

PETITIONER'S MOTION FOR LEAVE TO CONDUCT LIMITED POST-CUTOFF DISCOVERY

CAUSE NO. DF-24-18010
IN THE MATTER OF THE MARRIAGE OF

GWENDOLYN ULIJASZ,
Petitioner

and

JASON MCKEMIE,
Respondent

IN THE 302ND JUDICIAL DISTRICT COURT
DALLAS COUNTY, TEXAS

TO THE HONORABLE JUDGE OF SAID COURT:

Petitioner, Gwendolyn Ulijasz, appearing pro se, respectfully moves the Court for leave to conduct limited, targeted discovery after the discovery cutoff established in the Court's Pre-Trial Order and, in support, states as follows:

I. PROCEDURAL BACKGROUND

1. This matter is set for final trial on February 24, 2026.
2. The Court's Pre-Trial Order provides that discovery is to be completed and closed thirty (30) days prior to trial.
3. During the prior discovery periods Petitioner—through prior counsel—served discovery requests seeking financial and account-related records necessary to identify, inventory, and classify property at issue.
4. Respondent did not meaningfully produce the requested materials and the information and it was never obtained prior to the withdrawal of Petitioner's former counsel.
5. Petitioner further represents that, despite repeated requests to prior counsel, third party subpoenas to Amazon and Apple for purchase records were not issued, leaving Petitioner without access to itemized purchase information and proper identification and characterization of a significant sum of property.

6. Petitioner was excluded from accessing the 5609 La Foy, Dallas TX marital residence and its contents by order of the court. Petitioner was blocked by the Respondent to accessing the storage locations and private mailboxes where hundreds of Amazon and Apple packages were received. Petitioner therefore cannot independently identify or inventory property acquired during the above period.

7. Petitioner is now self-represented and, in preparing for trial, has identified a small and discrete set of third-party records essential to fair trial preparation.

II. NARROW AND PROPORTIONAL SCOPE OF REQUESTED DISCOVERY

6. Petitioner is not seeking to reopen general discovery or expand its scope.

7. Petitioner seeks leave only to issue three narrowly tailored third-party subpoenas to obtain neutral business records maintained in the ordinary course of business, limited in time and scope, for the purposes of:

- a. Identifying and classifying significant amount of property purchased via Respondent's Amazon and Apple accounts;
- b. Verifying financial activity already disclosed in Respondent's 2025 sworn Inventory and Appraisements;
- c. Assessing credibility and completeness of Respondent's disclosures; and
- d. Restoring access to information from which Petitioner was excluded.

III. SPECIFIC THIRD-PARTY RECORDS SOUGHT

8. Petitioner seeks leave to issue subpoenas for the following records, attached as Proposed Exhibits A-C:

A. Amazon.com Services LLC

Itemized purchase history for Jason McKemie's Amazon account and shipping information for the period August 1, 2023 through December 31, 2025, regardless of payment method.

B. Apple Inc.

Itemized purchase history, subscriptions, hardware purchases, and payment methods used for Jason McKemie's Apple account and shipping information for the period August 1, 2023 through December 31, 2025, regardless of payment method.

C. PhysicalAddress.com

Digital scan images (package image and front and back of each envelope as is done in the ordinary course of business for all clients at this private mailbox provider), produced in native electronic format, for mail addressed to Petitioner individually or jointly with Respondent that was received either directly or by "forward" into McKemie Mailbox 1015 during calendar year 2024 and 2025. No opening of mail or content beyond envelope/package exterior is requested.

9. Each proposed subpoena requests production with a custodian of records affidavit to streamline admissibility at trial.

IV. GOOD CAUSE FOR LEAVE OF COURT

10. Good cause exists to permit this limited discovery because:

- a. The records were previously requested but not produced;
- b. Petitioner was excluded from access to the underlying accounts, records, and residence;
- c. A substantially similar subpoena covering calendar year 2024 was previously authorized by the 254th Court and complied with by the same mailbox provider;
- d. The requested discovery is proportional, time-limited, and directed solely to third-party custodians; and
- e. The information is necessary for Petitioner to fairly prepare for trial.

11. Petitioner further notes that the discovery cutoff date fell on December 24, 2025, during a period when Petitioner was working through Respondent's court Motion of an issue with healthcare insurance. At the same time, Petitioner had already departed for previously scheduled holiday travel to her family home and was simultaneously engaged in mandatory year-end professional obligations related to the closing of her employer's calendar year-end and client's financial year-end. This is offered solely as context and not as an excuse. No prejudice will result from the limited relief requested herein.

V. REQUEST FOR RELIEF

12. Petitioner respectfully requests that the Court grant leave to conduct the limited post-cutoff discovery described above and authorize issuance of the attached subpoenas with a fourteen (14) day compliance period from service.

13. Petitioner further requests all such other and further relief to which she may be justly entitled.

WHEREFORE, PREMISES CONSIDERED, Petitioner respectfully requests that the Court grant this Motion for Leave to Conduct Limited Post-Cutoff Discovery and for such other and further relief as the Court deems just and proper.

Respectfully submitted,



Gwendolyn Ulijasz

Petitioner, Pro Se

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