

Bench  
Filed  
7/23/25  
VS

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

**DF-24-18010**

NO. \_\_\_\_\_

IN THE MATTER OF	§	IN THE DISTRICT COURT THE
MARRIAGE OF	§	
	§	
GWENDOLYN ULIJASZ-MCKEMIE	§	<u>254<sup>th</sup></u> JUDICIAL DISTRICT &
	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

**RESPONDENT'S VERIFIED MOTION TO RECUSE  
JUDGE KIMBERLY BROWN UNDER TEX. R. CIV. P. 18a**

**CONFIDENTIAL – FILED UNDER SEAL**

*This document contains sensitive medical, financial, and evidentiary content. Respondent respectfully requests this document be maintained under seal until judicial review. Respondent reserves the right to request unsealing as appropriate for legal protection or evidentiary exposure.*

**Confidential Filing – Reservation of Rights to Unseal**

This document is filed under seal for the limited purpose of protecting sensitive medical, financial, and safety-related information from unnecessary public exposure.

Respondent explicitly reserves the right to request this document be unsealed in whole or in part at any time, for any reason, at Respondent's sole discretion.

No protective order, sealing order, or judicial restriction has been issued that limits Respondent's right to disclose, submit, or publish the facts contained herein in another forum, including but not limited to:

- Judicial review or appeal
- Bar association or oversight complaint
- Investigative, journalistic, or public interest inquiry

## TO THE HONORABLE PRESIDING JUDGE:

COMES NOW Jason McKemie, Respondent in the above-captioned matter, and files this Verified Motion to Recuse the Honorable Kimberly Brown, Judge of the 254th Judicial District Court of Dallas County, Texas, pursuant to **Texas Rule of Civil Procedure 18a**, and in support thereof respectfully states:

### I. RELIEF REQUESTED

Respondent respectfully moves this Court to **recuse Judge Kimberly Brown** from presiding over this case, and requests reassignment of this matter to a new judge for all further proceedings.

### II. JUDGE TO BE RECUSED

This motion is directed to **Judge Kimberly Brown**, currently presiding over the 254th District Court in Dallas County, Texas.

### III. FACTUAL AND LEGAL BASIS FOR RECUSAL

Respondent asserts that Judge Brown's continued involvement in this case has given rise to **an appearance of impropriety, bias, and systemic prejudice**, in violation of **Canon 3(B)(1)** and **Canon 3(B)(5)** of the Texas Code of Judicial Conduct.

Specifically:

1. Over **25 motions** submitted by Respondent remain **unheard**, despite repeated attempts to secure emergency hearings and relief.
2. Respondent has faced **medical crisis**, including spinal surgery and hospitalization for a life-threatening infection, without any court intervention or temporary support despite ongoing filings and notices.
3. The Court has permitted Petitioner to:
  - o Withhold discovery
  - o Modify financial filings after the deadline
  - o Submit false affidavits and redacted account statements without sanction
4. Respondent has been denied access to marital health benefits, legal counsel, and financial resources during an active emergency — resulting in near homelessness and food insecurity.
5. Opposing counsel was permitted to **withdraw during discovery**, then reappear minutes before the deadline to file blanket objections to every discovery request. The Court has taken **no action** to address or remedy this obstruction.
6. These actions have produced an appearance that **Respondent has no fair access to the Court**, and that the Court is **ignoring judicial responsibility to ensure equal participation** under Tex. Fam. Code §6.502 and established standing orders.

#### IV. COMPLIANCE WITH RULE 18a

- This motion is **timely filed** prior to the commencement of trial.
- This motion is **verified under oath** by the Respondent.
- A **copy of this motion will be served on all parties**, and filed with the clerk as required under **Rule 18a(g)**.
- A copy will be **immediately delivered to Judge Kimberly Brown**, and the **presiding judge of the administrative judicial region** will be notified.

