

CAUSE NO. DF-24-18010

IN THE MATTER OF
THE MARRIAGE OF

GWENDOLYN ULIJASZ-McKEMIE
AND
JASON McKEMIE

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§

IN THE DISTRICT COURT

254TH JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

PETITIONER'S RESPONSE TO RESPONDENT'S
WRITTEN INTERROGATORIES

TO: Respondent Jason McKemie, pro se, via e-service.

COMES NOW Gwendolyn Ulijasz-McKemie, Petitioner in the above-entitled and numbered cause, and serves her Response to Respondent's Written Interrogatories.

Respectfully submitted,

SULLIVAN & COOK, LLC

/s/ Ethan Scroggins

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**ATTORNEYS FOR PETITIONER,
GWENDOLYN ULIJASZ-McKEMIE**

CERTIFICATE OF SERVICE

This is to certify that on this 23rd day of June, 2025, a true and correct copy of the foregoing document has been sent by electronic filing and service to all counsel and pro se parties of record.

/s/ Ethan Scroggins

Ethan Scroggins

OBJECTION TO UNTIMELY DISCOVERY

OBJECTION: Petitioner objects to the entirety of Respondent's Request for Interrogatories (incorrectly titled "Petitioner's First Set of Interrogatories") because it was not timely. Respondent served his request (and filed a notice with the Court confirming the date of service) on May 27, 2025, which is outside the applicable discovery period for this case. The Pretrial Scheduling Order in this case states that discovery deadlines will be pursuant to the Texas Rules of Civil Procedure. Texas Rule of Civil Procedure 190.3(b) states that "In a suit governed by the Family Code, all discovery must be conducted during the discovery period, which begins when the suit is filed and continues until 30 days before the date set for trial." Respondent had until May 23, 2025, to send discovery requests to comply. Therefore, Petitioner is not obligated to respond and Respondent cannot move to compel any responses to the untimely request.

RESPONSE TO REQUEST WITHOUT WAIVING THE TIMELINESS OBJECTION: Subject to and without waiving the foregoing objection, Petitioner, in the interest of good faith and judicial economy, will provide as complete as possible answers to each reasonable request subject to and without waiving any additional objections.

INTERROGATORIES

Interrogatory No. 1: Declaration of All Financial Transfers Above \$999 Since August 15, 2023

Identify and describe in **itemized detail** every instance in which **you transferred or received funds, assets, or items of value exceeding \$999** in a **single transaction or related series of transactions** from **August 15, 2023, to the present**, whether for personal, professional, legal, or other purposes. This includes but is not limited to:

- **Wire transfers** (domestic or international)
- **Cash transfers or cash withdrawals**
- **Payments through Zelle, Venmo, PayPal, CashApp, Apple Cash, or similar platforms**
- **Cryptocurrency or digital asset transfers** (e.g., Bitcoin, Ethereum, NFTs)
- **Transfers of stocks, RSUs, options, or other securities**
- **Real estate title transfers, lease payments, or asset assignments**
- **Prepaid debit cards, gift cards, or reloadable cards**
- **Third-party payments made on your behalf**
- **Transfers involving family members, romantic partners, attorneys, or employers**

For **each transaction**, provide:

- The **date** of the transaction
- The **amount or value**
- The **type of asset** or currency (e.g., USD, Bitcoin, Amex points, gift card)
- The **sender and recipient**, with full legal names and relationships
- The **platform, account, or institution** used
- The **reason or purpose** for the transaction
- Whether it was **disclosed in your financial discovery responses**, and if so, where it appears (e.g., "Bates #0324" or "Amex Jan 2024 PDF")

You are further required to affirmatively state under oath whether, to the best of your knowledge

and belief, there have been **no other transfers, payments, or conveyances of any form of value exceeding \$999** between August 15, 2023, and the date of your response **not disclosed herein or in prior financial discovery**.

This includes any transaction:

- **Conducted on your behalf or for your benefit by another person or entity**
- **Paid in part or whole with marital funds, business funds, or funds reimbursed later**
- **Processed through any alternate name, email, account, crypto wallet, business, or third Party**

Your response must:

- List each transaction **individually** — no aggregated summaries or mass-record dumps
- Be **complete and fully responsive**, not reliant on the opposing party to parse bank or card statements
- Include a final **affirmative sworn statement** confirming that no other qualifying transaction exists beyond those disclosed

OBJECTION: Petitioner objects to this interrogatory on the ground that it seeks information that is not relevant, admissible, or reasonably calculated to lead to the discovery of admissible evidence, and, is therefore, outside the scope of permissible discovery as provided by the Texas Rules of Civil Procedure. Tex. R. Civ. P. 192.3(a) and cmt. 1; Tex. R. Civ. Evid. 401,402.

