NO. DF-24-18010

IN THE MATTER OF THE MARRIAGE OF	§ § §	IN THE DISTRICT COURT
GWENDOLYN LAURA ULIJASZ-MCKEMIE & JASON MCKEMIE	§ § §	301ST JUDICIAL DISTRICT DALLAS COUNTY, TEXAS

RESPONDENT'S OBJECTION TO SWORN MOTION OF JONATHAN DRAKE STEELE TO APPEAR PRO HAC VICE; REQUEST FOR IMMEDIATE DENIAL; AND, ONLY IN THE ALTERNATIVE, REQUEST TO DEFER RULING, SET EMERGENCY STABILIZATION HEARING, REQUIRE SOURCE-OF-FUNDS DISCLOSURE, AUTHORIZE SOURCE-RECORD SUBPOENAS, AND ENTER PROTECTIVE CONDITIONS

TO THE HONORABLE COURT:

Respondent Jason McKemie objects to the proposed order granting Jonathan Drake Steele pro hac vice admission. The request should be denied. At minimum, no order should be signed on presentment, by 10-day letter, or without a live hearing.

This is not a routine appearance request in a routine divorce. It is a request to enlarge Petitioner's litigation machine while Petitioner remains noncompliant with healthcare-related orders, HSA access remains obstructed, source-record discovery remains broken, the estate remains unreconstructed, Respondent is in bankruptcy and medical collapse, and multiple collateral proceedings are now active. A separate relief package is forthcoming. The Court does not need to wait for that filing to stop this presentment now.

I. THE MOTION IS DEFECTIVE AND DOES NOT ESTABLISH GOOD CAUSE

1. The present submission appears incomplete on its face. The sworn motion states that it is accompanied by the Texas Board of Law Examiners acknowledgment letter confirming satisfaction of the non-resident attorney fee requirement, yet that acknowledgment letter is not visible in the materials served on Respondent. No proposed order should be signed on an incomplete submission.

2. This filing also constitutes the specific written objection referenced in Petitioner's March 24, 2026 10-Day Letter. Written objection has now been made. No presentment should occur.

3. The motion does not establish case-specific good cause. It supplies threshold licensure and status representations. It does not explain why this Court should authorize out-of-state litigation expansion now, over written objection, in a case already warped by healthcare obstruction, discovery collapse, source-record contamination, and extreme asymmetry in access to counsel and money.

4. Before any order is signed, Petitioner should be required by sworn filing to disclose whether the requested appearance is general or limited, the exact subject matter of the intended representation, and the source of every retainer, fee deposit, guaranty, replenishment, advance, reimbursement, or other funding associated with that appearance.

II. THIS CASE IS NOT IN A NEUTRAL PROCEDURAL POSTURE

5. This Court is not being asked to approve a neutral staffing adjustment. It is being asked whether Petitioner may further expand her litigation apparatus while the case remains in active failure: healthcare access is still obstructed, source-record discovery is still broken, the estate still cannot be reconstructed, Respondent remains without counsel, and the damage has already spilled into bankruptcy, housing collapse, agency escalation, and collateral proceedings.

6. Respondent is already in bankruptcy, remains medically unstable, lacks reliable access to prescriptions and surgery-related care, is facing ongoing housing and transportation instability, and is still trying to defend this case pro se while physically impaired. This is not ordinary divorce friction. It is cumulative destabilization.

7. Paper orders without enforcement have failed repeatedly. Repetition is not enforcement. Before this Court enlarges one side's legal team, it must first regain control of the case.

