

**DF-24-18010**

Cause No. \_\_\_\_\_

**NOTICE: THIS DOCUMENT  
CONTAINS SENSITIVE DATA**

IN THE MATTER OF  
THE MARRIAGE OF

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§  
§  
§

IN THE DISTRICT COURT

GWENDOLYN ULIJASZ-MCKEMIE

302nd JUDICIAL DISTRICT &

JASON MCKEMIE

DALLAS COUNTY, TEXAS

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## RESPONDENT’S FORMAL OBJECTION TO ANY PURPORTED SEALING OF RECORDS

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Respondent, **Jason McKemie**, files this *Formal Objection to any Purported Sealing of Records* in this matter and gives notice to the Court that **no valid sealing order has been noticed, heard, or entered** on the record with Respondent’s participation.

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**Respondent has never been served with a motion to seal, afforded notice of any request to seal, or provided an opportunity to be heard in related matters.** Respondent has nevertheless discovered an unsigned and unentered document titled **“Order to Seal Court Records” [EXHIBIT Z]** embedded within Petitioner’s discovery materials, despite the absence of any corresponding motion, hearing, findings, or signed order on the docket.

**Respondent objects to any attempt—formal or informal—to treat court records in this matter as sealed.**

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### I. NO NOTICE, NO HEARING, NO FINDINGS — NO SEAL

Under Texas law, sealing court records requires, at minimum:

1. Proper notice to all parties;
2. An opportunity to be heard; and
3. Specific judicial findings establishing a compelling interest that outweighs the presumption of open courts and that the sealing is narrowly tailored.

**None of these prerequisites have occurred during these proceedings.**

An unsigned or unentered proposed order has no legal effect and cannot lawfully restrict Respondent's access to the record or the public's right of access. **Any reliance on such a document violates due process and is procedurally improper.**

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## II. CHRONOLOGICAL TIMELINE OF MEDICAL INCAPACITATION, FINANCIAL DEPRIVATION, AND PROCEDURAL AMBUSH

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### **TUESDAY, DECEMBER 10, 2024 - Respondent Drives Himself to Surgery**

Respondent undergoes emergency invasive spinal surgery following a six-day hospitalization, during which he experienced paralysis from the waist down for approximately two days. Respondent is discharged under physician-directed recovery and requires prescribed rehabilitation equipment and uninterrupted access to healthcare and financial resources.

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### **WEDNESDAY, DECEMBER 11, 2024 – Predicted False Filings & Procedural Abuse**

While recovering from surgery and purchasing medically required rehabilitation equipment, Respondent discovers extensive documentation reflecting Petitioner's prior use of police reports, protective orders, and related civil and criminal filings against former romantic partners and prior employers. Fearing imminent false reports and a fraudulent protective order, Respondent contacts 911, advises that he believes he is being set up, and requests the call be documented for the record.

The 911 operator advises that the matter is not yet a police issue and instructs Respondent to retain counsel immediately. **Respondent retains legal counsel later that same day.**

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### **THURSDAY, DECEMBER 12, 2024 – Access Severed to Counsel & Financial Resources**

At counsel's direction, Respondent transfers \$30,000 into his account solely to cover approximately three months of living expenses in the marital residence while recovering from spinal surgery. Petitioner is notified by text and then texts Respondent to confirm they are legitimate. Respondent confirms their legitimacy.

Despite this confirmation, **Petitioner reports Respondent's legal retainer, the \$30,000 survival transfer, and post-surgical medical and rehabilitation-related expenditures as fraudulent transactions – removing Respondent's access to counsel, and then unilaterally severs Respondent's access to all marital financial resources.**

That same day, Petitioner assures Respondent she will remain "amicable," act with integrity,

allow him to remain in the marital residence, and maintain his healthcare during divorce proceedings, including up to six months post-divorce or until Respondent returns to W-2 employment. Respondent repeatedly states that he does not feel safe and demands immediate reinstatement of his legal retainer and restoration of financial access.

Petitioner simultaneously claims they are in severe financial distress, that they are at risk of bouncing their utility payment, and asserts she has no attorney and cannot begin interviewing attorneys until at least December 17–18, insisting that his retainer not be reinstated until that time so that they can retain counsel jointly.

For approximately four months prior, Petitioner had represented that the parties were experiencing a “short-term cash crunch,” directing Respondent to place increasing household expenses on his personal credit cards. As they would start their day, Petitioner would tell him, “Remember babe, leverage credit & preserve cash right now;” which he would do. Petitioner furthermore instructed Respondent Respondent to buy Christmas gifts for her extended family, assuring him that they would clear the balances and resume paying off all credit cards in full each month as they had always done previously when she receive the first half of a \$300,000 sign-on bonus on November 21, 2024. When November came petitioner, said that the sign on bonus was delayed till December 2024. These actions resulted in Respondent’s personal credit being fully exhausted at the time of Petitioner’s departure.

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### **FRIDAY, DECEMBER 13, 2024 – Legal, Financial, Medical Access Obstruction**

Respondent and Petitioner had planned to go to Petitioner’s families house for Christmas, and proceed forward with an amicable separation; however Petitioner cancelled Respondent’s ticket and informed him he wasn’t going just prior. Respondent stated, he needed his retainer and access to finances restored immediately. Petitioner delayed until late afternoon, and agreed to reinstate it on her way to the airport. By the time it is reinstated, his counsel will be unable to reengage until Monday morning of the following business week.