OBJECTION: Petitioner objects to this request on the ground that it is overly broad, unduly burdensome, insufficiently limited in time and scope, and continues as impermissible “fishing expedition” in contravention of the Texas Rules of Civil Procedure. Tex. R. Civ. P/ 192.4; Bryan v. General Electric Credit Corp., 553 S.W.2d 415, (Tex. Civ. App. – Houston [1st Dist.] 1977, no writ); Loftin v. Martin, 776 S.W.2d 145 (Tex. 1989).

OBJECTION: Petitioner objects on the ground that the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the amount in controversy, the parties' resources, the importance of the issues at stake in the litigation, and the importance of the proposed discovery in resolving the issues. TEX. R. Civ. P. 192.4(b).

INTERROGATORY NO. 2: MENTAL HEALTH DISCLOSURE

Identify and describe in detail any and all mental health diagnoses that have ever been assigned to you by any licensed medical provider, psychiatrist, psychologist, counselor, or mental health professional. For each diagnosis, state:

- a. The name and address of the diagnosing professional
- b. The date of diagnosis
- c. The name of the condition or diagnosis assigned
- d. Whether you are currently under treatment for this condition
- e. Any medications prescribed in relation to this diagnosis
- f. Any periods of hospitalization, inpatient treatment, or emergency intervention related to the diagnosis
- g. Whether you intend to introduce any mental health evidence or expert testimony in this matter

OBJECTION: Petitioner objects to this request on the ground that it is overly broad,

unduly burdensome, insufficiently limited in time and scope, and continues as impermissible “fishing expedition” in contravention of the Texas Rules of Civil Procedure. Tex. R. Civ. P/ 192.4; Bryan v. General Electric Credit Corp., 553 S.W.2d 415, (Tex. Civ. App. – Houston [1st Dist.] 1977, no writ); Loftin v. Martin, 776 S.W.2d 145 (Tex. 1989).

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ANSWER: Subject to and without waiving the foregoing objections, diagnosed with alcohol abuse disorder in 2012 and was treated at Hazeldon Sober Living and Ambrosia Counseling. Have had no issues since successful stay and treatment.

INTERROGATORY NO. 3: Employer-Related Settlements

Identify and describe all financial or non-financial compensation, benefits, agreements, or other consideration you have received—regardless of how labeled, structured, or timed (including but not limited to settlement agreements, separation agreements, severance packages, title changes, retroactive promotions, performance-based adjustments, or reclassifications)—from any current or former employer since May 1, 2001.

For each such instance, provide the following:

- A. The name of the employer or organization
- B. The full name(s) of all other individuals involved in the matter (e.g., alleged wrongdoers, HR personnel, attorneys, witnesses, mediators, etc.)
- C. The full name(s) of any law firm(s) that represented you in connection with the matter
- D. The full name(s) of your individual attorney(s)
- E. The total amount of legal fees, costs, or expenses incurred in connection with the matter, including identification of who paid those fees (you personally, reimbursement by the employer, or covered by another third party or entity)
- F. The date of the agreement, resolution, or compensation event
- G. A description of the grievance, dispute, or claim (e.g., discrimination, harassment, retaliation, wrongful termination, etc.)
- H. A detailed breakdown of all compensation or benefits received, including but not limited to:
 1. Cash payments
 2. W-2 or 1099 income
 3. Stock, stock options, RSUs, or other equity grants
 4. Ownership interests or profit-sharing arrangements
 5. Bonuses, retention or transition awards
 6. Continued or extended health, dental, or retirement benefits
 7. Title changes, job reclassifications, or favorable performance designations
 8. Confidentiality, non-disparagement, or release provisions
 9. Any alternative, indirect, or non-standard forms of compensation
 10. The fair market value (or your best good-faith estimate) of each category of compensation or benefit received.

OBJECTION: Petitioner objects to this interrogatory on the ground that it seeks information that is not relevant, admissible, or reasonably calculated to lead to the discovery of admissible evidence, and, is therefore, outside the scope of permissible discovery as provided by the Texas Rules of Civil Procedure. Tex. R. Civ. P. 192.3(a) and cmt. 1; Tex. R. Civ. Evid. 401,402.