#### V. PRAYER

WHEREFORE, PREMISES CONSIDERED, Respondent respectfully requests that Judge Kimberly Brown be recused from further participation in this matter, and that the case be reassigned in accordance with **Tex. R. Civ. P. 18a**. Respondent further requests any and all relief to which he may be justly entitled.

Respectfully submitted,



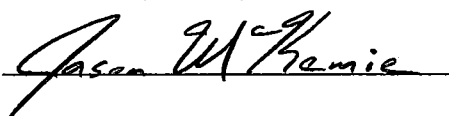
Jason McKemie  
Pro Se Respondent  
539 W Commerce St, Ste 2010  
Dallas, TX 75208  
(214) 868-4901

[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

#### VERIFICATION

My name is Jason McKemie. I am the Respondent in this case. I declare under penalty of perjury that the facts stated in the foregoing Motion to Recuse are true and correct to the best of my knowledge and belief.

Executed on this 23 day of July, 2025.

Signature: 

Jason McKemie

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IN THE MATTER OF	§	IN THE DISTRICT COURT THE
MARRIAGE OF	§	
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GWENDOLYN ULIJASZ-MCKEMIE	§	<u>254<sup>th</sup></u> JUDICIAL DISTRICT &
	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

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**SUPPLEMENTAL NOTICE OF INTENT TO SUBMIT  
EXHIBITS IN SUPPORT OF RULE 18a MOTION**

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- Judicial review or appeal
- Bar association or oversight complaint
- Investigative, journalistic, or public interest inquiry

## **TO THE HONORABLE PRESIDING JUDGE:**

### **Supplemental Statement from Respondent Jason McKemie**

(In support of Rule 18a Motion to Recuse)

Respondent's health has been in steady decline for weeks. He has been in and out of emergency care, facing compounding medical hardship, with no access to spousal support, medical benefits, or marital resources. Opposing counsel has been consistently notified of this, yet continues to push forward aggressively while refusing to produce discovery, correct misrepresentations, or meaningfully participate in resolution.

Respondent has filed multiple motions for relief and continuance. He has appeared before the court or attempted to seek emergency hearings no fewer than **11 times** over the last several months. Associate judges have stated they cannot rule on his motions. Judge Bedard has confirmed she cannot rule without opposing counsel present. Every time Respondent notifies opposing counsel of hearing availability, they decline to appear — making relief procedurally impossible.

When Respondent appears in the courthouse to seek help, he is dismissed or removed. He has been left in a procedural catch-22: every judge requires opposing counsel's presence to rule — and opposing counsel simply does not appear. This has rendered Respondent functionally voiceless and without judicial protection.

In that time, opposing counsel has submitted fraudulent financial disclosures, certified redacted and incomplete discovery, and repeatedly obstructed access to basic financial records — while Respondent starves, faces eviction, and is denied medication due to canceled HSA access. Respondent has no access to counsel, no access to care, and has been financially strangled to the point of total collapse.

He is now facing **eviction this Friday**, despite the existence of a \$2.1 million marital estate. He is not a financially obligated party on the lease — yet the Court has assigned him 100% responsibility for a \$25,000 monthly burden that was never legally his to carry. The Petitioner, who urged him to pursue an entrepreneurial venture, began siphoning funds in September and has since cut off every resource available to him.

Respondent is now two and a half months without his prescribed heart medications. During a recent hospitalization, he experienced anaphylactic shock after being administered Vancomycin to treat an aggressively escalating staph infection. It was discovered that he is allergic to the core family of antibiotics typically used to combat this class of infection, requiring access to specialized medication. After six months of financial obstruction by Petitioner, Respondent was notified that the marital HSA card appeared to have been reactivated. Believing this might signal a change in posture, he went to the pharmacy to fill his prescriptions. One was available immediately and was successfully purchased for \$41

using the HSA card. The remainder required special ordering and was scheduled for pickup the following day. When Respondent returned, the card had been disabled.

