

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. **DF-24-18010**

NOTICE: DOCUMENT CONTAINS SENSITIVE INFORMATION.

IN THE MATTER OF
MARRIAGE OF

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GWENDOLYN ULIJASZ-MCKEMIE
&
JASON MCKEMIE

§

§

§

IN THE DISTRICT COURT THE

302nd JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

(PROPOSED)

ORDER ON MOTION TO COMPEL

FULL & COMPLETE PRODUCTION MAP, AUTHORIZATIONS, &
SUBPOENAS AUTHORITY SUBJECT TO PRODUCTION DEFICIENCIES

IT IS HEREBY ORDERED THAT:

1. PRODUCTION MAP (Due Saturday, January 10TH, 2026 at Midnight)
 - **By Saturday, January 10th, 2026, at Midnight**, Petitioner shall produce a **full and complete Production Map** identifying **every financial account, payment platform, custodial account, equity or benefits platform, employer compensation plan, and stored-value account** in which Petitioner **has or had**, at any time from **August 1, 2023 to present**, any **ownership interest, signatory authority, control, access, or beneficial interest, without limitation and regardless of characterization**, including but not limited to **individual, joint, separate property, community property, inactive, closed, renamed, reissued, renumbered, or third-party-held accounts**.
 - The Production Map shall include, at minimum, for **each** account or plan:
 - Institution or platform name;
 - Account or plan type (including but not limited to **bank, brokerage, credit, Zelle, Venmo, Cash App, PayPal, RSUs, stock, options, equity funds, bonuses, deferred compensation, or benefits accounts**);
 - Account title or owner of record;
 - **Last four digits or other identifying suffix**;

- Open and close dates (if applicable); and
 - **Bates range and date range** of documents produced for each account or plan.
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2. EMPLOYER COMPENSATION (EXPRESSLY INCLUDED)

- The Production Map shall **expressly include all employer-based compensation**, whether from **current or prior employers**, including **RSUs, stock, options, equity funds, incentive or investment programs, deferred compensation, bonuses (paid or unpaid), and benefits accounts**, regardless of vesting status or payment date.
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3. AUTHORIZATIONS WHERE REQUIRED BY CUSTODIAN

- **By Saturday, January 10th, 2026, at Midnight**, Petitioner shall **execute and return any authorization, consent, or release** required by a custodian to produce records responsive to this Order **only where the custodian will not release records based solely on a subpoena or court order**.
 - Petitioner is **not required to independently request records** and is required **only to sign and return** any such authorization **within twenty-four (24) hours of presentment**.
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4. SUBPOENA AUTHORITY UPON INCOMPLETE PRODUCTION

- If production is **incomplete or inconsistent** after the deadlines set forth herein or in the Order on the Motion to Compel, **leave is granted** to issue **subpoenas duces tecum** to **any custodian identified in the Production Map** and any additional custodians revealed by the record, for the period **August 1, 2023 to present**, **without further order of the Court**.
 - **This subpoena authority is granted solely to cure deficiencies in required party production and to obtain custodian records necessary to complete continuity-based financial disclosures**.
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5. CREDIT ACCOUNT CONTINUITY

- For any **credit card or reissued/renumbered account**, custodian subpoenas shall request records sufficient to establish **account continuity**, including underlying account identifiers, associated card numbers with effective dates, open/close or reissue dates, and complete statement histories necessary to reconstruct transactions.
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6. CUSTODIAN DEADLINE

- Unless otherwise ordered by the Court or agreed in writing, **custodian production is due fourteen (14) days after service.**
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7. COMPLIANCE REVIEW

- A compliance review is set for _____ at _____.
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SIGNED this ____ day of JANUARY, 2026.

HONORABLE JUDGE PRESIDING
302ND DISTRICT COURT
DALLAS COUNTY, TX

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Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jason McKemie		jmckemie@mckemie.net	1/8/2026 12:28:46 PM	SENT
Gwendolyn Ulijasz		gulijasz@gmail.com	1/8/2026 12:28:46 PM	SENT
JASON EMORYMCKEMIE		jason@callvital.com	1/8/2026 12:28:46 PM	SENT