OBJECTION: Petitioner objects to this request on the ground that it is overly broad, unduly burdensome, insufficiently limited in time and scope, and continues as impermissible “fishing expedition” in contravention of the Texas Rules of Civil Procedure. Tex. R. Civ. P/ 192.4; Bryan v. General Electric Credit Corp., 553 S.W.2d 415, (Tex. Civ. App. – Houston [1st Dist.] 1977, no writ); Loftin v. Martin, 776 S.W.2d 145 (Tex. 1989).

OBJECTION: Petitioner objects on the ground that the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the amount in controversy, the parties' resources, the importance of the issues at stake in the litigation, and the importance of the proposed discovery in resolving the issues. TEX. R. Civ. P. 192.4(b).

ANSWER: Subject to and without waiving the foregoing objections, I started work at Cognizant in 2020 and worked as salary/W2 employee with an annual bonus until October 2024. In October 2024 I started work at Accenture where I am compensated with a base salary and variable pay/stock options that take place once a year. Some of my compensation is performance based. Once a year I have the option to withhold a percentage of my upcoming salary in exchange for a 50% company match towards stock purchases but in order to receive that benefit I need to work for them for that entire year period. If you leave early you do not get the employer match or the stock.

INTERROGATORY NO. 4: Individual Disputes and Personal Injury Claims (Non-Employer)

Identify and describe all financial or non-financial compensation, settlements, agreements, or other consideration you have received from any individual or their insurance carriers (not acting as your employer) in connection with any grievance, complaint, claim, accident, injury, or legal dispute—actual, threatened, perceived, or potential—since May 1, 2001.

Note: This interrogatory explicitly includes (but is not limited to) compensation arising from events such as car accidents, personal injuries, premises liability claims (e.g., slip-and-fall incidents), medical malpractice, defamation, harassment, or any other personal disputes involving an individual or their insurance provider.

For each instance, provide the following:

1. Full name of the individual or insurance carrier providing compensation or consideration
2. Full names of all other individuals involved (e.g., alleged wrongdoers, witnesses, attorneys, insurance adjusters, mediators)
3. Full names of law firm(s) that represented you
4. Full names of your individual attorney(s)
5. Total amount of legal fees, costs, or expenses incurred in connection with the matter, including identification of who paid those fees (you personally, reimbursed, or covered by another party or entity)
6. Date of the agreement, resolution, or compensation event
7. Description of the underlying grievance, dispute, or incident (e.g., harassment, assault, defamation, negligence, personal injury, car accident)
8. Detailed breakdown of all compensation or benefits received, including but not limited to:
 - Cash payments
 - Insurance claim settlements
 - Medical expense reimbursements
 - Property damage reimbursements or replacements
 - Transfers of property, assets, or services
 - Confidentiality, apology, or non-disparagement agreements
 - Any non-monetary, indirect, or alternative forms of consideration
 - Fair market value

OBJECTION: Petitioner objects to this interrogatory on the ground that it seeks information that is not relevant, admissible, or reasonably calculated to lead to the discovery of admissible evidence, and, is therefore, outside the scope of permissible discovery as provided by the Texas Rules of Civil Procedure. Tex. R. Civ. P. 192.3(a) and cmt. 1; Tex. R. Civ. Evid. 401,402.

OBJECTION: Petitioner objects to this request on the ground that it is overly broad, unduly burdensome, insufficiently limited in time and scope, and continues as impermissible “fishing expedition” in contravention of the Texas Rules of Civil Procedure. Tex. R. Civ. P/ 192.4; Bryan v. General Electric Credit Corp., 553 S.W.2d 415, (Tex. Civ. App. – Houston [1st Dist.] 1977, no writ); Loftin v. Martin, 776 S.W.2d 145 (Tex. 1989).

OBJECTION: Petitioner objects on the ground that the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the amount in controversy, the parties' resources, the importance of the issues at stake in the litigation, and the importance of the proposed discovery in resolving the issues. TEX. R. Civ. P. 192.4(b).

ANSWER: Subject to and without waiving the foregoing objections, none.

