

No. _____

IN THE COURT OF APPEALS
FIFTH DISTRICT OF TEXAS
DALLAS, TEXAS

IN RE JASON MCKEMIE, RELATOR

Original Proceeding from Cause No. DF-24-18010
In the 301st Judicial District Court
Dallas County, Texas

**EMERGENCY PETITION FOR WRIT OF MANDAMUS AND
EMERGENCY MOTION FOR TEMPORARY RELIEF TO STAY
SIGNING, ENTRY, ENFORCEMENT, IMPLEMENTATION, PROPERTY
TRANSFER, DEBT ALLOCATION, HEALTHCARE/BENEFITS
EFFECTS, INJUNCTIONS, FEES, COSTS, AND ALL EFFECTS OF
PETITIONER'S PROPOSED FINAL DECREE**

Emergency Motion for Temporary Relief Under Texas Rule of Appellate Procedure
52.10

Filed by: Relator, Jason McKemie
(Respondent in DF-24-18010)

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EMERGENCY NOTE

Relator files after Petitioner transmitted a proposed decree for receipt and entry. Relator has not received a signed decree, signed judgment, written ruling on recusal, written good-cause statement for proceeding after recusal, admitted exhibit list, remote bridge information, or court notice explaining what was heard, admitted, ruled, rendered, or signed.

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

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Identity of Parties and Counsel

Relator is Jason McKemie. Relator is Respondent in trial-court Cause No. DF-24-18010.

Real Party in Interest is Gwendolyn Laura Ulijasz, formerly styled in the trial court as Gwendolyn Ulijasz-McKemie.

Current counsel appearing for Petitioner/Real Party in Interest include Jonathan D. Steele, Beermann LLP; Rebecca Lee Armstrong, Armstrong Law Texas; Terra Aguirre, Armstrong Law Texas; Lauren N. Shaw, Armstrong Law Texas; and any additional counsel reflected in the trial-court eService record.

Known nonparties whose conduct is preserved for sanctions, civil claims, disciplinary complaints, criminal referrals, subpoena proceedings, chain-of-custody preservation, or other lawful relief include Pamela Woodman, Merritt McClayton, moving/security/landlord/vendor/payment actors, and any other participants or conspirators involved in the theft, evidence theft, healthcare obstruction, source-record concealment, false reporting, financial sabotage, digital intrusion, or procedural abuse described in the emergency record. They are not named as appellate respondents unless this Court determines joinder is necessary.

Identity of Trial Court / Respondent Judge

The underlying proceeding is Cause No. DF-24-18010, pending in the 301st Judicial District Court, Dallas County, Texas. The court communications available to Relator identify Judge Ashley Wysocki as presiding judge and Judge Stacy Dunlop as associate judge. Relator complains of the trial court proceeding to post-answer default trial, prove-up, proposed decree, signing, entry, enforcement, or decree effects after Relator submitted emergency filings, including a verified motion to recuse filed before evidence was offered. To the extent a substitute, visiting, assigned, or associate judge acted for the trial court on June 11, 2026, Relator seeks relief against the trial court and the judge acting for the trial court.

Statement of the Case

This is an emergency original proceeding under Texas Rule of Appellate Procedure 52 and an emergency motion for temporary relief under Rule 52.10. The immediate emergency is not now hypothetical. On June 11, 2026 at 4:28 p.m., Petitioner's counsel emailed the court administrator a proposed Final Decree of Divorce described as a proposed judgment in conformance with that afternoon's court appearance and asked the court to confirm receipt and entry. MR007.

The proposed decree recites that the Court proceeded by post-answer default, received testimony, admitted exhibits, and found the relief supported by pleadings and evidence. It omits Relator's emergency filings, verified pre-evidence recusal motion, no-bridge objection, medical-incapacity notice, de novo/trial-readiness request, healthcare/QLE/HSA/FSA issues, stolen hard drives, stolen evidence repositories, stolen legal work product, stolen trial materials, source-record defects, and non-waiver notice. MR008.

Relator seeks immediate temporary relief staying signing, entry, enforcement, implementation, property transfer, account transfer, debt allocation, healthcare/benefits effects, injunctions, fees, costs, sanctions, and all effects of Petitioner's proposed decree until the trial court complies with Rule 18a, due process, and the trial-readiness requirements identified below.