8. On October 31, 2025, Respondent was denied a court reporter, denied access to a transcript of the January 7, 2025 hearing, denied financial relief needed to prevent eviction, denied reimbursement for rent he paid on a property for which Petitioner was the sole financial guarantor, and denied meaningful HSA access while Petitioner presented a hardship narrative built around a bank balance of less than $4,000. Later-produced records showed that the same account had recently contained in excess of $171,000 and reflected substantial cash movement flatly inconsistent with the poverty presentation made to the Court. This was not an isolated event. The same type of false financial presentation occurred on January 7, 2025 and contributed to the temporary orders still in place today. Petitioner claimed she could not provide Respondent any assistance because she had only $4,000 remaining each month after

paying her bills. Even on that version of events, support was warranted, because Respondent could not afford critical heart medication or basic necessities. The later-produced records then showed what Respondent had already told the Court was there: substantial additional funds, including the second half of Petitioner's signing bonus, while community assets had been concealed and Respondent was being told the parties were in financial distress and pushed to absorb family holiday spending on his personal credit cards. **Respondent had nothing for medication, necessities, or stabilization while Petitioner was presenting a curated poverty narrative the records did not support. The denial of relief was obtained through a materially misleading presentation of ability to pay.**

9. Petitioner's counsel churn has not been random. It repeatedly coincided with discovery enforcement, was attributed to claimed financial difficulty, and was later contradicted by subsequently produced records showing substantial funds and account activity. Respondent identified that pattern in advance and, on January 15, 2026, filed **Respondent's Motion to Establish Conditions for Re-Entry of Counsel and to Preserve Fair Trial Procedures** before this exact tactic recurred. Petitioner then again obtained procedural advantage through false hardship presentations, including representations that she had only $4,000 remaining in checking, while later-produced records showed that one account alone had recently contained more than $171,000, with other accounts still unreconciled and not fully produced. The Court has repeatedly been asked to act on a manufactured version of financial reality, and Respondent has repeatedly been harmed by it. That harm is no longer confined to the parties. Respondent has been denied support, denied stabilization, denied equal footing, driven into bankruptcy, and left medically and physically compromised, while his elderly parents—who stepped in to keep him alive—are now losing their home. This is real harm to real people caused by litigation conduct built on false financial presentations. **This was not litigation under financial strain. It was a weaponized cycle of concealment, false hardship, counsel churn, and procedural advantage, and it deserves the strictest sanctions the Court is willing to impose.** Respondent contends this conduct constitutes fraud upon the Court, abuse of process, and sanctionable manipulation of both discovery and judicial relief, and that it warrants the strongest corrective relief available, including sanctions, add-back, reconstitution, fee shifting, and strict control over any further re-entry or expansion of counsel.

III. HEALTHCARE AND HSA OBSTRUCTION REQUIRE IMMEDIATE ENFORCEMENT

10. Healthcare obstruction is not collateral in this case. It is central. Respondent's surgery was blocked after Petitioner's false divorce-based QLE terminated his

healthcare coverage. Respondent remains impaired by a torn rotator cuff, ruptured bicep, torn shoulder tendons, and a compressed L5/L6 nerve, in addition to congestive-heart-failure complications following him being immediately cut off a GLP-1 inhibitor after 18 months on it at the maximum dose due to Petitioner's termination of his medical benefits through the submission of a false QLE. Respondent learned of this termination 24 days after the termination, and all billed medical services for the prior 24 days were clawed back and then services were billed to his cards at full rates maxing them out. Petitioner submitted a letter to the court which stated that the termination was an accident unrelated to Petitioner and "contrary to her wishes" however direct correspondence with Accenture's benefits has:

a. Accenture later disavowed the earlier letter, characterizing it as "unfortunate" and written by an individual who was "absent all of the facts."

b. Accenture confirmed that two persons are covered under the policies at issue: a participant and a dependent, and that Respondent is the dependent.

c. Accenture further confirmed that termination of dependent benefits can occur only through a participant-directed action.

d. Accenture confirmed that Respondent's benefits were terminated by a participant-directed, divorce-based QLE submission, which in turn triggered a COBRA notice.

e. The subsequent COBRA notice independently confirms the same sequence.

f. Petitioner has nevertheless maintained that the termination resulted from a back-office miscommunication, was contrary to her wishes, and was restored without a gap in coverage.

g. Full restoration has still been blocked. Accenture attempted to reinstate prior benefits, but Petitioner had entered the benefits portal and waived, deactivated, or defunded certain elections, creating obstacles to reinstatement of the very benefits she later claimed had not been intentionally terminated.

