

**NOTICE: THIS DOCUMENT
CONTAINS SENSITIVE DATA**

CAUSE NO. DF-24-18010

**IN THE MATTER OF
THE MARRIAGE OF**

**GWENDOLYN ULIJASZ-McKEMIE
AND
JASON McKEMIE**

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§

IN THE DISTRICT COURT

254TH JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

AGREED MOTION FOR WITHDRAWAL OF COUNSEL

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

Good cause exists for withdrawal of William Cook as counsel because the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services, including an obligation to pay the lawyer's fee as agreed, and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled.

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 address of Gwendolyn Ulijasz-McKemie is 12802 Kings Forest Street, San Antonio, 78320.

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

- Final Trial – 7/23/2025 at 1:30 p.m.
- Trial Announcements – 7/16/2025
- Mediation – no later than 6/23/2025
- Amended Pleadings – no later than 7/16/2025
- Inventories and Financial Information Exchange – 7/11/2025
- Custody Evaluation – no later than 6/23/2025
- Witness List – 7/16/2025
- Exhibit List – 7/16/2025

The discovery period in this suit will continue until 6/23/2025.

No formal discovery requests have been exchanged.

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 William Cook as your attorney, you should notify the Court within ten days of your receipt of this Motion. If you do not oppose William Cook's withdrawal as your attorney, you may notify William Cook in writing of your consent to this motion by signing this Motion.

William Cook prays that the Court enter an order discharging him as attorney of record for Gwendolyn Ulijasz-McKemie.

Respectfully submitted,

SULLIVAN & COOK, LLC

/s/ William Cook

Jeff Cook

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APPROVED AND CONSENTED TO:

Signed by:


Gwendolyn Ulijasz-McKemie

CERTIFICATE OF SERVICE

This is to certify that on this 28th day of April, 2025, a true and correct copy of the foregoing document has been sent by electronic filing and service to all counsel and pro se parties of record.

/s/ William Cook

William Cook

Automated Certificate of eService

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Filing Description:

Status as of 4/29/2025 11:21 AM CST

Associated Case Party: GWENDOLYN ULIJASZ MCKEMIE

Name	BarNumber	Email	TimestampSubmitted	Status
Kim Jones		kjones@sullivancook.com	4/28/2025 4:49:25 PM	SENT
Jeffrey ECook		jcook@sullivancook.com	4/28/2025 4:49:25 PM	SENT
Tiffany Castenada		tcastenada@sullivancook.com	4/28/2025 4:49:25 PM	SENT
William CCook		wcook@sullivancook.com	4/28/2025 4:49:25 PM	SENT
Ethan Scroggins		escroggins@sullivancook.com	4/28/2025 4:49:25 PM	SENT
Chandler Alt		calt@sullivancook.com	4/28/2025 4:49:25 PM	SENT

Associated Case Party: JASON MCKEMIE

Name	BarNumber	Email	TimestampSubmitted	Status
Jason McKemie		jmckemie@mckemie.net	4/28/2025 4:49:25 PM	SENT
JASON EMORYMCKEMIE		jason@callvital.com	4/28/2025 4:49:25 PM	SENT