

NO. **DF-24-18010**

IN THE MATTER OF	§	IN THE DISTRICT COURT
THE MARRIAGE OF	§	
	§	
GWENDOLYN ULIJASZ-MCKEMIE	§	<u>302</u> ND JUDICIAL DISTRICT
&	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

PROPOSED ORDER ON CONDITIONAL WITHDRAWAL OF COUNSEL, PROTECTIVE OVERSIGHT, AND COMPLIANCE HEARING

On this day the Court considered **Respondent, Jason McKemie’s, Supplemental Objection to Motion to Withdraw of Petitioner’s Counsel** and request for limited relief. Having reviewed the record and the arguments presented, the Court finds good cause to condition withdrawal and to issue limited protective and supervisory directives to preserve the integrity of discovery and prevent further prejudice.

FINDINGS

1. On **September 9, 2025**, the Court directed Petitioner’s counsel to produce missing financial documentation, and counsel acknowledged that directive on the record.
2. Certified, consecutive, institution-issued monthly statements and native transaction exports have not been produced for the period June 2023 through the present. The production to date is partial, inconsistent, and in many instances unusable for reliable tracing.
3. Respondent, proceeding pro se, has suffered concrete and continuing prejudice from these deficiencies, including loss of access to medical funds, severe credit damage, and inability to prepare for trial.
4. The record establishes that further informal cooperation between Respondent and Petitioner’s counsel would be futile and would risk further prejudice. Court-supervised compliance is therefore necessary.

ORDER

IT IS THEREFORE ORDERED THAT:

1. DISPOSITION OF MOTION TO WITHDRAW

DENIED.

The Motion to Withdraw of Petitioner’s counsel is denied in its entirety.

GRANTED CONDITIONALLY.

If the Court elects to permit withdrawal, it is granted **subject to full compliance** with these conditions:

- a. All court-ordered and previously requested financial disclosures must be produced and certified complete;
- b. A verified production log and sworn certification of completeness must be filed; and
- c. Substitute counsel must enter an appearance, or Petitioner must file a verified pro se declaration with current contact information.

2. COURT-CONTROLLED DISCOVERY PROCESS.

All remaining discovery, production, and verification of financial materials shall proceed directly under Court supervision or through any neutral expert or third-party custodian the Court designates. Respondent shall not be required to confer further with Petitioner or her counsel regarding discovery or production outside formal Court process.

3. PROTECTIVE OVERSIGHT.

Petitioner, her counsel, and their agents are prohibited from initiating direct contact with Respondent outside formal filings and service authorized by the Texas Rules of Civil Procedure. They shall not take any unilateral action—financial, procedural, or communicative—that could prejudice Respondent’s position or obstruct compliance with this Court’s orders.

4. EXPEDITED COMPLIANCE HEARING.

A compliance hearing is set for _____, 2025, at _____ m. to confirm completion of ordered financial production, review any certifications, and determine whether sanctions or other corrective measures are warranted.

5. RESERVATION OF SANCTIONS.

The Court reserves jurisdiction to impose sanctions, award costs and fees, and take any other appropriate action if evidence establishes that discovery obstruction or false representations were intentional or in bad faith

SIGNED this ____ day of _____, 2025.

THE HONORABLE JUDGE PRESIDING
302nd Judicial District Court
Dallas County, Texas

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Status as of 11/10/2025 3:19 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Kim Jones		kjones@sullivancook.com	11/10/2025 3:14:54 PM	SENT
Jeffrey ECook		jcook@sullivancook.com	11/10/2025 3:14:54 PM	SENT
Tiffany Castenada		tcastenada@sullivancook.com	11/10/2025 3:14:54 PM	SENT
William CCook		wcook@sullivancook.com	11/10/2025 3:14:54 PM	SENT
Ethan Scroggins		escroggins@sullivancook.com	11/10/2025 3:14:54 PM	SENT
Chandler Alt		calt@sullivancook.com	11/10/2025 3:14:54 PM	SENT
Jason McKemie		jmckemie@mckemie.net	11/10/2025 3:14:54 PM	SENT
Gwendolyn Uljasz McKemie		GUljasz@gmail.com	11/10/2025 3:14:54 PM	SENT
JASON EMORYMCKEMIE		jason@callvital.com	11/10/2025 3:14:54 PM	SENT