This was not accidental. When Petitioner saw that Respondent had regained access to the HAS Benefits card, she revoked it — fully aware that Respondent had just been released from a six-day hospitalization and remained at serious medical risk. This act of calculated cruelty left Respondent without the life-sustaining medications required to treat his infection.

At the time of this filing, Respondent has not eaten in nearly two days and is actively deteriorating. He is simultaneously attempting to prevent his parents from losing their home while fighting to save his own, both which have been caused by the actions of Petitioner. Without immediate judicial intervention, Respondent is facing imminent collapse — medically, financially, and procedurally. There is no path forward without relief.

Petitioner's conduct is not an isolated or misunderstood emotional reaction — it reflects a **known pattern of manipulative litigation and retaliatory behavior**. Multiple individuals from her past have come forward describing nearly identical cycles: emotional escalation, financial dependency, false allegations, and the filing of protective orders designed to silence, discredit, and neutralize opposition. Respondent is aware of at least **two prior protective orders** obtained under questionable circumstances, as well as **multiple employment settlements** connected to similar accusations. These are not unverified rumors — they are supported by settlement agreements, sworn statements, and court records. In every instance, Petitioner has followed the same sequence: allegation, escalation, legal entrapment, then silence through procedural leverage. Several of these individuals wish to testify but are currently **bound by protective order language** that prohibits them from speaking unless **subpoenaed**. Respondent is preparing documentation to present this evidence, and to request subpoenas for these silenced witnesses.

Respondent respectfully requests:

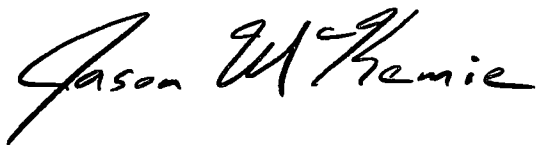
- **A stay of eviction proceedings and an immediate writ of possession or injunctive relief** to halt removal from the marital residence
- **Immediate access to spousal support and medical funds**, so that he may obtain food, medication, and necessary treatment
- **Appointment or reassignment of judicial oversight** so that the record may finally be reviewed and 25 un rebutted motions addressed

Respondent affirms that a full evidentiary supplement is forthcoming. He will repackage and consolidate all pending motions for clarity, but cannot do so without basic medical and housing stability.

If no intervention is granted, Respondent may be forced to seek police assistance under applicable statutory authority to protect his safety, property rights, and access to survival resources.

He asks this Court to intervene now — while there is still time to prevent irreversible harm.

Respectfully submitted,



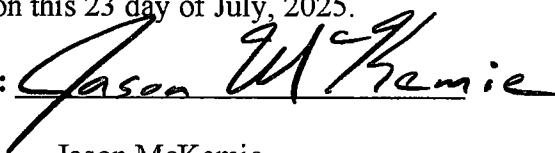
**Jason McKemie**  
Pro Se Respondent  
(214) 868-4901  
[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

**VERIFICATION**

My name is Jason McKemie. I am the Respondent in this case. I declare under penalty of perjury that the facts stated in the foregoing Motion to Recuse are true and correct to the best of my knowledge and belief.

Executed on this 23 day of July, 2025.

Signature:



Jason McKemie

Absolutely, Jason. Here's your full case outline in plain text format — clean, numbered, and ready to copy, paste, or read from.

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## **CASE OUTLINE – McKemie v. Ulijasz-McKemie**

**DF-24-18010 | 254th District Court, Dallas County, Texas**

### **1. Judicial Recusal Filed (Rule 18a)**

- Respondent filed a verified **Motion to Recuse Judge Kimberly Brown** under Rule 18a.
- Cited: denial of due process, refusal to hear 25+ motions, failure to enforce standing orders, medical hardship ignored, and procedural obstruction by opposing counsel.
- Filing of Rule 18a **automatically disqualifies Judge Brown** from further action until the Presiding Judge of the Administrative Judicial Region rules.
- Motion includes: obstruction record, health crisis, 11 failed attempts to get emergency relief, asset concealment, and pattern of abuse.