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### **SATURDAY, DECEMBER 14, 2024 – False Allegations & Contrived Distress**

Petitioner pays a \$10,195 retainer to the Hargrave Law Firm and accelerates legal activity over the weekend. That same day, Petitioner contacts 911 reporting that Respondent attempted suicide, then separately contacts the fire department, friends, and neighbors, initiating a cascade of emergency responses. Police records generated from the incident reflect that Respondent denied any intent to harm himself or others and that no suicide attempt or medical emergency was found. Respondent was emotionally drained and attempting to rest and recover from surgery, and was in bed with Petitioner’s dog which he was very close with. Petitioner went to extreme lengths to get the dog taken from him that night, stating the dog needed to go somewhere else “in case something happened to him.”

**On Monday, Petitioner’s counsel (Donna Tomlinson) files an *Ex Parte Petition for a Protective Order and a Petition for an Annulment of Marriage based on false allegations***, thereby preempting Respondent’s pending divorce filing and procedurally securing petitioner status, despite Respondent having retained counsel first and while Respondent remained medically incapacitated and without functional access to financial or legal resources.

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**PROCEDURAL IMPACT**

Since the inception of these proceedings, civil and criminal filings—combined with extreme financial deprivation, resource denial, and healthcare obstruction—have materially distorted the litigation. Now, as institutional mechanisms are poised to compel production of records that render these events and their impact irrefutable, Petitioner seeks to seal the record. Sealing is not intended to suppress demonstrated contradictions, obstruct judicial review, or shield misconduct from scrutiny.

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**III. SELECTIVE PUBLIC USE OF THE COURTS FORECLOSES SEALING**

**Any request to seal the record is independently barred by Petitioner’s own litigation conduct.**

Petitioner affirmatively invoked the public judicial process by filing a protective order application containing serious allegations against Respondent. Those allegations were placed into the public domain and were foreseeably accessible to third parties, including employers, professional contacts, and members of the community. **The protective order was denied in full on the record.** The Court made no findings supporting Petitioner’s allegations and declined to issue the requested protective relief, instead entering **mutual temporary injunctions** applicable to both parties.

The allegations underlying that public filing were unsupported by corroborating evidence and are directly contradicted by objective materials already in the record. **Respondent has never been charged with, arrested for, or convicted of any violent offense, and no prior history of violent conduct exists.** Twenty-nine sworn character affidavits—attached hereto as Exhibit A—attest to Respondent’s nonviolent character and longstanding reputation for lawful conduct. Contemporaneous video and audio recordings further contradict the material factual assertions advanced in support of the protective order application.

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**The documentary record establishes that on December 11, 2024—before any**

**protective order application was filed—it was Respondent, not Petitioner, who first contacted law enforcement.** On that date, Respondent called 911 after discovering documentation reflecting prior instances of false police reporting, improper protective order filings, and other related litigation measures.

**During that call, Respondent advised that he was about to retain divorce counsel and expressed that he felt that there was a significant probability that Petitioner would respond by initiating false police reports and ultimately seeking a protective order against him. (See Exhibit A) Within 3 days, multiple police contacts were initiated by Petitioner, followed by the filing of the protective order petition 5 days later.** The sequence of events unfolded precisely as predicted in that recorded call.

Moreover, **Petitioner’s description of events on December 12, 2024 differs materially across multiple sources: her sworn protective order petition (Exhibit B), her statements to law enforcement (Exhibit C), and the contemporaneous text message exchanges between the parties (Exhibit D).** These accounts are not merely framed differently—they present inconsistent narratives regarding tone, conduct, and sequence of events.

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**Where credibility is central and the record reflects material inconsistencies across sworn filings, police narratives, and contemporaneous communications, independent third-party verification may be necessary to ensure a complete and accurate record.** To the extent the Court determines that limited third-party subpoena process is warranted, such process would serve the Court’s truth-seeking function by clarifying—not expanding—the factual record.

Having chosen to publish accusations through the Court’s processes, Petitioner may not later seek secrecy merely because objective verification may contradict those allegations. **Adjudication—not concealment—is the proper mechanism for resolving disputed facts.** The possibility that further corroboration could undermine Petitioner’s narrative is not a lawful basis for sealing.

Texas law does not authorize sealing to preserve narrative control, to avoid scrutiny, or to insulate a litigant from the consequences of allegations voluntarily placed into the public record. **Embarrassment, reputational impact, employment consequences, or litigation disadvantage are not legally sufficient grounds to overcome the strong presumption of openness governing judicial records—particularly where sealing would suppress scrutiny of allegations already made public and would impede the record’s ability to correct a false or misleading public narrative.**

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#### **IV. PUBLIC INTEREST, THIRD-PARTY RELIANCE, AND INTEGRITY OF THE JUDICIAL PROCESS**

The issues implicated by sealing in this case extend beyond the private interests of the parties.

