

**NOTICE: THIS DOCUMENT
CONTAINS SENSITIVE DATA**

CAUSE NO. DF-24-18010

**IN THE MATTER OF
THE MARRIAGE OF**

**GWENDOLYN ULIJASZ-McKEMIE
AND
JASON McKEMIE**

§
§
§
§
§
§

IN THE DISTRICT COURT

301st JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

PETITIONER'S MOTION FOR CONTINUANCE

This Motion for Continuance is brought by Petitioner, Gwendolyn Ulijasz-McKemie, who shows in support:

1. This case is presently set for *Respondent's Supplemental Notice and Motion for May 21 Hearing* on May 21, 2026, at 1:30 p.m.
2. Respondent, Jason McKemie did not confer with Counsel for Petitioner prior to setting the hearing on May 21, 2026.
3. Counsel for Petitioner, Jonathan Drake Steele is not available on May 21, 2026, at 1:30 p.m., and has a previously scheduled hearing in Chicago, Illinois.
4. Counsel for Petitioner requested Respondent to reschedule the hearing and confer with Counsel for Petitioner prior to setting a hearing. Respondent did not agree, please find attached email correspondence with Respondent as *Exhibit "A"*.
5. For the foregoing reasons, Petitioner requests that the Court to remove the setting on May 21, 2026, and reset the hearing in accordance with its docketing procedures requiring Respondent to confer with Counsel for Petitioner for availability.
6. This request is not sought solely for delay, but that justice may be done.

Gwendolyn Ulijasz-McKemie prays that the Court grant this Motion for Continuance.

Respectfully submitted,

ARMSTRONG DIVORCE & FAMILY LAW, PLLC
5949 Sherry Lane, Suite 835
Dallas, TX 75225
Tel: (972) 544-1662
Fax: (972) 408-3455

RAJ

By: _____

REBECCA L. ARMSTRONG
State Bar No. 24062589
rebecca@armstronglawtexas.com

LAUREN N. SHAW
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Attorneys for Gwendolyn Uljasz-McKemie

AND

BEERMANN LLP
161 North Clark Street, Suite 3000
Chicago, Illinois 60601
Telephone: (312) 621-9700

By: _____

Jonathan Drake Steele
Illinois ARDC No. 6308171
Email: jsteele@beermannlaw.com
Attorney for Gwendolyn Uljasz-McKemie

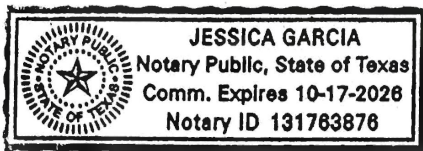
Verification

The undersigned states under oath: "I am the attorney for the movant in the foregoing Motion for Continuance. I have read the motion. The statements contained in paragraphs 1 - 6 in the motion are within my personal knowledge and are true and correct."

RAJ

REBECCA L. ARMSTRONG

SIGNED under oath before me on May 20, 2020.



Notary Public, State of Texas

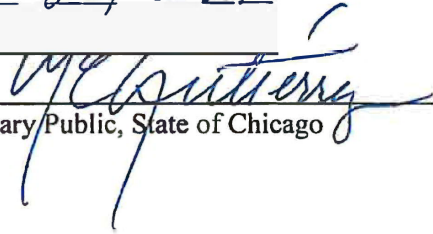
Verification

The undersigned states under oath: "I am the attorney for the movant in the foregoing Motion for Continuance. I have read the motion. The statements contained in paragraphs 1 - 6 in the motion are within my personal knowledge and are true and correct."



JONATHAN DRAKE STEELE

SIGNED under oath before me on May 20, 2026.



Notary Public, State of Chicago

Certificate of Conference


I certify that a reasonable effort has been made to resolve the issues addressed in this motion without the necessity of court intervention and opposing counsel is not opposed to the reset of final trial.



REBECCA L. ARMSTRONG
Attorney for Petitioner

Certificate of Service

I certify that a true copy of this Motion for Continuance was served in accordance with rule 21a of the Texas Rules of Civil Procedure on the following on May 20, 2026:

Jason McKemie by electronic filing manager. 