h. As a result of Petitioner's continued obstruction of Respondent's access to healthcare services, prescriptions, and benefits, these issues have now escalated beyond this Court to an ERISA fiduciary filing in federal court and a Department of Labor complaint in an effort to restore access.

i. Just before the February 24 bench trial, Petitioner submitted a revised inventory claiming that all HSA and FSA funds were her separate property,

appearing to position those healthcare funds outside the reach of the Court's prior reimbursement order.

j. Respondent remains in ongoing pain, cannot sleep in a bed, is forced to sleep upright on a couch, and remains blocked from medically necessary surgery. This is not confusion. It is sustained obstruction of healthcare access, and it is actively harming Respondent.

11. HSA access has been obstructed since the second day of these proceedings. No healthcare-related order has been complied with in any functional sense. Petitioner was ordered to obtain a replacement HSA card in Respondent's name and to cease further obstruction. She did neither. Instead, Respondent contends Petitioner ordered herself a new card, instructed the HSA administrator to cancel the old card upon activation of the replacement, then affixed the canceled card to the new-card mailer to create the appearance of compliance. Respondent discovered the deception the next day when the card failed while he was attempting to obtain critical heart medication. When Respondent contacted the HSA administrator, the administrator bridged in Petitioner and advised that Respondent could obtain the medication that day if Petitioner would provide the four-digit PIN she had placed on the account. Petitioner refused, terminated the call, and then refused further participation. She continues to block access. **This was not mistake, confusion, or partial compliance. It was deliberate obstruction. Petitioner knew exactly what loss of healthcare access would do to Respondent. Respondent has recorded statements in which Petitioner acknowledged that he could not go without healthcare and nevertheless continued the obstruction. This was staged compliance submitted to the Court in a form calculated to create the appearance of obedience while preserving actual obstruction and the harm that obstruction would cause.**

12. Petitioner is recorded on December 12th, 2024, emotionally crying as she expresses concern if Respondent was to loose access to healthcare benefits. At other times, she states she "doesn't want him to die." These statements conveying extreme consequences if an access interruption occurred; eliminates any claim of confusion and establishes that the continued obstruction was knowing, deliberate, and harmful.

13. The January 7 HSA-card episode was not compliance. It was theater. Respondent contends Petitioner canceled her own HSA card, attached that canceled card to a new mailer to create the appearance of compliance, and then, when the HSA administrator called and stated that Respondent could access critical heart medication that day if Petitioner would provide the four-digit access code she had imposed, Petitioner refused and terminated the call. The transcript should be treated as an exhibit of obstruction, not compliance.

14. This Court should not authorize another lawyer for the party obstructing access to medication while the opposing party is still fighting to restore basic medical care.

15. Any order concerning healthcare, benefits, HSA/FSA access, or medical funding must include:

- a date-certain deadline;
- third-party verification where necessary; and
- an automatic compliance hearing within 48 hours after the deadline.
- Filed assertions of compliance shall not substitute for actual proof of compliance.

IV. STABILIZATION COMES FIRST

16. Before Petitioner is permitted to add still more counsel, this Court must first stabilize the case.

17. Respondent is already bankrupt. He is in active medical collapse. He is five months a holdover on a lease he never agreed to be the financially obligated party on. He remains without functional healthcare access, without restored HSA/FSA access, without counsel, and without the basic conditions necessary to survive, work, and prepare for trial. He is physically impaired by a fully torn rotator cuff, ruptured bicep, torn shoulder tendons, and a compressed L5/L6 nerve requiring surgery. That surgery was blocked after Petitioner's false QLE terminated his healthcare coverage. He has put on approximately 52 pounds of water weight after being stripped off necessary medication and has suffered repeated congestive-heart-failure complications while these proceedings dragged on.

