

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

DF-24-18010

NO. _____

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

**EMERGENCY OBJECTION TO MOTION TO WITHDRAWAL OF COUNSEL
 AND REQUEST FOR EXPEDITED HEARING**

TO THE HONORABLE JUDGE SANDRA JACKSON:

Respondent **Jason McKemie** objects to Petitioner’s counsel’s latest Motion to Withdraw and moves for an immediate hearing. The record now shows a repeated, calculated pattern of withdrawing immediately after discovery is served, remaining absent until discovery closes, and re-appearing at the last possible moment with blanket objections and no production. Respondent warned both this Court and Associate Judge Abendroth that this tactic would be repeated; it has happened again exactly as predicted.

I. TIMELINE OF DISCOVERY ABUSE AND SERVICE VOID

Date	Event
Apr 29 2025	Order Granting Withdrawal of William Cook as Counsel – entered while discovery remained open to June 23 2025 .
May 27 2025	Respondent served formal discovery (Requests for Production, Interrogatories, and Initial Disclosures) under TRCP 192 & 194 .
Jun 17 2025 @ 8:53 a.m.	<i>Notice of Formal Discovery Served</i> filed with proof of service (Envelope ID 102086079).
Apr 29 – Jun 23 2025	No attorney of record for Petitioner; she refused to declare pro se despite repeated requests, creating a 55-day period during which service could not be completed.

Jun 23 2025 @ 11:08 p.m.	Ethan Scroggins (Sullivan & Cook) filed <i>Notice of Appearance</i> and simultaneous “service-only” responses to discovery fifteen minutes before the close of discovery .
Jul 10–16 2025	Respondent filed motions for enforcement and sanctions citing non-compliance.

This pattern demonstrates deliberate evasion of discovery obligations through withdrawal and late-night re-appearance. The record itself (filing timestamps and certificates of service) confirms these facts.

II. CONSEQUENCES OF THE WITHDRAWAL CYCLE

1. Discovery Skipped Entirely.

Petitioner has never produced financial records, lease buyout agreements, or account statements. At the pre-trial hearing before Judge Jackson, Respondent specifically warned that opposing counsel had skipped all discovery and predicted they would refuse compliance again.

2. Service Ambiguity and Due-Process Violation.

Each withdrawal left Respondent without a valid service recipient for weeks. Opposing counsel then re-entered only after deadlines passed, creating a procedural void that prevented Respondent from enforcing his rights.

3. Repetition Despite Judicial Warning.

At the Friday ([insert date here]) hearing before Associate Judge Abendroth, Respondent again described this pattern and stated his intention to file for subpoena rights this week. As predicted, Petitioner’s counsel has now filed another Motion to Withdraw to avoid service and production once more.

4. Bad Faith and Obstruction.

These repetitive withdrawals are not for “good cause” under Rule 10; they are a mechanism to frustrate discovery and conceal material financial information. This constitutes **abuse of process** and **bad-faith litigation conduct** under TRCP 215.2(b).

III. LEGAL GROUNDS FOR OBJECTION

1. **Rule 10 – Good Cause and Notice.** Counsel cannot withdraw if it will prejudice other parties or interfere with the orderly administration of justice. Repeated withdrawals to avoid discovery do exactly that.
 2. **Rule 21a – Service Requirements.** A party cannot evade service by refusing to appear pro se and then allow counsel to re-enter after deadlines.
 3. **Rule 215.2(b) – Sanctions.** The Court may impose sanctions for abuse of discovery procedure and failure to comply with discovery orders.
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III-A. Pre-Trial Hearing Before Judge Sandra Jackson

1. At the pre-trial hearing before District Judge **Sandra Jackson**, Respondent again raised his concern that Petitioner and her attorneys had completely skipped discovery and were using procedural maneuvers to avoid compliance. Judge Jackson acknowledged those concerns, confirmed that discovery remained open through **June 23 2025**, and stated that any non-production could be addressed through post-hearing enforcement. Respondent expressed hope that the Court's directive would compel genuine participation in discovery, but also conveyed that—based on the firm's prior pattern of withdrawal and late-night re-entries—he had little confidence they would comply without direct judicial oversight.
 2. The current motion to withdraw, was filed immediately after Respondent announced his intent to pursue subpoena rights, proves that the same pattern Judge Jackson cautioned against has now repeated itself exactly as predicted.
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IV. Additional Obstructive Conduct

1. Misrepresentation and Perjury (January 7 Hearing)

At the January 7, 2025 hearing, Petitioner mischaracterized her financial condition, claiming she lacked a vehicle, relied on public transportation, and was destitute, while her own 2023 W-2 shows compensation exceeding \$1.5 million. She further allowed her sister to testify that off-duty police officers had found “spy devices” in the marital home—statements now contradicted by video footage from that day showing no such discovery. These falsehoods were central to the Court's denial of Respondent's request for interim spousal support and legal fees, causing substantial financial and procedural harm.