REBECCA L. ARMSTRONG
Attorney for Petitioner

From: [Jason McKemie](#)
To: [Terra Aguirre](#)
Cc: [rgutierrez@beermannlaw.com](#); [Jonathan Steele](#); [saboucher@beermannlaw.com](#); [Lauren Shaw](#); [Rebecca Armstrong](#); [jason@callvital.com](#)
Subject: Re: IRMO: Gwendolyn Ulijasz-McKemie vs. Jason McKemie; Cause #DF-24-18010
Date: Tuesday, May 19, 2026 2:06:07 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image005.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)

Ms. Aguirre,

The Court did not provide multiple hearing dates. May 21st was the only available setting offered within the next approximately two weeks, and the matters noticed are emergency matters involving healthcare access, preservation issues, trial readiness, and ongoing harm.

I am not agreeing to reset, cancel, or remove the May 21st hearing. Unfortunately, emergencies do not come with the ability to pre-schedule around everyone's availability. Making it to the May 21st setting is already difficult enough under the present circumstances, and these issues are not ones which can wait for another setting.

For clarity, I am willing to confer regarding reasonable logistics and procedural matters. I am not agreeing that the emergency hearing should be reset because counsel is unavailable.

I intend to appear on the currently scheduled date and time unless otherwise directed by the Court.

Best Regards,



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

From: Terra Aguirre <terra@armstronglawtexas.com>
Date: Tuesday, May 19, 2026 at 1:38 PM
To: Jason McKemie <jmckemie@mckemie.net>
Cc: "rgutierrez@beermannlaw.com" <rgutierrez@beermannlaw.com>, Jonathan Steele <JSteele@beermannlaw.com>, "saboucher@beermannlaw.com" <saboucher@beermannlaw.com>, Lauren Shaw <lauren@armstronglawtexas.com>, Rebecca Armstrong <rebecca@armstronglawtexas.com>, "jason@callvital.com" <jason@callvital.com>
Subject: RE: IRMO: Gwendolyn Ulijasz-McKemie vs. Jason McKemie; Cause #DF-24-18010

Hi Jason,

We were not conferred with prior to you setting this hearing on May 21st. The attorneys are not available on this date. Did the Court provide you with multiple hearing dates to set your motion? We will need to discuss those dates with you and reset this hearing for a date that both sides are available. Please let us know.

Thank you,

Terra Aguirre

Paralegal, TBLS-BCP | Armstrong Divorce & Family Law
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From: Jason McKemie <jmckemie@mckemie.net>
Sent: Monday, May 18, 2026 12:51 AM
To: Terra Aguirre <terra@armstronglawtexas.com>
Cc: rgutierrez@beermannlaw.com; Jonathan Steele <JSteele@beermannlaw.com>; saboucher@beermannlaw.com; Lauren Shaw <lauren@armstronglawtexas.com>; Rebecca Armstrong <rebecca@armstronglawtexas.com>; jason@callvital.com
Subject: Re: IRMO: Gwendolyn Uljasz-McKemie vs. Jason McKemie; Cause #DF-24-18010

Ms. Aguirre,

My apologies for the delayed response. I am only now seeing your email due to the significant disruption caused by the April 16 unauthorized-entry/property-removal/theft/destruction event and the resulting loss of files, hard drives, storage media, printers and office systems, litigation materials, computer, and related infrastructure used for trial preparation and case management.

I also want to acknowledge that receiving direct outreach regarding coordination or hearing logistics was unexpected and not something I would have anticipated needing to monitor for. That has not been my experience with prior counsel during these proceedings, so I did not expect there to be a response request awaiting me.

To clarify, I did not present the ***Motion for Written Discovery Rulings, Subpoena Leave, Evidence Preservation, and Immediate Hearing*** during the May 12 proceeding. My understanding was that the hearing was limited to the pro hac vice admission issue, and I proceeded accordingly.

