

NO. **DF-24-18010**

IN THE MATTER OF	§	IN THE DISTRICT COURT
THE MARRIAGE OF	§	
	§	
GWENDOLYN ULIJASZ-MCKEMIE	§	301ST JUDICIAL DISTRICT
AND	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

NOTICE OF HEARING

PLEASE TAKE NOTICE that **Jason McKemie** will present the following motion for hearing before Associate Judge Stacy Dunlop: **Motion For Enforcement, Sanctions, Continuance, And Leave to Issue Third-Party Subpoenas**

DATE: Monday, June 1, 2026

TIME: 1:30 p.m.

JUDGE: Associate Judge Stacy Dunlop

COURT: 301st District Court

LOCATION: George L. Allen, Sr. Courts Building
600 Commerce Street, Suite 340
Dallas, Texas 75202

RELIEF TO BE PRESENTED

The hearing will concern trial-readiness relief before the June 11, 2026 trial setting, including:

1. Continuance of the June 11, 2026 trial setting;
2. Leave to issue third-party subpoenas and nonparty discovery for source records necessary to reconstruct the marital estate and verify financial, lease, QLE/benefits, healthcare, Accenture, landlord, contractor, and April 16 theft-related records;
3. Limited modification of discovery deadlines for third-party source-record discovery;
4. Enforcement of prior discovery rulings and prior discovery obligations;
5. Preservation and reservation of sanctions, fee shifting, adverse inferences, estate reconstitution, reimbursement, offsets, healthcare enforcement, property return, compensation, and April 16 theft remedies without prejudice;
6. Status/compliance hearing after subpoena returns; and
7. Written rulings on any relief granted, denied, or reserved.

The threshold issue for this hearing is financial trial readiness:

- No source records, no estate reconstruction. No estate reconstruction, no final trial.

PROPOSED ORDERS TO BE PRESENTED

Jason McKemie may present proposed orders including, but not limited to:

1. Proposed Order Granting Leave to Issue Third-Party Subpoenas for Financial, Lease, QLE, Benefits, and Estate Source Records;
2. Proposed Order Granting Leave to Issue Third-Party Subpoenas Concerning April 16 Theft, Movers, Security, Contractors, and Chain of Custody; and
3. Proposed Order Reserving Sanctions, Fee Shifting, Estate Reconstitution, Adverse Inferences, and Healthcare Enforcement for Further Hearing.

Respectfully submitted,

Jason McKemie
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of this Motion was served through the Texas eFile and Serve system on all counsel of record and all parties entitled to service on **May 26, 2026**.



Jason McKemie

Automated Certificate of eService

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