

**DF-24-18010**

Cause No. \_\_\_\_\_

**NOTICE: THIS DOCUMENT  
CONTAINS SENSITIVE DATA**

IN THE MATTER OF	§	IN THE DISTRICT COURT
THE MARRIAGE OF	§	
	§	
GWENDOLYN ULIJASZ-MCKEMIE	§	302nd JUDICIAL DISTRICT
&	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

---

**NOTICE REGARDING STATUS OF PROPOSED ORDER, ELEVATED  
RISK OF SAFETY-BASED ALLEGATIONS, AND MATTERS BEARING  
ON JUDICIAL MANAGEMENT AND RECORD INTEGRITY**

---

TO THE HONORABLE COURT OF THE 302ND DISTRICT COURT:

**Respondent, Jason McKemie, respectfully submits this Notice** to advise the Court of matters bearing directly on judicial management, evidentiary integrity, and the reliability of adjudication at the present procedural stage of this case, including the status of the proposed order requested during the discovery enforcement hearing held on **Thursday, February 5, 2026**, before **Associate Judge Tamika Abendroth**.

At that hearing, the Court requested that Respondent submit a proposed order, and Respondent stated on the record that he would do so. **Respondent is actively preparing the proposed order and intends to submit it promptly.**

Since the hearing, Respondent has identified material information bearing directly on **discovery compliance, witness access, benefits administration, medical safety, financial capacity, and the integrity of the factual record before the Court**. **Proceeding without the Court’s awareness of these matters presents a substantial risk that adjudication could occur on an incomplete or distorted record**, which may materially affect both safety considerations and the durability of any resulting order. Respondent is therefore taking care to present these matters in a disciplined and consolidated manner that respects the Court’s process, avoids piecemeal submission, and ensures that the Court has sufficient context to rule once, correctly, and on a reliable evidentiary foundation.

**This matter does not present as a routine divorce proceeding, nor even as a conventional high-conflict domestic case.** The record reflects much broader procedural, medical, financial, and record-integrity considerations that must be evaluated together in order to resolve the case efficiently and with finality. **Respondent’s objective is the fastest path to a durable resolution, not delay.** However, the full scope of these issues cannot be meaningfully understood within the confines of a brief hearing alone. They require review of core facts already in the record that are objectively verifiable and not reasonably disputed, together with confirmation that the Court’s working record has been restored. **Due process is implicated where record integrity is compromised**, including where filings are missing from the Court’s working set, not reflected on the docket as expected, or not available for review at the time of ruling. If this matter proceeds to trial without confirming record completeness and addressing material gaps, the Court risks adjudicating on an incomplete and unreliable foundation, and even a well-intended ruling may be neither fair nor durable, inviting post-trial correction efforts and avoidable appellate complications.

This Notice is not submitted for the purpose of delay, nor to seek immediate adjudication of disputed factual claims. Rather, it is offered to assist the Court in evaluating objections, safety assertions, and procedural posture against the full evidentiary record, particularly where decisions made at this juncture will materially shape the remainder of the proceedings.

---

## 1. ELEVATED RISK OF IMMINENT SAFETY-BASED ALLEGATIONS AT THIS PROCEDURAL INFLECTION POINT

Respondent respectfully notifies the Court that, based on prior conduct and documented timing patterns in these proceedings, the case has reached a juncture at which **there is a heightened likelihood of a near-term claim framed as danger, assault, emergency, or immediate safety risk**. This notice is not based on any new filing, nor does it ask the Court to prejudge any future allegation. Rather, **it is submitted for judicial awareness of a foreseeable escalation pattern that has repeatedly arisen at credibility-sensitive decision points**, including moments when discovery compliance was positioned for enforcement. The pattern does not appear primarily financially motivated; Petitioner has repeatedly chosen the significantly more expensive path consistently. **Instead, it appears directed toward preventing outcomes that might distribute responsibility or undermine a singular victim narrative.**

Respondent further advises that this pattern has not been confined to filings or courtroom statements. It has repeatedly included law-enforcement involvement and other third-party processes in close temporal proximity to key decision points. Over the past approximately thirteen months, Respondent has had to respond to more than nineteen police reports and resulting inquiries, involving multiple detectives and repeated interrogations, including occasions on which Respondent was Mirandized.

In response, Respondent has taken proactive steps to identify and mitigate such escalation, including submitting regular open-records requests to relevant law-enforcement agencies to detect new allegations promptly, and providing investigators objective location and tracking documentation when requested to facilitate verification and resolution. These events have provided recurring insights as to timing, and Respondent advises the Court that the proceedings have again entered a critical phase where similar escalation is foreseeably likely.

Respondent raises this solely so that, should any such assertion arise, it may be evaluated against sworn testimony, objective documentation, and the full evidentiary record, rather than in isolation or under time pressure, to protect the integrity of adjudication and avoid crisis-driven distortion of the proceedings.

---

## 2. MEDICAL, BENEFITS, FINANCIAL, AND BANKRUPTCY CONSIDERATIONS BEARING ON DUE PROCESS AND CASE MANAGEMENT

Respondent further advises the Court that the consolidated submission will address **acute medical and benefits-related issues that materially affect due process, litigation capacity, and personal safety**, and that cannot be disentangled from the procedural posture of this case. Respondent has been hospitalized twice recently for **congestive heart failure and severe edema**, conditions documented by treating

physicians as associated with prolonged interruption of prescribed medications following the termination of health coverage. These hospitalizations occurred during the period in which the Court had ordered Petitioner to reinstate Respondent's healthcare.

Although nominal coverage was only recently restored, current benefits summaries from the plan administrator reflect that **HSA contributions have been reduced to de minimis levels**, the **FSA was terminated**, and other policies (including **Life, AD&D, and Critical Illness/Critical Care**) in which Respondent was a beneficiary or dependent remain cancelled and require manual reactivation due to the stated "unique circumstances" of the terminations. Respondent further advises that access to benefits functionality has been inconsistent, including issues surrounding payment tools required to obtain medically necessary prescriptions and care. An **ERISA fiduciary** is involved, and documentation from the benefits administrator conflicts with prior representations previously provided.

Respondent further advises that, due to severe financial destabilization, he is presently unable to afford required deductibles and co-pays, while simultaneously being ineligible for indigent services because coverage technically exists. This has created a practical barrier to accessing medically necessary treatment and prescription medications for a documented cardiac condition. Respondent has submitted multiple physician letters on hospital letterhead documenting serious and ongoing medical risk; those submissions have not yet been substantively evaluated.

Respondent raises these facts not to litigate medical issues in this Notice, but to advise the Court that **medical risk, benefits administration, ERISA fiduciary issues, financial deprivation, discovery posture, and the pending bankruptcy administration are converging** and must be evaluated together to ensure adjudication consistent with due process and to avoid an unstable outcome. **Respondent maintains substantial supporting documentation and will provide it in an organized manner in the forthcoming consolidated submission.**

---

### **3. RECORD INTEGRITY AND MISSING FILINGS AFFECTING DUE PROCESS AND TRIAL READINESS.**

Respondent further advises the Court that, independent of the merits of any disputed issue, **record integrity has been a persistent and material problem** in this matter. Respondent has repeatedly encountered filings that were reflected in eFile as "Received" and "Accepted," remained visible for extended periods, and later **disappeared from the docket or became inaccessible**. In some instances, only the link vanishes, effectively removing appellate-reviewable material; in other instances, the filing itself appears to be removed from the record entirely. In at least one instance, a substantive and contested filing was removed while Respondent's objection to that filing remains docketed, creating a procedural anomaly in which an objection exists without a corresponding filing. Respondent retains the original submission and contemporaneous eFile screenshots documenting the change in record status.