Judicial filings asserting allegations of misconduct and safety concerns carry foreseeable consequences for third parties who rely on the accuracy of court records, including employers, family members, and professional contacts. **When a party has used public filings to advance serious allegations, transparency serves an important public interest by ensuring accountability, protecting reliance interests, and preserving confidence in the judicial process.**

Sealing under these circumstances **would risk obscuring conduct that bears directly on the proper use of judicial mechanisms and the integrity of the Court's processes.**

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#### **V. THE EVIDENTIARY RECORD'S ROLE IN ASSESSING CREDIBILITY, CORRECTING SWORN CONTRADICTIONS, AND PRESERVING DUE PROCESS FORECLOSES SEALING**

The Court should further consider that the existing and anticipated evidentiary record in this matter bears directly on the accuracy of sworn testimony, the credibility of allegations affirmatively placed into the public record, and the record's essential corrective and exonerative function. These considerations weigh decisively against any attempt to seal.

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#### **VI. SWORN TESTIMONY REGARDING EMPLOYER SETTLEMENTS AND SUBSEQUENT DOCUMENTARY CONTRADICTION**

At the January 7, 2025 hearing, Petitioner testified under oath in response to direct questioning by Respondent's then-counsel, Brant Webb, regarding whether she had received settlements from prior employers, including AIG and AllianceBernstein, and whether she had sought or received any settlement from Cognizant Technology Solutions. Petitioner was questioned separately and distinctly as to each employer. In each instance, she denied having received a settlement and denied having sought or received a settlement from Cognizant.

Subsequent proceedings and later-produced documents established that this sworn testimony was materially inaccurate. By March 2025, Petitioner had received a settlement in the amount of approximately \$148,000 from Cognizant Technology Solutions. Settlement agreements involving AIG and AllianceBernstein were also introduced into the record, each directly contradicting Petitioner's prior sworn denials.

The existence of multiple settlements—each resolved in connection with employment separation and allegations asserted at the time of departure—is material to credibility. Petitioner’s categorical denial of all such settlements when questioned individually and under oath invites judicial scrutiny. The later disclosure of these agreements, combined with their subsequent characterization and use in financial disclosures, mediation representations, and employment positioning, bears directly on the reliability of sworn testimony and the integrity of representations made to the Court.

Sealing the record under these circumstances would obstruct the Court’s ability to evaluate sworn contradictions and would prevent the record from performing its corrective and exonerative function with respect to allegations previously placed into the public domain.

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## **VII. MEDIATION REPRESENTATIONS AND THE CHARACTERIZATION OF SETTLEMENT PROCEEDS**

The record further reflects that, notwithstanding Petitioner’s sworn denials at hearing, she had in fact been pursuing settlement proceeds from Cognizant Technology Solutions at the time relevant to these proceedings.

During mediation, Petitioner’s counsel represented to Respondent that any Cognizant settlement constituted tort-based recovery, that Respondent was therefore not entitled to any community interest, and that Respondent should abandon the issue. Counsel further represented that, had the proceeds been characterized as compensation, a community claim would exist.

The subsequently produced settlement documentation reflects that the settlement was paid as compensation, rendering the mediation representations materially inaccurate. Community resources were expended in pursuit of that litigation, and the disposition and characterization of those funds have not yet been adjudicated by the Court.

These events are memorialized in the record and remain subject to judicial review. Sealing would improperly insulate these contradictions from examination.

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## **VIII. PUBLIC ALLEGATIONS OF SURVEILLANCE AND SECURITY THREATS CONTRADICTED BY OBJECTIVE EVIDENCE**

Petitioner and her sister also presented sworn allegations asserting the discovery of surveillance devices, concealed monitoring equipment, armed security involvement, and tracking devices at the marital residence and on Petitioner’s vehicle. These allegations were

publicly asserted and carried foreseeable reputational and safety consequences for Respondent.

The evidentiary record now reflects that:

- No surveillance devices were discovered at the marital residence;
- The item identified as a concealed surveillance device was a commercially available household hygrometer, which Petitioner herself identified by name and function in recorded video;
- The alleged vehicle tracking device belonged to Petitioner, as confirmed by her own discovery materials; and
- Video evidence documents the removal and destruction of home security equipment by Petitioner.

The objective evidence contradicting these allegations is already in the record, with additional corroborating evidence anticipated. Where serious allegations are publicly asserted and later contradicted by documentary and video evidence, sealing would impede the Court's ability to assess credibility and would freeze an inaccurate narrative in place.

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## **IX. SEALING IS IMPROPER WHERE THE RECORD BEARS ON CREDIBILITY, ACCOUNTABILITY, AND EXONERATION**

Embarrassment, reputational harm, employment consequences, or strategic disadvantage do not constitute valid grounds for sealing court records, particularly where the record bears directly on the accuracy of sworn testimony and the potential to exonerate a party against whom serious allegations were publicly made.

Having elected to invoke public judicial processes and to place serious accusations into the public record through sworn testimony and public filings, Petitioner may not seek secrecy at the point where documentary and objective evidence contradicts those accusations. Sealing under these circumstances would impede judicial evaluation of credibility, obstruct the corrective function of the record, and undermine due process.

Transparency in this context is not punitive. It is essential to the integrity of the Court's processes, public confidence in judicial proceedings, and the vindication of a party against whom serious allegations were publicly asserted and later contradicted by evidence.

