9.99
11/02	NORDSTROM #0738 DALLAS TX	204.01
11/02	USPS KIOSK 4822229553 DALLAS TX	21.05
11/02	NFG*EZEKIEL TAYLOR SCH 888-284-7978 DC	257.50
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11/01	EATZI'S - LOVERS DALLAS TX	127.81
11/02	RAISING CANES 0295 DALLAS TX	21.20
11/02	KASA YOGA DALLAS DALLAS TX	75.00
11/03	APPLE.COM/BILL 866-712-7753 CA	40.00
11/03	NORDSTROM DIRECT #0808 800-285-5800 IA	138.56
11/02	TLF*SURROUNDINGS EVENTS A 608-8457888 WI	229.99
11/03	WHATABURGER 176 Q26 DALLAS TX	19.23
11/05	CHILDREN INTERNATIONAL HTTPSWWW.CHIL MO	87.00
11/05	APPLE.COM/BILL 866-712-7753 CA	27.03
11/05	APPLE.COM/BILL 866-712-7753 CA	2.99
11/06	SP EMPORIUM PIES HTTPSWWW.EMPO TX	110.00
11/07	APPLE.COM/BILL 866-712-7753 CA	31.36
11/06	APPLE.COM/BILL 866-712-7753 CA	8.65
11/07	STUBHUB, INC. 866-788-2482 CA	215.00
11/06	PARKWHIZ, INC. 888-472-7594 IL	40.60
11/06	TEXAS BB CONCESSIONS ARLINGTON TX	15.55
11/08	APPLE.COM/BILL 866-712-7753 CA	29.99
11/09	APPLE.COM/BILL 866-712-7753 CA	6.4

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**EXHIBIT A  
GWEN'S PRODUCTION**

Description	Start	End	Date Produced	Responsive To RFP
2022-06-22 AdvantiGen Subscription Agreement.pdf	GU000001	GU000002	2/24/25	1A
2023-03-19 AdvantiGen Subscription Agreement.pdf	GU000003	GU000004	2/24/25	1A
2024 AIG 401(k).pdf	GU000005	GU000010	2/24/25	1A
2024 AMEX Platinum x6008 Statements.pdf	GU000011	GU000031	2/24/25	1A
2024 Chase Acct x3898 Statements.pdf	GU000032	GU000075	2/24/25	1A
2024 Chase Acct x6893 Statements.pdf	GU000076	GU000105	2/24/25	1A
2024-07 through 2025-01 Chase Sapphire x2372.pdf	GU000106	GU000126	2/24/25	1A
2024-12-31 MetLife HSA Summary.pdf	GU000127	GU000127	2/24/25	1A
2025 Accenture HSA Election Details.pdf	GU000128	GU000128	2/24/25	1A
2025 Accenture Life Insurance Summary.pdf	GU000129	GU000133	2/24/25	1A
2025-01-11 Email re Retainer loan terms.pdf	GU000134	GU000135	2/24/25	1A
2025-01-31 Accenture 401(k) Summary.pdf	GU000136	GU000137	2/24/25	1A
2025-02-01 Accenture Investment Summary.pdf	GU000138	GU000154	2/24/25	1A
2025-02-01 Ameriprise IRA & Roth IRA Acct. Summary.pdf	GU000155	GU000161	2/24/25	1A
2025-02-14 Email re Boerman Law Fees Judgment McNally.pdf	GU000162	GU000162	2/24/25	1A
2025-02-16 Accenture Employment Agreement (showing clawback of bonus).pdf	GU000163	GU000168	2/24/25	1A
2025-02-16 Overview of Offer from Accenture.pdf	GU000169	GU000171	2/24/25	1A
Amex Acct. x1009 Loan Disclosure.pdf	GU000172	GU000173	2/24/25	1A
Chase GLU Acct. Cannot Access.pdf	GU000174	GU000174	2/24/25	1A
Chase Visa x4005 Dec 2024.pdf	GU000175	GU000180	2/24/25	1A
Chase Visa x7396 Dec-Jan 2024.pdf	GU000181	GU000186	2/24/25	1A
Chase Visa 2024 Spending Report PDF.pdf	GU000187	GU000218	2/24/25	1A
Hartford ADD policy 25k from Cognizant.pdf	GU000219	GU000220	2/24/25	1A
Hartford Life Insurance Info. (Jason).pdf	GU000221	GU000223	2/24/25	1A
HSPRD History Bill - Uljasz.pdf	GU000224	GU000227	2/24/25	1A
Jan 2025 USAA 20250104 bank checking statement 9941.pdf	GU000228	GU000229	2/24/25	1A
Sofi Loan.pdf	GU000230	GU000230	2/24/25	1A
April 2024 Chase Visa x2372.pdf	GU000231	GU000236	3/11/25	1A
August 2024 Chase Visa x2372.pdf	GU000237	GU000242	3/11/25	1A
February 2024 Chase Visa x2372.pdf	GU000243	GU000246	3/11/25	1A
January 2024 Chase Visa x2372.pdf	GU000247	GU000250	3/11/25	1A
July 2024 Chase Visa x2372.pdf	GU000251	GU000256	3/11/25	1A
June 2024 Chase Visa x2372.pdf	GU000257	GU000262	3/11/25	1A
March 2024 Chase Visa x2372.pdf	GU000263	GU000266	3/11/25	1A
May 2024 Chase Visa x2372.pdf	GU000267	GU000272	3/11/25	1A
all chase accounts except GLU distr - no money market or savings account.pdf	GU000273	GU000273	3/11/25	1A
citibank - no charges Redacted.pdf	GU000274	GU000274	3/11/25	1A
Citibank no charges membership fee only.pdf	GU000275	GU000275	3/11/25	1A
wellsfargo auto loan closed 2023.pdf	GU000276	GU000276	3/11/25	1A
SAPPHIRE CHECKING (...3898) - balance transferred to new checking bc of fraud	GU000277	GU000279	3/11/25	1A
Chase Sapphire x3898 Account Restricted	GU000280	GU000280	3/11/25	1A
2024-01-26 AMEX.pdf	GU000281	GU000287	3/13/25	1A
2024-02-23 AMEX.pdf	GU000288	GU000298	3/13/25	1A
2024-03-26 AMEX.pdf	GU000299	GU000305	3/13/25	1A
2024-04-25 AMEX.pdf	GU000306	GU000316	3/13/25	1A
2024-05-26 AMEX.pdf	GU000317	GU000326	3/13/25	1A
2024-06-25 AMEX.pdf	GU000327	GU000336	3/13/25	1A
2024-07-26 AMEX.pdf	GU000337	GU000346	3/13/25	1A
2024-08-26 AMEX.pdf	GU000347	GU000354	3/13/25	1A
2024-09-25 AMEX.pdf	GU000355	GU000362	3/13/25	1A
2024-10-25 AMEX.pdf	GU000363	GU000368	3/13/25	1A
2024-11-25 AMEX.pdf	GU000369	GU000376	3/13/25	1A
2024-12-26 AMEX.pdf	GU000377	GU000384	3/13/25	1A
2025-01-26 AMEX.pdf	GU000385	GU000394	3/13/25	1A
2025-02-23 AMEX.pdf	GU000395	GU000402	3/13/25	1A
2023 Cognizant Incentive Award Plan Final.pdf	GU000403	GU000436	6/23/25	3, 12
2024 Jason Ameriprise.pdf	GU000437	GU000446	6/23/25	1, 12
2024 W2.pdf	GU000447	GU000447	6/23/25	2, 12
2024 Cognizant Technology Solutions 2024 W-2.pdf	GU000448	GU000450	6/23/25	2, 12
Accenture 401(k).pdf	GU000451	GU000474	6/23/25	1, 12
Accenture Investment Summary.pdf	GU000475	GU000491	6/23/25	1, 3, 9, 12
Accenture Paystubs Final.pdf	GU000492	GU000521	6/23/25	2, 12
Advantigen Confirmation.pdf	GU000522	GU000522	6/23/25	1, 9, 21
Advantigen Shares Final.pdf	GU000523	GU000555	6/23/25	3, 12
Advantigen Subscription Final.pdf	GU000556	GU000594	6/23/25	3, 12
AIG 401(k).pdf	GU000595	GU000614	6/23/25	1, 12
All 4 VEIP 2025 statements - inception Jan 2025 Final.pdf	GU000615	GU000648	6/23/25	1, 3, 12
Ameriprise Statements.pdf	GU000649	GU000746	6/23/25	1, 12
Amex.pdf	GU000747	GU000921	6/23/25	12, 15
Chase x3898 Final.pdf	GU000922	GU000985	6/23/25	1, 10, 12
Chase x6893 Final.pdf	GU000986	GU001029	6/23/25	1, 10, 12
Cognizant 401(k) Empower Statements.pdf	GU001030	GU001065	6/23/25	1, 12
Cognizant 401(k) Empower to Voya.pdf	GU001066	GU001069	6/23/25	1, 12
Cognizant 401(k) Voya Tax Final.pdf	GU001070	GU001073	6/23/25	1, 12
Cognizant 401(k) Voya to Ameriprise.pdf	GU001074	GU001076	6/23/25	1, 12
Cognizant 401(k) Voya.pdf	GU001077	GU001115	6/23/25	1, 12
Cognizant Paystubs.pdf	GU001116	GU001150	6/23/25	2, 12
Cognizant Separation Agreement Final.pdf	GU001151	GU001158	6/23/25	9, 12
E-trade Final.pdf	GU001159	GU001281	6/23/25	1, 12
E-Trade Final.pdf	GU001282	GU001303	6/23/25	1, 10, 12
HSA Final.pdf	GU001304	GU001318	6/23/25	1, 10, 12
Jetty Invoice Final.pdf	GU001319	GU001319	6/23/25	12
Lease Final.pdf	GU001320	GU001337	6/23/25	6, 12

