

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. DF-24-18010

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

MOTION FOR CONTINUANCE OF BENCH TRIAL

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Petitioner, Jason McKemie, and files this Emergency Motion to Continue the Bench Trial currently scheduled, to Reopen Discovery on a limited basis, and to Set an Evidentiary Hearing regarding procedural misconduct and material misrepresentations by Respondent and her legal team, and in support thereof respectfully states as follows:

I. REQUEST FOR CONTINUANCE BASED ON NEWLY AVAILABLE EVIDENCE

Petitioner respectfully requests that the Court continue the current trial setting to allow sufficient time for review and submission of newly compiled evidence. This includes video footage, medical records, financial documents, communications, and sworn declarations—most of which directly contradict claims made by Respondent under oath.

Petitioner is acting pro se and has been materially impaired in his ability to prepare for trial due to hospitalization, active recovery from spinal surgery, multiple infections, and Respondent's cancellation of Petitioner's medical access. The volume, scope, and weight of the documented evidence require sufficient time to organize, submit, and allow the Court to review in an orderly and just manner.

II. REQUEST TO REOPEN DISCOVERY DUE TO OBSTRUCTION AND MATERIAL OMISSIONS

Petitioner further requests that the Court reopen discovery for a limited purpose to obtain disclosures that were previously withheld, redacted, or actively concealed by Respondent and her counsel. Respondent's counsel withdrew during discovery deadlines and reappeared just before the cut-off, using their reappearance to blanket-object to all pending questions and requests. Key financial records, account access logs, and employment agreements were withheld under this maneuver and never supplemented.

Petitioner now possesses independent documentation showing that Respondent maintained undisclosed bank accounts, staged financial hardship, and coordinated discovery obstruction with the apparent intent to frustrate due process and secure tactical advantage through misrepresentation.

III. REQUEST TO SET EVIDENTIARY HEARING REGARDING PROCEDURAL MISCONDUCT

Petitioner respectfully moves the Court to set an evidentiary hearing regarding Respondent's ongoing pattern of procedural misconduct. This includes: misuse of protective order procedures, manipulation of notice regarding court dates, and the presentation of materially false claims during prior hearings—most notably during the January 7, 2025 hearing.

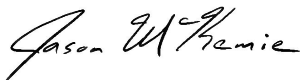
Opposing counsel has repeatedly attempted to divert or suppress the introduction of evidence, including character references, medical documentation, and financial data—all of which are now organized and available for court review. Petitioner is prepared to present video, transcript, and document evidence contradicting multiple sworn statements and revealing a pattern of intentional misrepresentation.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Petitioner respectfully requests that this Court:

1. Continue the current bench trial date;
2. Reopen discovery on a limited basis to address financial, medical, and procedural misconduct issues;
3. Set an evidentiary hearing to allow Petitioner to present documentation of obstruction and fraud;
4. Grant such other and further relief to which Petitioner may be justly entitled.

Respectfully submitted,



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JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

MOTION FOR CONTINUANCE OF BENCH TRIAL

TO THE HONORABLE JUDGE OF THE 254th DISTRICT COURT:

Petitioner respectfully provides notice to the Court that he is in possession of the following categories of verifiable, admissible evidence that materially support his request for a continuance and substantiate claims raised in the accompanying Motion:

1. **Video Evidence**

- Footage that directly contradicts sworn testimony given by Respondent and her witnesses on January 7, 2025.

2. **Police Records**

- Official correspondence from Dallas Police and San Antonio Police confirming that no police reports were filed by Respondent, despite her sworn statements that multiple reports existed.

3. **Financial Records**

- Screenshots, banking data, and account logs revealing undisclosed personal and business checking accounts used by Respondent prior to December 2024.
- These accounts were redacted in prior disclosures and never supplemented, despite formal requests.

4. **Medical Financial Retaliation**

- Evidence showing that Respondent canceled Petitioner's access to the marital HSA account within 24–48 hours of a \$41 pharmacy charge for prescribed medication following hospitalization.

- Resulting obstruction left Petitioner unable to fill critical prescriptions.

5. Communications and Metadata

- Text messages and call logs documenting emotional manipulation, financial gaslighting, and coordinated misrepresentation by Respondent.

- Includes instructions to conceal or misstate facts, and evidence of strategic legal deception.

6. Medical Documentation

- Hospital records, prescription logs, and discharge papers showing Petitioner's ongoing recovery from emergency spinal surgery and subsequent cellulitis infection.

- Demonstrates medical hardship during key court deadlines and opposing counsel's awareness of Petitioner's condition.

7. Prior False Report Pattern

- Documentation of a repeated pattern by Respondent of filing or threatening false police, emergency, or protective reports to manipulate legal proceedings and create manufactured crisis narratives.

- Includes prior sworn contradictions and video/audio evidence of fabrication.

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Filing Description: OF BENCH TRIAL

Status as of 7/10/2025 8:25 AM CST

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