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## X. REQUEST FOR RELIEF

Respondent respectfully requests that the Court:

1. Confirm on the record that **no sealing order is in effect absent a signed order entered after notice and hearing**;
2. **Disregard any purported sealing language** appearing in discovery or attachments that was never properly noticed, heard, or entered;
3. **Require that any future request to seal comply strictly with due process**, including notice, hearing, narrow tailoring, and specific findings; and
4. **Grant such other and further relief to which Respondent may be justly entitled.**

Respectfully Submitted,



### Jason McKemie

539 W. Commerce St., Ste. 2010

Dallas, TX 75208

214-868-490

[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

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## EXHIBITS

- Z**     **Petitioner's Order to Seal Records**
- A**     **Respondent's 911 Call Predicting False Police Reports & the Filing of a Fraudulent Protective Order on December 11, 2024**
- B**     **Petitioner's "PROTECTIVE ORDER" Version of Thursday, Dec 12, 2024**
- C**     **Petitioner's "POLICE REPORT" Version of Thursday, Dec 12, 2024**
- D**     **Respondent and Petitioner's Text Message Exchanges on Thursday, Dec 12, 2024** *(Following Petitioner's Reporting of Respondent's Divorce Retainer as Fraud (12/12/24), Respondent is expressing he does not feel safe, and that he needs his legal retainer reinstated immediately.)*

**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**

**254<sup>TH</sup> JUDICIAL DISTRICT**

**DALLAS COUNTY, TEXAS**

**Order to Seal Court Records**

IT IS ORDERED that all documents bearing Cause No. DF-24-18010 and styled “In the Matter of the Marriage of Gwendolyn Ulijasz-McKemie and Jason McKemie” are sealed, except those documents that are required by law to be recorded in the minutes of the Court. The documents shall not be opened or released except on appropriate court order.

SIGNED on \_\_\_\_\_ **XXXX** \_\_\_\_\_.

**EXHIBIT  
NOT FOR SIGNATURE**

\_\_\_\_\_  
JUDGE PRESIDING

# Incident Detail Report

# EXHIBIT A

Data Source: Data Warehouse  
 Incident Status: Closed  
 Incident number: 24-2241556  
 Case Numbers:  
 Incident Date: 12/11/2024 15:28:23  
 Report Generated: 4/7/2025 14:47:25

**Incident Information**

<b>Incident Type:</b>	1 Man	<b>Alarm Level:</b>	
<b>Priority:</b>	3 - General Service	<b>Problem:</b>	40 - Other
<b>Determinant:</b>		<b>Agency:</b>	Police
<b>Base Response#:</b>		<b>Jurisdiction:</b>	Dallas Police
<b>Confirmation#:</b>		<b>Division:</b>	Northwest
<b>Taken By:</b>	Macias, Rocio	<b>Battalion:</b>	520
<b>Response Area:</b>	523	<b>Response Plan:</b>	CH5 - 1MAN
<b>Disposition:</b>	NP - No Police Action	<b>Command Ch:</b>	
<b>Cancel Reason:</b>	DC-Disregard by Caller	<b>Primary TAC:</b>	
<b>Incident Status:</b>	Closed	<b>Secondary TAC:</b>	
<b>Certification:</b>	P-Patrol	<b>Delay Reason (if any):</b>	
<b>Longitude:</b>	96823481	<b>Latitude:</b>	32830384

**Incident Location**

<b>Location Name:</b>		<b>County:</b>	DALLAS
<b>Address:</b>	5609 La Foy Blvd	<b>Location Type:</b>	
<b>Apartment:</b>		<b>Cross Street:</b>	HOLLAND AVE/W BEVERLY DR
<b>Building:</b>		<b>Map Reference:</b>	34-R
<b>City, State, Zip:</b>	Dallas TX 75209		

**Call Receipt**

<b>Caller Name:</b>	mckemie jason	<b>Call Back Phone:</b>	(214) 868-4901
<b>Method Received:</b>		<b>Caller Location:</b>	
<b>Caller Type:</b>		<b>Caller Location Phone:</b>	
<b>Caller Address:</b>		<b>Caller Apartment:</b>	
<b>Caller Building:</b>	3096	<b>Caller County:</b>	
<b>Caller City, State, Zip:</b>			

**Time Stamps**

Description	Date	Time	User	Elapsed Times Description	Time
Phone Pickup	12/11/2024	15:28:22			
1st Key Stroke	12/11/2024	15:28:22		Received to In Queue	00:07:14
In Waiting Queue	12/11/2024	15:35:37		Call Taking	00:07:15
Call Taking Complete	12/11/2024	15:35:38	Macias, Rocio	In Queue to 1st Assign	
1st Unit Assigned				Call Received to 1st Assign	
1st Unit Enroute				Assigned to 1st Enroute	
1st Unit Arrived				Enroute to 1st Arrived	
Closed	12/11/2024	17:30:18	Saenz, Luis C	Incident Duration	02:01:56

**Resources Assigned**

No Resources Assigned

**Personnel Assigned**

No Personnel Assigned

**Caution Notes**

No Caution Notes found

**Permits**

Permit Number	Address	Premise Name	Type	Status	Start and End Dates	Comments
670355	5609 La Foy Blvd		RESIDENTIAL	Active	05/03/2019 to 05/03/2020	
1202330	5609 La Foy Blvd		RESIDENTIAL	Closed	08/02/2023 to 08/02/2024	
1127190	5609 La Foy Blvd		RESIDENTIAL	Closed	10/21/2008 to 10/31/2009	

