

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
&	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

NOTICE OF MATERIAL DISCOVERY CONCEALMENT AND RESERVATION OF RIGHTS

TO THE HONORABLE COURT:

Petitioner hereby provides notice of material omissions and concealment within Respondent's certified discovery responses. Specifically, multiple financial accounts have now been identified that were not disclosed or produced despite explicit and repeated requests. These omissions are not minor—they directly contradict prior sworn representations and certified discovery disclosures filed with the Court.

Petitioner asserts that these omissions constitute discovery fraud and may rise to the level of bad faith, perjury, and obstruction of due process.

Petitioner formally:

1. **Preserves the right** to seek sanctions and damages.
2. **Requests that no party be permitted** to amend or supplement discovery responses related to financial accounts without first seeking leave of court and full evidentiary review.
3. **Reserves the right** to file supplemental evidence into the record to document the concealment in full.

This notice is submitted to protect judicial integrity, prevent undue surprise at trial, and ensure that all parties are held to the standard of truthfulness and compliance required under Texas Rules of Civil Procedure.



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