

DF-24-18010

NO. _____

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

**RESPONDENT'S NOTICE OF NON-WAIVER OF SANCTIONS, CONTEMPT, FEE
OBJECTIONS, CIVIL CLAIMS, ATTORNEY MISCONDUCT CLAIMS, AND OBJECTION
TO TREATING ENGINEERED COLLAPSE AS WAIVER**

TO THE HONORABLE COURT:

Respondent, Jason McKemie, files this Notice before final trial, final orders, or any ruling that could be used to suggest waiver, abandonment, merger, release, adjudication, or consent. From this point forward, Jason McKemie is referred to as Respondent.

Respondent does not waive sanctions, contempt, enforcement, fee objections, civil claims, attorney-misconduct complaints, disciplinary complaints, criminal referrals, mandamus, appellate complaints, or independent tort claims arising from the manufactured collapse created by Gwendolyn Laura Uljasz, her counsel, former counsel, agents, vendors, investigators, contractors, third-party actors, co-conspirators, and anyone acting with or for her.

NO WAIVER OF SANCTIONS, CONTEMPT, ENFORCEMENT, OR FEE OBJECTIONS

Respondent does not waive any request for sanctions, contempt, enforcement, fee shifting against Petitioner, discovery sanctions, evidentiary sanctions, attorney-fee recovery, referral, disqualification, disgorgement, or other relief against Petitioner, current counsel, former counsel, pro hac vice counsel, law firms, investigators, vendors, OSINT/cyber actors, reputation-management actors, landlord-side actors, movers, security personnel, U-Haul/payment proxies, benefit/HR/plan-administrator actors, and any co-conspirator or person acting with, for, at the direction of, or for the benefit of Petitioner.

Respondent objects to any award of fees, costs, expert expenses, vendor expenses, protective-order expenses, discovery expenses, travel expenses, pro hac vice expenses, or sanctions against Respondent. Any claim that Respondent caused delay is false. The delay was caused by Petitioner's fraud, perjury, concealment, discovery obstruction, source-record concealment, healthcare obstruction, financial sabotage, evidence theft, trial-material theft, hard-drive theft, legal-work-product theft, false reporting, manufactured eviction, and abuse of process.

Respondent expressly preserves and does not waive any claim, defense, objection, sanctions request, contempt request, enforcement request, fee objection, disciplinary complaint, criminal referral, mandamus issue, appellate issue, independent civil claim, or related remedy, including, without limitation, claims and remedies arising from:

1. False police reports, false reporting, false emergency-service reports, and manufactured law-enforcement narratives;

2. Fraudulent protective-order applications, false protective-order evidence, and abuse of protective-order process;
3. Fraudulent evidence submissions, fabricated evidence, altered evidence, false exhibits, and use or attempted use of stolen evidence;
4. Perjury, aggravated perjury, coordinated aggravated perjury, false sworn testimony, false declarations, and false representations to the Court;
5. Malicious prosecution, malicious use of process, and malicious continuation of proceedings, where legally available;
6. Abuse of process, litigation abuse, procedural sabotage, and use of court process to financially, medically, reputationally, and evidentially disable Respondent;
7. Insurance fraud, false QLE conduct, healthcare obstruction, benefit interference, HSA/FSA obstruction, life insurance/AD&D obstruction, critical-illness benefit obstruction, and ERISA/EBSA-related claims or referrals;
8. Theft, civil theft, Texas Theft Liability Act claims, conversion, and return/recovery of stolen property;
9. Evidence theft, hard-drive theft, legal-work-product theft, trial-material theft, theft of binders, paper files, printer, printer ink, litigation equipment, medications, medical records, financial records, device evidence, Apple TV/device evidence, and stolen supplies being used by Petitioner;
10. Destruction of evidence, spoliation, concealment of evidence, destruction of livelihood equipment, destruction of Respondent's music studio, destruction of computer-building hardware, and all spoliation-related remedies;
11. Civil conspiracy, aiding and abetting, concerted action, agency liability, vendor/contractor participation, third-party investigative participation, landlord-side participation, payment-proxy participation, mover/security participation, and John/Jane Doe co-conspirator liability;
12. Fraud, fraudulent inducement, fraudulent concealment, financial misrepresentation, false destitution claims, false compliance representations, false healthcare-compliance representations, and false source-record representations;
13. Tortious interference, employment interference, reputational interference, business interference, destruction of livelihood, interference with existing or prospective economic relationships, and interference with Respondent's ability to earn income;
14. Invasion of privacy, unauthorized digital access, unauthorized cloud access, unauthorized access to Blink, Google, Dropbox, Facebook, device-location systems, authentication systems, security-camera systems, and related digital accounts;