**Pre-Scheduled Information**

No Pre-Scheduled Information

**Transports**

No Transports Information

Transport Legs  
No Transports Information

Comments Date	Time	User	Type	Conf.
12/11/2024	15:35:38	[REDACTED]	Response	
12/11/2024	17:10:20	[REDACTED]	Response	
12/11/2024	17:14:52	[REDACTED]	Response	

**Comments**  
 [1] caller thinks is being set up by wife , findind info on lawsuits in wifes document , (gwendolyn uljasz mckemie ) she is nal ,is on busn trip traveling ..  
 [2] REV BY SPVR LEE...  
 [3] RTC: when calling comp adv not police matter comp said was talking to an attorney already 214 868 4901

Address Changes  
No Address Changes

Priority Changes  
No Priority Changes

Alarm Level Changes  
No Alarm Level Changes

Activity Log

Date	Time	Radio	Activity	Location	Log Entry	User
12/11/2024	15:33:07		Problem Nature		Incident problem nature changed from <Blank> to 40 - Other~P	[REDACTED]
12/11/2024	15:35:38		ANI/ALI Statistics		INT Insert:Dec 11 2024 15:28:22 / INT SendNP:Dec 11 2024 15:28:22 / WS RecvNP:Dec 11 2024 15:28:22 / WS Process:Dec 11 2024 15:35:38	[REDACTED]
12/11/2024	15:35:38		Read Comment	5609 La Foy Blvd	Comment for incident 937 was marked as read.	[REDACTED]
12/11/2024	16:11:36		Read Incident		Incident 937 was Marked as Read.	[REDACTED]
12/11/2024	16:11:36		Read Comment		Comment for Incident 937 was Marked as Read.	[REDACTED]
12/11/2024	16:18:53		UserAction		User clicked Exit/Save	[REDACTED]
12/11/2024	17:10:20		Read Comment	5609 La Foy Blvd	Comment for Incident 937 was marked as read.	[REDACTED]
12/11/2024	17:10:37		Read Comment		Comment for Incident 937 was Marked as Read.	[REDACTED]
12/11/2024	17:11:02		UserAction		User clicked Exit/Save	[REDACTED]
12/11/2024	17:12:23		UserAction		User clicked Exit/Save	[REDACTED]
12/11/2024	17:14:52		Request to Cancel	5609 La Foy Blvd	RTC: when calling comp adv not police matter comp said was talking to an attorney already 214 868 4901	[REDACTED]
12/11/2024	17:14:52		Read Comment	5609 La Foy Blvd	Comment for Incident 937 was marked as read.	[REDACTED]
12/11/2024	17:14:53		UserAction		User clicked Exit/Save	[REDACTED]
12/11/2024	17:19:31		Read Comment		Comment for Incident 937 was Marked as Read.	[REDACTED]
12/11/2024	17:19:36		UserAction		User clicked Exit/Save	[REDACTED]
12/11/2024	17:30:13		UserAction		User clicked Cancel	[REDACTED]
12/11/2024	17:30:18		Cancel Response	5609 La Foy Blvd	Cancellation Reason: DC-Disregard by Caller, Response Disposition: NP - No Police Action	[REDACTED]
12/14/2024	22:03:41		UserAction		User clicked Exit/Save	[REDACTED]
12/14/2024	22:29:34		UserAction		User clicked Exit/Save	7210

Edit Log

Date	Time	Field	Changed From	Changed To	Reason	Table	Workstation	User
12/11/2024	15:28:22	Call_Back_Phone		(214) 868-4901	(Response Viewer)	Response_Master_Incident	CAD911CT336	[REDACTED]
12/11/2024	15:28:22	Agency Name		911	(Response Viewer)	Incident	CAD911CT336	[REDACTED]
12/11/2024	15:28:22	Call Back Phone		(214) 868-4901	(Response Viewer)	Incident	CAD911CT336	[REDACTED]
12/11/2024	15:28:23	Longitude	0	96823479	Entry Selected/Returned from GeoLocator	Response_Master_Incident	CAD911CT336	[REDACTED]
12/11/2024	15:28:23	Latitude	0	32830363	Entry Selected/Returned from GeoLocator	Response_Master_Incident	CAD911CT336	[REDACTED]

## **PETITIONER’S “PROTECTIVE ORDER VERSION” OF THURSDAY, DECEMBER 12TH, 2024**

Jason has grown increasingly agitated and aggressive, particularly when I ask him about his drug use and his constant spending. He is having manic episodes, and I cannot reason with him at all.

Jason’s manic behavior includes staying up most nights, active and walking around the house through all hours of the night. During that time, Jason rearranges items on the kitchen countertop, organizes cabinets, and does this over and over again. During this behavior, I am kept awake and unable to sleep. I am unable to stop this behavior without fear of physical reaction from Jason. This is not behavior that any functioning person can live with and maintain their health and a job.

Most recently, Jason’s behavior has now become paranoid as well as threatening. On Thursday night, December 12, 2024, I returned from a business trip and found Jason angry. It felt different than other times in that he seemed to not be in control of himself. I was in my office sitting on the floor with open file medical files, situated between my desk and the filing cabinet toward the back of the room. My dog Katie was behind me in her bed. Unprovoked, he yelled for what I would estimate 35-40 minutes, accusing me of a myriad of things, red in the face, and pacing back and forth, and periodically name calling while he belittled me. Jason had made remarks that led me to believe that he was tracking me and that he had been keeping tabs on me in a way that was not comfortable. I realized I did not have access to the office door and decided to stay quiet and nod until it was over. I was very scared. I wanted to sleep in the office with my door locked but he insisted I go up to our bedroom.