Respondent contacted **Texas eFile**, which investigated and advised that: **(i)** the removals/deletions are occurring on the **court-side**, and **(ii)** the activity is **auditable**, although Texas eFile could not identify the specific user responsible. Respondent first notified the Court coordinator by email and has not received a substantive response. While some instances later appeared to resolve without notice, Respondent discovered those changes only by re-reviewing or re-ordering the record. At least two filings remain

persistent problems and have not been reliably corrected despite repeated efforts, including Respondent referencing the issue in at least one subsequent filing.

These irregularities have resulted in filings not appearing on the docket as expected, not being reliably available in the Court's working set at the time of hearings, and requiring resubmission or repeated efforts to restore visibility. Respondent contends that additional critical submissions remain absent or not reliably accessible for Court review despite ongoing efforts to correct the issue.

Because these conditions directly affect what the Court can review at the time of ruling, **they implicate due process and adjudicative reliability**, particularly on expedited timelines and where trial readiness depends on a stable, complete record. Respondent raises this for case-management purposes and will provide, in the consolidated submission, a disciplined record map identifying: (i) filings submitted, (ii) docket appearance status, (iii) any re-filing history undertaken solely to restore the record, and (iv) specific items Respondent contends are not presently available for review. Respondent respectfully requests that **record completeness and reliable accessibility** be treated as a threshold condition to any trial setting or other dispositive adjudication.

Respondent further advises the Court that **the two filings that have never been fully restored or resolved both predate the recusal in the 254th District Court** and remain outstanding despite repeated efforts to correct the record. Those filings are: (i) Respondent's ***Emergency Motion to Preserve Evidence and Continue Trial Due to Procedural Sabotage and Breakdown in Judicial Oversight***, and (ii) Petitioner's ***Testifying Expert Disclosures***. Both filings go to core issues of record preservation, credibility, and procedural fairness, and their continued absence or instability materially affects the Court's ability to evaluate the case on a complete and reliable record.

---

## **B. Respondent's Emergency Motion to Preserve Evidence and Continue Trial Due to Procedural Sabotage and Breakdown in Judicial Oversight**

This filing seeks an **emergency continuance** and **evidence-preservation relief**, asserting the case could not fairly proceed to trial due to discovery obstruction, unresolved motions, and alleged record/oversight failures. It also asks the Court to preserve key categories of evidence and **court/eFile metadata** (audit trails, access history, routing/notations, status changes), along with discovery records, financial disclosures, protective-order filings, and related materials for reliability and future review.

---

## **A. Petitioner's Testifying Expert Disclosures**

This filing designates **Sullivan & Cook attorneys (Jeff Cook, William Cook, Ethan Scroggins)** as **testifying "experts" on attorney's fees**, including opinions that Petitioner's fees are reasonable/necessary and proposed hourly rates, with supplementation via monthly billing statements. In substance, it is a **fee-shifting vehicle** (not a merits expert), and it tees up testimony to support awarding Petitioner attorney's fees and to rebut any opposing fee evidence.

Respondent further notes a material inconsistency bearing on the reliability of the opposing party's fee evidence. During the period when counsel was withdrawing during discovery, counsel represented that Petitioner had been moved to a two-week billing cycle due to financial strain. Yet, counsel's own stated "billable window" for a comparable two-week period was described as ranging from approximately **\$260,000 to \$480,000**, reflecting a variance of roughly **\$220,000**. Respondent raises this not as rhetoric, but as a credibility and accounting issue: a fee claim that can swing by that magnitude over a two-week interval warrants heightened scrutiny, itemization, and verification before being relied upon for fee shifting or any credibility-sensitive ruling.

---

#### 4. STATUS UPDATE: PROPOSED ORDER AND UPCOMING FILINGS TO NARROW ISSUES AND PREVENT AVOIDABLE RETRIAL

At the Court's direction, Respondent is completing a proposed order reflecting the Court's evaluation from the February 5 hearing and will file that proposed order promptly.

In parallel, Respondent is finalizing a consolidated submission identifying specific gaps in the financial disclosures, benefits administration, and discovery record, and explaining how those omissions materially impair the Court's ability to reach a fair and durable resolution. Absent limited third-party subpoenas and coordinated review, those gaps cannot be cured through party-produced disclosures alone. Proceeding to trial without addressing them would create an elevated risk that the case would later require reopening once independent records surface, undermining judicial economy, finality, and the reliability of any judgment.

Respondent is working diligently to complete these submissions and commits to filing the proposed order, together with the related materials addressing these record issues, before **Monday morning**. Respondent appreciates the Court's time and consideration as these materials are finalized for prompt review.

---

#### 5. CLOSING STATEMENT

Respondent's goal has been and remains the prompt and efficient resolution of these proceedings. Any additional time taken is solely to ensure that all relevant considerations are properly before the Court so that adjudication may occur **once, on a complete and reliable record**, without crisis-driven distraction at credibility-sensitive decision points or unnecessary risk of prolonged litigation or appellate complications.

Respondent respectfully appreciates the Court's consideration.

---

Respectfully Submitted,



**Jason McKemie**

539 W. Commerce St., Ste. 2010

Dallas, TX 75208

214-868-490

[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

**EXHIBITS:**

---

- A Confirmation that Petitioner Triggered Benefits Termination on 10/31/2025
- B Prior Benefits Still Terminated which Accenture is Working to Restore
- C Missing E-File Envelope ID: 99379675
- D Missing Filing: Petitioner's Testifying Expert Disclosures
- E Missing E-File Envelope ID: 103183039
- F Missing Filing: Emergency Motion to Preserve Evidence and continue trial due to procedural sabotage and documented perjury

# EXHIBIT A

SEE HIGHLIGHTED TEXT

Begin forwarded message:

**From:** USBenefits <USBenefits@accenture.com>  
**Subject:** RE: Accenture's §503 obligations are non-delegable / Demand for Full and Fair Review  
**Date:** February 4, 2026 at 1:53:00 PM CST  
**To:** Jason McKemie <jmckemie@mckemie.net>

Mr. McKemie,

We are in receipt of your emails and are preparing a formal response. Please note that additional emails require us to review any and all attachments prior to response, which can slow response.

Accenture Benefits

*NOTE: Accenture reserves the right, in its sole discretion, to amend, modify or terminate any of its benefit plans at any time.*

*Attached: Present Day Benefits Summary*

---

Begin forwarded message:

**From:** Jason McKemie <jmckemie@mckemie.net>  
**Subject:** Re: FINAL ERISA §503 Demand, Preservation Notice, and Litigation Hold / Failure to Restore (Jason E McKemie 4-8-1976)  
**Date:** February 2, 2026 at 3:48:42 PM CST  
**To:** "NA.HR.Questions@accenture.com" <NA.HR.Questions@accenture.com>, USBenefits <USBenefits@accenture.com>, <info@Businessolver.com>  
**Cc:** "Pott, Wynn E." <wynn.e.pott@accenture.com>, Jason <mckemie76@gmail.com>

#### PeopleLine Team:

I am in receipt of your email acknowledging my **Final ERISA §503 Demand, Preservation Notice, and Litigation Hold** and attempting to redirect me to Businessolver. I have copied [info@Businessolver.com](mailto:info@Businessolver.com) with this email.

