

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

DF-24-18010

NO. _____

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

PETITIONER'S NOTICE OF FORMAL DISCOVERY SERVED

PURSUANT TO TEX. R. CIV. P. 192.3 AND 194

TO THE HONORABLE JUDGE KIMBERLY BROWN:

Petitioner, Jason McKemie, respectfully files this Notice of Formal Discovery Served and states as follows:

1. On **May 27, 2025**, Petitioner served Respondent, Gwendolyn Ulijasz-McKemie, with formal written discovery pursuant to **Texas Rules of Civil Procedure 192.3 and 194**, including Requests for Production, Interrogatories, and Initial Disclosures.
2. Discovery was delivered to Respondent via multiple verified channels to ensure proper and redundant service, including her **registered personal email on file with the Texas eFile system**:
 - gwen@ulijasz.com
3. Additional copies were sent to Respondent's other known and previously used addresses to avoid any ambiguity in service, including:
 - **Personal:** gstat04@hotmail.com
 - **Professional:** gwendolyn.ulijasz@accenture.com
 - **Aliases:** erika_sloane87@yahoo.com, esloane609@gmail.com
4. Delivery was also confirmed via **SMS-to-email transmission** to Respondent's known mobile devices, with return receipt confirmation from:
 - 9174711979@vzwpix.com
 - 2102786377@vzwpix.com
5. While formal discovery was initiated on May 27, 2025, Petitioner had previously made **multiple written requests for financial documentation**, including before and after mediation. Respondent has not produced sufficient documentation to enable a meaningful evaluation of the marital estate. Specifically, she has not provided:
 - A single pay stub from **Cognizant**

- A single pay stub from **Accenture**
- Any bank statement from her **new personal checking account**, believed opened around Sept/Oct 2024
- Any income statement or bank record from her **business account (GLU Distribution LLC)**
- Numerous other categories of relevant financial disclosures previously requested

Petitioner reserves the right to file a Motion to Compel and request sanctions should Respondent fail to comply with the applicable discovery deadlines.

6. Petitioner also reserves the right to request a **Discovery Conference** or other relief as necessary should this noncompliance continue.

Respectfully submitted,



Jason McKemie
Pro Se Petitioner

539 W Commerce St
Suite # 2010
Dallas, TX 75208
(214) 868-4901
jmckemie@mckemie.net

Certificate of Service

I certify that a true and correct copy of this Notice was served on Respondent Gwendolyn Uljasz-McKemie on this the **17th day of June, 2025**, via the following channels:

- **Email of Record (TX eFile):** gwen@uljasz.com
- **Personal:** gstat04@hotmail.com
- **Professional:** gwendolyn.uljasz@accenture.com
- **Aliases:** erika_sloane87@yahoo.com
- **Mobile (SMS-to-email with delivery confirmation):**
 - 9174711979@vzwpix.com
 - 2102786377@vzwpix.com

Jason E 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.

Envelope ID: 102086079

Filing Code Description: Discovery

Filing Description: PETITIONER NOTICE OF FORMAL DISCOVERY
SERVED

Status as of 6/17/2025 10:27 AM CST

Case Contacts

| Name | BarNumber | Email | TimestampSubmitted | Status |
|--------------------------|-----------|-------------------------|----------------------|--------|
| Brant M. Webb | | firm@webbfamilylaw.com | 6/17/2025 8:53:08 AM | SENT |
| Betty Villarreal | | betty@webbfamilylaw.com | 6/17/2025 8:53:08 AM | SENT |
| Chandler Alt | | calt@sullivancook.com | 6/17/2025 8:53:08 AM | SENT |
| Jason McKemie | | jmckemie@mckemie.net | 6/17/2025 8:53:08 AM | SENT |
| Gwendolyn Uljasz McKemie | | GUljasz@gmail.com | 6/17/2025 8:53:08 AM | SENT |
| JASON EMORYMCKEMIE | | jason@callvital.com | 6/17/2025 8:53:08 AM | SENT |