Statement of Jurisdiction

This Court has mandamus jurisdiction over district courts and judges within its district under the Texas Government Code and Texas Rule of Appellate Procedure 52. Tex. R. App. P. 52.1. Relator seeks temporary relief under Texas Rule of Appellate Procedure 52.10 while the Court considers this petition. Rule 52.10 authorizes the Court to grant temporary relief to preserve the parties' rights while the petition is pending.

No petition seeking the same relief has been filed in the Supreme Court of Texas. If the Court determines that any requested relief must be modified because a signed decree has already been entered after this petition was prepared, Relator requests immediate protection of signing, entry, enforcement, implementation, and all decree effects, and requests leave to supplement or conform the requested relief.

Statement of Emergency

This is not a routine continuance dispute. This is a signing, entry, enforcement, and decree-effects emergency. Petitioner has submitted a proposed decree designed to convert Relator's medical collapse, no-bridge status, disconnected phone service, stolen trial materials, stolen hard drives, healthcare obstruction, source-record concealment, and unresolved recusal into post-answer default and global denial of Relator's relief. MR007-MR008.

Relator submitted emergency filings between 1:17 p.m. and 1:46 p.m. on June 11, 2026. The eFile history shows the Verified Emergency Motion to Abate, Stay, or Continue Trial; Verified Motion to Recuse; and Proposed Order as Under Review, and shows the Non-Waiver Notice and Supplemental Medical-Emergency Notice as Submitted. MR001. Those filings were transmitted before or during the trial window and before Petitioner's proposed decree was emailed for receipt and entry.

Relator has not received a signed decree, signed judgment, written ruling on recusal, written good-cause statement for proceeding after recusal, admitted exhibit list, remote bridge information, or court notice explaining what was heard, admitted, ruled, rendered, or signed.

Relief Requested

Relator requests immediate temporary relief under TRAP 52.10 staying signing, entry, enforcement, implementation, turnover, transfer, debt allocation, healthcare/benefits effects, account transfer, property transfer, domain-name transfer, injunctions, fees, costs, sanctions, and all effects of Petitioner's proposed Final Decree of Divorce.

Relator requests mandamus relief directing the trial court to refrain from signing, entering, enforcing, or implementing Petitioner's proposed decree or any final decree entered in Relator's medical absence until the trial court addresses: (1) Relator's verified pre-evidence recusal motion; (2) Relator's medical incapacity and no-bridge objection; (3) healthcare/QLE/HSA/FSA noncompliance; (4) stolen hard drives, stolen evidence repositories, stolen legal work product, stolen trial materials, stolen financial records, stolen medical records, and stolen device evidence; (5) source-record

concealment and estate reconstruction; (6) de novo/trial-readiness issues; (7) Rule 204 issues; (8) survival-level financial relief and access-to-counsel requests; and (9) non-waiver filings.

Relator requests categorical protection that Gwendolyn Laura Ulijasz, her counsel, experts, vendors, investigators, agents, contractors, and anyone acting with or for her shall not access, inspect, image, copy, test, review, rely on, use, disclose, control, receive, use derivatively, use at trial, or benefit from Relator's stolen hard drives, stolen evidence repositories, stolen legal work product, stolen trial materials, stolen financial records, stolen medical records, stolen device evidence, or derivative materials.

Relator requests that no fees, costs, sanctions, expert expenses, vendor expenses, protective expenses, or cost shifting be awarded against Relator based on the collapse Petitioner manufactured.

Issues Presented

1. Whether the trial court abused its discretion by proceeding to post-answer default trial, prove-up, proposed decree, signing, entry, or decree effects after Relator transmitted a verified recusal motion before evidence was offered and before trial evidence was received.
2. Whether a proposed decree may convert medical incapacity, no bridge access, disconnected phone service, financial collapse, stolen trial materials, and emergency objections into post-answer default and global denial of pending relief.
3. Whether the trial court may sign or enforce a proposed decree awarding disputed Accenture compensation, VEIP/ESPP, RSUs, HSA funds, accounts, debts, injunctions, and property rights without source records, forensic accounting, healthcare compliance, stolen-evidence protection, and de novo/trial-readiness review.
4. Whether temporary relief is necessary under TRAP 52.10 to prevent signing, entry, enforcement, implementation, property transfer, account transfer, debt allocation, healthcare/benefits effects, injunctions, fees, costs, and all effects of Petitioner's proposed decree while this Court considers mandamus relief.

