

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA
DF-24-18010

NO. _____

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 OBJECTION TO PROCEDURAL REENTRY AND MOTION FILING
BY RESPONDENT'S COUNSEL**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Jason McKemie, Petitioner, and respectfully files this Notice of Objection to Respondent's procedural reentry and contemporaneous filing of substantive motions. In support thereof, Petitioner would show the Court as follows:

I. BACKGROUND

1. Respondent's prior counsel withdrew from this matter by court order, citing nonpayment. At that time, no substitution of counsel was entered, and Respondent failed to formally designate herself as pro se despite repeated requests.
2. On June 23, 2025, at approximately 11:45 PM, Respondent's prior counsel submitted a Notice of Appearance—simultaneously filing multiple substantive motions and responses related to discovery and pretrial disclosures.
3. At the time of these filings, Respondent's counsel had not yet been formally reinstated or approved by the Court. Petitioner reasonably relied on the eFile system, which continued to show all prior counsel as withdrawn and Respondent as self-represented.

II. PROCEDURAL DEFICIENCY AND GAMESMANSHIP

1. Texas Rule of Civil Procedure 10 requires formal substitution of counsel and authorizes the Court to deny withdrawal or reentry until representation is properly established.
2. Filing substantive motions at the exact moment of reappearance—before judicial recognition of representation—is procedurally improper and undermines fairness.
3. The timing of these filings—15 minutes before the 30-day pretrial discovery window closed—appears to be part of a deliberate strategy to:
 - Avoid timely discovery responses;
 - Evade valid service;
 - Manufacture standing at the last possible moment;
 - And obstruct Petitioner’s right to meaningful pretrial preparation.

III. REQUEST FOR RELIEF

WHEREFORE, PREMISES CONSIDERED, Petitioner respectfully requests that the Court:

- Strike or stay any substantive filings submitted contemporaneously with Respondent’s Notice of Appearance on or about June 23, 2025;
- Require Respondent’s counsel to obtain formal judicial acknowledgment of reentry before any additional motions are considered;
- And grant such other relief as justice and equity may require.

IV. NOTICE OF SUPPLEMENTAL FILING

1. Petitioner also respectfully informs the Court that an evidentiary supplement will be forthcoming in support of Petitioner’s prior Emergency Motion for Temporary Financial Relief, filed on June 25, 2025. The supplement provides documentation relevant to the relief sought in that motion and establishes

further grounds for immediate intervention.

2. Petitioner intends to submit additional filings in the coming days, including further evidence related to:
 - Perjury by Respondent and third-party witnesses;
 - Financial misrepresentation and concealment;
 - And violations of standing orders and procedural norms.

3. These materials are being submitted in good faith to ensure the Court has access to a full and accurate record prior to any substantive ruling.

Respectfully submitted,

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Pro Se Petitioner
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in divorce proceedings.

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Filing Description: NOTICE OF OBJECTION TO PROCEDURAL REENTRY AND MOTION FILING BY RESPONDENT'S COUNSEL

Status as of 6/30/2025 9:54 AM CST

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