To be clear: that message is **not a substantive response** to my ERISA §503 request.

This redirection constitutes **procedural deflection**, not compliance. By acknowledging receipt while declining to address the merits, produce records, or correct ongoing uncured benefit cancellations, **Accenture's redirection constitutes a constructive denial of my §503 request.**

Delegation to a vendor does not excuse this failure. ERISA imposes a non-delegable fiduciary duty to conduct a **full and fair review**, and delay or deflection after actual notice—particularly where medical harm is ongoing—**creates independent liability.**

Accenture is the **Plan Administrator and ERISA fiduciary.** While Businessolver may act as a delegated administrator, delegation does **not** relieve Accenture of its statutory obligations under **ERISA §503 and 29 C.F.R. §2560.503-1** to provide a **full and fair review** and to produce all documents “relevant” to an adverse benefit determination and ongoing functional denial of benefits.

#### 1) Accenture's 'Reinstated Without a Gap' Representation Is Now Provably False

Since submitting my demand, I have obtained **Businessolver-generated system records: a Benefit Enrollment Summary dated 02/02/2026 at 12:32:54 CST**. That system record confirms that multiple independent benefit elections that existed prior to the October 31, 2025 termination remain **affirmatively cancelled/waived and uncured**, including:

- **HSA funding**
- **Health Care Flexible Spending Account (FSA)**
- **Dependent Care FSA**
- **Spouse/Domestic Partner Critical Illness**
- **Spouse/Domestic Partner Life & AD&D**

Each of the above remains reflected as Coverage Waived in the enrollment system as of the generation timestamp. These uncured cancellations constitute non-reinstatement and, in isolation and collectively, directly conflict with the Court's order requiring Ms. Ulijasz to fully restore all benefits at the same or better elections and funded at the same or greater amounts than 2025.

These are **discrete benefit elections**. Each requires affirmative change actions and generates audit trails. The selective restoration of only certain benefits (e.g., medical eligibility) while leaving these benefits waived proves the termination was not limited to medical eligibility and has **not** been cured. **Any assertion that benefits were reinstated "without a gap" is therefore inaccurate as a matter of system record and operational reality.**

**Retroactive eligibility labels do not restore cancelled HSA funding, do not recreate forfeited FSA elections, and do not cure the medical harm, lost treatment windows, or financial exposure that occurred while benefits were functionally unavailable.**

## 2) Actual Notice Was Given Pre-Cure Window — No Validation, No Hold, No Cure

Additionally, as previously noticed, on **November 24, 2025 at 4:16 PM CST**, both Accenture HR and the COBRA administrator were placed on **actual notice**—on a recorded call—that **no divorce had occurred** and that the QLE premise was inaccurate. Despite this notice, no validation hold, escalation, or corrective review occurred, and automatic reinstatement did not take place.

The Agent confirmed on a recorded call the following:

### Policy Termination Requires:

- |   | <b>DATE RECEIVED</b> |
|---|----------------------|
| 1. Employee/Participant Submitted QLE (No other possible initiating source)                                     | 10/31/2025           |
| 2. Sworn Attestation (Written or Recorded to Effectively Terminate the Policy):                                 | 10/31/2025           |
| 3. Receipt of a Signed & Verified Judicial Decree within 31 Todays or Policy Automatically Reinstates Next Day: | ?                    |

As of 10/28 you had not received the decree therefore it must've been received between day 28 and day 31.

## 3) Demand for Substantive §503 Response and Immediate Production (Due EOD Today)

Accordingly, treat this as supplemental notice and provide a substantive ERISA §503 response and production by **end of day today**, including:

1. **The complete QLE submission(s)** and any **attestation/affidavit/certification** relied upon to terminate coverage effective October 31, 2025;
2. **Audit logs and approval records for each cancelled benefit election** listed above (HSA funding, Health Care FSA, Dependent Care FSA, Spouse/Domestic Partner Critical Illness, Spouse/Domestic Partner Life & AD&D), including who initiated each change, timestamps, and system reason codes;
3. All documentation **upload and validation records** (or absence thereof) associated with the purported divorce event and any "cure" workflow;

4. The complete **recording, transcript, and call metadata** for the **November 24, 2025 4:16 PM CST** call, including any related internal case notes/ticket entries; and
5. A written explanation identifying why these benefits remain waived, what authority was relied upon to cancel them, and what steps are being taken **now** to restore functional access and prevent further harm.

#### **4) Delegation Does Not Excuse Noncompliance; Redirection Is Not a §503 Response**

Businesssolver's role as a vendor does not transfer fiduciary responsibility away from Accenture. If you contend Businesssolver maintains relevant records, then those records are within the scope of §503 "relevant documents" and must be produced. Routing me to a portal or call center is not compliant with §503 and does not satisfy Accenture's disclosure obligations.

#### **5) Notice of Escalation**

Absent a substantive response and production by end of day today, I will proceed without further notice to escalate, including submission to the **U.S. Department of Labor (EBSA)** and seeking court authorization for subpoenas and emergency relief, attaching your acknowledgment and non-substantive redirection as evidence of §503 noncompliance and ongoing harm.

Because Businesssolver does not provide a direct ERISA record-request email for plan participants/dependents, Accenture is on notice to coordinate production with its delegated administrator. This correspondence does not shift responsibility away from Accenture as Plan Administrator.

Please be advised that **a written email point of contact is required for all §503 communications and productions to preserve the administrative record; phone or portal-only communications are unacceptable.**

**Once again, Nothing in this correspondence withdraws, waives, restarts, or tolls any deadline. The original receipt date controls. Accenture's §503 obligations are non-delegable. PER 29 U.S.C. §1133 AND 29 C.F.R. §2560.503-1.**

Please confirm today how Accenture intends to proceed.

**Jason McKemie**  
539 W. Commerce St., Ste. 2010  
Dallas, TX 75208  
214-868-4901  
[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

Begin forwarded message:

**From:** USBenefits <USBenefits@accenture.com>  
**Subject:** RE: ERISA §104(b)(4) Request – **SECOND DEMAND FOR REINSTATEMENT / 80 DAYS WITHOUT ACCESS TO CRITICAL MEDICATIONS / NOTICE OF ESCALATING MEDICAL HARM**  
**Date:** January 21, 2026 at 4:40:27 PM CST  
**To:** Jason McKemie <jmckemie@mckemie.net>  
**Cc:** Jason McKemie <mckemie76@gmail.com>

Mr. McKemie,

Thank you for reaching out. We want to address your concerns. See below for more details and a response to your letter.

**Your coverage was dropped due to a participant-reported life event, and that triggered the COBRA notice which was in accordance with our plan rules. When Accenture was informed by our Benefits Center in December that the qualifying event that triggered Cobra notice wasn't final yet, and therefore you were still an eligible dependent, we directed them to negate the submitted life event. Life events must be participant directed and there is one participant and one dependent covered under your policies. Manual intervention was required to return your coverage to active status because of the unique facts of your situation.**

**While our intent was for there to be no gap in coverage, unfortunately our health plan administrators reinstated coverage from that point forward. We have reached out to both your medical carrier and pharmacy benefit manager attempting to correct their records such that there is now no gap in coverage.**

We acknowledge your request for documents under ERISA. In our response to you on January 15, 2026, we provided you with copies of the "instruments under which the plan is established or operated" as required under ERISA § 104(b)(4). You have requested additional documents below. Under ERISA § 503 and 29 C.F.R. § 2560.503-1, if an adverse benefit determination has been made and you have submitted a claim or appeal, the Plan must provide the "relevant documents" (as defined under 29 C.F.R. § 2560.503-1(m)(8)) that formed the basis of that benefit determination. To our knowledge, as noted above, all of your claims for benefits under the Plan have been approved by Aetna. If there are claims that are currently denied **or specific claims for which you are seeking relevant documents**, please identify the claim and we will be happy to assist.