18. The Court should not enlarge Petitioner's litigation machine while the opposing party remains medically destabilized, financially collapsed, and functionally unable to defend himself on anything approaching equal footing. Stabilization comes first. Healthcare comes first. Housing comes first. Access to counsel comes first. The proposed order already drafted at the Court's direction to bring these proceedings to an expeditious conclusion should be ruled on before any more lawyers are brought in.

V. DISCOVERY IS NOT A MISSING-PDF PROBLEM. IT IS A SOURCE-RECORD DESTRUCTION PROBLEM

19. Discovery in this case is not merely incomplete. It is structurally broken. In the first court, discovery was functionally bypassed through withdrawal, re-entry, blanket objections, and end-of-window gamesmanship. In the second court, after Respondent warned that the same tactic would repeat, it did.

20. On January 6, 2026, the Court ordered compliance and set a hearing for January 9. Petitioner was found noncompliant. Another hearing on January 20 again resulted in noncompliance. A third hearing on February 5 followed, and again Petitioner remained noncompliant. At that hearing, Petitioner still could not produce even one complete bank statement for even one requested month from the relevant Chase accounts.

21. The defect is deeper than missing pages. Respondent contends the record reflects coordinated fragmentation designed to defeat tracing: investments relabeled as extra tax withholding; loans appearing without disclosed source or payment trail; statements spliced across years; and account histories broken into unusable fragments.

22. The problem is especially stark in the Chase revolving-credit records. Petitioner used nine credit cards tied to one underlying account, cycled card numbers approximately every 10 to 14 days, and made multiple paydowns within the same billing cycle, washing transactions across statements and destroying continuity. In the visible fragments alone, one card reflects more than $67,000 in overpayments in a prior year. That is only what can be seen from the broken record that was produced.

23. This cannot be fixed through another round of selected PDFs, screenshots, or handpicked monthly statements. This is not benign disorganization. It is a production method that defeats reconstruction.

24. The only viable path forward is institution-issued source records showing full continuity, including all card mappings, all account-number continuity, all transaction histories, all payment flows, and all linked account relationships. The Court should also appoint a neutral forensic accountant, with costs billed to the estate or otherwise allocated as the Court deems just, to reconstruct the estate back to August 2023.

25. Following the Court's repeated findings of noncompliance, the Court instructed Respondent to draft a proposed order that could bring these proceedings to an expeditious conclusion. That order remains in the record. It should be ruled on before any further expansion of Petitioner's counsel footprint.

26. Petitioner's counsel churn has not been random. It repeatedly coincided with discovery pressure, was justified by claimed financial difficulty, and was later contradicted by financial records showing substantial funds and account activity. Respondent identified that pattern in advance and, on January 15, 2026, filed **Respondent's Motion to Establish Conditions for Re-Entry of Counsel and to Preserve Fair Trial Procedures** because the tactic had already been used to delay compliance, distort preparation, and force proceedings forward on unequal footing. **The conditions requested here are therefore not speculative or newly invented; they are the direct continuation of protections Respondent previously sought after calling out this same repeat maneuver before Petitioner did it again.**

VI. THIS CASE WAS BUILT ON A COORDINATED FINANCIAL CUT-OFF

27. The fraud and concealment issues did not begin in this courtroom. Over the four to five months before separation, Respondent contends Petitioner siphoned away more than $650,000 while telling him the parties were only enduring a short-term budget squeeze and directing him to absorb increasing community debt.

28. Petitioner induced Respondent to rely on her financial support, continue carrying debt, absorb holiday spending, and forgo outside employment opportunities in reliance on her representations that her compensation and investments would cover the shortfall. According to Respondent, that reliance was exploited, not honored.

29. Then, while Respondent was recovering from spinal surgery and had retained counsel after warning of anticipated false filings, Petitioner reported his legal retainer, survival-fund transfer, rehabilitation equipment, and other legitimate transactions as fraud, severed his access to marital funds, and moved immediately into retaliatory litigation.

30. At the same time, Petitioner was assuring Respondent on recorded calls that she would remain amicable, would not leave him without support, and would handle the separation fairly. Respondent further contends those calls also include threats that if he did not communicate everything he was thinking in real time, things would get "really bad." The chronology matters because the promises and the cutoff happened together.