Statement of Facts

Relator has spent more than a year telling the trial court that Petitioner's strategy is to separate him from counsel, financially strangle him, obstruct healthcare, conceal source records, weaponize protective-order narratives, destroy his ability to work, and then convert the collapse into waiver, default, or trial advantage. The emergency has now fully materialized.

On June 11, 2026, Relator submitted five emergency filings: a Verified Emergency Motion to Abate, Stay, or Continue Trial; a Verified Motion to Recuse; a Proposed Order; a Non-Waiver Notice; and a Supplemental Medical-Emergency Notice. MR001-MR006. The emergency motion stated that the collapse was caused by financial strangulation, healthcare obstruction, false QLE processing, litigation sabotage, evidence theft, hard-drive theft, stolen legal work product, stolen trial materials, stolen medications, source-record concealment, and a manufactured eviction. MR002.

The verified recusal motion was filed before evidence was offered, before any witness was called, before any exhibit was offered, before testimony was taken, and before trial evidence was received. MR003. It stated that Petitioner unlawfully entered the residence, stole hard drives, stole evidence repositories, stole legal work product, stole trial materials, stole binders, stole paper files, stole the printer, stole printer ink, stole medications, destroyed livelihood equipment, and was recorded saying she had to 'get more evidence.' MR003.

The supplemental medical notice stated that Relator has congestive heart failure, repeated hospitalizations, shortness of breath, dizziness, heart palpitations, severe pain, physical instability, unsafe transportation after a recent wreck, no working phone service, no gas resources, and a need for emergency medical evaluation. It expressly objected to any trial proceeding, evidence presentation, witness testimony, exhibit admission, prove-up, final order, decree, rendition, or adverse ruling in Relator's absence. MR006.

Petitioner's counsel then emailed the court administrator a proposed decree at 4:28 p.m., calling it a proposed judgment in conformance with that afternoon's court appearance and asking for receipt and entry. MR007. The decree recites that the court

proceeded by post-answer default, received testimony, and admitted exhibits. MR008. It contains no meaningful recital that Relator filed a verified pre-evidence recusal motion, emergency motion, proposed order, non-waiver notice, supplemental medical notice, bridge request, no-bridge objection, or healthcare/stolen-evidence/source-record objection.

The proposed decree is not a neutral default decree. It finds no informal marriage before June 22, 2024, starts the community estate on June 22, 2024, awards Petitioner the UBS Accenture VEIP/ESPP account, all Accenture RSUs, the Chase checking account ending x9259, the Accenture HSA account, domain-name and online-identifier restrictions, and other property/debt provisions. MR008. It attempts to wipe out record-identified estate categories without source-record review, including sign-on bonus, Cognizant settlement proceeds, VEIP/equity, RSUs, HSA/benefits, account continuity, loan funding, debt characterization, reimbursement, add-backs, offsets, and reconstitution.

Healthcare is not collateral. EBSA materials state that a divorce-based QLE terminated dependent healthcare coverage effective October 31, 2025 despite no divorce decree, that the Plan later admitted the QLE was erroneous, and that HSA/FSA and other benefits remained unavailable or nonfunctional. MR010. The HSA transcript shows Relator called to activate or obtain functional HSA access and that the administrator confirmed the card Relator possessed was not the active card associated with the account, while Petitioner retained control of the active-card and portal structure. MR011.

New SAPD records further show the same pattern: Petitioner uses stolen or controlled materials to manufacture criminal narratives. SAPD Report #26106749 documents Petitioner attempting to characterize Relator's HSA-card call and medical-treatment letters as fraud or impersonation; the officer documented that Relator appeared to be an authorized user verifying the status of his own HSA card and that there was no evidence of criminal intent. MR012.

SAPD Report #26108224 documents a narrative that Relator's belongings were mailed to Petitioner's address, that items were being searched and thrown away, and that tracker devices and alleged narcotics were turned over from those items. MR013.

