

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 AND
	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

**MOTION TO PRESERVE DISCOVERY RIGHTS AND
COMPELL DISCOVERY RESPONSES**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, **Jason McKemie**, Respondent in the above-entitled cause, and files this **Notice of Preservation of Discovery Rights and Compel Discovery Responses**, and in support thereof respectfully shows the Court:

1. Respondent served formal discovery on **May 27, 2025**, well within the discovery period defined by **Texas Rule of Civil Procedure 190.3(b)**. At the time of service, Petitioner had not declared herself pro se, and no clear attorney of record was active due to partial withdrawal filings. Respondent served all known counsel, Petitioner directly via all known addresses, and filed formal notice with the Court.
2. Petitioner raised no objection at the time of service and has since filed formal responses to the very discovery she now claims was untimely. To now object on procedural grounds is not just inconsistent—it is a tactical effort to avoid disclosure.
3. **Respondent further states that he has been left without legal counsel solely due to the deliberate and coordinated financial strangulation imposed by Petitioner and her family, including the obstruction of medical accounts, post-surgical cutoff of funds, and refusal to pay joint debts.** Petitioner’s false representations and her sister’s aggravated perjury at the January 7, 2025, hearing directly contributed to Respondent’s loss of legal representation.
4. It is through this manufactured deprivation—financial, legal, and procedural—that Petitioner now seeks to exploit the same rules she has manipulated. **Respondent respectfully asserts that he has a right to counsel and a right to defend himself with equal access to discovery and due process. The very party who severed that access should not be allowed to benefit from the harm she has inflicted.**

5. Out of an abundance of caution, Respondent hereby preserves his right to compel full and timely discovery responses, and asks the Court to:
 - Confirm that service was timely and proper;
 - Overrule Petitioner's procedural objections;
 - Compel full and unredacted discovery responses;
 - Recognize that discovery manipulation and obstruction are ongoing patterns requiring Court supervision;
 - And reserve the issue of sanctions for later evidentiary hearing.

 6. Petitioner understands that the Court must base its rulings on evidence—not merely allegations. To that end, Petitioner will be submitting recorded evidence within the week, including video testimony, financial transaction records, and contemporaneous communications that clearly demonstrate: (1) Respondent knowingly provided false statements regarding her financial condition; (2) Respondent deliberately obstructed Petitioner's access to marital assets, including healthcare funds and attorney retainers; and (3) these actions were designed to cut off Petitioner's ability to retain counsel and defend himself during discovery. These materials will directly support Petitioner's claim of coordinated financial strangulation and are being filed in good faith to ensure the Court receives a full and accurate record before trial.
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PRAYER FOR RELIEF

Respondent prays that the Court:

- **Formally preserve and enforce Respondent's right to conduct and compel discovery**, including the discovery served on May 27, 2025, which was timely and properly served in good faith;
- **Compel Petitioner to provide full, unredacted responses** to all outstanding discovery requests without further procedural delay or objection;
- **Acknowledge that Respondent has been stripped of access to all marital assets**, despite being legally married to Petitioner since **August 2023**, and has been financially disabled by Petitioner's obstruction of funds and spousal support;
- **Affirm Respondent's right to legal counsel**, and respectfully request that no final adjudication or evidentiary hearing proceed until Respondent has had a fair opportunity to retain counsel;
- **Acknowledge the procedural harm and prejudicial delay caused by Petitioner's concealment of counsel and litigation tactics**, and reserve the issue of **sanctions** for further evidentiary hearing; and

- Grant all other relief, at law or in equity, to which Respondent may be justly entitled.

Respectfully submitted,



Jason McKemie

Pro Se Respondent

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