**They emailed this list of defective discovery docs I spent 24 hours detailing all the deficiencies with in**

My Holdings All RSUs and Stock w. vesting schedules Final.pdf	GU001338	GU001352	6/23/25	1, 3, 12
New CC Account Paid Off Final.pdf	GU001353	GU001356	6/23/25	12
Payment to IRS for 2024 Taxes.pdf	GU001357	GU001357	6/23/25	12
Pictures of Software and Jason.pdf	GU001358	GU001595	6/23/25	12, 13
Promisorry Note.pdf	GU001596	GU001597	6/23/25	4, 12
Statements.pdf	GU001598	GU001650	6/23/25	1, 10, 12, 15
Texts with Sister.pdf	GU001651	GU001656	6/23/25	5, 11, 12
Tracking Devices Final.pdf	GU001657	GU001662	6/23/25	12
ULIASZ LETTER - Procedure.pdf	GU001663	GU001663	6/23/25	7, 12
Woodman.pdf	GU001664	GU001664	6/23/25	4, 12
Audio Jason			6/23/25	12, 13, 14
Advantigen Subs Final.pdf	GU001665	GU001668	6/23/25	3, 12
Dec 2024 page 3.pdf	GU001669	GU001669	10/9/25	1, 10, 12, 15
Nov 2024 page 3.pdf	GU001670	GU001670	10/9/25	1, 10, 12, 15

Jason McKemie

Wednesday, December 3, 2025 at 1:53:10 AM Central Standard Time

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**Subject:** Re: Subject: Court-Ordered Financials — Immediate Production Required  
**Date:** Thursday, September 25, 2025 at 2:20:51 PM Central Daylight Time  
**From:** Jason McKemie <jmckemie@mckemie.net>  
**To:** Ethan Scroggins <escroggins@sullivancook.com>  
**CC:** Will Cook <wcook@sullivancook.com>, Chandler Alt <calt@sullivancook.com>, Kim Jones <kjones@sullivancook.com>, Jason McKemie <mckemie76@gmail.com>  
**Priority:** High  
**Attachments:** Disc Demand\_Gwen - Disc List (Master).pdf

Ethan,

I know there's a lot to pull together but can you prioritize these for quick turn around? Would be much appreciated. Thanks.

1. Chase Sapphire Visa x2372
  - Nov 2024 – Missing Pages 3, 5-7
  - Dec 2024 – Missing Page 3
  - Jan 2025 – Missing Page 3

Loan Amount following statements for separate property calculation:  
- Sept 2023  
- June 2024

Also, please expedite the statements for Chase Sapphire x7396. The only statement provided was Jan of 2025. The card had a balance of roughly \$35k in Dec, so this was not a new card and had been used heavily. Need Statements for June 2023 – Present.

Attached are the line items you requested.

Jason McKemie  
214.868.4901

---

**From:** Jason McKemie <jmckemie@mckemie.net>  
**Date:** Wednesday, September 24, 2025 at 8:13 AM  
**To:** Ethan Scroggins <escroggins@sullivancook.com>