After that episode I made a decision to leave the home. I no longer feel safe in the home, and I am unable to protect myself while he is there. In the morning, he did not approach me until I brought my suitcase downstairs. I went into my office to grab a last item before leaving, and he stood in my office doorway, barring the way out. He immediately became agitated. He started accusing me of irrational things, such as being ungrateful of the time he had spent choosing Christmas gifts. He became increasingly upset and I started to get scared. Like the night before, something felt different and more threatening. I managed to get out of the office. My goal was to get safely out of the house.

1202330 5609 La Foy Blvd

RESIDENTIAClosed

05/03/2020

08/02/2023

to

08/02/2024

1127190 5609 La Foy Blvd

RESIDENTIAClosed

10/21/2008

to

10/31/2009

Pre-Scheduled Information  
No Pre-Scheduled Information

Transports  
No Transports Information

Transport Legs  
No Transports Information

Comments Date	Time	User	Type	Conf.
12/14/2024	22:04:53	[REDACTED]	Response	
12/14/2024	22:04:59	[REDACTED]	Response	
12/14/2024	22:05:25	[REDACTED]	Response	
12/14/2024	22:05:26	[REDACTED]	Response	
12/14/2024	22:07:23	[REDACTED]	Response	
12/14/2024	22:07:27	[REDACTED]	Response	
12/14/2024	22:14:58	EN42	Response	
12/14/2024	22:15:07	EN42	Response	
12/14/2024	22:22:53	[REDACTED]	Response	
12/15/2024	01:19:15	Layton1, Alberto	Response	

**Comments**  
 [1] WELFARE CHECK ON HUSBAND, RP IS WIFE (MCKINNEY, GWENDOLYN), COMP HAS NOT RESPONDING MESSAGES, ANSWERED CALLS, HAS NOT BEEN ACTIVE ON SOCIAL MEDIA. HAS TURNED OFF CAMERAS, CONCERNED DUE TO PREVIOUS SUICIDE ATTEMPT ON THURSDAY  
 [2] Multi-Agency Fire Incident #: 2024352994  
 [3] [Page] Problem changed from \*\*A - Ambulance Request to 44 - Welfare Check by Fire [Shared]  
 [4] RELATIONSHIP AND FINANCIAL ISSUES GOING ON PER RP. POSS TRIGGERING COMPS BEHAVIOR. [Shared]  
 [5] THERE IS A SMALL CHIHUAHUA AT LOC NEIGHBOR WOULD BE GRABBING DOG [Shared]  
 [6] DOOR CODE 445566 [Shared]  
 [7] Male states him and his wife are having a fight. Denies wanting to harm himself or others and states he is fine. [Shared]  
 [8] [Fire] has closed their incident [2024352994]  
 [9] E540 ADV EXPRD P2 [Shared]  
 [10] ro/s spoke with husband who stated he was okay and did not need police. ro/s attempted to contact caller via phone call but did not receive an answer. bwc 12493 [Shared]

Address Changes  
No Address Changes

Priority Changes  
No Priority Changes

Alarm Level Changes  
No Alarm Level Changes

Activity Log

Date	Time	Radio	Activity	Location	Log Entry	User
12/14/2024	22:01:39		Premise History Access		Premise History Viewed	[REDACTED]
12/14/2024	22:04:04		Problem Nature		Incident problem nature changed from <Blank> to 40/01 - Other-P	[REDACTED]
12/14/2024	22:04:53		Incident in Waiting Queue			[REDACTED]
12/14/2024	22:04:53		Waiting Pending Incident Time Warning		Waiting Pending Incident Time Warning timer expired	[REDACTED]
12/14/2024	22:04:53		Read Comment	5609 La Foy Blvd	Comment for Incident 131 was marked as read.	[REDACTED]
12/14/2024	22:04:58		Remove Waiting Pending Incident Warning		Removing Waiting Pending Incident Time Warning timer expired	[REDACTED]
12/14/2024	22:04:59		Incident in Waiting Queue Timer Clear			[REDACTED]

## EXHIBIT D

Ok. Sounds good.

\$82 on eBay ? That was the other o wasn't sure

Dominique's gift

Ok thx. That charge already had gone through, so unlike the attorney retainer and the airline ticket. They said that I could call them back and let them know about that one this afternoon. Thank you.

Sure. If you see anything else, just let me know.

Idk if I should pack for two weeks or not? I think yes ? I guess I'll just do that so long as we are spinning a little and we can talk tomorrow or this weekend. Or if you have a decision already for Christmas you can let me know.

Sorry for all the texts I'll just shut up now.

I just got this

I'm sorry, I don't know how to answer your question. My heart and mind her in two different places.

15 of 23

I understand. Same.

Gwen, I shouldn't have committed to leave the house today. I'm broken. Physically, mentally, and emotionally. My back is in so much pain. I'm really having a tough time. And I've been told not to leave the house as well.