INTERROGATORY NO. 5: Business, Corporate, or Non-Profit Entities

Identify and describe any and all financial or non-financial compensation, settlements, agreements, or other consideration you have received—regardless of how it was labeled, structured, or timed—from any business, corporation, non-profit organization, institution, or other legal entity (not acting as your employer) in connection with, arising from, or contemporaneous with any grievance (whether actual, threatened, perceived, or potential), complaint, claim, or legal dispute, whether formal or informal, since May 1, 2001.

For each such instance, provide the following:

- A. The full legal name of the business, corporation, or entity;
- B. The full name(s) of all other individuals involved in the matter (e.g., employees, executives, attorneys, agents, witnesses, etc.);
- C. The full name(s) of any law firm(s) that represented you in connection with the matter;
- D. The full name(s) of your individual attorney(s);
- E. The date of the agreement, resolution, or compensation event;
- F. A description of the underlying claim, grievance, or dispute (e.g., personal injury, product liability, breach of duty, harassment, data breach, etc.);
- G. A detailed breakdown of all compensation or benefits received, including but not limited to:
 1. Cash settlements or structured payout
 2. Store credits, products, or services
 3. Stock, equity, or ownership interests
 4. Confidentiality, non-disparagement, or release agreements
 5. Any non-standard, indirect, or alternative forms of compensation
 6. The fair market value (or your best good-faith estimate) of each category of compensation or benefit received.

OBJECTION: Petitioner objects to this interrogatory on the ground that it seeks information that is not relevant, admissible, or reasonably calculated to lead to the discovery of admissible evidence, and, is therefore, outside the scope of permissible discovery as provided by the Texas Rules of Civil Procedure. Tex. R. Civ. P. 192.3(a) and cmt. 1; Tex. R. Civ. Evid. 401,402.

OBJECTION: Petitioner objects to this request on the ground that it is overly broad, unduly burdensome, insufficiently limited in time and scope, and continues as impermissible “fishing expedition” in contravention of the Texas Rules of Civil Procedure. Tex. R. Civ. P. 192.4; Bryan v. General Electric Credit Corp., 553 S.W.2d 415, (Tex. Civ. App. – Houston [1st Dist.] 1977, no writ); Loftin v. Martin, 776 S.W.2d 145 (Tex. 1989).

OBJECTION: Petitioner objects on the ground that the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the amount in controversy, the parties' resources, the importance of the issues at stake in the litigation, and the importance of the proposed discovery in resolving the issues. TEX. R. Civ. P. 192.4(b).

ANSWER: Subject to and without waiving the foregoing objections, I faced discrimination and received a settlement by Cognizant. I never sued them or filed a claim. My attorney was Lindsey Grunert at Kotchen & Low LLP. The settlement was based on conduct from prior to the marriage. I received the funds in May 2025. See the settlement agreement produced in Exhibit A. Lindsey took a portion of the money as a contingency fee.

INTERROGATORY NO. 6: Life Insurance and Related Policies

Identify and fully describe any and all life insurance policies, accidental death and dismemberment (AD&D) policies, disability insurance policies, or similar instruments for which you have ever been the beneficiary, owner, policyholder, applicant, or payor since your relationship with Petitioner began—whether currently active, lapsed, expired, canceled, pending, or denied—that insure or insured the life, health, or bodily integrity of Petitioner (Jason McKemie).

For each policy or instrument identified, provide:

1. Full name and address of the issuing insurance company
2. Policy number and date of issuance
3. Face value or maximum payout amount of each policy
4. Current status (active, lapsed, canceled, pending, expired, or denied)
5. Specific beneficiary designation(s)
6. Date each policy was applied for and the date coverage began
7. Amount and frequency of premiums paid
8. Source of funds used for premium payments
9. Purpose or stated reason for obtaining or attempting to obtain each policy

OBJECTION: Petitioner objects on the ground that the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the amount in controversy, the parties' resources, the importance of the issues at stake in the litigation, and the importance of the proposed discovery in resolving the issues. TEX. R. Civ. P. 192.4(b).

ANSWER: Subject to and without waiving the foregoing objections, Accenture issues basic life insurance that covers both Jason McKemie and me. I believe it is through Banner Aetna. It was effective 1/1/2025 and coverage is \$1,500,000.00. Jason was listed as a beneficiary. The plan is paid for by Accenture and still active to my knowledge.