Relator denies ever driving to Petitioner's San Antonio residence, placing items there, mailing items to her, stalking her, surveilling her, or manufacturing medical records. Relator has location evidence from his phone, vehicle, keys, AirTags, and related sources to disprove Petitioner's location narratives. The point is not isolated false reporting. The point is stolen-evidence narrative laundering: Petitioner stole or controlled property and device evidence, manufactured an explanation for possession, and then used those items to create police narratives against Relator.

This was theft. No softer label applies. The opposing party stole the evidence needed to try the case against her and is now asking the trial court to sign a decree that benefits from the absence of that evidence.

Procedural Background

The case began in the 254th Judicial District Court, moved after prior recusal proceedings, proceeded through the 302nd Judicial District Court, and is now in the 301st Judicial District Court. The record reflects repeated requests for source financial records, healthcare enforcement, HSA/FSA functionality, trial-readiness review, third-party subpoenas, court-reporter protection, adequate trial time, de novo review, financial stabilization, sanctions, and preservation relief.

Relator timely filed a de novo request after the June 1, 2026 associate-judge hearing. The de novo request specifically identified source-record defects, VEIP/equity issues, loan/source-record issues, sanctions, forensic accounting, estate reconstitution, healthcare/HSA/FSA enforcement, April 16 evidence theft, stolen hard drives, stolen evidence repositories, categorical non-access/non-use/no-benefit relief, and trial-readiness issues. MR009.

On June 11, 2026, Relator transmitted the emergency motion, recusal motion, proposed order, non-waiver notice, and supplemental medical-emergency notice. MR001-MR006. Petitioner's proposed decree was then submitted for receipt and entry, omitting the emergency posture and recasting medical incapacity as post-answer default. MR007-MR008.

ARGUMENT

The emergency relief should be granted because signing or enforcing Petitioner's proposed decree would convert Petitioner's theft, false compliance, healthcare obstruction, source-record concealment, false reporting, and manufactured collapse into a final decree. Ordinary appeal is inadequate because the decree would immediately affect property, benefits, accounts, debt, injunctions, employability, healthcare, fees, and the record itself.

I. PETITIONER'S PROPOSED DECREE CREATES AN IMMEDIATE SIGNING, ENTRY, AND ENFORCEMENT EMERGENCY.

Petitioner's counsel submitted a proposed decree at 4:28 p.m. and asked the court to confirm receipt and entry. MR007. The proposed decree recites post-answer default, testimony, admitted exhibits, and relief supported by pleadings and evidence. MR008. It seeks decree effects now, not later.

The proposed decree attempts to deny all relief requested by Relator through a global catchall while omitting the pending emergency filings, recusal motion, medical incapacity, no-bridge objection, healthcare obstruction, stolen evidence, and source-record defects. MR008. That is why temporary relief must target signing, entry, enforcement, implementation, property transfer, account transfer, debt allocation, healthcare/benefits effects, injunctions, fees, costs, sanctions, and all decree effects.

II. THE VERIFIED PRE-EVIDENCE RECUSAL MOTION REQUIRED A STANDSTILL BEFORE EVIDENCE OR DECREE EFFECTS.

Rule 18a is the cleanest procedural strike. The verified recusal motion stated on its face that it was filed before evidence was offered, before witnesses were called, before exhibits were offered, before testimony was taken, and before trial evidence was received. MR003.

Texas Rule of Civil Procedure 18a(f)(2)(A) provides that if a recusal motion is filed before evidence has been offered at trial, the respondent judge must take no further action until the motion has been decided, except for good cause stated in writing or on the record. Relator has received no written ruling on recusal and no written or on-record good-cause statement permitting evidence, prove-up, rendition, proposed decree,

signing, entry, or decree effects despite the pre-evidence recusal motion.

Petitioner will call this a third recusal. Relator anticipated that attack. MR003. The motion is not tactical. It is based on new material facts after prior recusal proceedings: Petitioner's unlawful entry, theft of hard drives, theft of evidence repositories, theft of legal work product, theft of trial materials, stolen medications, destroyed livelihood equipment, false reporting, stolen-property narratives, and the resulting impossibility of fair trial.

III. UNDER-REVIEW EFILE STATUS CANNOT ERASE THE EMERGENCY FILINGS.

The eFile history shows the three core filings - the emergency motion, verified recusal motion, and proposed order - as Under Review, and shows the non-waiver notice and supplemental medical notice as Submitted. MR001. That status is not a license to pretend the filings did not exist.

