

**NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA**

**DF-24-18010**

NO. \_\_\_\_\_

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<b>IN THE MATTER OF</b>	<b>§</b>	<b>IN THE DISTRICT COURT THE</b>
<b>MARRIAGE OF</b>	<b>§</b>	
	<b>§</b>	
<b>GWENDOLYN ULIJASZ-MCKEMIE</b>	<b>§</b>	<b>_____ 254<sup>th</sup> JUDICIAL DISTRICT</b>
<b>&amp;</b>	<b>§</b>	
<b>JASON MCKEMIE</b>	<b>§</b>	<b>DALLAS COUNTY, TEXAS</b>

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**EMERGENCY NOTICE OF COUNSEL MISCONDUCT, PRIOR COMMUNICATIONS,  
AND DEMAND FOR IMMEDIATE COURT REVIEW**

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**TO THE HONORABLE JUDGE OF SAID COURT:**

Petitioner, **Jason McKemie**, respectfully files this Emergency Notice to bring to the Court's attention a pattern of willful silence, discovery obstruction, and procedural sabotage by Respondent's counsel. These actions, or deliberate inactions, are causing **irreparable harm** in the final days before trial and must be addressed without delay.

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**I. IMMEDIATE RISK OF IRREPARABLE HARM**

Petitioner is scheduled to be **evicted from his residence within the next several days** and remains medically compromised following hospitalization and ongoing infection from cellulitis. He is without access to a healthcare HSA card, without critical medication, and without adequate legal resources. All of this was communicated to Respondent's counsel **in multiple emails** dating back to **May 2025**.

To date, **no response has been received** – not even an acknowledgment.

This silence is not neglect. It is part of a broader **strategy of attrition and obstruction**, designed to prevent Petitioner from defending himself at trial and to maintain the advantage of concealed financial documents, false testimony, and one-sided control of community funds.

**Petitioner additionally requests that this filing be reviewed on an emergency basis.** The continued obstruction has already resulted in Petitioner being unable to fill a prescribed antibiotic following hospitalization for cellulitis. This occurred after Respondent deactivated the healthcare HSA card used to pay for the first prescription. Petitioner now faces eviction,

untreated infection, and no viable means to present his case at trial. Judicial action is urgently required.

## II. TIMELINE OF MATERIAL COMMUNICATIONS IGNORED

- **May 2025:** Emails sent to Ethan Scroggins and William Cook detailing medical crisis, HSA cancellation, Gwen’s prior abuse, and discovery obstruction.
- **June 2025:** Updated disclosures and pending emergency motions shared with no reply.
- **July 2025 (ongoing):** Multiple formal emails notifying counsel of perjury by Gwen Ulijasz McKemie and Pamela Woodman, including attached video and sworn exhibits.
- **July 14-17, 2025:** Emails sent with subject lines referencing trial sanctions, criminal referral, and financial concealment. No response received.
- **July 17, 2025 (today):** Petitioner confirms still no reply or appearance.

These communications contain **direct legal implications** – including the falsification of police testimony, abuse of court orders, and knowingly false financial disclosures. Respondent’s counsel is choosing silence to evade responsibility.

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## III. PROCEDURAL ABUSE, ETHICS VIOLATIONS, AND COLLUSION RISK

Respondent’s counsel cannot claim ignorance. They were **personally copied** on all material emails and filings, which are available in the court record and will be provided as formal exhibits. By remaining silent, they are:

- Violating their duty to confer in good faith per **Tex. R. Civ. P. 191.2**
- Concealing known perjury, which may trigger **Tex. Disciplinary Rule 3.03(a)(5)** (Failure to disclose known fraud upon a tribunal)
- Attempting to induce default or hardship-based dismissal through procedural attrition
- Denying Petitioner basic access to justice, and violating the spirit of **Tex. Fam. Code §6.502**

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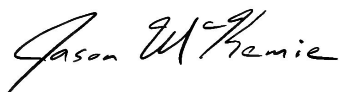
## IV. RELIEF REQUESTED

Petitioner urgently and respectfully requests the following:

1. **That the Court take judicial notice** of opposing counsel's documented failure to respond to material communications between May and July 2025.
2. **That the Court order Respondent's counsel to appear** in person and provide immediate explanation for their silence and failure to comply with discovery and ethical duties.
3. **That the Court grant the following emergency relief:**
  - **Continuance of trial** until pending sanctions and discovery issues are adjudicated.
  - **Immediate freeze of eviction enforcement** until due process is assured and Petitioner's financial status is reviewed.
  - **HSA Benefits Card Access Restored**
    - **Enforce Standing and Temporary Orders** by compelling Respondent to provide Petitioner with the **shared HAS Card credentials** within 24 hours of this Order. If Respondent fails to do so, Petitioner requests an **automatic \$5,000 sanction**, with an additional **\$500 daily penalty** for each day of noncompliance thereafter.
    - Respondent shall also immediately initiate the order of a replacement HSA card to Petitioner's designated mailing address at **physicaladdress.com**, to be received no later than **21 calendar days** from the date of this Order. If Respondent fails to do so, Petitioner requests an **automatic \$5,000 sanction**, with an additional **\$500 daily penalty** for each day of noncompliance thereafter.
    - Respondent shall ensure that sufficient funds remain available on the HSA card to cover Petitioner's emergency medical needs.

Petitioner further reserves the right to seek monetary sanctions, bar referral, and evidentiary exclusion if Respondent's counsel continues this obstructive conduct.

Respectfully submitted,



**Jason McKemie**

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**VERIFICATION**

I, Jason McKemie, declare under penalty of perjury that the facts stated in this Notice are true and correct to the best of my knowledge.

**Signed:** Jason McKemie

**Date:** July 17, 2025

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AND DEMAND FOR IMMEDIATE COURT REVIEW**

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**PROPOSED ORDER**

On this day, the Court considered Petitioner’s Emergency Notice of Counsel Misconduct, Prior Communications, and Demand for Immediate Court Review.

IT IS ORDERED that opposing counsel for Respondent appear before this Court on an emergency basis to address the issues raised herein.

IT IS FURTHER ORDERED that:

- Trial is **continued** pending resolution of discovery and misconduct issues;
- Enforcement of any eviction order is **temporarily stayed**;
- Respondent shall immediately restore Petitioner’s access to community medical funds including the HSA card, or provide alternative emergency relief.

**SIGNED** this \_\_\_\_\_ day of **JULY, 2025**.

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JUDGE PRESIDING

254th District Court, Dallas County, Texas

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Status as of 7/21/2025 9:56 AM CST

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