INTERROGATORY NO. 6: Reports and Complaints Filed (Jason McKemie)

Identify and fully describe each and every formal or informal report, complaint, or communication you have made to any law enforcement agency, emergency services agency, government department, regulatory body, social service agency, educational institution, parole office, animal welfare organization,

or other entity—including but not limited to 911 calls, police reports, fire department communications, emergency medical service calls, Department of Family and Protective Services (DFPS) reports, parole or probation officer notifications, Humane Society reports, or school board complaints—regarding or relating to Petitioner (Jason McKemie).

For each such report or complaint, provide:

1. The specific date and time of the report or complaint
2. The name of the agency, department, or organization contacted
3. Any report, case, or reference number provided by the entity
4. A detailed description of the allegations, claims, or issues reported
5. The names and contact information (if known) of all officials, officers, or employees who received, responded to, or investigated the complaint or report
6. The current status or final outcome of the investigation, complaint, or response
7. Whether any follow-up actions were taken or recommended by the responding entity
8. The name(s) of any other individual(s) involved, interviewed, or consulted in relation to the complaint or report

OBJECTION: Petitioner objects to this request on the ground that it is overly broad, unduly burdensome, insufficiently limited in time and scope, and continues as impermissible “fishing expedition” in contravention of the Texas Rules of Civil Procedure. Tex. R. Civ. P/ 192.4; Bryan v. General Electric Credit Corp., 553 S.W.2d 415, (Tex. Civ. App. – Houston [1st Dist.] 1977, no writ); Loftin v. Martin, 776 S.W.2d 145 (Tex. 1989).

OBJECTION: Petitioner objects on the ground that the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the amount in controversy, the parties' resources, the importance of the issues at stake in the litigation, and the importance of the proposed discovery in resolving the issues. TEX. R. Civ. P. 192.4(b).

ANSWER: Subject to and without waiving the foregoing objections, I made the following complaints to the San Antonio Police Department:

- Case No. SAPD24277190 – Contacted Officer Vick #1762 on December 12, 2024 for unlawful installation of tracking devices. I also spoke with Detective Scott at 210-207-7680
- Case No. SAPD25002158 – Contacted Officer Villegas #83 on January 4, 2025 for harassment
- Case No. SAPD25009850 – Contacted Officer Fowler #1408 on January 15, 2025 for harassment

There are likely additional reports made but I do not currently have the reports or any information regarding the reports. They also were with the San Antonio Police Department. I have not followed up on the reports, but I believe they were investigated. I was called in to identify a picture of a person and they showed me a picture of Jason McKemie.

INTERROGATORY NO. 7: Reports and Complaints Filed (Jason McKemie)

Identify any individual with whom you have had a romantic or sexual relationship during the marriage, and for each, describe any financial benefits, gifts, travel, housing, or employment obtained or provided as a result of that relationship.

ANSWER: Subject to and without waiving the foregoing objection, none.

INTERROGATORY NO. 8: Communications with Law Enforcement or Prosecutorial Personnel Regarding Petitioner

Identify **each and every law enforcement official, prosecutorial employee, or affiliated personnel** with whom you have had **any communication**—formal or informal—**regarding Petitioner (Jason McKemie)** at any time, including but not limited to:

- **Police officers, detectives, or supervisors**
- **Assistant District Attorneys, District Attorneys, or prosecutorial investigators**
- **Victim’s advocates or domestic violence liaison personnel**
- **Any employee of the Dallas Police Department, San Antonio Police Department, or other local, state, or federal agency**

For each individual, provide:

- Full **name, title, and badge or employee ID number** (if known)
- The **agency or office** they were affiliated with
- Their **phone number, email address, and/or** other contact information
- The **date(s) and method(s)** of communication (e.g., phone, email, in-person, video call)
- A **summary of what was discussed**, including any allegations, claims, or requests made
- Whether the communication was **initiated by you or them**, and the **reason for the contact**
- Whether any **written report, case number, or formal complaint** resulted from the communication
- Whether you provided **any documents, recordings, or other materials** during or after the communication

This includes any communication:

- That referenced Petitioner by name, photograph, or identifying detail
- That related to criminal, civil, protective order, or investigatory matters
- That occurred through **personal, professional, or third-party channels**

OBJECTION: Petitioner objects to this interrogatory on the ground that it seeks information that is not relevant, admissible, or reasonably calculated to lead to the discovery of admissible evidence, and, is therefore, outside the scope of permissible discovery as provided by the Texas Rules of Civil Procedure. Tex. R. Civ. P. 192.3(a) and cmt. 1; Tex. R. Civ. Evid. 401,402.