Texas Rule of Civil Procedure 21 provides that an electronically filed document is deemed filed when transmitted to the filing party's electronic filing service provider, subject to limited exceptions. The emergency filings were transmitted before or during the trial window and before Petitioner's proposed decree was submitted for entry. MR001.

At minimum, the under-review status itself required caution. The trial court should not sign or enforce a decree that omits filings already transmitted into the electronic filing system and directly challenging trial readiness, recusal, medical incapacity, no bridge access, healthcare obstruction, stolen evidence, and non-waiver.

IV. POST-ANSWER DEFAULT DOES NOT EQUAL WAIVER, CONFESSION, OR CONSENT.

Petitioner's proposed decree admits this was a post-answer default posture. MR008. Texas law does not treat post-answer default as abandonment of the answer or implied confession of the issues joined by the answer. *Stoner v. Thompson*, 578 S.W.2d 679, 682 (Tex. 1979). Petitioner still had to prove her case with evidence.

Relator's absence was medical incapacity, not waiver. MR006. Relator requested remote access by email because his phone service was disconnected; he lacked gas, food, medication access, safe transportation, and the ability to call for help; and he expressly objected to evidence, testimony, exhibits, prove-up, decree, rendition, final orders, and adverse rulings in his absence. MR006.

The proposed decree's default language falsely converts medical incapacity, no bridge access, stolen trial materials, stolen evidence repositories, and financial collapse into 'failed to appear' and 'wholly made default.' That is precisely the due-process injury mandamus must stop.

V. THE PROPOSED DECREE IS A BAD-FAITH AMBUSH DECREE, NOT A NEUTRAL DEFAULT DECREE.

The decree does not merely dissolve the marriage. It wipes out contested, record-identified property categories without source records, de novo review, forensic accounting, cross-examination, or meaningful participation. It finds no informal marriage before June 22, 2024; starts the community estate on June 22, 2024; awards Petitioner the UBS Accenture VEIP/ESPP account; awards all Accenture RSUs; awards the Accenture HSA; awards the Chase x9259 account; and imposes domain and online-identifier restrictions. MR008.

Relator's de novo request had already placed these issues before the referring district judge: source records, VEIP/equity, unsupported loans, forensic accounting, reconstitution under Texas Family Code section 7.009, disproportionate division under section 7.001, healthcare/HSA/FSA enforcement, evidence theft, stolen hard drives, stolen evidence repositories, non-access/non-use/no-benefit protections, and trial readiness. MR009.

Petitioner cannot conceal source records, obstruct healthcare, steal evidence, manufacture collapse, then submit a decree that awards her the very assets and benefits that require source-record tracing. The proposed decree is an attempt to use the collapse she manufactured to obtain relief that cannot survive complete records, forensic accounting, cross-examination, or a fair trial.

VI. PETITIONER STOLE PROPERTY AND DEVICE EVIDENCE, THEN MANUFACTURED POLICE NARRATIVES FROM THE PROPERTY SHE STOLE OR CONTROLLED.

New SAPD records materially strengthen the emergency. Petitioner is not merely making false reports. Petitioner is manufacturing the source material for false reports.

After the manufactured eviction/writ event and unlawful entry into Relator's residence, Petitioner stole property, evidence, device evidence, legal work product, trial materials, hard drives, medical records, financial records, and litigation materials. MR015. SAPD records now show narratives built around items allegedly mailed or placed at Petitioner's residence, tracker devices allegedly found in bags, HSA-call transcripts, medical letters, alleged drug items, and escalating criminal allegations. MR012-MR014.

Relator denies ever driving to Petitioner's San Antonio residence, placing items there, mailing items to her, stalking her, surveilling her, or manufacturing medical records. He has location proof from phone, vehicle, keys, AirTags, and related sources. The emergency is that Petitioner is stealing evidence, controlling chain of custody, relocating or discarding items, and then using stolen or controlled items to manufacture police narratives against Relator.

VII. PETITIONER REPORTED RELATOR FOR FRAUD AFTER THE HSA CALL EXPOSED PETITIONER'S FALSE HEALTHCARE COMPLIANCE.

The HSA/SAPD sequence shows false compliance in court, healthcare obstruction, retaliatory false reporting, and abuse of process. EBSA materials state that a false divorce-based QLE terminated dependent healthcare coverage effective October 31, 2025 despite no divorce decree, and that functional HSA/FSA and other benefits remained unavailable or nonfunctional. MR010.