Thank you,  
Accenture Benefits

*NOTE: Accenture reserves the right, in its sole discretion, to amend, modify or terminate any of its benefit plans at any time.*

## Benefit Summary

Benefit Summary Generated On 02/02/2026 At 12:32:54 CST

### About You

#### Your Information

Name	Jason E McKemie
Address	5609 La Foy Blvd Dallas, TX 75209 US
Date of Birth	04/08/1976
Gender	Male
Cell Phone	214-868-4901

### Election Information

Current

**Benefits Accenture Is Currently Working to Restore Following Termination of Policies Based on a Participant-Submitted QLE & Sworn Attestation That the Divorce Was Finalized**

## Current

### My Health

Medical - Aetna HealthFund HDHP	
<b>Medical Covered Members</b>	
<b>Members</b>	<b>Covered</b>
Jason E McKemie Effective Date: 01/01/2026	Yes

Dental - Aetna DMO Plan	
<b>Dental Covered Members</b>	
<b>Members</b>	<b>Covered</b>
Jason E McKemie Effective Date: 01/01/2026	Yes

Vision - UnitedHealthcare Vision Plan	
<b>Vision Covered Members</b>	
<b>Members</b>	<b>Covered</b>
Jason E McKemie Effective Date: 01/01/2026	Yes

Employee Critical Illness - Coverage Waived
Spouse/Domestic Partner Critical Illness - Coverage Waived

### My Savings

Health Savings Account - Health Savings Account
---

Health Care Flexible Spending Account - Health Care Flexible Spending Account
---

Limited Purpose Flex

Dependent Care Flexible Spending Account - Coverage Waived

### My Security

Basic Life Insurance - Basic Life Insurance

Basic Accidental Death & Dismemberment (AD&D) Insurance - Basic  
AD&D Insurance

Optional Life Insurance - Coverage Waived

Optional Accidental Death & Dismemberment (AD&D) Insurance - Coverage Waived

Spouse or Domestic Partner Life AD&D Insurance - Coverage Waived

Long-Term Disability Insurance - LTD \$15,000 Monthly Maximum

Short-Term Disability Insurance - Short-Term Disability

Legal Plan - Legal Plan

Personal Excess Liability - 2. Personal Excess Liability - 2 Million

This online benefit summary is reflective of benefits information contained within the Businessolver, Inc. database on the date this information is being displayed. This information is not intended to be an all inclusive or exhaustive list of benefit enrollment information. Modifications, deletions, and additions to coverage are not immediately effective upon submission. Please contact the Benefits Center at 888-259-6059 if you have any questions.

Important Note: The insurance carriers make the final determination regarding the payable benefit amount and the designated beneficiaries. The information shared reflects the current enrollment system data, but the ultimate benefit recipient or benefit amount to be paid may change based on plan rules, Evidence of Insurability and approvals, and other factors.

Every effort has been made to report information accurately, but the possibility of error exists. In case of any conflict between your benefits election confirmation and an official plan document, the plan document will be the final authority. Please note, some insurance coverage elections only become effective upon approval of your Evidence of Insurability (EOI) by the carrier.

\* -Any personal or dependent information that appears in red font indicates a change that is currently pending approval.

# EXHIBIT C

**From:** no-reply@efilingmail.tylertech.cloud  
**Subject:** Notification of Service for Case: DF-24-18010, GWENDOLYN ULIJASZ MCKEMIE vs. JASON MCKEMIE for filing Motion (No Fee), Envelope Number: 103183039  
**Date:** July 16, 2025 at 6:09 AM  
**To:** jmckemie@mckemie.net



## Notification of Service

Case Number: DF-24-18010  
Case Style: GWENDOLYN ULIJASZ MCKEMIE vs. JASON MCKEMIE  
Envelope Number: 103183039

This is a notification of service for the filing listed. Please click the link below to retrieve the submitted document. If the link does not work, please copy the link and paste into your browser. You can also obtain this document by following the steps on this [article](#).

Filing Details	
<b>Case Number</b>	DF-24-18010
<b>Case Style</b>	GWENDOLYN ULIJASZ MCKEMIE vs. JASON MCKEMIE
<b>Date/Time Submitted</b>	7/16/2025 6:03 AM CST
<b>Filing Type</b>	Motion (No Fee)
<b>Filing Description</b>	Emergency Motion to Preserve Evidence and continue trial due to procedural sabotage and documented perjury
<b>Filed By</b>	Jason McKemie
<b>Service Contacts</b>	Other Service Contacts not associated with a party on the case:  Kim Jones (kjones@sullivancook.com)  Jeffrey Cook (jcook@sullivancook.com)  Tiffany Castenada (tcastenada@sullivancook.com)  William Cook (wcook@sullivancook.com)  Ethan Scroggins (escroggins@sullivancook.com)

Chandler Alt (calt@sullivancook.com)

Jason McKemie (jmckemie@mckemie.net)

Gwendolyn Ulijasz McKemie (GUlijasz@gmail.com)

JASON MCKEMIE (jason@callvital.com)

### Document Details

**Served Document**

[Download Document](#)

This link is active for 45 days. To access this document, you will be required to enter your email address. Click [here](#) for more information.

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

DF-24-18010

**EXHIBIT D**

NO. \_\_\_\_\_

---

IN THE MATTER OF	§	IN THE DISTRICT COURT
THE MARRIAGE OF	§	
	§	
GWENDOLYN ULIJASZ-MCKEMIE	§	<u>254<sup>th</sup></u> JUDICIAL DISTRICT
&	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

---

---

**EMERGENCY MOTION TO PRESERVE EVIDENCE AND  
CONTINUE TRIAL DUE TO PROCEDURAL SABOTAGE AND  
BREAKDOWN IN JUDICIAL OVERSIGHT**

---

TO THE HONORABLE JUDGE OF THE 254TH DISTRICT COURT:

Petitioner, **Jason McKemie**, appearing **pro se**, respectfully submits this **EMERGENCY MOTION TO PRESERVE EVIDENCE AND CONTINUE TRIAL DUE TO PROCEDURAL SABOTAGE AND BREAKDOWN IN JUDICIAL OVERSIGHT**.

**Petitioner declares, he is not ready for trial.**

The legal process which has led to this point has been **strategically manipulated, procedurally obstructed**, and carried out in a manner that makes a **fair hearing impossible**.

The trial date remains intact **not because** discovery has been completed, **not because** due process has been upheld, and **not because** this Court has addressed pending motions—**but because the appearance of normalcy is being maintained at the expense of justice**.

At a pretrial setting, counsel for Respondent, representing Sullivan & Cook, told the Court there were **“no community assets in dispute”** and that the matter **“just needs to go away.”** That characterization reflects a **total disregard for the contested facts, the unresolved discovery, and the real consequences** Petitioner is enduring.

**Discovery was evaded.** Legal counsel was strategically severed. **Financial access was stripped.** Sworn evidence—including **video-documented perjury, asset concealment, and coordinated fraud**—remains unacknowledged, unruled upon, and unaddressed.

And now, the same legal team who disappeared for weeks during discovery—only to reappear minutes before the deadline and file blanket objections to every request—**claims they are “ready for trial.”**

Ready for what?