31. This was not routine financial separation. It was a coordinated financial ambush that left Respondent without funds, without counsel, without healthcare access, and reduced to food pantries and even selling plasma to pay for medication.

32. The record also remains burdened by protective-order allegations that Respondent contends did not occur and are contradicted by transcript, audio, video, and text-message exhibits. A case built on disputed allegations and broken financial records should not be further armed before the Court first addresses the foundation.

VII. THIS CASE HAS SPILLED INTO MULTIPLE COURTS, AGENCIES, AND FEDERAL FORUMS

33. This case is no longer contained within one family-court docket. It has spilled into multiple JP-court eviction proceedings, a county-court appeal from an eviction, federal bankruptcy, imminent ERISA and Department of Labor / EBSA escalation arising from the false QLE and benefits termination, and reporting or escalation concerning identity theft, insurance fraud, and cyber-related interference with accounts and evidence.

34. Respondent also seeks targeted third-party records relating to the QLE and benefits handling by Accenture, the HSA administrator's access restrictions, the lease-buyout agreement withheld by the landlord, institution-issued banking continuity records, and Google or related account-provider data sufficient to identify the IP address or device that accessed Respondent's account and deleted exhibits.

35. That spillover matters. It proves the failure in this courtroom is no longer staying here. It is radiating outward, multiplying cost, and deepening damage.

36. Respondent's vehicle lender is now moving to lift the bankruptcy stay. Respondent's parents advanced funds to keep him alive and are now themselves losing their home. The overall effect of Petitioner's conduct has been to obstruct Respondent's medical recovery and return to work.

37. This Court does not need another lawyer in this case. It needs control of this case.

VIII. STEELE IS NOT A NEUTRAL ADDITION TO THIS RECORD

38. Jonathan Drake Steele is not being introduced into a clean case as a fresh set of hands. Respondent objects because his entry threatens to deepen the same accusation-driven and witness-pressure posture that has already corrupted these proceedings.

39. Respondent intended to call a former partner of Petitioner as a witness concerning Petitioner's alleged use of protective orders and related process to silence prior targets. Respondent contends that, on the eve of a hearing to extend a protective order involving that witness, the witness was arrested under suspicious circumstances, failed to appear, and a default extension was entered adding speech restrictions. Respondent further contends the protective-order extension package bearing Steele's office information was then injected into discovery, with the practical effect of silencing a material witness in this case.

40. At minimum, that sequence presents a serious witness-interference concern. The Court should not treat it as neutral.

41. If the Court is unwilling to deny the request outright, it should at least require a live evidentiary hearing before admitting an attorney whose prior involvement is tied to alleged suppression of a material witness.

IX. BEFORE ANY ORDER IS SIGNED, THE COURT SHOULD REQUIRE A FULL SWORN ACCOUNTING OF COUNSEL FUNDING

42. Petitioner has repeatedly advanced narratives of financial inability when doing so blocked relief, resisted compliance, justified counsel withdrawal, or prevented Respondent from obtaining stabilization. Petitioner should not be permitted to plead poverty to defeat relief and then quietly fund additional attorneys when doing so serves delay and strategic advantage.

43. If funds exist for additional counsel, then funds exist for immediate stabilization, for restoration of medical access, for repayment of the funds advanced by Respondent's parents, and for parity funding sufficient for Respondent to consult with and retain counsel, including bankruptcy counsel.

44. Before any order is signed, Petitioner should be required by sworn filing, supported by institution-issued source records, to disclose:

a. all engagement letters, retainers, trust ledgers, invoices, replenishments, guaranties, and payments for newly appearing counsel;

b. all payments to security, cyber, investigator, risk-mitigation, or other litigation-related vendors;

c. the source of every payment; and

d. the account or accounts from which those funds were paid.