The HSA transcript shows Relator was trying to activate or obtain functional access to his own HSA card while covered under the plan. MR011. The HSA administrator confirmed access defects and contradicted Petitioner's receipt-upload precondition. MR011.

SAPD Report #26106749 then documents Petitioner trying to report the HSA call as fraud or impersonation. The officer stated it did not appear Relator was impersonating Petitioner, that Relator was listed as an authorized user, that Relator appeared to be verifying the status of his own HSA card, and that there was no evidence of criminal intent. MR012. A proposed decree awarding Petitioner the Accenture HSA and erasing healthcare issues would reward documented false compliance and false reporting.

VIII. ORDINARY APPEAL IS INADEQUATE.

Mandamus relief requires a clear abuse of discretion and no adequate remedy by appeal. In re Prudential Ins. Co. of Am., 148 S.W.3d 124 (Tex. 2004); Walker v. Packer, 827 S.W.2d 833 (Tex. 1992). Due process requires notice and a meaningful opportunity to be heard at a meaningful time and in a meaningful manner. Mathews v. Eldridge, 424 U.S. 319 (1976); Univ. of Tex. Med. Sch. at Houston v. Than, 901 S.W.2d 926 (Tex. 1995). A judgment entered under materially defective opportunity to be heard creates due-process injury. Peralta v. Heights Med. Ctr., Inc., 485 U.S. 80 (1988).

Appeal is inadequate because signing and enforcing the decree would immediately alter property, accounts, HSA/benefits, debts, injunctions, domain rights, employment-rebuilding capacity, and the factual record while leaving Relator medically collapsed, financially collapsed, without counsel, without source records, without trial materials, and without stolen evidence repositories. The proposed decree would become the mechanism for turning Petitioner's theft, source-record concealment, false reporting, healthcare obstruction, and manufactured collapse into final relief.

The Court should grant temporary relief now. TRAP 52.10 exists for exactly this kind of emergency: to preserve rights while the Court considers the petition.

Emergency Temporary Relief Under TRAP 52.10

Relator requests immediate temporary relief under TRAP 52.10 staying signing, entry, enforcement, implementation, turnover, property transfer, account transfer, debt allocation, healthcare/benefits effects, injunctions, fees, costs, sanctions, and all decree effects pending this Court's action on the petition.

Relator has notified or made diligent effort to notify counsel and parties by expedited email/eService because his phone service has been disconnected and he cannot place outbound calls. A certificate of expedited notice is included below.

Prayer

Relator respectfully requests that the Court immediately grant temporary relief under TRAP 52.10 staying signing, entry, enforcement, implementation, turnover, transfer, account transfer, debt allocation, healthcare/benefits effects, injunctions, fees, costs, sanctions, and all effects of Petitioner's proposed Final Decree of Divorce.

Relator further requests that the Court condition any further decree proceedings on compliance with Rule 18a, written rulings on recusal and good cause, medical-incapacity review, no-bridge review, healthcare/QLE/HSA/FSA enforcement, stolen-evidence protection, source-record production, de novo/trial-readiness review, Rule 204 review, financial-stabilization/access-to-counsel review, and written rulings preserving all objections.

Relator requests all further relief to which he is entitled.

Respectfully Submitted,

/s/ Jason McKemie
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539 W. Commerce St., Suite 2010
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214-868-4901
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Relator, Pro Se

TRAP 52.3(K) CERTIFICATION

I certify that I have reviewed this petition and concluded that every factual statement in the petition is supported by competent evidence included in the mandamus record or by a reasonable inference from the mandamus record, subject to supplementation where documents remain under review, unavailable, sealed, or in third-party custody.

/s/ Jason McKemie

Jason McKemie

CERTIFICATE OF EXPEDITED NOTICE UNDER TRAP 52.10

I certify that, before filing this Emergency Motion for Temporary Relief, I notified or made a diligent effort to notify all parties by expedited means that this emergency mandamus petition and motion for temporary relief has been or will be filed.

Because my phone service is disconnected and I cannot place outbound calls, I provided expedited notice by email to all counsel of record and/or through e-service where available.