2. False Victimhood Narrative and Manufactured Police Reports

Petitioner and her witnesses created a false “surveillance-victim” narrative that reversed the truth. In reality, Respondent has been the subject of over a dozen false police reports, 6 unfounded investigations, and was read his miranda rights 3 times all for allegations which were later shown to be false. Additionally, there have been 3 tracking-device recovered from his belongings and vehicle—events confirming that the allegations against Respondent were the inverse of reality.

3. Improper Expert-Witness Designations

After Respondent revealed that he possessed a transcript demonstrating perjury at the January 7 hearing, Petitioner’s attorneys immediately designated themselves—**Jeff Cook, William Cook, and Ethan Scroggins**—as “expert witnesses” on their own billing and conduct. This dual-role designation violates procedural safeguards, deprives Respondent of fair discovery, and was filed to obstruct examination into counsel’s actions. Respondent filed a ***Motion to Strike Improper Expert Designations (April 14 2025)*** documenting this misconduct.

4. Systemic Pattern of Obstruction

These episodes demonstrate a continuing pattern of misrepresentation, discovery evasion, and manipulation of court procedure designed to prejudice Respondent and conceal evidence. Allowing another withdrawal without strict conditions would perpetuate the same pattern.

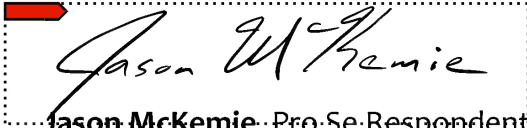
IV. RELIEF REQUESTED

Respondent respectfully requests that the Court:

1. **DENY** the pending Motion to Withdraw; **or**, if the Court is inclined to permit withdrawal, **condition** any withdrawal on the following:
 - **Complete discovery first:** Petitioner and Sullivan & Cook shall produce **all outstanding discovery, financial records, and supplemental documents ordered by this Court** and file a **sworn certification of full compliance** with those discovery obligations **before** any withdrawal becomes effective.
 - **Maintain representation continuity:** Withdrawal shall not be granted until Petitioner has filed either (a) a Notice of Substitute Counsel or (b) a Sworn Declaration of Pro Se Status with verified service information.
 - **No pause or extension:** All existing deadlines remain in force; no stay or extension of discovery or enforcement shall result from counsel’s withdrawal.

2. Set an **immediate expedited hearing** to confirm production and representation status, and to ensure a complete evidentiary record before any order is signed.
3. Grant any further relief in law or equity to which Respondent is entitled.

Respectfully submitted,

A handwritten signature in black ink, reading "Jason McKemie", is enclosed in a dashed rectangular box. A red horizontal bar is positioned above the top-left corner of the box.

Jason McKemie, Pro-Se-Respondent

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DF-24-18010

NO. _____

IN THE MATTER OF
THE MARRIAGE OF

GWENDOLYN ULIJASZ-MCKEMIE

JASON MCKEMIE

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IN THE DISTRICT COURT

302nd JUDICIAL DISTRICT &

DALLAS COUNTY, TEXAS

ORDER ON OBJECTION TO WITHDRAWAL OF PETITIONER’S COUNSEL

On this day, the Court considered *Respondent’s Emergency Objection to Motion to Withdrawal as Counsel and Request for Expedited Hearing*. After reviewing the motion, the record, and applicable law, the Court makes the following findings and orders:

IT IS ORDERED THAT:

1. The Motion to Withdraw filed by Ethan Scroggins of Sullivan & Cook, LLC, is **[DENIED] OR, IN THE ALTERNATIVE, CONDITIONALLY GRANTED** subject to full compliance with the terms below.

2. Discovery Compliance Requirement.

Petitioner and her current counsel, Sullivan & Cook, LLC, shall produce **all outstanding discovery, financial records, and supplemental materials ordered by this Court**, and shall file a **sworn certification of full compliance** before any withdrawal becomes effective.

3. Continuity of Representation.

a. No withdrawal shall take effect until Petitioner has filed either:

1. **Notice of Substitute Counsel**, or
2. **Sworn Declaration of Pro Se Status** providing verified email and physical service addresses.

b. Service on current counsel shall remain valid until one of these filings is accepted by the Court.

4. Deadlines Preserved.

All current deadlines and discovery obligations remain in effect. No stay or extension shall result from counsel's withdrawal.

5. Hearing.

The Court will set an **expedited hearing** to confirm compliance with discovery obligations and representation status before any order of withdrawal is signed.

6. The Court retains jurisdiction to enforce these directives and impose sanctions for non-compliance.

Reservation of Rights for Sanctions

Respondent expressly reserves all rights to seek sanctions, attorney's fees, and other relief under Texas Rules of Civil Procedure 13, 215, and the Court's inherent authority for discovery abuse and bad-faith conduct by Petitioner and her counsel, Sullivan & Cook, LLC, during their representation.

SIGNED on this _____ day of _____, 2025.

THE HONORABLE JUDGE OF THE 302ND DISTRICT COURT

302nd Judicial District Court

Dallas County, Texas

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Status as of 11/5/2025 10:40 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
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