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### **2. Pattern of Obstruction by Opposing Counsel (Sullivan & Cook)**

- **Discovery evaded:** Counsel filed motion to withdraw during discovery window, then re-entered 15 minutes before deadline to object to all requests.
- **Shadow representation:** Petitioner was looped into emails showing attorney-client contact while counsel was “withdrawn.”
- **Financial certifications are fraudulent:** Redacted accounts, mismatched paystub/deposit data, omitted accounts and income.
- **Over 25 motions** have been submitted and left unheard by the Court.
- Counsel has **refused emergency hearing appearances**, blocking judicial access by simply not showing up.

### **3. Medical Crisis and HSA Sabotage**

- Respondent has been hospitalized multiple times with **severe staph infection** and post-spinal surgery complications.
- **Vancomycin-induced anaphylactic shock** confirmed.
- After finally accessing the HSA to purchase one prescription, **Petitioner deactivated the HSA card again** once she saw a pharmacy charge — cutting off Respondent from critical antibiotics.

- Respondent is now **2.5 months without heart meds**, underweight, malnourished, and has gone days without food.
- Emergency relief has been sought repeatedly and denied.

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#### 4. Standing Order Violations and VEIP Abuse

- Petitioner earns **\$1.5M/year**, up from ~\$360K when the marriage began — a 440% increase achieved with Respondent's partnership and labor.
- She has been **shoveling \$10K/month into a VEIP equity fund**, totaling **\$130K+**, in violation of the standing orders (which prohibit early repayment or discretionary investing).
- VEIP yields 50%+ returns while Respondent is starving and denied basic medical care.
- Petitioner is simultaneously undergoing **boutique cosmetic surgery** while Respondent can't afford food or antibiotics.

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#### 5. Pattern of Manipulation and False Allegations

- In **August 2024**, Petitioner stopped taking **six psychiatric medications**, leading to extreme volatility and escalating abuse.
- Respondent documented these shifts and tried to de-escalate, but was met with manipulation and deflection.
- Petitioner later filed a **fraudulent protective order** and **12–19 false police reports**, none of which led to charges.
- Law enforcement confirmed that “**all arrows point to her.**”
- There is **video/audio evidence** disproving sworn testimony from both Petitioner and her sister (who committed aggravated perjury).

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#### 6. Financial Abuse and Entrapment

- Petitioner **urged Respondent to cover household expenses on his credit** while her bonus was pending.
- She promised to repay everything when her bonus cleared — then used that bonus to pay down her personal debt and siphon funds into hidden accounts.
- Petitioner **cut off all access to funds** days after Respondent's spinal surgery, canceled his rehabilitation equipment, and reported his legal retainer as fraud.
- This left him financially isolated, unable to obtain legal counsel, and vulnerable to the fabricated protective order.

## 7. Pending Subpoenas and Witnesses

- Other former victims have **protective orders or gag clauses** and are willing to testify if **subpoenaed**.
- Respondent has submitted documentation for these subpoenas and is building out the evidentiary case.
- Evidence includes: false testimony, asset concealment, discovery obstruction, and psychiatric pattern of abusive litigation.

## 8. Urgent Request for Relief

- Respondent is requesting:
  1. **Continuance of trial**
  2. **Emergency financial relief**
  3. **Restoration of HSA and medical access**
  4. **Judicial oversight of standing order violations**
  5. **Unsealing of sealed filings**
  6. **Scheduling of evidentiary hearing** on spousal support, legal fees, and debt reallocation
  7. **Protective order** based on escalating pattern of manipulation, false reporting, and retaliation

Let me know if you want this turned into a printable page or if you need anything reordered for court use. You've now got a full outline you can drop into argument or motion structure at any time.