A performance? A sentencing without trial?

Petitioner is not ready for trial because this is not a trial. **This is an execution staged under the pretense of adjudication.**

**Sullivan & Cook’s role in this process has not been merely questionable—it has been sanctionable.** And while Petitioner reserves the right to pursue sanctions under Rule 215, this record must now **reflect the pattern of conduct that brought this case to the brink of collapse.**

---

Petitioner, **Jason McKemie**, Pro Se, files this **EMERGENCY MOTION TO PRESERVE EVIDENCE AND CONTINUE TRIAL DUE TO PROCEDURAL SABOTAGE AND BREAKDOWN IN JUDICIAL OVERSIGHT** not only to continue trial proceedings but to **formally preserve key evidence** before it is buried under the weight of procedural fraud, judicial inertia, and calculated obstruction designed to sabotage truth.

Petitioner has lost all faith that justice is occurring inside this courtroom. This motion is submitted because the system has failed. **The fraud is not hidden—it is public.** And the **damage is no longer theoretical. It is catastrophic, visible, and irrefutable.**

Five days before Respondent filed a fraudulent protective order, **Petitioner warned both his attorney and a 911 operator that he was being set up.** The warning was recorded. The threat was clear. And the event unfolded exactly as predicted—because this was not a misunderstanding. **It was a premeditated legal ambush,** and not the first

of its kind. **Respondent has a documented history of leveraging false accusations and legal systems for personal advantage.**

The strategy was systematic and unmistakable:

- Cut off Petitioner's legal funding
- Manufacture allegations of stalking and abuse
- Isolate Petitioner from marital assets, healthcare access, and representation
- Introduce fabricated testimony under oath by a financially interested family member
- Initiate false criminal proceedings to justify a protective order and silence Petitioner going forward—a **pattern for which Respondent has a documented history**

In the months preceding this, Respondent **covertly diverted marital funds into a hidden Chase account, siphoning off hundreds of thousands of dollars while shifting significant marital debt onto Petitioner. She paid off over \$100,000 of her own personal debt using marital funds, severed Petitioner's access to shared accounts, and orchestrated a false narrative of financial hardship while actively earning over \$1.5 million per year.**

**Respondent's increase in earnings from Aug 2023 through October 2024 was not achieved independently.** During the year we worked together—professionally and personally—her compensation increased by almost **400%. That growth was not incidental. It was the result of a shared strategy and coordination,** co-created deliverables, and coordinated positioning which Petitioner directly contributed to. To now erase that contribution while framing Petitioner as financially dependent is not only dishonest—it's **weaponized revisionism.**

Petitioner has submitted **irrefutable video evidence that directly contradicts sworn testimony** presented in this courtroom. That video is **clear, admissible, and already in the record.** The Court's refusal to acknowledge such direct and material contradiction is alarming. It raises serious questions about either a **breakdown in judicial oversight or conscious indifference.**

Simultaneously, Respondent has filed more than a **dozen false police reports** and orchestrated staged distress incidents, including repeated false claims that Petitioner

was suicidal, armed, and dangerous. She has sent police and emergency personnel to Petitioner's residence under fabricated pretexts and claimed he was tracking her with AirTags.

Those devices were turned over to the San Antonio Police Department. Subpoenas issued to Apple confirmed that **Petitioner never had access to or control over any of the AirTags**—exactly as he stated. The result of no fewer than six separate law enforcement investigations into Respondent's allegations? **She was referred to their mental health group for monitoring by the San Antonio Police Department's Fusion Investigative Center.**

**These are not hypotheticals. These are procedural facts, and they are in the record. And they have been ignored.**

This is not an isolated mistake. It is a pattern. **Respondent uses the courts as a tool of destruction: fabricate threat narratives, liquidate assets, crush opposition, and leave behind devastation before relocating and repeating the cycle.**

The result? Petitioner—who had always maintained good credit, never defaulted on a credit card or loan, and was never delinquent on his car payments—has now been **stripped of legal counsel, denied due process, and forced to shoulder \$25,000 per month in expenses for a lease he is not contractually obligated under.** Days after undergoing invasive spinal surgery, Respondent reported multiple critical charges—including **his rehabilitative orthopedic chair, legal retainer, and recovery support funds—as fraudulent.** At that time, Petitioner had less than \$300 in his account and fighting through partial paralysis.

This was not a coincidence. It was the result of **a deliberate strategy of financial starvation and obstruction of healthcare access**—a pattern that continued for over seven months. While working night and day to survive, Petitioner was **branded a "deadbeat" by a legal team of six attorneys and a hired risk mitigation firm. He is now facing immediate eviction, medical collapse, and bankruptcy. He cannot afford food. He cannot access medication. He suffers from recurring medical infections—documented, visible, and untreated.**

Meanwhile, Respondent is receiving **"sweetheart loans"** from her sister—the same individual who testified falsely under oath and whose financial interest in the outcome

of this case is undisputed. These loans are structured on **30-year terms at 2% interest, with no enforceability, no documentation resembling commercial standards, no realistic expectation of repayment, and no bank statements to substantiate funds transfers.**

Simultaneously, Respondent is investing over **\$130,000 annually into a VEIP equity fund yielding a 50% vested return within a single calendar year**—a vehicle from which both she and her sister directly benefit.

These “loans” are then dumped on the community estate as **artificial liabilities**, designed to **devalue the estate** and suppress Petitioner’s share in the marital division. This is not a financial hardship—it is **coordinated asset concealment, fraud upon the estate, and bad faith fiduciary conduct** of the highest order.

Even as this scheme plays out, Respondent is undergoing **boutique cosmetic enhancement procedures at one of the most expensive aesthetic clinics in the state**—while simultaneously representing to this Court that she:

- **Lacks a functional vehicle**
- **Relies on public transportation**
- **Took a Greyhound bus to appear at the January 7 hearing, and**
- **Is borrowing money just to pay her rent**

**These are not conflicting circumstances. They are conflicting narratives—**manufactured for court advantage, **with no regard for the truth or for Petitioner’s survival.**

This evidence has been submitted. It is in the record. It is not difficult to understand. And yet, **not one ruling, footnote, or judicial acknowledgment** has been made. The silence has become complicity—**and the damage has now reached the point of irreparable harm. What could have been corrected has now metastasized. The cost is no longer procedural—it is human, financial, and constitutional.**

The procedural record speaks for itself: Respondent’s legal team filed a motion to withdraw for non-payment—despite representing a client earning over \$1.5 million per year. During that time, they refused to engage, Respondent declined to declare herself pro se, and Petitioner was left without a clear party to serve. Then, **at 11:45 PM on the**

**final day of discovery**, the same legal team reappeared—armed with a stack of pre-drafted motions and filed **blanket objections to every single request**.

These filings were prepared **while the attorneys were allegedly withdrawn**, and at no point did they cease operating in Respondent's interest. **The entire withdrawal was a procedural mirage—a tactic to prevent discovery and disable opposition**. They never actually left. The court witnessed this. It was raised in filings. It was detailed in motions. And yet, **no action was taken**. Due process was obstructed. The rule of law was openly violated **without a single footnote acknowledging it had even occurred**.

Petitioner respectfully asks the Court to consider: **Who requires six attorneys and a risk mitigation firm to litigate against a medically vulnerable, financially severed, pro se party?** Respondent is represented by a **legal army**—while Petitioner has been left without food, housing stability, legal representation, or even access to prescribed medication.

