

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

DF-24-18010
NO. _____

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

MOTION FOR NOTICE PRIOR TO ANY DISMISSAL

TO THE HONORABLE JUDGE BROWN:

COMES NOW, **Jason McKemie**, Petitioner in the above-entitled matter, and respectfully files this **Motion for Notice Prior to Any Dismissal**, and in support thereof, Petitioner would show the Court as follows:

1. CONCERN OVER PRIOR REPRESENTATIONS TO THE COURT

- Petitioner respectfully notes that, during the **April 7th, 2025, Pre-Trial/DWOP** hearing in this matter, **Respondent’s counsel made statements characterizing the marriage as short and asserting there were no community assets in dispute.** These statements are not reflective of the actual complexities and financial issues in the case. Petitioner finds such representations concerning and respectfully asserts that **the Court has not been presented with a complete or accurate account of the financial and procedural realities of this case.** Petitioner therefore requests the Court ensure that **no adverse action—including dismissal—be based on incomplete characterizations or procedural technicalities**, particularly in proceedings where Petitioner may not be present or adequately informed.

2. PROCEDURAL IMBALANCE AND PENDING EVIDENTIARY SUBMISSIONS

- **Petitioner respectfully notes that he is currently self-represented and engaged in these proceedings in good faith, while Respondent—despite having made statements indicative of financial hardship and in addition to representations to the Court concerning money purportedly transferred to Petitioner and debts allegedly paid—is represented by a well-resourced legal team comprising five attorneys.** Recent motions filed in this case now identify several of those **attorneys (3) as testifying experts regarding billing practices.** While such designations may be customary in complex commercial litigation, their use in a family law context highlights the **disparity in legal representation.** Petitioner intends to submit evidentiary materials addressing financial and procedural matters and respectfully seeks procedural safeguards to ensure full and fair consideration of those issues. **Petitioner has also documented ongoing procedural concerns, including recurring misuse of law enforcement processes, as reflected in the record by references to multiple prior protective orders involving Respondent. These issues further underscore the need for equitable procedural safeguards to prevent undue prejudice and to ensure a full and fair presentation of the facts.**

3. REQUEST FOR NOTICE PRIOR TO ANY DISMISSAL

- Accordingly, **Petitioner respectfully requests that the Court issue a directive prohibiting any dismissal of this action—including dismissal for want of prosecution—without at least fourteen (14) days’ prior written notice to Petitioner and an opportunity to be heard.** This request is made in good faith and with the utmost respect for the Court’s role in maintaining procedural fairness.

WHEREFORE, PREMISES CONSIDERED, Petitioner respectfully requests that the Court grant this Motion and issue an order ensuring proper notice and an opportunity to be heard prior to any potential dismissal.

This Motion is submitted solely for procedural purposes and shall not be construed as a waiver or limitation of any substantive claims to which Petitioner may be entitled.

Respectfully submitted,



Jason McKemie

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CERTIFICATE OF SERVICE

I hereby certify that a **true and correct copy** of the foregoing document has been served upon **all counsel of record via electronic service** in accordance with the **Texas Rules of Civil Procedure** on this **24th day of April 2025**.

Jason McKemie

Pro Se Petitioner

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