You are more than welcome to come here, shower, change clothes, get a suitcase together, and whatever else you might need. Katie's here and I know she's dying to see you. But my request would be that you could find a hotel for tonight. I'm really hurting and I just need to lay down and be still and try to relax. I'm about to run over to the CVS because my doctor just called me and some more pain meds.

And you're more than welcome to take Katie if you want to. She's missed you a ton. So I know she'd love a night with you. And if you need me to come grab her tomorrow or something like that to watch her whether it's one week or two weeks, that's totally fine too. I love her and I'd take real good care of her. But she's definitely your dog. So it's whatever you want for her.

I'm sure this sucks to hear after traveling all week. But I am absolutely destroyed, and I'm so wrecked mentally and emotionally. I just need to follow instructions right now. Stuart's even driving by here in a little bit check on me.

I hate doing this. But honestly, I don't have the energy, or even really the ability to get in a car and ride somewhere with my back like this. The only reason I'm driving across the street CVS is for those meds.

I hope you have a safe flight and sorry about this

Thu, Dec 12 at 6:27 PM

Ok I understand. I don't know I can manage a hotel  
jason. I have to work tonight and be packed to leave by  
noon. I just honestly don't know I can turn myself

**16 of 23**

around fast enough. I will see what I can do. On the hotel - we really have no money jason. My next paycheck is spoken for. It's all just going on a credit card.

Again let me see what I can do.

Hey, just do what you Gotta do and come here when you gotta come here. It will all work out.

Text Message • SMS

Ok I understand. I don't know I can manage a hotel jason. I have to work tonight and be packed to leave by noon. I just honestly don't know I can turn myself around fast enough. I will see what I can do. On the hotel - we really have no money jason. My next paycheck is spoken for. It's all just going on a credit card.

Again let me see what I can do.

iMessage

I definitely can sleep on the floor in my office. With a hotel - I won't be done prepping work stuff , printing some materials , until late, and I have a 8am meeting. I understand you can't leave.

I'm really truly sorry you are in pain jason. I am. I won't approach you to talk.

That won't be necessary.

Thank you

It will be OK and you don't have to avoid me or anything. It's not like that. I'm not angry. Definitely not vengeful or anything like that. Actually, I'm pretty embarrassed about the whole thing and...

I'm, I'm just really sorry I made your day so fucked

Ok. Well I will give you a lot of space. I don't mind sleeping on the air mattress. I think I know where it is. I assume Stuart has some idea about what's going on ,

**17 of 23**

yes ? Just want to be aware

Found out I can have you on my healthcare through cobra for 6 months. In case.

That's really kind of you. But don't worry about that right now. Just focus on your work, all that shit will work out.

Stuart knows that we're having a tough time

Ok

Thu, Dec 12 at 8:46 PM

I'm just packing for WI up here. Just letting you know. It'll take me another 30-45 mins or so. Then I'll just be working. I'll sleep in my office. It's fine.

Thu, Dec 12 at 11:07 PM

I came upstairs to get my pillow & saw that you had gotten yours.

I'm sleeping on the couch. I already have my CPAP down here and I sleep hard anyway.

Go on up to bed when you're able to wrap up.

Jason ... I'm really concerned about you sleeping on the couch with your back. I'm up at 6:00am and I don't want to wake you. Pls sleep in the bed. But it's up to you.

I'm sure. It's all yours. Might make your morning faster too.

Fri, Dec 13 at 1:01 PM

Send the link and I'll do it in the next 30 mins

**18 of 23**

Thank you Gwen for agreeing to make this payment today. I don't feel safe or even Informed of various options, including those you've suggested.

I want you to know that it really meant a lot to me yesterday when you were so understanding about everything, and told me that if that's what I needed to feel comfortable; that you would immediately make that payment.

I feel lost, hurt, confused, and financially isolated. I sincerely appreciate you making this payment for a retainer. I just want to get some guidance as well as options, and it's my desire to find something that would work for both of us which provides some avenue for us to work together to heal and regain each other's trust. But also want a retainer made. They can provide assistance and guidance in whatever may be needed, for whatever various come.

Once again, I asked for a reduction of retainer and they dropped it from \$5750 down to \$5000

Please list my name on the form so they know it's from me.

LawPay  
secure.lawpay.com



Please send me a screenshot of the receipt when complete

Also have an email on drafting to cover a number of little details that we have in been able to have time to talk about some various other little things that need to be taken care of. I'll try to get out here shortly.

Despite all of this, I do hope you have a good trip. I hope that you're able to get some rest, get caught up with work, spend time with family, etc.

So what's the plan for you early next week, I did that you're going to Madison you were gonna be staying there a week and you were really excited about it but

now you're going on Monday to New York for this gala that Ashlee dumped on you.

and by the way, that's gonna really suck. I know you're really looking forward to spending time with family. So having to ditch family to go do that he's gonna be kind of a bummer.


I was just curious what you're playing was after that. Are you going back to Madison after that are you cutting Madison short going to New York and then come back here?

Ok. I'm just sitting here a minute. Sick. Give me like 2 mins pls.

Ok. Doing now.

