

NO. DF-24-18010

**IN THE MATTER OF
THE MARRIAGE OF**

**GWENDOLYN ULIJASZ-MCKEMIE
AND
JASON MCKEMIE**

§ **IN THE DISTRICT COURT**
§
§
§ **254TH JUDICIAL DISTRICT**
§
§ **DALLAS COUNTY, TEXAS**

MOTION FOR WITHDRAWAL OF COUNSEL

This Motion for Withdrawal of Counsel is brought by Donna R. Tomlinson, who is attorney of record for Gwendolyn Ulijasz-McKemie. Donna R. Tomlinson requests the Court to grant her permission to withdraw as attorney for Gwendolyn Ulijasz-McKemie in this case. In support, Donna R. Tomlinson shows:

Good cause exists for withdrawal of Donna R. Tomlinson as counsel, in that Gwendolyn Ulijasz-McKemie no longer wishes to retain Donna R. Tomlinson and wishes to represent herself.

A copy of this motion has been delivered to Gwendolyn Ulijasz-McKemie, who is hereby notified in writing of her right to object to this motion. Gwendolyn Ulijasz-McKemie has consented to the motion. The last known mailing address of Gwendolyn Ulijasz-McKemie is 539 West Commence St. PMB 3720, Dallas, Texas 75208. The last known email address of Gwendolyn Ulijasz-McKemie is pam_woodman@icloud.com.

The settings and deadlines, including discovery deadlines, in this case are as follows:

January 7, 2025 at 2:30 p.m. - Temporary Orders hearing before the Honorable Associate Judge Bedard, 254th Judicial District Court of Dallas County, Texas located at 600 Commerce Street, 4th Floor, Dallas, Texas 75202.

The Court's contact information is:

Court clerk: (214) 653-6741

Court coordinator: dc254coordinator@dallascounty.org

The following hearings have been held in this case and have been recorded by the court reporters set forth below:

Type of Hearing	Date of Hearing	Transcript Requested?	Transcript Received?	Court Reporter's Name, Address, Tel. No.
Temporary Ex Parte Protective Order and Ex Parte Restraining Order	12/18/2024	No	N/A	N/A
Temporary Ex Parte Protective Order and Ex Parte Restraining Order	12/20/2024	No	N/A	N/A
Temporary Ex Parte Protective Order and Ex Parte Restraining Order	12/31/2024	No	N/A	N/A

The discovery period in this suit will continue until thirty days before trial.

No discovery requests have been served by either party in this case.

There have not been any oral depositions in this case.

On entry of an order granting this motion and discharging Movant as attorney of record for Gwendolyn Ulijasz-McKemie, Movant will provide Gwendolyn Ulijasz-McKemie with the originals of all of Gwendolyn Ulijasz-McKemie's discovery responses and documents Gwendolyn Ulijasz-McKemie has produced in response to discovery requests.

Notice to Client

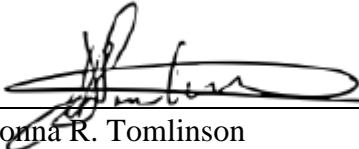
You do not have to agree to this motion. If you wish to contest the withdrawal of Donna R. Tomlinson as your attorney, you should notify the Court within ten days of your receipt of this Motion. If you do not oppose Donna R. Tomlinson's withdrawal as your attorney, you may notify Donna R. Tomlinson in writing of your consent to this motion by signing this Motion or the Order for Withdrawal of Counsel.

Donna R. Tomlinson prays that the Court enter an order discharging her as attorney of record for Gwendolyn Ulijasz-McKemie.

Respectfully submitted,

Hargrave Family Law
4201 Spring Valley Road, Suite 1210
Dallas, Texas 75244
Tel: (214) 420-0100
Fax: (214) 420-0101

By: _____


Donna R. Tomlinson
State Bar No. 24046868
donna@jhfamilylaw.com
Attorney for Gwendolyn Ulijasz-McKemie

Certificate of Service

I certify that a true copy of this Agreed Motion for Withdrawal of Counsel was served in accordance with rule 21a of the Texas Rules of Civil Procedure on the following on January 3, 2025:

Brant Webb by electronic filing manager.



Donna R. Tomlinson
Attorney for Gwendolyn Ulijasz-McKemie

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.

Crystal Martinez on behalf of Donna Tomlinson
Bar No. 24046868
crystal@jhfamilylaw.com
Envelope ID: 95831611
Filing Code Description: Motion - Withdraw Attorney
Filing Description:
Status as of 1/3/2025 1:42 PM CST

Associated Case Party: GWENDOLYN ULIJASZ MCKEMIE

Name	BarNumber	Email	TimestampSubmitted	Status
Crystal Martinez		crystal@jhfamilylaw.com	1/3/2025 12:35:14 PM	SENT
Donna Tomlinson		donna@jhfamilylaw.com	1/3/2025 12:35:14 PM	SENT

Associated Case Party: JASON MCKEMIE

Name	BarNumber	Email	TimestampSubmitted	Status
Brant M. Webb		firm@webbfamilylaw.com	1/3/2025 12:35:14 PM	SENT
Betty Villarreal		betty@webbfamilylaw.com	1/3/2025 12:35:14 PM	SENT