15. Financial sabotage, financial strangulation, concealment or dissipation of marital assets, source-record concealment, account wipeouts, disguised transfers, false characterization of equity/investment compensation, and obstruction of estate reconstruction;
16. Manufactured eviction, concealed lease buyout, landlord/lease-buyout concealment, eviction abuse, wrongful housing destabilization, and any related Dallas County, JP court, county court, bankruptcy, or civil remedies;
17. Attorney misconduct, counsel participation, former-counsel participation, current-counsel participation, pro hac vice counsel conduct, law-firm conduct, discovery obstruction, false representations, fee claims, sanctions exposure, disqualification, disgorgement, disciplinary complaints, and referrals where legally supported;
18. Sanctions, contempt, enforcement, adverse inferences, exclusion, evidentiary remedies, fee denial, fee shifting against Petitioner/counsel, discovery sanctions, Rule 13 sanctions, Chapter 10 sanctions, Rule 215 sanctions, and any other remedy supported by the record;
19. Criminal referrals, law-enforcement referrals, insurance-fraud referrals, benefits-fraud referrals, disciplinary referrals, and referrals concerning theft, evidence theft, false reporting, fraud, perjury, healthcare obstruction, and unlawful access;
20. Exemplary damages, statutory damages, actual damages, consequential damages, mental anguish damages where legally available, loss-of-use damages, lost-income damages, medical damages, survival-stabilization damages, attorney's fees, costs, and all other relief available under Texas law, federal law, equity, or the Court's inherent authority.

NO WAIVER OF INDEPENDENT CIVIL CLAIMS

Respondent does not waive independent civil claims against Gwendolyn Laura Ulijasz, Pamela Ulijasz Woodman, current counsel, former counsel, agents, vendors, contractors, investigators, movers, security personnel, landlord-side participants, benefit/HR actors, payment proxies, digital-access actors, law-enforcement-reporting participants, and John/Jane Doe co-conspirators.

These independent civil claims include, without limitation: theft, Texas Theft Liability Act claims, conversion, evidence theft, hard-drive theft, legal-work-product theft, trial-material theft, theft of binders, paper files, printer, printer ink, litigation equipment, medications, and device evidence, abuse of process, civil conspiracy, fraud, tortious interference, employment interference, invasion of privacy, unauthorized digital access, false reporting, malicious prosecution where legally available, healthcare obstruction, false QLE conduct, benefit interference, financial sabotage, manufactured eviction, landlord/lease-buyout concealment, destruction of livelihood, destruction of evidence, spoliation-related remedies, and exemplary damages where legally supported.

Respondent does not ask this Court to adjudicate those independent civil claims as part of the divorce property division. Respondent objects to any final divorce decree being used to imply that those claims have been divided, released, merged, waived, abandoned, tried, denied, or adjudicated.

NO WAIVER OF STOLEN-EVIDENCE CLAIMS

Respondent does not waive any claim, objection, sanction request, contempt request, exclusion request, preservation request, or civil claim arising from Petitioner's theft of Respondent's hard drives, evidence repositories, binders, paper files, legal work product, printer, printer ink, trial materials, medications, device evidence, Apple TV/device evidence, financial records, medical records, and litigation equipment.

This was theft. No softer label applies. Petitioner unlawfully entered a residence she was barred from entering, stole evidence, stole trial materials, stole legal work product, stole hard drives, stole Respondent's supplies, stole Respondent's printer, stole Respondent's printer ink, and is using Respondent's stolen property at her residence. Petitioner is recorded saying she had to "get more evidence."

Petitioner stole Respondent's Apple TV/device evidence and then used or attempted to use the stolen device to manufacture a false stalking/surveillance narrative with the San Antonio Police Department. A device stolen from Respondent was turned into a false accusation against Respondent.

