

**CAUSE NO. DF-24-18010**

IN THE MATTER OF THE MARRIAGE OF

GWENDOLYN ULIJASZ-MCKEMIE

AND

JASON MCKEMIE

IN THE 302ND JUDICIAL DISTRICT COURT

DALLAS COUNTY, TEXAS

**Petitioner's Motion in Limine Regarding Audio and Video Recordings**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Petitioner, Gwen Uljasz ("Petitioner"), appearing pro se, and files this Motion in Limine Regarding Audio and Video Recordings, and respectfully shows the Court as follows:

**1. Purpose of Motion**

Petitioner files this Motion in Limine for the limited and procedural purpose of ensuring an orderly, efficient, and fair trial. This motion is not intended to exclude evidence categorically, but to require that any audio or video recordings be properly disclosed, authenticated, and ruled upon before being referenced or played in court.

**2. Recordings at Issue**

Petitioner anticipates that Respondent may attempt to reference or play audio or video recordings purportedly involving Petitioner. Some recordings may have been made without Petitioner's knowledge or consent, may be selectively edited, or may not have been previously disclosed in discovery. Such recordings have been brought forward to the court by the Respondent in past hearings.

**3. Need for Advance Ruling**

Audio and video recordings are inherently prejudicial, time-consuming, and disruptive if introduced without advance notice or foundation. Allowing surprise playback risks derailing the proceedings and impairing the Court's ability to manage the trial efficiently.

**4. Requested Relief**

Petitioner respectfully requests that the Court enter an order that:

A. Respondent shall not reference, describe, or play any audio or video recordings involving Petitioner unless and until such recordings were:

- i. Marked as exhibits by the deadline passed (2/17/2026);
- ii. Properly disclosed;
- iii. Authenticated; and
- iv. Specifically ruled admissible by the Court.

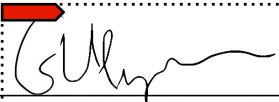
B. Any request to introduce such recordings shall be addressed outside the flow of testimony, at the Court's discretion.

5. No Prejudgment Requested

Petitioner does not ask the Court to determine the admissibility, legality, or weight of any recordings at this time, only to require that standard evidentiary procedures be followed before any such material is presented.

WHEREFORE, PREMISES CONSIDERED, Petitioner respectfully prays that the Court grant this Motion in Limine and for such other and further relief, at law or in equity, to which Petitioner may be justly entitled.

Respectfully submitted,



A handwritten signature in black ink, enclosed in a dashed rectangular box. A red arrow points to the top left corner of the box. Below the signature is a horizontal line.

Gwen Ulijasz

Petitioner; Pro Se

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