

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
REQUESTS FOR PRODUCTION

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 Requests for Production.

Respectfully submitted,

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/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 Requests for Production (incorrectly titled “Petitioner’s First Requests for Production”) 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 production to each reasonable request subject to and without waiving any additional objections.

REQUESTS

1. All bank statements for any personal or joint checking, savings, or investment accounts.

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, see Exhibit A.

2. All paystubs, earnings statements, or compensation records from any employer, including but not limited to Accenture, for the period referenced above.

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, see Exhibit A.

3. All documentation relating to stock option grants, restricted stock units (RSUs), or VEIP/bonus equity programs.

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, see Exhibit A.

4. All documents related to any financial or cash support received from Respondent's sister or other family members, including any 'loan agreements.'

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, see Exhibit A.

5. All communications between Respondent and her sister referring to or discussing the parties' divorce, court proceedings, financial support, loans, or testimony.

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, see Exhibit A.

6. Any documents relating to real property leased or owned by Respondent, including lease agreements for any residence in San Antonio.

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, see Exhibit A.

7. All medical records, letters, or invoices Respondent intends to rely upon to establish financial hardship or medical issues as part of her defense or claims.

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, see Exhibit A.

8. All documents related to any FMLA claims, short-term disability, or leave of absence from Accenture.

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 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 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, see no documents were identified, after a diligent search, that are responsive to the request.

9. All communications with Accenture or any third party employer regarding Respondent’s employment status, accommodations, complaints, or investigations.

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, see Exhibit A.

10. Any documentation supporting Respondent’s claim that she contributed funds to community or joint expenses.

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, see Exhibit A.

11. All communications or notes discussing Jason McKemie, including journal entries or messages shared with third parties about Petitioner's character, conduct, or behavior.

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, see Exhibit A.

12. All documents Respondent intends to use in any hearing or trial on the merits of 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).

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 to the foregoing request to the extent that it purports to require Petitioner to marshal all of her available proof that Petitioner intends to offer at trial.

ANSWER: Subject to and without waiving the foregoing objections, see Exhibit A.

13. All photographs, screenshots, social media messages, or electronic records related to the parties' relationship or Respondent's statements about Petitioner.

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, see Exhibit A.

14. All audio or video recordings made by Respondent relating to Petitioner.

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, see Exhibit A.

15. All credit card statements for any account held solely or jointly by Respondent during the period described above.

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, see Exhibit A.