OBJECTION: Petitioner objects to this request on the ground that it is overly broad, unduly burdensome, insufficiently limited in time and scope, and continues as impermissible “fishing expedition” in contravention of the Texas Rules of Civil Procedure. Tex. R. Civ. P/ 192.4; Bryan v. General Electric Credit Corp., 553 S.W.2d 415, (Tex. Civ. App. – Houston [1st Dist.] 1977, no writ); Loftin v. Martin, 776 S.W.2d 145 (Tex. 1989).

OBJECTION: Petitioner objects on the ground that the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the amount in controversy, the parties' resources, the importance of the issues at stake in the litigation, and the importance of the proposed discovery in resolving the issues. TEX. R. Civ. P. 192.4(b).

ANSWER: Subject to and without waiving the foregoing objections, Officer Vick #1762 on December 12, 2024, Detective Scott at 210-207-7680, Officer Villegas #83 on January 4, 2025, Officer Fowler #1408 on January 15, 2025 all at San Antonio Police Department.

INTERROGATORY #9: Security Services, Surveillance, Bug Detection, & Security Sweep Services

Identify all individuals, companies, contractors, or consultants who have provided you with personal security services, including but not limited to physical protection, property sweeps, electronic surveillance detection, or threat assessments, from December 1, 2024, to present.

For each, state:

- The full name, title or role, cell phone number, email address, and relationship to you
- Business name (if applicable), phone number, and email address
- Date(s) of service and nature of service performed
- The location(s) where services were rendered
- Any findings or reports issued as a result of those services
- The total cost of each service
- The method of payment, including copies of receipts, invoices, contracts, or credit card or bank statements showing proof of payment

This request includes, without limitation, any individuals who performed or assisted with sweeps of vehicles, residences, electronic devices, personal belongings, or workspaces.

OBJECTION: Petitioner objects to this interrogatory on the ground that it seeks information that is not relevant, admissible, or reasonably calculated to lead to the discovery of admissible evidence, and, is therefore, outside the scope of permissible discovery as provided by the Texas Rules of Civil Procedure. Tex. R. Civ. P. 192.3(a) and cmt. 1; Tex. R. Civ. Evid. 401,402.

OBJECTION: Petitioner objects to this request on the ground that it is overly broad, unduly burdensome, insufficiently limited in time and scope, and continues as impermissible “fishing expedition” in contravention of the Texas Rules of Civil Procedure. Tex. R. Civ. P/ 192.4; Bryan v. General Electric Credit Corp., 553 S.W.2d 415, (Tex. Civ. App. – Houston [1st Dist.] 1977, no writ); Loftin v. Martin, 776 S.W.2d 145 (Tex. 1989).

OBJECTION: Petitioner objects on the ground that the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the amount in controversy, the parties' resources, the importance of the issues at stake in the litigation, and the importance of the proposed discovery in resolving the issues. TEX. R. Civ. P. 192.4(b).

OBJECTION: Petitioner objects for the reason that it seeks personal and confidential information and invades the personal and constitutionally protected privacy rights of Petitioner. Sears, Roebuck & Co. v. Ramirez, 824 S.W.2d 558,559 (Tex.1992); El Centro de/ Barrio, Inc. v. Barlow, 894 S.W.2d 775, 780 (Tex.App.-San Antonio 1994, orig. proceeding). Additionally, the requested information, if any exists, should be kept confidential based on the nature of services described by Respondent. Providing the requested information would defeat the use, if any, of any protective or preventative services described by the request.

INTERROGATORY #10: Travel

For all travel or trips where you stayed overnight somewhere other than 12802 Kings Forest St, San Antonio, TX 78230 between **October 1, 2024, and the present**, identify and itemize all related expenses, including:

- Airfare
- Lodging or accommodations
- Meals and restaurants
- Entertainment (e.g., concerts, theater, events)
- Personal services (e.g., massage, spa)
- Coffee shops, cafes, and other travel-related purchases

For each trip, specify:

- The **location(s)** and **date(s)** of travel
- The **purpose** of the trip (business, personal, or both)
- The **names, phone numbers, and email addresses** of:
 - Anyone who **accompanied you**
 - Anyone you **visited** or **met with**
 - Anyone you **stayed with**, or who **paid for or arranged** your accommodations
- The **method of payment** for each expense, including last four digits of account
- For work-related trips, attach complete **Concur or expense reimbursement reports** and proof of repayment (e.g., reimbursement deposits on credit card or bank statement)

OBJECTION: Petitioner objects to this interrogatory on the ground that it seeks information that is not relevant, admissible, or reasonably calculated to lead to the discovery of admissible evidence, and, is therefore, outside the scope of permissible discovery as provided by the Texas Rules of Civil Procedure. Tex. R. Civ. P. 192.3(a) and cmt. 1; Tex. R. Civ. Evid. 401,402.