HEALTHCARE, HSA/FSA, LIFE INSURANCE, AD&D, CRITICAL ILLNESS, & BENEFITS CLAIMS

Respondent does not waive any claim, enforcement request, contempt request, sanctions request, civil claim, federal benefits claim, ERISA/EBSA complaint, COBRA-related claim, HSA/FSA claim, make-whole claim, medical-harm claim, or appellate/mandamus complaint related to healthcare obstruction.

Petitioner obstructed healthcare access beginning no later than December 18, 2024. Petitioner cut off or obstructed medical insurance, HSA access, FSA access, critical illness coverage, life insurance, AD&D, spouse AD&D, and related benefits. Petitioner caused or participated in a false QLE process that cut off Respondent's healthcare on October 31, 2025, the same day she testified she would not obstruct healthcare. The healthcare order remains functionally noncomplied with.

NO WAIVER OF MANDAMUS, APPEAL, DE NOVO, RECUSAL, DUE PROCESS, OR COURT-REPORTER COMPLAINTS

Respondent does not waive mandamus, emergency appellate relief, appeal, de novo complaints, recusal complaints, due-process complaints, trial-readiness complaints, court-reporter complaints, discovery complaints, source-record complaints, healthcare complaints, stolen-evidence complaints, or complaints based on inadequate trial time.

Respondent objects to any final trial proceeding before de novo/trial-readiness issues are heard, source financial records are produced and verified, healthcare/QLE records are produced and verified, the signed healthcare order is functionally enforced, stolen hard drives and evidence repositories are preserved and returned without access or benefit to Petitioner or her agents, adequate trial time is provided, a court reporter is present, and Respondent's medical, financial, transportation, communication, and evidence-access collapse is addressed.

REQUEST

Respondent requests that this Notice be made part of the record before any trial evidence is received. Respondent further requests that no final trial, final decree, final property division, fee award, sanctions award, or order be used to imply waiver, release, merger, adjudication, abandonment, consent, or denial of Respondent's independent civil claims, sanctions requests, contempt requests, attorney-misconduct complaints, criminal referrals, disciplinary complaints, healthcare claims, stolen-evidence claims, mandamus complaints, appellate complaints, or claims arising from the collapse Petitioner engineered.

Respectfully Submitted,

A handwritten signature in black ink that reads "Jason McKemie". The signature is written in a cursive style with a long horizontal line underneath the name.

Jason McKemie

539 W. Commerce St., Ste. 2010

Dallas, TX 75208

214-868-4901

jmckemie@mckemie.net

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., Ste. 2010, Dallas, Texas 75208.

I declare under penalty of perjury that the factual statements in this Notice are true and correct based on my personal knowledge, documents, videos, audio, court filings, records reviewed by me, and matters stated on information and belief where the basis for that belief is identified.

Executed in Texas on June 11, 2026.



Jason McKemie

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this filing was served on all counsel of record by e-service and/or email on June 11, 2026.



Jason McKemie

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 116029052

Filing Code Description: Notice Of Filing

Filing Description: NOTICE OF NON-WAIVER OF SANCTIONS, CIVIL CLAIMS, ATTORNEY MISCONDUCT CLAIMS, AND OBJECTION

Status as of 6/12/2026 9:22 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Rebecca LArmstrong		rebecca@armstronglawtexas.com	6/11/2026 1:26:44 PM	SENT
Terra Aguirre		terra@armstronglawtexas.com	6/11/2026 1:26:44 PM	SENT
Lauren N.Shaw		lauren@armstronglawtexas.com	6/11/2026 1:26:44 PM	SENT
Jason McKemie		jmckemie@mckemie.net	6/11/2026 1:26:44 PM	SENT
Gwendolyn Ulijasz McKemie		GUlijasz@gmail.com	6/11/2026 1:26:44 PM	SENT
Gwendolyn Ulijasz		gulijasz@gmail.com	6/11/2026 1:26:44 PM	SENT
JONATHAN STEEL		jsteele@beermannlaw.com	6/11/2026 1:26:44 PM	SENT
REBECCA LARMSTRONG		REBECCA@ARMSTRONGLAWTEXAS.COM	6/11/2026 1:26:44 PM	SENT
JASON EMORYMCKEMIE		jason@callvital.com	6/11/2026 1:26:44 PM	SENT