TYPE	COMPANY / INSTITUTION	IDENTIFIER	Description	Start	COMMENTS
			Tracing for All Cash/E Withdrawals >\$499		Chase x3898 Jan 2025 \$13k, 10/24 \$500, 11/24 \$600, 9/24 \$1,600, etc. All accounts please.
			All transfers		All accounts, w/ account #'s, names
			GLU DISTRIBUTION X8627 Statements		I have recived no statements.
			Tracing for All Overpayments towards Credit Cards		Chase Sapphire x3444 - Aug 2025 \$13,210, Chase Sapphire x2372 Feb 2024 \$5,796, Etc. (Lots). Need full tracing
			FULL Statements Released for VENMO (JUNE 2023 - PRESENT)		need all
			Tracing for Dally Account Balances		all accounts
			Create Contiguous Summary for all Checking Accounts		contiguous with legend showing mapping to credit card swapping
			COGNIZANT SETTLEMENT		Tort Claim was False. Community Asset. \$ requires full tracing. Used Community Property to Fund Litigation
			Divorce Legal Costs		All legal is separate per the Agmnt between Will Cook and Brant Webb via email: full accounting of SC billing required to ensure charges are applied solely to Petitioner; as SC moved Given to two-week billing during discovery, her maximum exposure cannot exceed two weeks of charges, and I bear none.
			Other Legal Expenses Paid		
			COGNIZANT SETTLEMENT		All Billing needed from all law offices
			Legal Costs for Protective Order, Contempt, Extension of Protective Order		Billing Statements Needed.
			MISSING VEIP SUMMARY		Monthly Statements Required
RETIREMENT	AIG	AIG	2024 AIG 401(k).pdf	GU000005	Daily Snapshots, 6mo Summary are Not Acceptable, Lacks Monthly Statements
RETIREMENT	AMERIPRISE	AMERIP	2025-02-01 Ameriprise IRA & Roth IRA Acct. Summary.pdf	GU000155	Annual Reports are not Acceptable
CREDIT	AMERICAN EXPRESS	AMEX LOAN	Amex Acct. x1009 Loan Disclosure.pdf	GU000172	Require Monthy Statement: Loan Disclosure from Aug 2024 tells me nothing about what payments have been made, and what is outstanding
BANK	CHASE	CHASE	2024 Chase Acct x3898 Statements.pdf	GU000032	Missing: June 2023 - Dec 2023, June 2025 - Sept 2025
CREDIT	CHASE	CHASE 2372	August 2024 Chase Visa x2372.pdf	GU000237	Missing: June 2023 - March 2024, Aug 2024 - Sept 2025
BANK	CHASE	CHASE 3898	Chase Sapphire x3898 Account Restricted	GU000280	June 2023 - Dec 2023, June 2025 - Sept 2025
BANK	CHASE	CHASE 3898	SAPPHIRE CHECKING (...3898) - balance transfered to new checking bc of fraud	GU000277	Balance Transferred shows \$13,000 Missing. Need full tracing.
CREDIT	CHASE	CHASE 4005	Chase Visa x4005 Dec 2024.pdf	GU000175	Missing: June 2023 - Nov 2024, ergggfsgFeb - Sept 2025
CREDIT	CHASE	CHASE 7396	Chase Visa x7396 Dec-Jan 2024.pdf	GU000181	Only Jan 2025 Statement Provided. Dec had \$34,857 balance - was not a new card. \$13K Overpayment Dec 2024 Need June 2023 - Present
BANK	CHASE	REDACTED	Personal Checking		REDACTIONS ARE NOT PERMITTED
CREDIT	CHASE	CHASE SPD RPT	Chase Visa 2024 Spending Report PDF.pdf	GU000187	Spending Reports are Not Acceptable
BANK	CHASE	CHS ACTS	all chase accounts except GLU distr - no money market or savings account.pdf	GU000273	Spending Reports are Not Acceptable
CREDIT	CHASE	CHS SAP	2024-07 through 2025-01 Chase Sapphire x2372.pdf	GU000106	Nov 2024 - Missing Page 3, 5-7, Dec 2024 - Missing Page 3, January 2025 Missing Page 3
CREDIT	CITIBANK	CITI	citibank - no charges. Redacted.pdf	GU000274	Need Monthly Statements
COMP	COGNIZANT	COG PAY	2024-09-13 Cognizant Paystub.pdf	GU000279	Missing June. - Nov 2023,
COMP	GLU DISTRIBUTION	GLU D	Chase GLU Acct. Cannot Access.pdf	GU000174	Monthly Statements Required
LEGAL	LEGAL	HSPRD	HSPRD History Bill - Ulnjasz.pdf	GU000224	Need Full Accounting for All Legal Billing, Marital and Not. Her legal bills are separate from mine, however value needs to be established for wasted assets
LEGAL	LEGAL	LEGAL	2025-02-14 Email re Beerman Law Fees Judgment McNally.pdf	GU000162	Need all legal billing accounted for.
HSA	HSA	METLIFE	2024-12-31 MetLife HSA Summary.pdf	GU000127	Release HSA Card Immediately
LOANS	LOANS	RETAINER LOANS	2025-01-11 Email re Retainer loan terms.pdf	GU000134	proof of funds + notarized agmnt prior to standing / temp orders or remove it
LOANS	LOANS	SOFI	Sofi Loan.pdf	GU000230	Need Current Months Statement
LOANS	AUTO LOAN	WR AUTO	wellsfargo auto loan closed 2023.pdf	GU000276	Why do you have your previous car loan versus your current?

**Cc:** "wcook@sullivancook.com" <wcook@sullivancook.com>, Chandler Alt <calt@sullivancook.com>, Kim Jones <kjones@sullivancook.com>, Jason Mckemie <mckemie76@gmail.com>

**Subject:** Re: Subject: Court-Ordered Financials — Immediate Production Required

Ethan,

This should get you started. Thx.

Please reply with full and complete documentation by Tuesday, Sept 30, 2025.

Jason McKemie

---

**From:** Ethan Scroggins <escroggins@sullivancook.com>

**Date:** Tuesday, September 23, 2025 at 3:12 PM

**To:** Jason McKemie <jmckemie@mckemie.net>

**Cc:** "wcook@sullivancook.com" <wcook@sullivancook.com>, Chandler Alt <calt@sullivancook.com>, Kim Jones <kjones@sullivancook.com>, Jason Mckemie <mckemie76@gmail.com>

**Subject:** RE: Subject: Court-Ordered Financials — Immediate Production Required

Mr. McKemie,

The Court directed and made sure that production would be made in response to legitimate and reasonable requests for production made under proper procedure. You already asked for these documents, and we have already produced documents bates labeled GU000001 – GU001668 in response. The manner at which we have produced documents follows the rules.

If you have identified specific instances of missing pages in statements, provide those specific instances. You cannot just state that the entire production is incomplete while ignoring what we have produced.

I will not address the arguments you are making about community property and separate property in this email. That is a matter for the Court and an issue for final trial.

Sincerely,

**ETHAN SCROGGINS**  
Sullivan & Cook LLC

*Attorney*  
600 East Las Colinas Blvd, Suite 1300  
Irving, TX 75039  
(214) 520-7494  
[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)

**From:** Jason McKemie <jmckemie@mckemie.net>

**Sent:** Sunday, September 21, 2025 9:32 PM

Jason McKemie

Wednesday, December 3, 2025 at 1:50:47 AM Central Standard Time

---

**Subject:** RE: Subject: Court-Ordered Financials — Immediate Production Required  
**Date:** Tuesday, September 30, 2025 at 5:47:54 PM Central Daylight Time  
**From:** Ethan Scroggins <escroggins@sullivancook.com>  
**To:** Jason McKemie <jmckemie@mckemie.net>  
**CC:** Will Cook <wcook@sullivancook.com>, Chandler Alt <calt@sullivancook.com>, Kim Jones <kjones@sullivancook.com>, Jason McKemie <mckemie76@gmail.com>

Mr. McKemie,

I had an emergency TRO come up today that took up most of my day and an all day mediation yesterday.

Six days is too short a turnaround for the amount of items you identified. We will have a substantive response to you regarding the identified items by end of day October 7, 2025 (one week from now).

Sincerely,

**ETHAN SCROGGINS**  
Sullivan & Cook LLC

*Attorney*  
600 East Las Colinas Blvd, Suite 1300  
Irving, TX 75039  
(214) 520-7494  
[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)

**From:** Jason McKemie <jmckemie@mckemie.net>  
**Sent:** Wednesday, September 24, 2025 8:13 AM  
**To:** Ethan Scroggins <escroggins@sullivancook.com>  
**Cc:** Will Cook <wcook@sullivancook.com>; Chandler Alt <calt@sullivancook.com>; Kim Jones <kjones@sullivancook.com>; Jason McKemie <mckemie76@gmail.com>  
**Subject:** Re: Subject: Court-Ordered Financials — Immediate Production Required  
**Importance:** High

Ethan,

This should get you started. Thx.

Please reply with full and complete documentation by Tuesday, Sept 30, 2025.

Jason McKemie

---

**From:** Ethan Scroggins <escroggins@sullivancook.com>  
**Date:** Tuesday, September 23, 2025 at 3:12 PM  
**To:** Jason McKemie <jmckemie@mckemie.net>  
**Cc:** "wcook@sullivancook.com" <wcook@sullivancook.com>, Chandler Alt

<calt@sullivancook.com>, Kim Jones <kjones@sullivancook.com>, Jason McKemie <mckemie76@gmail.com>

**Subject:** RE: Subject: Court-Ordered Financials — Immediate Production Required

Mr. McKemie,

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If you have identified specific instances of missing pages in statements, provide those specific instances. You cannot just state that the entire production is incomplete while ignoring what we have produced.

I will not address the arguments you are making about community property and separate property in this email. That is a matter for the Court and an issue for final trial.

