

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. DF-24-18010

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| 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 INTENT TO SEEK DISPROPORTIONATE
DIVISION OF MARITAL ESTATE AND PRESERVATION
OF CLAIMS FOR CIVIL DAMAGES**

COMES NOW, Jason McKemie, Pro Se Respondent, and files this Notice of Intent to Seek a Disproportionate Division of the Marital Estate and Preservation of Claims for Civil Damages, and respectfully shows the Court as follows:

I. NOTICE OF INTENT TO SEEK DISPROPORTIONATE DIVISION

Respondent intends to seek a disproportionate division of the marital estate based on the following factors:

- Fraudulent concealment of marital assets
- Repeated violations of standing and temporary orders
- Documented obstruction of medical care during a post-surgical recovery
- Interference with Respondent's legal counsel via financial manipulation
- Pattern of coordinated false allegations and use of protective orders as litigation leverage
- Proven perjury and discovery abuse by Petitioner and her agents

Respondent asserts that the actions of Petitioner, Gwendolyn Uljasz-McKemie, constitute a deliberate strategy to deprive Respondent of access to marital funds, medical treatment, legal representation, and a fair adjudication of rights.

II. PRESERVATION OF CLAIMS FOR CIVIL DAMAGES

Respondent hereby gives formal notice that he reserves the right to seek civil damages against the following individuals and entities, including but not limited to:

1. **Gwendolyn Ulijasz-McKemie**
 - For financial fraud, medical sabotage, malicious prosecution, intentional infliction of emotional distress, and defamation.
2. **Pamela Woodman**
 - For aggravated perjury, aiding and abetting fraud upon the Court, and falsifying claims used in support of a protective order.
3. **Sullivan & Cook, LLP** (including named attorneys)
 - For abuse of process, procedural obstruction, certification of false discovery, ethical violations, and aiding concealment of financial accounts and records.

Respondent states unequivocally that the emotional, physical, financial, and reputational harm caused is measurable, documented, and ongoing. This filing serves to preserve all such claims for future litigation, including motions for sanctions, civil liability actions, and referral to licensing and professional oversight boards.

III. PUBLIC FILING & TRANSPARENCY

Respondent further gives notice that in the event of continued concealment, stonewalling, or retaliatory litigation tactics, all referenced documentation will be submitted into public record. This includes:

- Video evidence of false testimony
 - Law enforcement reports
 - Financial transaction records showing concealment
 - Email correspondence proving actual knowledge by opposing counsel
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PRAYER

WHEREFORE, PREMISES CONSIDERED, Respondent respectfully prays that this Court:

- Take judicial notice of this filing
 - Allow Respondent to pursue a disproportionate division of the estate at final hearing
 - Recognize the scope of documented abuse and fraud that necessitates such relief
 - Acknowledge Respondent's formal preservation of civil claims as outlined above
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CONFIDENTIALITY CLAUSE

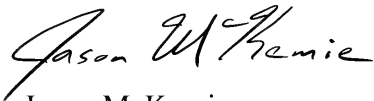
Respondent may not withhold responsive documents under a blanket claim of confidentiality. *Confidentiality is not a recognized objection to discovery under Texas law.* If confidentiality is asserted,

a motion for protective order must be filed by Respondent. In the absence of such, all responsive documents must be produced in full and unredacted, including complete account numbers.

RESERVATION OF RIGHTS

Petitioner reserves the right to file all submitted evidence into public record in the event that opposing party refuses to negotiate in good faith, continues to commit acts of perjury, or attempts to use confidentiality as a shield for procedural misconduct.

Respectfully submitted,



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Pro Se Respondent
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Filing Code Description: NOTICE OF INTENT

Filing Description: TO SEEK DISPROPORTIONATE DIVISION OF MARITAL ESTATE

Status as of 7/18/2025 3:41 PM CST

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