

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. DF-24-18010

IN THE MATTER OF
THE MARRIAGE OF

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GWENDOLYN ULIJASZ-MCKEMIE
&
JASON MCKEMIE

IN THE DISTRICT COURT

302nd JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

NOTICE OF PROCEDURAL BAR TO PRETRIAL OR TRIAL SETTING AND PRESERVATION OF OBJECTION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, **Jason McKemie, *Pro Se *Not by Choice, Respondent***, and files this Notice to preserve on the record that, under **Texas Rule of Civil Procedure 18a(f)(2)**, it is **procedurally improper** and without authority to set any pretrial conference or trial date in this matter at this time.

1. Recusal Motion Has Not Been Heard or Decided

1. The statement made by opposing counsel that “the recusal motion has already been decided” is incorrect.
2. The reassignment of this case to the current Court was an **administrative action** by the Regional Presiding Judge, not a hearing or ruling on the merits of the pending recusal motion.
3. The factual grounds and legal arguments in the recusal motion have never been heard, argued, or ruled upon by any court.

2. Rule 18a(f)(2) Prohibits Further Proceedings

4. Under **TRCP 18a(f)(2)**:

“If a motion to recuse is filed, the judge must take no further action in the case until the motion has been decided.”

5. “Further action” includes setting a pretrial conference or trial, as such actions move the case toward adjudication while the recusal challenge remains unresolved.

3. Preservation of Objection

6. Respondent hereby **objects** to any pretrial or trial setting at this stage as procedurally barred by TRCP 18a(f)(2).
 7. Any attempt to proceed with scheduling in violation of this rule will be noted on the record, and Respondent will seek appropriate relief to enforce compliance with the procedural requirements.
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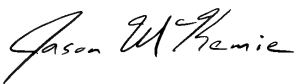
4. Foundational Defects in the Record

8. Opposing counsel is attempting to force trial without discovery and on a January 7 record both sides know is built on demonstrably false statements — a foundation that is factually bankrupt, functionally corrupt, and cannot support a lawful judgment.
 9. Proceeding without first correcting this record and addressing rampant asset concealment and fraud would constitute a direct denial of due process and irreparably taint any judgment entered in this matter.
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PRAYER

Respondent respectfully requests that the Court take no further action to set pretrial or trial dates until the pending recusal motion is heard and decided on the merits, and that this objection be noted and preserved in the record.

Respectfully submitted,



Jason McKemie

Pro Se Respondent (See Disclaimer: *Not by Choice)

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**Disclaimer "Procedural Identity Theft" Included on Last Page of all Filings*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice was served on all counsel of record via [TX e-File - Email] on this the 8 day of August, 2025.



Jason McKemie

RESPONDENT'S DISCLAIMER:

PRO SE NOT BY CHOICE (PROCEDURAL IDENTITY THEFT DISCLAIMER)

Petitioner did not merely file first — she intercepted Respondent's filing by fraudulently reversing his attorney retainer the day after his spinal surgery, she severed his access to counsel and funds. She withheld the retainer reinstatement until Friday to block re-engagement, then had attorneys work through the weekend to file first with a fabricated protective order — a calculated seizure of Petitioner status to construct a false narrative of abuse and victimhood, consistent with her documented legal history of doing so across multiple institutions.

Respondent was left destitute, forced to sell plasma for medication. Over the prior 4 months, Petitioner had funneled hundreds of thousands into hidden accounts and buried him in marital debt through emotional manipulation under the pretense of a "short term cash crunch". In reality, large volumes of cash were flowing in yet she informed Respondent they were at risk of bouncing utility payments, encouraging him to get another credit card or to put groceries on 6mo payment plans. SAPD referred her to the Mental Health Division after the fourth AirTag she turned in — just as the prior 3 — was registered solely to her iCloud, effectively killing the "stalking" narrative. Despite 25 Motions, 5 Emergency Motions, 22 Ex Parte Judicial Requests for Relief, a Judge Recusal, over nine months...no court has ruled on the perjury, aggravated perjury, fraud, asset concealment, witness tampering,—or corrected the false "six-month marriage" narrative that was weaponized to deny Respondent spousal support, legal fees, and due process.

Truth is an absolute defense to defamation.

—NOTICE TO THE COURT AND RECORD—

This document is submitted with a standing constitutional and procedural reservation of rights. Respondent has previously notified this Court in writing of un rebutted allegations of discovery abuse, evidentiary suppression, financial coercion, and litigation misconduct—all of which remain unrul ed upon at the time of this filing.

Any entry of decree, final ruling, or trial-based judgment prior to formal rulings on these motions constitutes a willful denial of due process under both the Texas Constitution and the 14th Amendment to the U.S. Constitution.

This reservation is hereby entered into the permanent record and incorporated by reference into all prior and future filings, without waiver.

"THE RIGHT TO DUE PROCESS WITHOUT ACCESS OR ENFORCEMENT IS AN ILLUSION OF JUSTICE—NOT JUSTICE ITSELF.

This notice also preserves Respondent's right to seek redress under 42 U.S.C. §1983 or there applicable remedies if fundamental rights violations are not corrected.

Trial May Not Proceed Until Outstanding Motions Are Ruled On

Trial WOULD CONSTITUTE A PROCEDURAL FAILURE IF COMMENCED PRIOR TO THE Court's ruling on all pending motions, including those relating to discovery violations, financial concealment, and procedural fraud. Proceeding without resolving these matters would not only violate due process but would also allow the foundation of trial to rest on un rebutted falsehoods and unresolved evidentiary conflicts.

Respondent respectfully requests that the Court confirm, on the record, that no trial setting or final ruling will occur until all outstanding motions have been fully adjudicated.

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Filing Description: NOTICE OF PROCEDURAL BAR TO PRETRIAL OR TRIAL SETTING AND PRESERVATION OF OBJECTION

Status as of 8/8/2025 11:05 AM CST

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