Sincerely,

**ETHAN SCROGGINS**  
Sullivan & Cook LLC

*Attorney*  
600 East Las Colinas Blvd, Suite 1300  
Irving, TX 75039  
(214) 520-7494  
[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)

**From:** Jason McKemie <[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)>

**Sent:** Sunday, September 21, 2025 9:32 PM

**To:** Ethan Scroggins <[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)>

**Cc:** Will Cook <[wcook@sullivancook.com](mailto:wcook@sullivancook.com)>; Chandler Alt <[calt@sullivancook.com](mailto:calt@sullivancook.com)>; Kim Jones <[kjones@sullivancook.com](mailto:kjones@sullivancook.com)>; Jeff Cook <[jcook@sullivancook.com](mailto:jcook@sullivancook.com)>; Jason McKemie <[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)>; Jason McKemie <[mckemie76@gmail.com](mailto:mckemie76@gmail.com)>

**Subject:** Subject: Court-Ordered Financials — Immediate Production Required

**Importance:** High

Ethan,

On **September 8**, the Court directed your client to provide **full and complete financials**, and you confirmed on the record that production would be made. Two weeks later, no additional statements have been received. Ten months have now passed without compliance, which has prevented resolution and caused considerable harm; I want to move forward, but cannot until your client complies.

**A. Scope of Required Production (June 2023 – June 2025)**

1. **All accounts.** Bank, credit card, investment, retirement, and brokerage

accounts. No account may be excluded on the ground it is “separate property.” If an account is asserted to be separate, your client bears the burden to establish separate character through **complete statements and tracing**.

2. **Monthly statements only.** Produce official, institution-issued **monthly** statements. **No quarterlies, annual summaries, or daily “snapshots”** (e.g., AIG one-day reports). These do not satisfy the Court’s directive.
3. **Sequential, gap-free coverage.** Statements must be consecutive and **cover every day** in the period. The closing balance of one statement must equal the opening balance of the next. If an account or card number changed, production must show **continuous coverage from the prior number’s last day through the successor’s first day**.
4. **Complete documents. All pages** for each statement set. No missing pages.
5. **Format and organization.** Pages must be right-side-up, legible, and searchable (OCR). Each account must be produced as **one consolidated PDF** (labeled by institution, last-4, and month sequence).
6. **Account tracing (renumbered/reissued cards).** Provide a **cross-reference spreadsheet** linking prior and successor numbers and the effective date(s) of change(s).
7. **Supporting pay records.** Produce **complete pay stubs** and **full accountings** for the period.

#### **B. Third-Party Services and Security Personnel**

1. **Vendors (e.g., Jetty Partners; any security/investigative/contractor services).** Produce **full invoices, proof of funds transfers or canceled checks,** and **service documentation** describing dates, locations, personnel, scope, and findings.
2. **Interrogatory disclosure (witness identification).** Identify by **full legal name, current residential and business addresses, telephone numbers, email addresses, and employer:**
  - a. The **three security personnel** who accompanied Respondent at the marital residence on **January 2, 2024;**
  - b. **All** individuals who searched Respondent’s **new residence;** and
  - c. The individual(s) who inspected Respondent’s **vehicle** and allegedly discovered a device.

This information is required so that subpoenas may be issued timely for trial.

#### **C. Loans, Contributions, and Non-community Items**

1. **Loans.** Any loan your client intends to list must be supported by:
  - a. **Executed, notarized loan agreement** dated **prior** to issuance; and
  - b. **Proof of funds transfer** into your client’s account (wire/ACH/canceled check).
1. **Loans incurred after December 16, 2024** are excluded from this production as taken against standing/temporary orders and will not be treated as community obligations.
2. **Concurrent equity contributions.** Ongoing contributions (approximately

**\$10,000/month, ~\$130,000/year**) to equity funds initiated **after** entry of the orders are inconsistent with any asserted loan-based “need” and must be fully disclosed in the statements and accountings.

3. **Elective cosmetic procedures.** Elective cosmetic surgery is **not** a community obligation and must be **excluded** from community expense accounting.
4. **GLU Distribution (...8627).** Produce **monthly statements** in the same consolidated, sequential, complete manner as all other accounts.
5. **Reimbursements and allowances.** Provide a **full accounting of all reimbursements/allowances** (including housing/rent reimbursements) and all **business-related expenses** during the period; statements must reflect receipt of reimbursements where claimed.

#### **D. Production Mechanics (to avoid disputes)**

- **Native data for validation.** In addition to PDFs, produce **native transaction exports** (CSV/Excel) for each account with at least: transaction date, posting date, description/merchant, debit/credit, running balance, instrument/ID, and transfer source/destination.
- **No redactions** other than PII masking to last-4 where legally required.
- **Bates numbering** and clear file naming (Institution\_Last4\_YYYYMM-YYYYMM.pdf).
- **Privilege log** required for any withheld material, with sufficient detail for evaluation.
- **Custodian certification.** Provide a signed statement (by Respondent and/or the records custodian, as applicable) that production is **complete, consecutive, and gap-free** for the stated period and that the **card/account renumbering mapping is accurate.**

#### **E. Immediate and Final Deadlines**

- **Immediate:** The **December 2024** statement for the card ending **2372** is incomplete (**page 3 missing**). Provide the complete **four-page** statement within **24 hours**.
- **Final:** All remaining responsive financial records **in the format above** must be produced **no later than Monday, September 29, 2025**. By that date, three weeks will have elapsed since the Court’s directive—a **sufficient and reasonable period**.

#### **F. HSA Access**

Additionally, I demand immediate release of the **HSA card credentials**, which are protected by the standing and temporary orders and which I have requested at least **28 times**. Attached are prior requests and medical documentation reflecting the progression of harm since **May 2025**, including **three emergency-room visits** and a **six-day hospitalization**.

Attached is a letter another letter, this one documenting my diagnosis of Congestive Heart Failure, and reiterating the criticality of access to this card.

Timely production is also critical for trial preparation. Trial exhibits must be exchanged 30 days before trial. If full and complete financials are not produced at least 90 days before trial, I

cannot reasonably prepare exhibits or submit materials to a forensic accountant. Any attempt to delay production until exhibits are due will require me to seek a continuance of the trial date.

---

**Non-compliance:** If production is not made **in this format** and **by these deadlines**, I will file notice with the Court and seek appropriate relief, including an order compelling proper production or authorizing subpoenas to custodians of records **at your client's expense**, as well as any other relief the Court deems just.

Please confirm receipt, provide the complete **December 2024 Chase x2372 statement within 24 hours, and confirm the September 29 production timing.**

Sincerely,

Jason McKemie  
(214) 868-4901  
[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

Ethan,

Thank you for confirming production **GU000001-GU001668**. I'm not "ignoring" what was produced; I'm identifying the **specific defects** that prevent the Court-ordered "full and complete" financials. Please cure the items below or point me to the exact **Bates range** that already satisfies each request. Attached are **Demonstrative Exs. A-1 and A-2** marking missing months/pages; they are **illustrative only** and not a substitute for production.

This should get you started. I will advise if I find any additional documentation missing.

**A. Global completeness (all accounts).** Based on my review of **GU000001-GU001668**, **no account** includes a full set of **consecutive monthly statements** for the Court-ordered period. The specific items listed below are **illustrative**, not exhaustive. To close the loop for **every account produced to date**:

1. **Consecutive monthlies.** Produce **official monthly statements (all pages)** for each **account** from **June 1, 2023 to present**, so that the **closing balance of one month equals the next month's opening balance**, with **no gaps**.
2. **Native detail.** For each account, also produce the **CSV/Excel transaction export** (transaction date, posting date, description/merchant, debit/credit, running balance, transfer source/destination).
3. **Production map.** Provide a **production map** listing **account → months produced (Bates) → missing months**, for all personal, joint, business, credit, and plan accounts.
4. **If unavailable.** If you contend any monthly statement **cannot be obtained**, identify the **specific month** and provide (a) the institution's written confirmation or portal notice showing unavailability, and (b) the **steps and dates** you took to request it (e.g., branch request number or ticket).
5. **Page completeness.** Where a month has been produced **without all pages**, re-produce the **complete set**. If a provider omits "Page x of y" footers, state the **total page count** for that month so completeness can be verified.