OBJECTION: Petitioner objects to this request on the ground that it is overly broad, unduly burdensome, insufficiently limited in time and scope, and continues as impermissible “fishing expedition” in contravention of the Texas Rules of Civil Procedure. Tex. R. Civ. P/ 192.4; Bryan v. General Electric Credit Corp., 553 S.W.2d 415, (Tex. Civ. App. – Houston [1st Dist.] 1977, no writ); Loftin v. Martin, 776 S.W.2d 145 (Tex. 1989).

OBJECTION: Petitioner objects on the ground that the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the amount in controversy, the parties' resources, the importance of the issues at stake in the litigation, and the importance of the proposed discovery in resolving the issues. TEX. R. Civ. P. 192.4(b).

Interrogatory No. 11: Local Rentals, Hotel Stays, and Private Accommodations

Identify each occasion between **May 2023, and the present** in which you rented, stayed at, or were hosted at any **hotel, short-term rental, or private accommodation** within the **Dallas-Fort Worth metropolitan area**, including but not limited to properties arranged through Airbnb, VRBO, hotel chains, or private individuals.

For each occasion, provide the following:

- The **exact date(s)** and **address or location** of the stay
- The **platform, host, or property name** (e.g., Airbnb, VRBO, Marriott, private residence)
- The **stated or intended purpose** of the stay (e.g., personal, social, romantic, business, or medical)
- The **full names, phone numbers, and email addresses** of:
 - Any person who **stayed with you**
 - Any person who **visited you, invited you, or was present** at the property
 - Any individual or entity who **paid for, reimbursed, or arranged** the accommodations
- An **itemized breakdown of all expenses** associated with the stay, including:
 - Lodging
 - Food and beverages
 - Rideshare or transportation
 - Entertainment or services
- The **method of payment** used for each expense, including the **last four digits of the account or card**
- Whether any **portion of the cost was reimbursed, refunded, or covered** by a third party; if so, identify the **source, reason, and provide supporting documentation**

OBJECTION: Petitioner objects to this interrogatory on the ground that it seeks information that is not relevant, admissible, or reasonably calculated to lead to the discovery of admissible evidence, and, is therefore, outside the scope of permissible discovery as provided by the Texas Rules of Civil Procedure. Tex. R. Civ. P. 192.3(a) and cmt. 1; Tex. R. Civ. Evid. 401,402.

OBJECTION: Petitioner objects to this request on the ground that it is overly broad, unduly burdensome, insufficiently limited in time and scope, and continues as impermissible “fishing expedition” in contravention of the Texas Rules of Civil Procedure. Tex. R. Civ. P/ 192.4; Bryan v. General Electric Credit Corp., 553 S.W.2d 415, (Tex. Civ. App. – Houston [1st Dist.] 1977, no writ); Loftin v. Martin, 776 S.W.2d 145 (Tex. 1989).

OBJECTION: Petitioner objects on the ground that the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the amount in controversy, the parties' resources, the importance of the issues at stake in the litigation, and the importance of the proposed discovery in resolving the issues. TEX. R. Civ. P. 192.4(b).

Interrogatory No. 12: History of Protective Orders, Restraining Orders, and Similar Legal Instruments

Identify **each and every individual or entity** for whom you have filed, or who has filed against you, a **protective order, restraining order, no-contact order, temporary restraining order (TRO), or any other legal instrument** imposing restrictions on physical, verbal, digital, or geographic contact **from May 27, 1996, to the present.**

For each instance, provide the following:

