

NO. **DF-24-18010**

NOTICE: CONTAINS SENSITIVE CONTENT

IN THE MATTER OF
THE MARRIAGE OF

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IN THE DISTRICT COURT

GWENDOLYN ULIJASZ-MCKEMIE
&
JASON MCKEMIE

302nd JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

PROPOSED ORDER GRANTING LEAVE TO SERVE SUBPOENAS

ON THIS DAY, the Court considered Respondent Jason McKemie's *Motion for Leave to Serve Subpoenas Duces Tecum Outside the Discovery Period* pursuant to **Texas Rule of Civil Procedure 205.3**.

After reviewing the motion and the record, the Court finds that:

1. Material disputes exist regarding whether **lease buyout payments, rent payments, or lease-termination payments** were made in connection with the property located at **5609 La Foy Blvd, Dallas, Texas**;
2. Records necessary to resolve these disputes are **not within Respondent's possession** and are maintained by third-party financial institutions and entities;
3. Good cause exists to permit **narrowly tailored third-party subpoenas** outside the discovery period to ensure a complete and accurate record and to prevent potential double recovery.

IT IS THEREFORE ORDERED THAT:

1. Respondent Jason McKemie is **GRANTED LEAVE** to serve Subpoenas Duces Tecum pursuant to Texas Rule of Civil Procedure 205.3 on the following entities:
 - **JPMorgan Chase Bank, N.A.**
 - **American Express National Bank**
 - **Wells Fargo Bank, N.A.**
2. The subpoenas shall be **strictly limited in scope** to records sufficient to determine:
 - Whether lease buyout payments, rent payments, or lease-termination payments were made;
 - The **amount, timing, source, and method** of any such payments;
 - Whether such payments involved **undisclosed or unproduced accounts**.

3. The authorized subpoenas shall be **time-limited** to the period **December 16, 2024 through the present**.
4. Where a responsive payment is identified, the subpoenaed entity may be required to produce **complete monthly account statements only as conditionally specified** in the subpoena, sufficient to verify the source, characterization, and context of the transaction.
5. The subpoenas shall **not** require production of general financial records unrelated to the above-referenced property or issues.
6. Production shall be made directly to **Respondent Jason McKemie** within the time frames specified in the subpoenas.

SIGNED on this ____ day of _____, 2025.

PRESIDING JUDGE

302nd Judicial District Court
Dallas County, Texas