**B. Missing or incomplete statements (monthly required)**

1. **Chase Sapphire Visa x2372**
  - **Nov 2024 - Missing Pages 3, 5-7**
  - **Dec 2024 - Missing Page 3**
  - **Jan 2025 - Missing Page 3**

Please ensure produced **statements do not have omitted pages of transaction history.**

2. **AIG 401(k)** – Only a **06/22/2024 one-day snapshot** and a **01/01/2025-06/01/2025 roll-up** were produced. These are not monthly statements. Please produce **consecutive monthly statements (all pages)** from **Sept 2023-present** and the **CSV/Excel** export with **date, posting date, description, source code, amount, and running balance.**
3. **GLU Distribution LLC (Chase)** – **Monthly statements June 2023-present** have not been produced. The fee-only report is not a monthly statement. Chase confirms monthly statements are available at any branch with authorization. Please produce **full monthly statements (all pages)** plus **check images, wires/ACH/Zelle**, and a **CSV/Excel** ledger.

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#### **C. Retirement/equity deferrals (VEIP/ESPP) & employer match (Oct 2024-present)**

4. **Payroll elections/changes** – Produce **VEIP/ESPP election/change confirmations** (Nov/Dec 2024) and any HR/benefits emails memorializing effective dates/amounts.
5. **Payroll registers/pay stubs** – Produce the **per-pay registers** showing **VEIP** line items and **tax** withholdings to reconcile any entries labeled “extra tax withholding.”
6. **Plan/provider postings** – Provide **plan statements** reflecting each payroll deferral and the associated **employer match/true-up and vesting**, and the **remittance files** (employer→plan) showing **source codes** and dates.

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#### **D. AIG 401(k) loan history (separate vs community; reimbursement)**

7. The plan shows an active loan (orig. **10/11/2019**). Please produce:
  - **Loan principal balance as of Sept 1, 2023,**
  - **Amortization schedule;** and
  - **Each loan payment** posted **Sept 2023-present** (principal/interest).
  - If available, provide the administrator’s **“balance as of Sept 1, 2023”** letter.

---

#### **E. Production map (to avoid more back-and-forth)**

8. Provide a simple **production map** linking each account to **Bates ranges & months covered**, and identifying missing months.

For example:

Account	Last-4	Institution	Months Produced (Bates)	Missing Months	CSV?
Chase Visa	x2372	Chase	2024-11 (GU-); 2024-12 (GU-)	2024-12 p.3 missing	No
AIG 401(k)	—	AIG	2025 H1 roll-up (GU-); 2024-06-22 snapshot (GU)	2023-09..present monthlies	No
GLU LLC DDA	x8627	Chase	—	2023-06..present	No
Payroll (VEIP)	—	Employer	—	Oct 2024..present registers	—

If you contend any item above is already produced, please identify the **Bates range and month**.

### Format & timing

- **Format:** Statements as **OCR PDFs**; payroll/registers & remittances as **CSV/Excel** (or legible PDF if CSV not kept).
- **Cure date:** Please produce the missing pages/monthlies and provide the production map by **close of business (5:00 p.m. CT) Tuesday, Sept 30, 2025**. If you need **one business day**, say so now.
- **If not cured:** I will file a short **motion to compel** seeking (i) a production map, (ii) replacement of snapshots/roll-ups with **true monthlies + CSV**, and (iii) **fees**.

To keep lanes clean: **HSA access** will be addressed by **separate emergency motion and proposed order** (same-day digital provisioning).

**F. Discovery.** As a courtesy for the time required to compile the deficiency inventory, I am extending the response deadline by one business day. **Please provide a full and complete response—either producing the missing materials or citing exact Bates ranges—no later than close of business (5:00 p.m. CT) on Tuesday, September 30, 2025.**

Best,

Jason McKemie  
 (214) 868-4901  
[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

**Attachments:**

- **Demonstrative Ex. A-1** – Missing Monthly Statements by Account/Month (compiled from GU000001-GU001668).
- **Demonstrative Ex. A-2** – Chase Sapphire x2372 – Missing Statements/Pages (compiled from GU000001-GU001668).

*(Demonstratives only; no work-product waiver / no admissions.)*

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 109297794

Filing Code Description: Motion - Compel

Filing Description: ENVELOPE #109297794 DOC001

Status as of 12/19/2025 10:45 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jason McKemie		jmckemie@mckemie.net	12/19/2025 10:03:55 AM	SENT
Gwendolyn Ulijasz McKemie		GUlijasz@gmail.com	12/19/2025 10:03:55 AM	SENT
JASON EMORYMCKEMIE		jason@callvital.com	12/19/2025 10:03:55 AM	SENT

IN THE MATTER OF:

IN THE 302 FAMILY DISTRICT

McKenzie

COURT OF DALLAS COUNTY, TEXAS

ASSOCIATE JUDGE'S REPORT (Divorce/SAPCR)

Temporary \_\_\_\_\_ Final \_\_\_\_\_

Pursuant to an Order of Referral, a hearing in this matter has been held by a duly appointed Associate Judge as authorized by Chapter 201, Texas Family Code. The parties are hereby given notice of the findings and recommendations contained herein and of their right to be heard by a District Judge upon compliance with the terms of Chapter 201, Texas Family Code. A copy of this Report has been given to each party or the party's attorney who appeared at the hearing.

AGREEMENT  DEFAULT  CONTESTED HEARING  Reporter/Interpreter Present \_\_\_\_\_

APPEARANCES: Husband/Father: \_\_\_\_\_ and Attorney: \_\_\_\_\_

Wife/Mother: \_\_\_\_\_ and Attorney: \_\_\_\_\_

Other: \_\_\_\_\_ and Attorney: \_\_\_\_\_

The parties appeared Jan 6, 2026 on Motion to Compel Discovery & requests regarding hsa

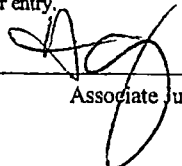
The court grants respondents request that financial documents be turned over by Jan. 9, 2026

The hsa card was provided to respondent, Mr. McKenzie at the time of the hearing

On January 12, 2026, Mr. McKenzie (husband) appeared & present a ex parte relief regarding eviction proceedings, temporary stay & temporary support. Those requests were denied.

Attorney for  Husband/Father  Wife/Mother will reduce this Report to written Order and submit to other side and Court within fourteen (14) days.  Orders require proof of submission to other attorney OR signature of all  attorneys or  parties for entry.

Jan. 12, 2026  
Date

  
Associate Judge

Agreed

Agreed

Agreed

Agreed

# Benefit Summary

Benefit Summary Generated On 02/02/2026 At 12:32:54 CST

## About You

### Your Information

Name	Jason E McKemie
Address	5609 La Foy Blvd Dallas, TX 75209 US
Date of Birth	04/08/1976
Gender	Male
Cell Phone	214-868-4901

## Election Information

Current

## Current

### My Health

Medical - Aetna HealthFund HDHP

#### Medical Covered Members

Members

Covered

Jason E McKemie  
Effective Date: 01/01/2026

Yes

Dental - Aetna DMO Plan

#### Dental Covered Members

Members

Covered

Jason E McKemie  
Effective Date: 01/01/2026

Yes

Vision - UnitedHealthcare Vision Plan

#### Vision Covered Members

Members

Covered

Jason E McKemie  
Effective Date: 01/01/2026

Yes

Employee Critical Illness - Coverage Waived

Spouse/Domestic Partner Critical Illness - Coverage Waived

Child Critical Illness - Coverage Waived

### My Savings

Health Savings Account - Health Savings Account

Health Care Flexible Spending Account - Health Care Flexible  
Spending Account

**52 of 69**

Limited Purpose Flex

Dependent Care Flexible Spending Account - Coverage Waived

## My Security

Basic Life Insurance - Basic Life Insurance

Basic Accidental Death & Dismemberment (AD&D) Insurance - Basic  
AD&D Insurance

Optional Life Insurance - Coverage Waived

Optional Accidental Death & Dismemberment (AD&D) Insurance - Coverage Waived

Spouse or Domestic Partner Life AD&D Insurance - Coverage Waived

Dependent Child Life/AD&D - Coverage Waived

Long-Term Disability Insurance - LTD \$15,000 Monthly Maximum

Short-Term Disability Insurance - Short-Term Disability

Legal Plan - Legal Plan

Personal Excess Liability - 2. Personal Excess Liability - 2 Million

## Dependent Child-Only Life/AD&D - Coverage Waived

This online benefit summary is reflective of benefits information contained within the Businessolver, Inc. database on the date this information is being displayed. This information is not intended to be an all inclusive or exhaustive list of benefit enrollment information. Modifications, deletions, and additions to coverage are not immediately effective upon submission. Please contact the Benefits Center at 888-259-6059 if you have any questions.