- **Who** was involved:
 - Full legal name of the petitioner and respondent
 - Relationship of the parties (e.g., spouse, partner, co-worker, acquaintance)
- **What** type of legal instrument was filed:
 - Protective order, TRO, emergency order, criminal stay-away order, etc.
 - Whether the filing was civil, family, or criminal in nature
- **When** it occurred:
 - Date the petition was filed
 - Date of any hearing(s)
 - Duration the order was in effect
- **Where** it was filed:
 - Jurisdiction and name of the court
 - Case number and court of record (if available)
- **Why** it was filed:
 - Allegations or factual basis asserted
 - Whether law enforcement was involved
 - Whether any criminal charges were filed in relation to the petition
- **Outcome and status** of the proceeding:
 - Whether the petition was granted, denied, withdrawn, dismissed, or expired
 - Terms of the final order, if granted (e.g., distance, duration, firearm restrictions)
 - Whether you complied with or violated any part of the order
 - Any appeals, modifications, or expungements related to the case
- **Supporting documentation:**
 - Whether you possess any court filings, police reports, or written communications related to the case(s)

- Whether you have been advised by legal counsel, and if so, identify the firm or attorney (you may assert privilege where appropriate)

OBJECTION: Petitioner objects to this interrogatory on the ground that it seeks information that is not relevant, admissible, or reasonably calculated to lead to the discovery of admissible evidence, and, is therefore, outside the scope of permissible discovery as provided by the Texas Rules of Civil Procedure. Tex. R. Civ. P. 192.3(a) and cmt. 1; Tex. R. Civ. Evid. 401,402.

OBJECTION: Petitioner objects to this request on the ground that it is overly broad, unduly burdensome, insufficiently limited in time and scope, and continues as impermissible “fishing expedition” in contravention of the Texas Rules of Civil Procedure. Tex. R. Civ. P/ 192.4; Bryan v. General Electric Credit Corp., 553 S.W.2d 415, (Tex. Civ. App. – Houston [1st Dist.] 1977, no writ); Loftin v. Martin, 776 S.W.2d 145 (Tex. 1989).

OBJECTION: Petitioner objects on the ground that the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the amount in controversy, the parties' resources, the importance of the issues at stake in the litigation, and the importance of the proposed discovery in resolving the issues. TEX. R. Civ. P. 192.4(b).

ANSWER: Subject to and without waiving the foregoing objections, I obtained a protective order against Christopher McNally on March 10, 2023 in Cook County, Illinois. Law enforcement was involved. There was also a petition to modify the protective order to further prevent danger posed by Christopher McNally, including having him surrender his firearms.

INTERROGATORY NO. 13: Reports and Complaints Filed (Others)

Identify and fully describe each and every formal or informal report, complaint, or communication you have made to any law enforcement agency, emergency services agency, government department, regulatory body, social service agency, educational institution, parole office, animal welfare organization, or other entity—including but not limited to 911 calls, police reports, fire department communications, emergency medical service calls, Department of Family and Protective Services (DFPS) reports, parole or probation officer notifications, Humane Society reports, or school board complaints—in the past 5 years. (Christopher McNally, Aimee McNally, Chris Strathouloupoulos, Etc.)

For each such report or complaint, provide:

1. The specific date and time of the report or complaint
2. The name of the agency, department, or organization contacted
3. Any report, case, or reference number provided by the entity
4. A detailed description of the allegations, claims, or issues reported
5. The names and contact information (if known) of all officials, officers, or employees who received, responded to, or investigated the complaint or report
6. The current status or final outcome of the investigation, complaint, or response
7. Whether any follow-up actions were taken or recommended by the responding entity
8. The name(s) of any other individual(s) involved, interviewed, or consulted in relation to the complaint or report.

OBJECTION: Petitioner objects to this interrogatory on the ground that it seeks information that is not relevant, admissible, or reasonably calculated to lead to the discovery of admissible evidence, and, is therefore, outside the scope of permissible discovery as provided by the Texas Rules of Civil Procedure. Tex. R. Civ. P. 192.3(a) and cmt. 1; Tex. R. Civ. Evid. 401,402.

OBJECTION: Petitioner objects to this request on the ground that it is overly broad, unduly burdensome, insufficiently limited in time and scope, and continues as impermissible “fishing expedition” in contravention of the Texas Rules of Civil Procedure. Tex. R. Civ. P/ 192.4; Bryan v. General Electric Credit Corp., 553 S.W.2d 415, (Tex. Civ. App. – Houston [1st Dist.] 1977, no writ); Loftin v. Martin, 776 S.W.2d 145 (Tex. 1989).

OBJECTION: Petitioner objects on the ground that the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the amount in controversy, the parties' resources, the importance of the issues at stake in the litigation, and the importance of the proposed discovery in resolving the issues. TEX. R. Civ. P. 192.4(b).