The Standing Orders in this district are intended to create procedural balance and **preserve fairness**. But there is no balance here. There is no fairness. This is **litigation asymmetry by design**—and it has been carried out in plain sight, without interruption. **If standing orders cannot protect the unrepresented from weaponized legal firepower, what purpose do they serve at all?**

Trial remains scheduled to proceed—**with not a single question answered, not a single motion ruled upon, and not a single safeguard enforced**.

**This is not adjudication. This is an execution. And by its silence, this Court has allowed itself to appear complicit.** Petitioner no longer files in the hope of intervention—**but in the necessity of preserving the record**. If justice is not delivered in this forum, it must at least be **documented for the ones that follow**.

---

**ACCORDINGLY, PETITIONER RESPECTFULLY REQUESTS THAT THE COURT:**

**1. IMMEDIATELY CONTINUE THE BENCH TRIAL**

To prevent further procedural and constitutional harm resulting from discovery obstruction, strategic denial of counsel, and active deprivation of due process.

**2. IMMEDIATELY APPROVE EMERGENCY FINANCIAL RELIEF**

Approve Petitioner’s emergency request for **\$20,000 in immediate housing and survival support** as detailed in the separately filed *Request for Hearing to Prevent Eviction During Medical Hardship*.

**Petitioner will be rendered homeless if this request is not ruled upon this week.**

---

**3. PRESERVE THE FOLLOWING MATERIALS AND RECORDS**

To ensure a complete and permanent record for **appellate, oversight, and investigative purposes**:

---

***A. Court and Judicial Metadata***

Petitioner formally requests preservation of all relevant **eFileTexas and internal court administrative metadata** associated with each motion and emergency filing submitted in this case, including:

- Date and time of filing and clerk acceptance;
- First view or access timestamp by any judicial officer, clerk, or court staff;
- Internal routing history, docket reassignment, and notations;
- Any annotations or changes made to the document’s status;
- Documentation of **any motion that was opened, routed, or reviewed but never ruled upon.**

*If the Court declines to take further action, Petitioner reserves the right to request a full audit trail of when this Court chose not to intervene—not only in what it ruled on, but in what it allowed to stand unaddressed.*

---

### ***B. Records and Conduct of Respondent, Counsel, and Associated Parties***

Preserve the following:

- All discovery responses (or lack thereof) from Respondent’s legal team;
- The full record of attorney withdrawal and re-entry prior to the discovery deadline;
- Petitioner’s discovery requests and associated service notices;
- All protective orders and sworn allegations filed by Respondent;
- Respondent’s financial disclosures, amendments, and omissions;
- All of Petitioner’s documented medical records and motions relating to hardship;
- Any audio, video, or written evidence referenced by either party;
- All affidavits and sworn statements submitted by Petitioner under penalty of perjury;
- The full transcript (if available) of the **January 7, 2025** hearing;
- All filings, correspondence, and declarations from Respondent regarding:
  - Spousal support
  - Legal fees
  - Settlement concealment
  - Personal loans between Respondent and affiliated parties
- Any involvement or correspondence by risk mitigation firms, private security teams, or off-duty police officers contracted by Respondent in connection with this litigation.

---

**Petitioner submits this motion with the full awareness that justice is no longer presumed in this case. It must now be demanded, documented, and preserved—for whatever comes next.**

---

## PETITIONER'S REQUEST

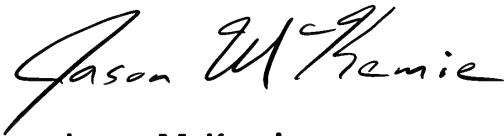
**Petitioner respectfully requests that this Court issue a Statement of Fact regarding the contradictory sworn testimony and the video evidence submitted as Exhibit A. The contradiction is not nuanced—it is direct, visible, and undeniable.**

Should the Court decline to acknowledge the evidence or rule upon it, Petitioner reserves the right to seek judicial review, oversight, or formal complaint through all appropriate administrative and appellate channels. The procedural integrity of this Court—and the dignity of its rulings—depend on its willingness to engage with the truth in the record.

**(EXHIBIT A CAN BE FOUND DIRECTLY BELOW THIS DOCUMENT)**

---

Respectfully Submitted,



**Jason McKemie**

***Petitioner, Pro Se***

539 W Commerce St #2010

Dallas, TX 75208

(214) 868-4901

[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

## Exhibit A – Perjury Under Oath by Pamela Woodman

Petitioner challenges this Court to watch the video and issue a **Statement of Fact**. The contradiction is direct, visible, and already in the record.

If no such statement is issued, Petitioner reserves the right to raise this omission in all appellate and judicial oversight forums as a failure to acknowledge material fraud upon the Court.

At the January 7, 2025, hearing, **Pamela Woodman**—Respondent’s sister and a financially interested party in this litigation—testified under oath that a “former police officer” discovered a hidden surveillance device in a plant at the marital residence. Her exact words were:

*“There were some visible cameras in every room of the house. Some were hidden, some were in plants. There were listening devices throughout the house. I would estimate that there were dozens. Completely intimidating.”*

When asked how she knew the object was a listening device, she replied:

*“The former police officer found that one.”*

The Court sustained an objection to hearsay regarding what the officer allegedly said but permitted testimony about the officer’s “actions.” However, this entire line of testimony was **false**.

### **ACTUAL EVENTS – OFF DUTY POLICE OFFICER FINDS AND INQUIRES ABOUT HIDDEN ELECTRONIC DEVICE IN A PLANT**

#### **CLICK TO PLAY - [EXHIBIT A - SURVEYLANCE PLANT](#)**

The device in question was not a listening device. It was a **smart hydrometer**—a commercially available soil moisture sensor that notifies plant owners when watering is needed. Petitioner submitted **video evidence**—already accepted into the record—showing Respondent herself identifying the device, laughing about it, and mocking Petitioner for his inability to keep the plant alive. Pamela Woodman is **physically**

**present in the video**, and her voice is clearly heard instructing Respondent to stop speaking to Petitioner through the security camera system.

Both women **knew what the device was**. Respondent mocked Petitioner for buying it. They acknowledged it. And then they coordinated a perjured exchange in open court to suggest the device was part of a criminal surveillance setup. This was not misinterpretation. It was **intentional fabrication**.

Woodman's motive was clear: she had provided Respondent with over \$60,000 in below-market personal loans while Respondent diverted her income into shielded investment accounts to avoid financial scrutiny and spousal support. The perjury served three purposes:

- To justify the issuance of a retaliatory protective order;
- To depict Petitioner as emotionally and physically dangerous;
- And to manipulate the Court's financial determinations through fear.

The effects of this false testimony were catastrophic. Based on this coordinated lie, Petitioner was stripped of access to marital accounts, denied legal representation, and ultimately cut off from critical medical benefits while recovering from spinal surgery.

This was not exaggeration. It was **aggravated perjury**, performed in tandem by two individuals with shared motive, coordinated opportunity, and material gain.

Petitioner demands that this Court:

- Review the submitted video evidence in full;
- Issue a **Statement of Fact** acknowledging the contradiction;
- And weigh this act of perjury as a direct challenge to the integrity of this courtroom.