Important Note: The insurance carriers make the final determination regarding the payable benefit amount and the designated beneficiaries. The information shared reflects the current enrollment system data, but the ultimate benefit recipient or benefit amount to be paid may change based on plan rules, Evidence of Insurability and approvals, and other factors.

Every effort has been made to report information accurately, but the possibility of error exists. In case of any conflict between your benefits election confirmation and an official plan document, the plan document will be the final authority. Please note, some insurance coverage elections only become effective upon approval of your Evidence of Insurability (EOI) by the carrier.

\* -Any personal or dependent information that appears in red font indicates a change that is currently pending approval.

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. DF-24-18010

NOTICE: DOCUMENT CONTAINS  
SENSITIVE INFORMATION.

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

---

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MOTION TO OBTAIN CERTIFIED TRANSCRIPT OF JANUARY 7, 2025, HEARING AND REQUEST FOR  
PAYMENT FROM COMMUNITY FUNDS UNDER PETITIONER'S CONTROL

---

I, **Jason McKemie**, Respondent, appearing *pro se*, respectfully request authorization for a certified transcript of the **January 7, 2025 Temporary Restraining Order hearing** held before the Honorable **Judge Kimberly Brown** (then sitting for the 254th District Court).

1. **CERTIFIED TRANSCRIPT REQUIRED.**

- The hearing included **extensive testimony** on matters still material to this case— including financial issues, counsel withdrawal, property interests, prior and pending civil litigation, security and safety matters, third-party statements, alleged criminal conduct, and the timeline and duration of the marriage.
- To ensure that testimony is not taken out of context or reviewed in incomplete form, a **certified transcript of the entire hearing** is necessary, so all parties and the Court have an accurate and complete record.

2. **Existing Recording.**

- I possess an unofficial digital recording of approximately **three hours and forty-four minutes** of the hearing; however, it omits the first **ten to fifteen minutes** of proceedings.
- A **complete, court-certified transcript** is required so that the record used for trial preparation is full and accurate and ensures a **fair, just, and equitable resolution** of these proceedings.

3. **Preparation Authority.**

- The hearing was recorded digitally rather than by a court reporter.
- I request that the **Clerk of the 254th District Court**, or that court's designated transcription vendor, be authorized to prepare and certify the **complete transcript** of the digital recording and release it to the **302nd District Court** for use in this cause.

4. **Payment of Costs / Reservation of Rights.**

- Temporary Orders entered after that hearing assign me responsibility for all expenses of the marital estate, while all community accounts and liquid funds remain solely under **Petitioner Gwendolyn Ulijasz's control.**
  - I ask that the Clerk or transcription vendor bill the cost of preparing the certified transcript to be **paid from community funds under Petitioner's exclusive control,** and I reserve my right to reimbursement of my community share of that cost at the final division of the estate.
5. **Access to the Record.**
- A certified transcript of the January 7, 2025, hearing is fundamental to these proceedings.
  - Both parties and the Court must have equal access to an accurate record to ensure **transparency and due process.**
  - There is no valid reason for either party to oppose its preparation.
6. **Request for Prompt Ruling.**
- Because this motion concerns preservation of the record for trial and requires no additional evidence, I respectfully ask the Court to **rule promptly by submission** and notify both parties by email.
  - Delay would prejudice my ability to prepare for trial.

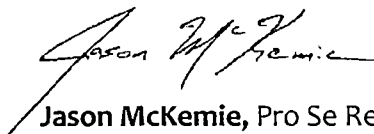
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**WHEREFORE, PREMISES CONSIDERED,**

I respectfully ask the Court to:

1. Authorize the **Clerk of the 254th District Court of Dallas County, Texas,** or that court's designated transcription vendor, to prepare and certify the **complete transcript** of the **January 7, 2025 hearing** before Judge Kimberly Brown and release it to the **302nd District Court** for use in this cause;
2. Direct that the reasonable cost of preparing the transcript be **billed to Petitioner Gwendolyn Ulijasz** and paid from **community funds under her control;**
3. Reserve Respondent's right to reimbursement of his community share of such cost at the final division of the estate; and
4. Grant all other relief to which Respondent may be justly entitled.

Respectfully submitted,



**Jason McKemie**, Pro Se Respondent  
539 W Commerce St, Suite #2010  
Dallas, TX 75208  
(214) 868-4901 | [jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. DF-24-18010

NOTICE: DOCUMENT CONTAINS SENSITIVE INFORMATION.

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

**ORDER AUTHORIZING PREPARATION OF CERTIFIED TRANSCRIPT**  
*of the January 7, 2025, Hearing w/ Payment from Community Funds*

On this day, the Court considered Respondent Jason McKemie's Motion to Obtain Certified Transcript of the January 7, 2025, TRO Hearing and Request for Payment from Community Funds under Petitioner's Control.

After reviewing the motion and the record, the Court finds that good cause exists to grant the requested relief and that a certified transcript of the hearing is necessary to ensure an accurate record for use in these proceedings.

**IT IS THEREFORE ORDERED** that the Clerk of the 254th District Court of Dallas County, Texas, or that court's designated transcription vendor, is authorized to prepare and certify the complete transcript of the January 7, 2025 hearing held before the Honorable Judge Kimberly Brown and to release the certified transcript to the 302nd District Court for use in this cause.

**IT IS FURTHER ORDERED** that the reasonable cost of preparing the certified transcript shall be billed directly to Petitioner, Gwendolyn Ulijasz, and paid from community funds under her control.

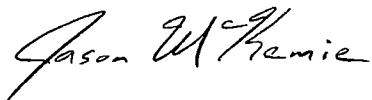
**IT IS FURTHER ORDERED** that Respondent retains the right to reimbursement of his community share of such cost at the final division of the estate and to seek equitable reallocation of expenses as appropriate.

All other relief not expressly granted herein is **DENIED**.

