

FILED UNDER SEAL PURSUANT TO TEXAS  
RULES OF CIVIL PROCEDURE AND  
COURTS INHERENT AUTHORITY

**DF-24-18010**

NO.

IN THE MATTER OF  
MARRIAGE OF

§

IN THE DISTRICT COURT THE

§

§

GWENDOLYN ULIJASZ-MCKEMIE

§

302<sup>th</sup> JUDICIAL DISTRICT &

§

JASON MCKEMIE

§

DALLAS COUNTY, TEXAS

**NOTICE OF PRESERVATION OF WITNESSES, NOTICE OF LATE  
DISCOVERY PRODUCTION, AND REQUEST FOR CONTINUANCE  
FOR FINANCIAL AND MEDICAL STABILIZATION**

**NOTICE IS HEREBY GIVEN:**

Respondent files this Notice for the limited purposes of (1) preserving Respondent's ability to call identified witnesses; (2) notifying the Court of substantial discovery production occurring on the eve of exhibit deadlines; and (3) requesting a continuance consistent with the Court's prior statements allowing Respondent reasonable time to prepare for trial once certified financial discovery is complete.

This filing is **not offered as merits brief** and is intended solely to preserve procedural rights and prevent prejudice.

**I. NOTICE OF LATE AND ONGOING DISCOVERY PRODUCTION**

Petitioner has begun producing a significant volume of discovery documents immediately prior to the exhibit deadline. While Respondent will review and evaluate the materials in good faith, production at this hour does not permit meaningful analysis, account tracing, or verification of completeness.

Respondent anticipates that additional deficiencies will remain and that third-party subpoenas will still be required. Respondent will address any remaining deficiencies through the pending Motion to Compel after completing review.

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## II. PRESERVATION OF ABILITY TO CALL WITNESSES

Respondent provides the following **non-exclusive witness list** to preserve the ability to call witnesses as discovery is completed. This list may be supplemented as additional discovery, third-party subpoenas, and trustee findings are finalized.

### A. Material Witnesses

- Pam Woodman
- Christopher McNally
- Elizabeth Bender
- Dr. Kathy Spangenberg
- Wynn E. Pott

### B. Third-Party / Professional Witnesses

- Jason Paru
- Detective Vidal (San Antonio Police Department)
- Detective Carnivally (San Antonio Police Department)
- Detective Wesner (San Antonio Police Department)
- Carolina Reyes (San Antonio Police Department)
- Jerome D. Lee
- Dr. Younas Barber
- David Aron
- Lauren Whipple, MD

### C. Additional Potential Witnesses

- Andy Ulijasz
- Clint Woodman
- Patrick Winter
- Dane Patching
- Christina Segura
- Firas Junaid
- Lynn McKemie

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## III. THIRD-PARTY WITNESS IDENTIFICATION STILL OUTSTANDING

Respondent has repeatedly requested, via interrogatories and discovery, identification of third-party vendors and individuals whose actions are relied upon by Petitioner. This

information remains outstanding and is required for subpoena issuance and trial preparation, including but not limited to:

- Security, investigative, surveillance, and contractor vendors (e.g., Jetty Partners);
- The three off-duty police officers present at the marital residence on January 2, 2024;
- Individuals and companies involved in surveillance of Respondent's residence;
- The individual or vendor who inspected Petitioner's vehicle and reported discovery of a tracking device;
- The cybersecurity vendor receiving approximately \$2,700 per month in payments.

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#### IV. REQUEST FOR CONTINUANCE CONSISTENT WITH PRIOR COURT STATEMENTS

At the prior pre-trial hearing, the Court indicated that Respondent would be afforded reasonable time—approximately **90 days**—to prepare for trial **once certified financial discovery is complete**.

Given:

- the timing and volume of current production,
- the need for account tracing and third-party subpoenas,
- pending findings of the federal bankruptcy trustee,
- pending ERISA/QLE determinations affecting healthcare,
- and Respondent's ongoing medical instability and need to undergo surgery,

Respondent respectfully requests a continuance consistent with the Court's prior statements so that trial preparation may proceed on a complete, verified record.

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**PRAYER**

**Respondent respectfully requests that the Court:**

1. Acknowledge this notice preserving Respondent's ability to call witnesses;
  2. Take notice of late and ongoing discovery production; and
  3. Grant a continuance consistent with the Court's prior guidance to allow completion of discovery, subpoena returns, trustee findings, and medical stabilization.
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**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  
Respondent, Pro Se

### Automated Certificate of eService

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Filing Description: NOTICE OF PRESERVATION OF WITNESSES, & LARGE DISCOVERY PRODUCTION IN FINAL HOUR

Status as of 1/26/2026 12:52 PM CST

#### Case Contacts

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