I did, however, raise that broader emergency stabilization, discovery, preservation, healthcare, and trial-readiness issues remained pending before the Court in connection with my objection to the requested admission.

I also subsequently filed notice regarding the **Thursday, May 21, 2026, hearing currently set for 1:30 p.m.**, which was served through eFile/eService on Friday.

The pending motions and related filings include unresolved matters involving:

1. Emergency stabilization and interim financial relief
2. Healthcare / medication / HSA-FSA enforcement and restoration
3. April 16 evidence theft, property return, and preservation issues
4. Source-record financial discovery and verification
5. Trial-readiness, continuance, and unresolved procedural matters reflected in the pending motions

The foregoing is not intended as a complete statement of all issues arising from the April 16 event

or other pending matters, many of which remain subject to ongoing preservation, stabilization, healthcare, evidentiary, and procedural concerns requiring further Court involvement. I intend to appear and address the matters properly noticed for hearing.

Separately, I would like to ask for your assistance regarding a recurring issue. Ms. Ulijasz has been repeatedly instructed not to contact my family members directly or indirectly. This boundary has been communicated multiple times, via text, email, court filings, and through former counsel; with explicit instructions that **any property intended for return must be mailed directly to me at my Commerce Street address.**

Despite those repeated instructions, Ms. Ulijasz continues violating this request, including through a recent third-party mailing containing items taken from the residence on April 16th rather than returning those items directly to me as previously requested. Those mailings have also included unwanted personal notes and correspondence directed to my elderly parents, who have already been significantly affected by Petitioner's conduct during these proceedings and (as previously communicated) desire no further contact from her.

My family does not wish to receive communications, property, correspondence, or indirect outreach from Ms. Ulijasz. Given the significant financial and emotional harm already caused during these proceedings, these repeated contacts are distressing, unwelcome, and need to stop immediately.

Consistent with my prior requests, any property, documents, photographs, or materials intended for return should be mailed directly to me at:

Jason McKemie
539 W. Commerce St., #2010
Dallas, TX 75208

...and not to any member of my family.

There should be no further communication with my family, directly or indirectly, from Ms. Ulijasz or through third parties.

Please confirm that this instruction and no-contact request will once again be communicated clearly, directly, and without ambiguity to Ms. Ulijasz.

For the record, I have always been and remain willing to confer regarding reasonable logistical and procedural matters that may avoid unnecessary motion practice, hearings, or emergency escalation.

Best Regards,



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

From: Terra Aguirre <terra@armstronglawtexas.com>
Date: Tuesday, March 24, 2026 at 4:50 PM
To: "jason@callvital.com" <jason@callvital.com>, Jason McKemie <jmckemie@mckemie.net>
Cc: "rgutierrez@beermannlaw.com" <rgutierrez@beermannlaw.com>, Jonathan Steele <JSteele@beermannlaw.com>, "saboucher@beermannlaw.com" <saboucher@beermannlaw.com>, Lauren Shaw <lauren@armstronglawtexas.com>, Rebecca Armstrong <rebecca@armstronglawtexas.com>
Subject: IRMO: Gwendolyn Ulijasz-McKemie vs. Jason McKemie; Cause #DF-24-18010

Good afternoon,

Please find attached the following documents that have been filed with the Court in the above-mentioned matter:

1. Sworn Motion of Jonathan Steele to Appear Pro Hac Vice;
2. Rebecca Armstrong's Motion in Support of Pro Hac Vice;
3. Proposed Order Granting Pro Hac Vice; and
4. Correspondence regarding the Proposed Order.

Thank you,

Terra Aguirre

Paralegal, TBLS-BCP | Armstrong Divorce & Family Law

Board Certified Paralegal - Family Law

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Terra Aguirre on behalf of Rebecca Armstrong
Bar No. 24062589
terra@armstronglawtexas.com
Envelope ID: 115138354
Filing Code Description: Motion - Continuance
Filing Description:
Status as of 5/20/2026 2:06 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
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