SIGNED on this \_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
**JUDGE PRESIDING**  
 302nd Judicial District Court  
 Dallas County, Texas

**APPROVED AS TO FORM:**



**Jason McKemie**, Pro Se Respondent  
539 W Commerce St, Suite #2010  
Dallas, TX 75208  
(214) 868-4901 | [jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 107431776

Filing Code Description: Motion - Miscellaneous

Filing Description: MOTION TO OBTAIN CERTIFIED TRANSCRIPT OF JANUARY 7, 2025, HEARING AND REQUEST FOR PAYMENT FROM COMMUNITY FUNDS UNDER PETITIONER'S CONTROL

Status as of 10/30/2025 11:18 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Ethan Scroggins		escroggins@sullivancook.com	10/29/2025 1:08:07 PM	SENT
Jason McKemie		jmckemie@mckemie.net	10/29/2025 1:08:07 PM	SENT
Gwendolyn Uljasz McKemie		GUljasz@gmail.com	10/29/2025 1:08:07 PM	SENT
JASON EMORYMCKEMIE		jason@callvital.com	10/29/2025 1:08:07 PM	SENT

## **EXHIBIT LIST (TO BE ATTACHED)**

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- Exhibit A: Respondent/Movant Pleadings Index by Category (100 filings / 1,110 pages).
- Exhibit B: Motion to Compel with Color Production Grid
- Exhibit D: Credit Card Over Payment
- Exhibit E: Signed Order to Reinstate Healthcare
- Exhibit F: Motion to Compel Docket Sheet
- Exhibit G: Benefits Summary generated February 2, 2026, reflecting multiple coverages waived.
- Exhibit H: Motion to Obtain Certified Transcript of January 7, 2025 Hearing (with proposed order).
- Exhibit I: Motion to Establish Conditions for Re-Entry of Counsel and Preserve Fair Trial.
- Exhibit K: Unified Proposed Order drafted at the Associate Judge's direction following the February 5 compliance hearing (pending).

NO. **DF-24-18010**

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

---

**PROPOSED UNIFIED ORDER REGARDING (1) MATERIAL DEVELOPMENTS, (2) THIRD-PARTY VERIFICATION, (3) HEALTHCARE + HSA/FSA FUNCTIONALITY, (4) INTERIM HSA/FSA MAKE-WHOLE RELIEF, AND (5) PRETRIAL SEQUENCING**

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On this day, the Court considered Respondent’s filings requesting (i) the Court’s awareness of material developments affecting healthcare access and enforcement of prior orders, (ii) authorization of limited third-party verification to resolve disputed issues, (iii) safeguards to ensure functional healthcare and HSA/FSA access without disruption, and (iv) pretrial sequencing necessary to ensure the matter proceeds on a complete and accurate record.

The Court enters this Order to **enforce existing orders, preserve due process, prevent ongoing or foreseeable harm, and maintain the status quo pending final adjudication**, and further finds that the procedures and structures set forth herein are **not intended to delay these proceedings**, but to **reduce uncertainty, promote transparency, and ensure reliable compliance**.

The Court finds that by addressing potential sources of harm, clarifying obligations, and relying on **objective, outcome-based verification** rather than repeated motion practice, this Order is intended to **protect the parties from avoidable injury, preserve procedural fairness, and facilitate the most expeditious, orderly, and informed resolution of this case**.

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**I. MATTERS REQUIRING IMMEDIATE STRUCTURE AND THIRD-PARTY VERIFICATION**

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Without adjudicating fault or final relief, the Court notes the following issues require immediate structure and neutral verification:

**A. BANKRUPTCY TRUSTEE INVOLVEMENT / SEQUENCING**

Respondent has filed bankruptcy relief and a bankruptcy trustee is now involved. Trustee review necessarily overlaps with disputed financial issues in this case and supports careful sequencing so proceedings are not conducted on an incomplete or conflicting record.

**B. HEALTHCARE ACCESS IS DISPUTED AS “FUNCTIONAL,” NOT MERELY “ON PAPER”**

The parties present irreconcilable positions regarding whether Respondent has uninterrupted, usable access to medically necessary care, prescriptions, and benefits functionality.

**C. HSA/FSA FUNCTIONALITY REMAINS A CENTRAL, TIME-SENSITIVE DISPUTE**

Respondent contends that HSA/FSA access has been repeatedly non-functional and that he does not possess independent, reliable access. Petitioner contends compliance has occurred and any issues are administrative. Because disruption creates immediate, non-substitutable harm, a self-executing safeguard is warranted to prevent repeat disputes and repeat disruption.

**D. THIRD-PARTY INSTITUTIONAL RECORDS ARE REQUIRED**

The Court finds these disputes cannot be reliably resolved by party testimony alone and require neutral, third-party verification from the institutions that maintain the source records.

**II. DEFINITIONS**

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- A. **“Healthcare Reinstatement Order”** means the Court’s Signed Order on Emergency Reinstatement of Healthcare signed December 17, 2025.
- B. **“Functional Access”** means that Respondent can actually obtain medically necessary care and prescriptions using active plan eligibility and benefit functionality, including: medical and pharmacy processing, and usable HSA and/or FSA funds for qualified expenses, without needing cooperation from an adverse party.
- C. **“Coverage Preservation Cash-Value Equivalent” (CPCVE)** means the cash-value equivalent of \$20,643.56, defined as a lump sum in the Court’s **December 17, 2025 Order on Emergency Reinstatement of Healthcare**, adopted as a substitute remedy where functional access to healthcare or related benefit functionality fails or cannot be reliably preserved.

**III. SUMMARY OF MATERIAL DISPUTES REQUIRING THIRD-PARTY VERIFICATION**

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The Court finds the parties present materially irreconcilable positions on issues central to Respondent’s health and procedural capacity, including:

- A. Healthcare Access and Continuity (medical + pharmacy)
- B. HSA and FSA functionality, enrollment, funding, card status, and access control history
- C. QLE / eligibility actions affecting dependent coverage status and system audit trails
- D. Housing / lease modification, buyout, rent ledgers, and eviction-related records (to the extent implicated by pending motions)
- E. Financial disclosure completeness and accuracy (to the extent implicated by pending motions)
- F. Bankruptcy-trustee overlap requiring sequencing

#### **IV. AUTHORIZATION OF LIMITED THIRD-PARTY SUBPOENAS (NEUTRAL VERIFICATION)**

---

Respondent is authorized to issue limited third-party subpoenas (and/or written authorizations where appropriate) narrowly tailored to the disputes above, including subpoenas necessary to trace, verify, or exclude undisclosed payments made directly or indirectly on Petitioner's behalf through banking institutions, peer-to-peer payment platforms, or payment intermediaries.

The Court finds that good cause exists under Texas Rule of Civil Procedure 205.3 to authorize the limited third-party subpoenas described herein. The records sought are relevant, material, proportional, and necessary to obtain independent source-of-truth records that are not reliably obtainable through party production alone, and are required for fair case administration, enforcement of existing orders, and trial preparation.

##### **A. EMPLOYER / PLAN ADMINISTRATOR / BENEFITS CENTER / VENDORS (SOURCE RECORDS) RECORDS SUFFICIENT TO VERIFY:**

- 1) Dependent eligibility and any QLE submission(s), uploads/attestations, reason codes, effective dates, cure/reinstatement workflow, and system/audit trail reflecting who initiated and approved changes;
- 2) Pharmacy benefit manager (PBM) eligibility updates and processing dates;
- 3) HSA and FSA enrollment and funding for 2025 and 2026 plan years;
- 4) HSA/FSA card issuance, replacement, activation/deactivation, lost/stolen reporting history, credential/access control events, and any relevant call logs/tickets.

##### **B. FINANCIAL INSTITUTIONS**

Complete records necessary to verify disputed disclosures (account statements, transaction history, and account ownership/authority records as applicable).

##### **C. ORDER GRANTING LEAVE FOR TARGETED THIRD-PARTY SUBPOENAS**

This authorization **constitutes leave of court under Rule 205.3** notwithstanding any discovery control plan, scheduling order, or discovery cutoff, and is entered as a targeted exception necessary to ensure record integrity and due process.

##### **D. LANDLORD, PROPERTY MANAGER, AND ASSOCIATED FINANCIAL INSTITUTIONS**

Lease files, modifications, buyouts, rent ledgers, payment history, notices, eviction filings/records, and complete banking and payment records sufficient to verify whether rent or housing-related payments were made directly or indirectly on Petitioner's behalf, including but not limited to:

- 1) records from any financial institution holding accounts for the landlord or property manager, including Wells Fargo Bank, N.A., reflecting deposits, Zelle transactions, ACH credits, wires, checks, or other payment activity originating from or attributable to Petitioner;

- 2) records reflecting peer-to-peer or third-party payment processing used to transmit funds for rent or housing obligations, whether labeled as rent or otherwise characterized;
- 3) records sufficient to confirm the absence or presence of any such payments during the relevant period.