1:25 5Gw

Messages



**Payment Receipt** \$5,000.00

<b>Webb Family Law Firm PC</b> 325 North Saint Paul Street Suite 3900 Dallas, Texas 75201 (214) 871-2730	<b>Account Holder</b> Gwendolyn Ulijasz 539 W COMMERCE ST 2010 Dallas, Texas 75208
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**Payment Summary**

<b>Account:</b> IOLTA	<b>Amount</b>	\$5,000.00
<b>Client</b> Jason	<b>Paid:</b>	
<b>Name:</b> McKemie	<b>Payment</b>	AMEX
<b>Statement</b> Gwen	<b>Method:</b>	
<b>Number:</b> Ulijasz	<b>Card</b>	*****5000
	<b>Number:</b>	
	<b>Entry</b>	Manual
	<b>Mode:</b>	
	<b>Auth Code:</b>	240309
	<b>Payment</b>	
	<b>Date:</b>	December 13, 2024 01:25 pm
	<b>Transaction</b>	
	<b>Id:</b>	123576476

😞 I can relate Gwen. I've been destroyed over this, completely devastated.

Hearing that you told your mother that, really felt like a dagger right in the heart. I am deeply sad and quite literally blowing my eyes out right now.

I just wanted to talk to this attorney and see what options there are and get some guidance. And I'm looking for things with a potentially positive outcomes, but I also want to understand all potential outcome so I'm not caught off guard anymore. It's just tearing me apart to hear these things as a surprise.

Again, just thanks for making the payment. I want to be on this appointment.

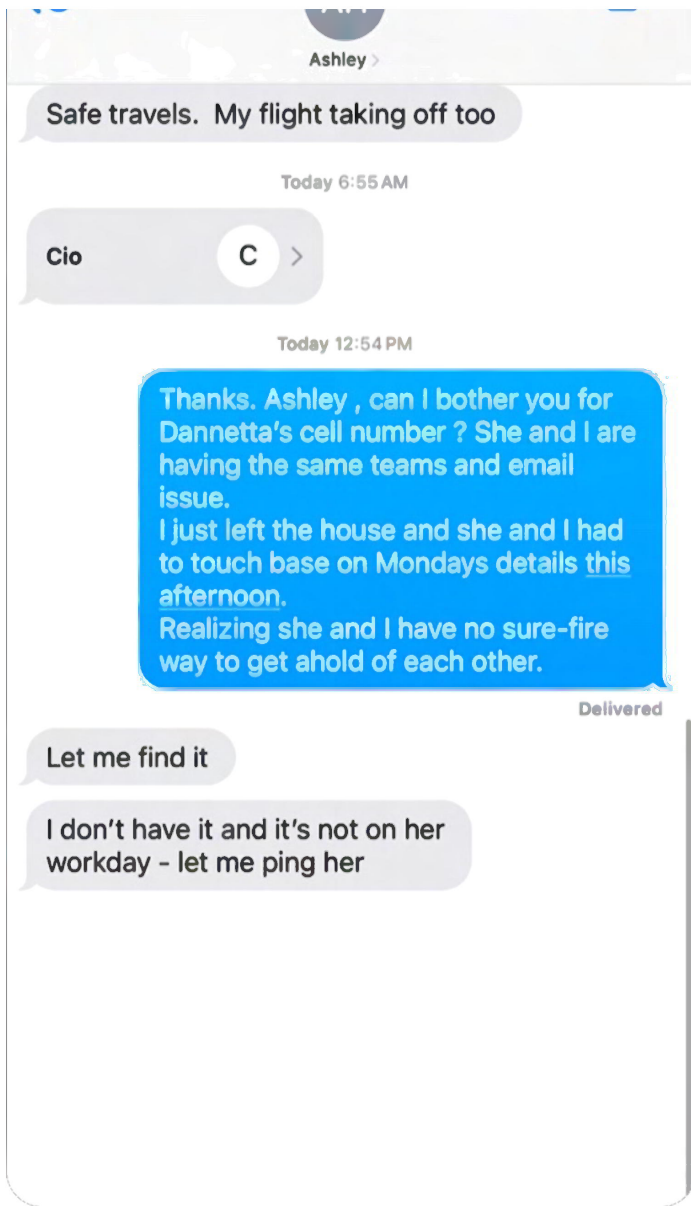
Thank you. Have a good trip.

I just don't think you have any idea how bad this hurts for me right now. How sad it makes me. And how much I freaking miss you.

Anyway, travel safe

I was typing a reply but I actually really feel car sick from that ride. I'm going to check my bag and take a few minutes.

I don't have an attorney. I won't have one until Monday maybe Tuesday. I can't manage my job and find an attorney. Also my work email is fucked bc apparently Accenture has one of their global servers down. It's been for the last day. So yes I need my Mac. Like 20% of the company is affected which is insane that it's still going on.



Here's proof. I freaking have to ask Ashley for people's cell phone numbers.

I understand that and that's fine. We don't have to have one on the same day.

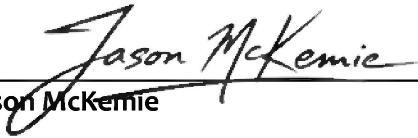
I did find one, and I have had an initial consultation and then a 30 minute discussion.

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## **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this Emergency Motion and all exhibits were served on Petitioner and any counsel of record via e-service/e-filing on **February 17, 2026**.

  
\_\_\_\_\_  
Jason McKemie

### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 111323549

Filing Code Description: Objections - Misc

Filing Description: RESPONDENT'S - TO ANY PURPORTED SEALING OF RECORDS

Status as of 2/17/2026 10:34 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
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