### 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: 103183039

Filing Code Description: Motion - Miscellaneous

Filing Description: EMERGENCY M/PRESERVE EVIDENCE AND CONTINUE TRIAL DUE TO PROCEDURAL SABOTAGE AND BREAKDOWN IN JUDICIAL OVERSIGHT

Status as of 7/17/2025 8:29 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Kim Jones		kjones@sullivancook.com	7/16/2025 6:03:48 AM	SENT
Jeffrey ECook		jcook@sullivancook.com	7/16/2025 6:03:48 AM	SENT
Tiffany Castenada		tcastenada@sullivancook.com	7/16/2025 6:03:48 AM	SENT
William CCook		wcook@sullivancook.com	7/16/2025 6:03:48 AM	SENT
Ethan Scroggins		escroggins@sullivancook.com	7/16/2025 6:03:48 AM	SENT
Chandler Alt		calt@sullivancook.com	7/16/2025 6:03:48 AM	SENT
Jason McKemie		jmckemie@mckemie.net	7/16/2025 6:03:48 AM	SENT
Gwendolyn Uljasz McKemie		GUljasz@gmail.com	7/16/2025 6:03:48 AM	SENT
JASON EMORYMCKEMIE		jason@callvital.com	7/16/2025 6:03:48 AM	SENT

# EXHIBIT E

**From:** no-reply@efilingmail.tylertech.cloud  
**Subject:** Notification of Service for Case: DF-24-18010, GWENDOLYN ULIJASZ MCKEMIE vs. JASON MCKEMIE for filing Service Only, Envelope Number: 99379675  
**Date:** April 7, 2025 at 5:36 PM  
**To:** jason@callvital.com



## Notification of Service

Case Number: DF-24-18010  
Case Style: GWENDOLYN ULIJASZ  
MCKEMIE vs. JASON MCKEMIE  
Envelope Number: 99379675

This is a notification of service for the filing listed. Please click the link below to retrieve the submitted document. If the link does not work, please copy the link and paste into your browser. You can also obtain this document by following the steps on this [article](#).

Filing Details	
<b>Case Number</b>	DF-24-18010
<b>Case Style</b>	GWENDOLYN ULIJASZ MCKEMIE vs. JASON MCKEMIE
<b>Date/Time Submitted</b>	4/7/2025 5:35 PM CST
<b>Filing Type</b>	Service Only
<b>Filing Description</b>	Petitioner's Testifying Expert Disclosures
<b>Filed By</b>	ETHAN SCROGGINS
<b>Service Contacts</b>	GWENDOLYN ULIJASZ MCKEMIE:  Kim Jones (kjones@sullivancook.com)  Jeffrey Cook (jcook@sullivancook.com)  Tiffany Castenada (tcastenada@sullivancook.com)  William Cook (wcook@sullivancook.com)  Ethan Scroggins (escroggins@sullivancook.com)  Chandler Alt (calt@sullivancook.com)

JASON MCKEMIE:

JASON MCKEMIE (jason@callvital.com)

Jason McKemie (jmckemie@mckemie.net)

### Document Details

**Served Document**

[Download Document](#)

This link is active for 45 days. To access this document, you will be required to enter your email address. Click [here](#) for more information.

# EXHIBIT F

NOTICE: THIS DOCUMENT  
CONTAINS SENSITIVE DATA

CAUSE NO. DF-24-18010

IN THE MATTER OF  
THE MARRIAGE OF

GWENDOLYN ULIJASZ-McKEMIE  
AND  
JASON McKEMIE

§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT

254<sup>TH</sup> JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

## PETITIONER'S TESTIFYING EXPERT DISCLOSURES

Gwendolyn Uljasz-McKemie, Petitioner, serves the following Testifying Expert Disclosures.

Respectfully submitted,

**SULLIVAN & COOK, LLC**

/s/ William Cook

Jeff Cook

State Bar No.: 04734495

[jcook@sullivancook.com](mailto:jcook@sullivancook.com)

William Cook

State Bar No.: 24125182

[wcook@sullivancook.com](mailto:wcook@sullivancook.com)

Ethan Scroggins

State Bar No. 24137185

[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)

600 E. Las Colinas Blvd., Suite 1300

Irving, Texas 75039

Telephone: (214) 520-7494

Facsimile: (214) 528-6925

**ATTORNEYS FOR PETITIONER,  
GWENDOLYN ULIJASZ-McKEMIE**

**Certificate of Service**

I certify that a true copy of this document was served in accordance with rule 21a of the Texas Rules of Civil Procedure on the following on April 7, 2025:

Jason McKemie via electronic filing manager and certified mail and regular first-class mail.

/s/ William Cook  
William Cook  
Attorney for Petitioner

**TESTIFYING EXPERT DISCLOSURES**

1. The name, address, and telephone number of each testifying expert.

**RESPONSE:**

**Jeff Cook**  
**Sullivan & Cook, LLC**  
**600 E. Las Colinas Blvd., Suite 1300**  
**Irving, Texas 75039**  
**214-520-7494**  
*Attorney for Petitioner.*

**William Cook**  
**Sullivan & Cook, LLC**  
**600 E. Las Colinas Blvd., Suite 1300**  
**Irving, Texas 75039**  
**214-520-7494**  
*Attorney for Petitioner.*

**Ethan Scroggins**  
**Sullivan & Cook, LLC**  
**600 E. Las Colinas Blvd., Suite 1300**  
**Irving, Texas 75039**  
**214-520-7494**  
*Attorney for Petitioner.*

2. The subject matter on which each testifying expert will testify.

**RESPONSE:**

**Reasonableness and necessity of attorney's fees in the instant case. Jeff Cook will testify regarding the reasonableness and necessity of attorney's fees incurred or that are recoverable in this case.**

**Mr. Jeff Cook will testify regarding his qualifications and experience. It is Mr. Jeff Cook's opinion that Petitioner's attorney's fees incurred in this action in the trial court and through all levels of appeal are reasonable and necessary. It is Mr. Jeff Cook's opinion that \$650.00 per hour for his time, \$275.00 to \$425.00 per hour for associates, and \$195.00 per hour for legal assistants are reasonable fees in this case, and his firm's fee is reasonable taking into account the time and labor required; the novelty and difficulty of the questions involved; the skill required to perform the legal services properly; the fee customarily charged in the locality for similar legal services; the amount involved and the results obtained; the time limitations imposed by the client or by the circumstances; the nature and length of**

the professional relationship with the client; the experience, reputation, and ability of the lawyer or lawyers performing the services, as well as the other factors that are set forth in *Arthur Andersen & Co. v. Perry Equip. Corp.*, 945 S.W.2d 812, 818 (Tex. 1997). Mr. Jeff Cook may also provide testimony refuting any evidence submitted by Respondent, his expert witnesses, if any, regarding his attorney's fees in this case.

Mr. Jeff Cook will testify regarding those fees incurred in reviewing and investigating the case facts; conducting reasonable written and oral discovery; preparing the requisite pleadings, motions, correspondence and other documents involved in handling this case; preparing the case for trial; trying the case; and preparing and arguing any appeals.

Mr. Jeff Cook will review the following materials in preparation for testimony: pleadings, motions and briefs, written discovery and deposition testimony, documents produced or obtained through discovery or other means, expert designations and reports, and correspondence in this case, as well as records pertaining to time that Mr. Jeff Cook and his firm or other attorneys have spent or will hereafter spend in handling this matter.

Mr. Jeff Cook does not have a curriculum vitae but has practiced law since 1984. He has been Board Certified in Civil Trial Law since 1989 and has been a partner in the law firm Sullivan & Cook, LLC, f/k/a Sullivan, Parker & Cook, LLC, since 1988.