X. THE ASYMMETRY IS EXTREME, AND THE DAMAGE HAS SPREAD BEYOND THIS COURT

45. The asymmetry in this case is extreme. On one side is a party with repeated access to counsel, repeated ability to rotate firms, and the ability to fund not just lawyers but outside vendors, security-related activity, and continuing litigation escalation. On the other side is a party who has been eating from a food pantry, unable at times to afford heart medication, unable to fund transcripts, unable to stabilize housing, already forced into bankruptcy, and left to defend himself pro se while physically breaking down.

46. This is not one law firm versus one pro se litigant. This is a legal machine. And it has spilled beyond this courtroom into family court, multiple JP-court eviction proceedings, a county-court appeal, federal bankruptcy, ERISA-related escalation, Department of Labor / EBSA escalation, insurance-fraud reporting, and cyber-related reporting arising from account compromise, MFA insertion, data destruction, identity-theft fallout, and interference with electronically stored evidence.

47. Respondent contends Petitioner's coordinated financial ambush, obstruction of his return to work, and intentional medical harm have now destabilized two generations of one family. Respondent's parents are losing their retirement home while Petitioner seeks to expand counsel again.

XI. IF ANY APPEARANCE IS ALLOWED, STRICT PROTECTIVE CONDITIONS ARE CRITICAL

48. Denial is the appropriate result. If the Court does not deny, it should at minimum defer ruling pending hearing.

49. If the Court nevertheless allows any pro hac vice appearance, it should do so only under strict protective conditions:

a) **Full Accounting of Litigation Expenditures:** No admission of out-of-state counsel shall be permitted unless and until Petitioner provides a full sworn accounting, supported by institution-issued source records, of all prior attorney fees and all litigation-related expenditures, including payments to

law firms, investigators, risk-mitigation vendors, security vendors, technology or cyber vendors, consultants, and any other case-related service provider, together with all sources of funds and proof of payment. Petitioner may not deplete or disguise community value through untraced litigation spend. Any claimed litigation expense that cannot be traced from source to recipient through competent source-record proof shall not be recognized as a valid community charge, shall not support further counsel expansion, shall not support any claim of financial inability, and shall be treated as an unsupported unilateral expenditure subject to add-back, reconstitution, reimbursement, and expense-shifting in Petitioner's column unless and until Petitioner proves otherwise by competent tracing.

b) **Resident Texas counsel must remain attorney in charge in fact and in name,** personally sign every filing, **personally appear at every hearing,** conference, docket call, submission, and trial setting, and remain jointly responsible for any misrepresentation, service defect, presentment abuse, scheduling abuse, or other misconduct by nonresident counsel.

c) **No hearing, submission, or trial setting may be converted to Zoom, continued, or otherwise altered solely for the convenience of nonresident counsel.**

d) No substantive adverse relief, emergency accommodation, or procedural restriction against Respondent may be based solely on uncorroborated allegation, police-report narrative, hearsay summary, or unsworn third-party assertion without **source-record corroboration** and an opportunity to be heard.

e) **A court reporter shall make a verbatim record of any hearing involving counsel admission, discovery, enforcement, sanctions, emergency relief, contempt, or any issue affecting Respondent's rights.**

f) Any order requiring payment, restoration of access, restoration of benefits, document production, or other financial compliance must contain a date-certain deadline, require third-party verification where the act is capable of third-party confirmation, and include an automatic compliance setting already placed on the Court's docket for **48 hours after the deadline**. Filed assertions of compliance shall not substitute for actual proof of compliance.

g) No newly appearing counsel may widen the case through collateral accusation narratives, third-party smear material, or procedural side warfare without prior leave of Court after noticed hearing.

h) No party shall enter, access, or attempt to access the marital residence or any disputed property except by written agreement, court order, or a scheduled transfer supervised by a neutral third party, civil standby, or other person approved by the Court. Any property retrieval shall occur only by written inventory, fixed date and time, and neutral supervision.

i) Except through counsel, filed written communication, or other Court-approved written channel, neither party shall initiate direct contact with the other concerning disputed facts, property access, benefits, finances, or litigation issues.

j) No party shall interfere with the other party's access to healthcare, insurance, HSA/FSA benefits, housing, transportation, employment, devices, accounts, cloud data, or electronically stored evidence, whether directly or through any third party.