#### **E. PEER-TO-PEER AND PAYMENT SERVICE PROVIDERS (PETITIONER ACCOUNTS)**

Complete account statements, transaction histories, payment logs, metadata, and account linkage records for any peer-to-peer or payment service provider used by Petitioner, including but not limited to Venmo, Zelle, Apple Pay, Cash App, PayPal, or similar platforms, sufficient to verify the source, destination, purpose, and timing of any payments relevant to disputed housing, financial disclosure, or enforcement issues.

### **V. HEALTHCARE + HSA/FSA FUNCTIONALITY SAFEGUARD (SELF-EXECUTING)**

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#### **A. INDEPENDENT FUNCTIONAL ACCESS REQUIREMENT**

Petitioner shall not interfere with, restrict, disable, or obstruct Respondent's access to healthcare, prescriptions, or benefit functionality pending further order of the Court.

#### **B. OBJECTIVE PROOF OF NON-FUNCTIONALITY (TRIGGER STANDARD)**

If Respondent experiences a denial, disruption, or non-functionality of healthcare coverage, prescription access, or HSA and/or FSA functionality, Respondent may file a "Notice of Healthcare or HSA/FSA Non-Functionality" attaching objective proof, including but not limited to:

- 1) a pharmacy point-of-sale decline, reversal, or inability-to-fill notice;
- 2) a provider or pharmacy statement reflecting inability to schedule, bill, or dispense due to coverage issues;
- 3) a vendor or plan status page reflecting inactive, blocked, or non-functional coverage or account status.

#### **C. 24-HOUR OUTCOME-BASED CURE, RE-ATTEMPT, AND AUTOMATIC DEPOSIT REQUIREMENT**

##### **1) RESPONDENT-INITIATED FAILURE AND NOTICE**

If Respondent experiences a denial, disruption, or non-functionality of healthcare coverage, prescription access, or HSA/FSA functionality, Respondent may file and serve a **Notice of Healthcare or HSA/FSA Non-Functionality** pursuant to Section B, attaching objective proof of the failed transaction or access attempt.

##### **2) OPPORTUNITY TO CURE (24 HOURS)**

Upon service of the Notice, Petitioner shall have **twenty-four (24) hours** to remediate the specific failure identified, such that Respondent can complete the **same transaction** without obstruction or dependence on Petitioner.

### 3) RE-ATTEMPT AND CONFIRMATION

Following the 24-hour cure period, Respondent shall re-attempt the same transaction or access. If the transaction **successfully completes**, no further action is required under this subsection.

### 4) AUTOMATIC DEPOSIT UPON SECOND FAILURE

If the transaction does not successfully complete upon re-attempt after the cure period, Petitioner shall deposit the Coverage Preservation Cash-Value Equivalent (\$20,643.56) into the Court Registry **within twenty-four (24) hours of the failed re-attempt** as interim parity relief, consistent with the valuation adopted by the Court in its December 17, 2025 Order, without regard to the present availability or applicability of COBRA.

### 5) HEARING AND DISPOSITION OF FUNDS

Upon deposit, the Court shall set a prompt hearing to determine whether the failure or non-functionality was caused, in whole or in part, by Petitioner's actions or omissions.

- If the Court so finds, the deposited funds shall be released to Respondent as **interim protective and parity relief**, intended solely to preserve access to medically necessary care and benefits pending final adjudication, **and not as compensation for past harm, damages, or injury.**
- If the Court does not so find, the Court shall retain, reallocate, or otherwise dispose of the funds as equity and due process require.
- The deposit obligation under subsection (4) is mandatory and not stayed by any request for hearing, clarification, or reconsideration.
- Any determination made at such hearing shall be limited to the administration of interim relief under this Order and shall not constitute findings for purposes of any separate civil action.

## D. PURPOSE AND RESERVATION

This structure is entered to prevent repeated disruption of medical access, to eliminate reliance on assurances or administrative delay, and to protect Respondent from ongoing harm. The Court expressly reserves all ultimate determinations regarding fault, reimbursement, offsets, fee shifting, sanctions, or disproportionate division for later adjudication.

Nothing in this Order shall be construed as a finding, adjudication, waiver, release, satisfaction, or limitation of any claim, cause of action, remedy, or right that may exist outside the scope of this proceeding. This Order does not preclude Respondent from seeking additional relief, including

compensatory damages, exemplary damages, sanctions, statutory remedies, or other civil relief, nor does it waive any right to pursue such claims in a court of competent jurisdiction, including any right to a jury trial where applicable.

**E. THIRD-PARTY PRODUCTION DEADLINE**

Unless otherwise agreed in writing or ordered by the Court, any third-party custodian served pursuant to this Order shall produce responsive documents and electronically stored information within fourteen (14) days of service. Production may be made electronically via secure link or other reasonable method.

**F. MANDATORY SHARING OF THIRD-PARTY PRODUCTIONS**

Any documents, data, statements, exports, logs, notices, or records received by either party from any third-party custodian pursuant to this Order shall be produced to the other party within three (3) business days of receipt, without awaiting further request.

**G. PHASED SERVICE; AVOIDANCE OF DUPLICATION**

Respondent may serve subpoenas authorized by this Order in phases. Respondent shall make reasonable efforts to avoid duplicative subpoenas where prior third-party production fully covers the same custodian, accounts, time period, and record categories.

**H. BUSINESS-RECORDS AUTHENTICATION**

Respondent may elect to utilize deposition by written questions solely for the purpose of business-records authentication under the Texas Rules of Evidence and Texas Rules of Civil Procedure.

## **VI. BANKRUPTCY / PRETRIAL SEQUENCING**

---

Because the bankruptcy trustee's review overlaps with disputed financial issues, and because third-party institutional verification is required, the Court orders the following sequencing:

**A. VERIFIED-RECORD FIRST**

The Court will prioritize receipt of third-party records authorized by this Order so that pretrial hearings and/or trial are conducted on an accurate, neutral factual record.

**B. CASE MANAGEMENT CONFERENCE / HEARING STRUCTURE**

Upon receipt of third-party productions (or expiration of compliance deadlines), the Court may set a focused pretrial hearing to address:

- 1) healthcare/HSA/FSA functionality verification and enforcement,
- 2) disputed disclosure completeness (if applicable),

- 3) housing/lease verification (if applicable),
- 4) and the effect of trustee review on sequencing and scope.

## **VII. NO ERISA ADJUDICATION / ENFORCEMENT OF EXISTING ORDERS ONLY**

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Nothing in this Order adjudicates ERISA claims or determines federal rights. The Court enters this Order to enforce its existing temporary orders and to ensure neutral verification of facts directly impacting access to care and the fairness and safety of the proceedings.

## **VIII. EFFECTIVE DATE**

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This Order is effective immediately upon judicial signature.

**SO ORDERED.**

SIGNED on FEBRUARY \_\_\_\_\_, 2026.

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**JUDGE PRESIDING**  
302ND JUDICIAL DISTRICT COURT  
DALLAS COUNTY, TEXAS

**Automated Certificate of eService**

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Filing Code Description: Proposed Order/Judgment  
Filing Description: ORDER ON STATUS, VERIFICATION, INTERIM RELIEF, AND PRETRIAL MANAGEMENT  
Status as of 2/11/2026 4:23 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jason McKemie		jmckemie@mckemie.net	2/10/2026 11:57:36 AM	SENT
Gwendolyn Uljasz McKemie		GUljasz@gmail.com	2/10/2026 11:57:36 AM	SENT