Executed on June 12, 2026.

/s/ Jason McKemie

Jason McKemie

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this petition, emergency motion, and mandamus record was served on all parties and counsel of record by eService and/or email on June 12, 2026.

/s/ Jason McKemie

Jason McKemie

CERTIFICATE OF COMPLIANCE

Pursuant to Texas Rule of Appellate Procedure 9.4(i), I certify that this computer-generated petition contains 3,738 words in the portions subject to the word limit. I relied on the word-count function used to prepare this document.

Executed on June 12, 2026.

/s/ Jason McKemie

Jason McKemie

UNSWORN DECLARATION OF JASON MCKEMIE

My name is Jason McKemie. My date of birth is April 8, 1976. My address is 539 W. Commerce St., Suite 2010, Dallas, Texas 75208.

I am the Relator in this emergency mandamus proceeding and the Respondent in trial-court Cause No. DF-24-18010.

I declare under penalty of perjury that the factual statements in this Emergency Petition for Writ of Mandamus and Emergency Motion for Temporary Relief are true and correct based on my personal knowledge, documents, court filings, medical records, communications, screenshots, videos, audio recordings, records reviewed by me, and matters stated on information and belief where the basis for that belief is identified.

As of the time this filing is submitted, I have not received a signed decree, signed judgment, written ruling on recusal, written good-cause statement for proceeding after recusal, admitted exhibit list, remote bridge information, or court notice explaining what was heard, admitted, ruled, rendered, or signed after the June 11, 2026 trial setting.

I have congestive heart failure. I have been repeatedly hospitalized for congestive-heart-failure symptoms and related medical complications. I attempted to travel toward Dallas for the June 11, 2026 trial setting but could not safely complete the trip because of my medical condition, lack of gas resources, disconnected phone service, unsafe vehicle condition after a recent wreck, and worsening symptoms.

My inability to physically appear was medical incapacity. It was not waiver, abandonment, delay, failure to prosecute, consent to trial, consent to evidence being taken in my absence, or consent to final orders.

The documents included in Mandamus Record Volume 1 are true and correct copies of documents transmitted through eFileTexas, documents submitted in trial-court Cause No. DF-24-18010, documents received by email, proposed orders/decrees transmitted by counsel, screenshots or PDF prints from eFileTexas/re:SearchTX, and records in my possession or accessible to me.

Executed in Texas on June 12, 2026.

/s/ Jason McKemie

Jason McKemie

MANDAMUS RECORD / APPENDIX INDEX

MR001 - eFile filing history showing June 11 emergency filings submitted/under review.

MR002 - Verified Emergency Motion to Abate, Stay, or Continue Trial.

MR003 - Verified Motion to Recuse and Request for Referral under TRCP 18a.

MR004 - Proposed Order on Emergency Motion.

MR005 - Notice of Non-Waiver of Sanctions, Civil Claims, Attorney Misconduct Claims, and Objection to Treating Engineered Collapse as Waiver.

MR006 - Supplemental Verified Notice of Current Medical Emergency, Inability to Safely Appear, Request to Halt Proceedings, Request for Remote Appearance, and Non-Waiver.

MR007 - June 11, 2026 4:28 p.m. email transmitting Petitioner's proposed decree for receipt and entry.

MR008 - Petitioner's proposed Final Decree of Divorce.

MR009 - Request for De Novo Hearing and objections to Associate Judge's report, excerpt.

MR010 - EBSA complaint / false divorce QLE / HSA-FSA benefits obstruction excerpt.

MR011 - HSA administrator transcript excerpt.

MR012 - SAPD Report #26106749.

MR013 - SAPD Report #26108224.

MR014 - SAPD Incident Detail Report SAPD-2025-0288323.

MR015 - Writ Aftermath / stolen evidence submission excerpt.

Relator files Mandamus Record / Appendix Volume 1 under Tex. R. App. P. 52.7 and requests leave to supplement the mandamus record with signed orders, docket entries, transcripts, admitted exhibit lists, court-reporter records, bodycam/video/audio, Apple/Find My location records, SAPD property records, Dallas/constable records, Accenture/Businessolver/Aetna/HSA/FSA records, source financial records, and sealed Rule 204 materials as necessary.