XII. SANCTIONS, ADD-BACK, RECONSTITUTION, AND FRAUD-RELATED RELIEF ARE PRESERVED

50. Any additional appearance of counsel does not waive, moot, release, or extinguish any claim for sanctions, add-back, reconstitution, waste, reimbursement, expense-shifting, evidentiary relief, or fraud-related relief arising from discovery obstruction, healthcare termination, estate depletion, or prior counsel conduct.

51. Nothing in this objection waives Respondent's right to seek source-record discovery, forensic-accounting relief, fee shifting, or referral of suspected financial or insurance fraud to the appropriate authority.

XIII. RELIEF REQUESTED

52. The Court should deny the sworn motion of Jonathan Drake Steele to appear pro hac vice.

53. If the Court declines immediate denial, then the Court should order that no proposed order be signed on presentment, by 10-day letter, or without a live hearing over written objection.

54. Before any ruling on counsel expansion, the Court should set an emergency hearing on:

a. healthcare restoration and HSA/FSA access;

b. immediate stabilization relief;

c. source-record discovery and funding disclosure;

d. correction of unsupported factual predicates still operating in the record; and

e. sanctions or enforcement for continuing obstruction.

55. The Court should order immediate make-whole relief sufficient to restore functional access to prescriptions, HSA/FSA funds, and the surgery previously blocked by the false QLE and continuing access obstruction.

56. The Court should grant limited third-party subpoena authority sufficient to obtain:

a. Accenture QLE and benefits records;

b. HSA administrator records, access logs, and account restrictions;

c. landlord records concerning the lease buyout;

d. institution-issued banking, card-mapping, and continuity records; and

e. Google or related account-provider data identifying the device or IP address tied to access or deletion of Respondent's exhibits and account materials.

57. The Court should appoint a neutral forensic accountant to reconstruct the estate back to August 2023, with fees advanced from marital resources, charged to the estate, or otherwise allocated as the Court deems just.

58. If any additional appearance of counsel is allowed, then trial and exhibit deadlines should be continued at least 60 days after actual source-record production, and Respondent should receive parity funding sufficient to consult with and retain counsel.

59. Any order requiring payment, restoration of access, restoration of benefits, or financial compliance must include an automatic compliance hearing within 48 hours after the deadline and third-party verification where necessary.

60. All sanctions, add-back, reconstitution, waste, expense-shifting, and related relief arising from prior counsel conduct, discovery obstruction, healthcare obstruction, and financial dissipation should be expressly preserved.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Respondent Jason McKemie respectfully requests that the Court:

(1) deny the pro hac vice request;

(2) in the alternative, defer any ruling until after a live hearing;

(3) set emergency stabilization, healthcare, funding-disclosure, and source-record hearings first;

(4) order immediate sworn funding disclosures for divorce related expenditures and third-party source-record relief;

(5) enforce immediate healthcare and employer benefits reinstatement orders as well as the make whole relief for 2025/2026 lost benefits (HSA/FSA + out of pocket maximum benefits) restoration with automatic compliance settings;

(6) appoint a neutral forensic accountant to reconstruct the estate back to August 2023; and

(7) grant all other relief, at law or in equity, to which Respondent may be justly entitled.

Respectfully Submitted,

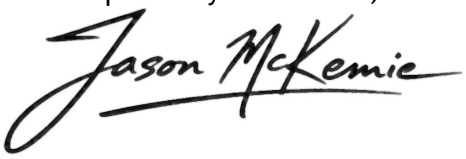

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EXHIBIT INDEX

No exhibits are attached to this filing. Exhibits referenced herein will be submitted by supplemental filed shortly thereafter.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this filing was served on all counsel of record and/or parties entitled to service via electronic service through the Court's electronic filing manager on **April 7, 2026.**

Jason McKemie

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.

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