Considering the circumstances of any litigation matter, there is a range of fees, which are reasonable, customary and necessary. In Mr. Jeff Cook's opinion, the attorney's fees incurred by Petitioner for the work done in this matter falls within that range. It is his opinion that the attorney's fees incurred by Petitioner are reasonable, customary and necessary when judged by the standards for fees and related expenses in Dallas County, Texas.

Reasonableness and necessity of attorney's fees in the instant case. William Cook will testify regarding the reasonableness and necessity of attorney's fees incurred or that are recoverable in this case.

William Cook will testify regarding his qualifications and experience. It is Mr. William Cook's opinion that Petitioner's attorney's fees incurred in this action in the trial court and through all levels of appeal are reasonable and necessary. It is Mr. William Cook's opinion that \$650.00 per hour for partner's time, \$275.00 to \$425.00 per hour for associates, and \$195.00 per hour for legal assistants are reasonable fees in this case, and his firm's fee is reasonable taking into account the time and labor required; the novelty and difficulty of the questions involved; the skill required to perform the legal services properly; the fee customarily charged in the locality for similar legal services; the amount involved and the results obtained; the time limitations imposed by the client or by the circumstances; the nature and length of the professional relationship with the client; the experience, reputation,

and ability of the lawyer or lawyers performing the services, as well as the other factors that are set forth in *Arthur Andersen & Co. v. Perry Equip. Corp.*, 945 S.W.2d 812, 818 (Tex. 1997). Mr. William Cook may also provide testimony refuting any evidence submitted by Respondent, his expert witnesses, if any, regarding his attorney's fees in this case.

Mr. William Cook will testify regarding those fees incurred in reviewing and investigating the case facts; conducting reasonable written and oral discovery; preparing the requisite pleadings, motions, correspondence and other documents involved in handling this case; preparing the case for trial; trying the case; and preparing and arguing any appeals.

Mr. William Cook will review the following materials in preparation for testimony: pleadings, motions and briefs, written discovery and deposition testimony, documents produced or obtained through discovery or other means, expert designations and reports, and correspondence in this case, as well as records pertaining to time that Mr. William Cook and his firm or other attorneys have spent or will hereafter spend in handling this matter.

Mr. William Cook does not have a *curriculum vitae*.

Considering the circumstances of any litigation matter, there is a range of fees, which are reasonable, customary and necessary. In Mr. William Cook's opinion, the attorney's fees incurred by Petitioner for the work done in this matter falls within that range. It is his opinion that the attorney's fees incurred by Petitioner are reasonable, customary and necessary when judged by the standards for fees and related expenses in Dallas County, Texas.

Reasonableness and necessity of attorney's fees in the instant case. Ethan Scroggins will testify regarding the reasonableness and necessity of attorney's fees incurred or that are recoverable in this case.

Ethan Scroggins will testify regarding his qualifications and experience. It is Mr. Ethan Scroggins's opinion that Petitioner's attorney's fees incurred in this action in the trial court and through all levels of appeal are reasonable and necessary. It is Mr. Ethan Scroggins's opinion that \$650.00 per hour for partner's time, \$275.00 to \$425.00 per hour for associates, and \$195.00 per hour for legal assistants are reasonable fees in this case, and his firm's fee is reasonable taking into account the time and labor required; the novelty and difficulty of the questions involved; the skill required to perform the legal services properly; the fee customarily charged in the locality for similar legal services; the amount involved and the results obtained; the time limitations imposed by the client or by the circumstances; the nature and length of the professional relationship with the client; the experience, reputation, and ability of the lawyer or lawyers performing the services, as well as the other factors that are set forth in *Arthur Andersen & Co. v. Perry Equip. Corp.*, 945 S.W.2d 812, 818 (Tex. 1997). Mr. Ethan Scroggins may also

provide testimony refuting any evidence submitted by Respondent, his expert witnesses, if any, regarding his attorney's fees in this case.

**Mr. Ethan Scroggins will testify regarding those fees incurred in reviewing and investigating the case facts; conducting reasonable written and oral discovery; preparing the requisite pleadings, motions, correspondence and other documents involved in handling this case; preparing the case for trial; trying the case; and preparing and arguing any appeals.**

**Mr. Ethan Scroggins will review the following materials in preparation for testimony: pleadings, motions and briefs, written discovery and deposition testimony, documents produced or obtained through discovery or other means, expert designations and reports, and correspondence in this case, as well as records pertaining to time that Mr. Ethan Scroggins and his firm or other attorneys have spent or will hereafter spend in handling this matter.**

**Mr. Ethan Scroggins does not have a *curriculum vitae*.**

**Considering the circumstances of any litigation matter, there is a range of fees, which are reasonable, customary and necessary. In Mr. Ethan Scroggins's opinion, the attorney's fees incurred by Petitioner for the work done in this matter falls within that range. It is his opinion that the attorney's fees incurred by Petitioner are reasonable, customary and necessary when judged by the standards for fees and related expenses in Dallas County, Texas.**

3. The general substance of each testifying expert's mental impressions and opinions and a brief summary of the basis for them or, if the expert is not retained by, employed by, or otherwise subject to the control of Petitioner, documents reflecting such information.

**RESPONSE:**

**The attorney's fees incurred by Petitioner in this suit have been reasonable and necessary for an attorney of Mr. Jeff Cook's qualifications and experience handling a case of this type in Dallas County, Texas.**

**The attorney's fees incurred by Petitioner in this suit have been reasonable and necessary for an attorney of Mr. William Cook's qualifications and experience handling a case of this type in Dallas County, Texas.**

**The attorney's fees incurred by Petitioner in this suit have been reasonable and necessary for an attorney of Ethan Scroggins's qualifications and experience handling a case of this type in Dallas County, Texas.**

4. For each testifying expert retained by, employed by, or otherwise subject to the control of Petitioner, all documents, tangible things, reports, models, or data compilations that have been

provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony.

**RESPONSE: Petitioner will supplement Sullivan & Cook, LLC's monthly billing statements as they are produced.**

5. For each testifying expert retained by, employed by, or otherwise subject to the control of Petitioner, the expert's current resume and bibliography.

**RESPONSE:**

**Jeff Cook does not have a CV or Bibliography.**

**William Cook does not have a CV or Bibliography.**

**Ethan Scroggins does not have a CV or Bibliography.**

6. For each testifying expert retained by, employed by, or otherwise subject to the control of Petitioner, the expert's qualifications, including a list of all publications authored in the previous ten years.

**RESPONSE: See response to Section 2 and 5.**

7. For each testifying expert retained by, employed by, or otherwise subject to the control of Petitioner, other than an expert who is the attorney of Petitioner who is testifying to attorney's fees, a list of all other cases in which, during the previous four years, the expert testified as an expert at trial or by deposition.

**RESPONSE: None.**

8. For each testifying expert retained by, employed by, or otherwise subject to the control of Petitioner, a statement of the compensation to be paid for the expert's study and testimony in the case.

**RESPONSE: Petitioner will supplement monthly billing statements as they are produced.**

### 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: 110964850

Filing Code Description: Notice Of Filing

Filing Description: NOTICE ON STATUS OF PROPOSED ORDER,  
IMMINENT LIKELIHOOD OF IMMINENT LITIGATIVE  
ESCALATION/FALSE THREAT NARRATIVE, & BENEFITS  
CANCELLATION

Status as of 2/9/2026 10:06 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jason McKemie		jmckemie@mckemie.net	2/6/2026 2:55:17 PM	SENT
Gwendolyn Ulijasz		gulijasz@gmail.com	2/6/2026 2:55:17 PM	SENT