

**DF-24-18010**

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

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<b>IN THE MATTER OF</b>	<b>§</b>	<b>IN THE DISTRICT COURT</b>
<b>THE MARRIAGE OF</b>	<b>§</b>	
	<b>§</b>	
<b>GWENDOLYN ULIJASZ-MCKEMIE</b>	<b>§</b>	<b>301<sup>st</sup> JUDICIAL DISTRICT</b>
<b>&amp;</b>	<b>§</b>	
<b>JASON MCKEMIE</b>	<b>§</b>	<b>DALLAS COUNTY, TEXAS</b>

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**JASON MCKEMIE’S REQUEST FOR DE NOVO HEARING;  
OBJECTIONS TO ASSOCIATE JUDGE’S REPORT;  
REQUEST TO STAY ENTRY AND EFFECT OF REPORT PENDING DE NOVO REVIEW;  
REQUEST FOR EMERGENCY SETTING BEFORE REFERRING COURT;  
AND REQUEST FOR ADEQUATE EVIDENTIARY TIME, COURT REPORTER,  
EXHIBIT ADMISSION, WITNESS TESTIMONY, AND WRITTEN RULINGS**

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

Respondent, **Jason McKemie**, files this Request for **De Novo Hearing** under **Texas Family Code § 201.015** and objects to the Associate Judge’s June 1, 2026, Report.

This request is timely. The hearing occurred on June 1, 2026. Jason received notice of the substance of the Associate Judge’s Report on June 1, 2026, and an e-served copy of the signed/entered report was received through the clerk thereafter. This filing is submitted on **June 4, 2026**, within the third working day under **Texas Family Code § 201.015**.

This is not a motion for reconsideration. This is Jason McKemie’s statutory request for a fresh evidentiary hearing before the referring **District Judge, Hon. Ashley Wysocki**.

**I. REQUEST FOR DE NOVO HEARING**

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Jason McKemie, Respondent, requests a De Novo hearing before the referring District Judge on every adverse, denied, refused, unaddressed, unclear, or implied ruling contained in, arising from, or reflected by the June 1, 2026 Associate Judge’s Report.

The Associate Judge’s Report denied Jason McKemie’s **Motion for Enforcement, Sanctions, Continuance, and Leave to Issue Third-Party Subpoenas** in all respects, while declining to consider the continuance request. That ruling cannot stand without de novo review because the hearing did not reach the merits of the source-record, trial-readiness, healthcare,

evidence-theft, protective-order, and sanctions issues.

## **II. SPECIFIC ISSUES PRESENTED FOR DE NOVO REVIEW**

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Under Texas Family Code § 201.015(b), Jason specifically requests de novo review of the following issues:

1. The denial of Respondent, **Jason McKemie's**, Motion for Enforcement, Sanctions, Continuance, and Leave to Issue Third-Party Subpoenas.
2. The refusal or failure to consider Jason's continuance / abatement request despite the **June 11, 2026**, trial setting and the unresolved source-record, discovery, healthcare, stolen-evidence, and trial-readiness defects.
3. The denial of leave to issue third-party subpoenas for financial source records, including but not limited to bank records, credit-card records, payment-source records, overpayment/refund records, replacement-card/account-lineage records, payroll records, Accenture records, VEIP/equity records, myHoldings records, RSU records, bonus worksheets, tax transcripts, loan-funding records, GLU Distribution LLC records, San Antonio lease/reimbursement records, rent ledgers, QLE/benefits records, HSA/FSA records, healthcare reinstatement records, landlord records, legal-retainer records, third-party contractor records, and vendor/payment records.
4. The denial or failure to grant discovery enforcement, source-record verification, sworn account/month/source-record certification, Rule 191.3 counsel certification review, and compliance mechanisms necessary to reconstruct the marital estate.
5. The denial or failure to grant relief concerning Petitioner's incomplete, non-continuous, non-source-verifiable financial production.
6. The denial or failure to address the fact that Bates ranges, production indexes, screenshots, summaries, redacted statements, annual snapshots, isolated account pages, and counsel affidavits are not substitutes for complete, continuous, institution-origin source records.
7. The denial or failure to address the VEIP / equity / "extra tax withholding" issue, including whether elective equity investment, RSU share withholding, employer match, payroll deductions, taxable RSU events, or deferred/equity compensation were concealed, mislabeled, or treated as tax withholding to distort the marital estate.
8. The denial or failure to address unsupported loan claims, including family-loan claims, LightStream, SoFi, alleged cyber/security/vendor obligations, and any claimed debt

lacking traceable funding, account entry, repayment history, and community-purpose proof.

9. The denial or failure to address sanctions, show-cause relief, adverse inferences, fee shifting against Petitioner and responsible counsel, counsel certification, forensic accounting from third-party financial source records, estate reconstitution under Texas Family Code § 7.009, and disproportionate division under Texas Family Code § 7.001.
10. The denial or failure to enforce healthcare, HSA/FSA, prescription, reimbursement, benefits-card, benefits-portal, QLE, COBRA, and healthcare-reinstatement relief.
11. The denial or failure to address Petitioner's healthcare interference, including blocked benefits access, QLE/benefits issues, HSA/FSA functionality, medical reimbursement control, and administrator access.
12. The denial or failure to address April 16, 2026 evidence theft, stolen hard drives, stolen evidence repositories, stolen devices, stolen litigation files, stolen financial records, stolen trial-preparation materials, stolen medical/legal records, stolen professional records, stolen electronics, stolen music/studio equipment, stolen medication, stolen safes/briefcases, and the resulting chain-of-custody crisis.
13. The denial or failure to order categorical non-access, non-use, and non-benefit relief concerning Jason McKemie's stolen hard drives, evidence repositories, source files, litigation materials, and derivative materials.
14. The denial or failure to order preservation of all external chain-of-custody evidence concerning the April 16 theft, including communications, photographs, videos, inventories, booking records, dispatch records, payment records, location records, storage records, possession records, vendor records, mover records, security records, landlord records, constable-related records, and records identifying where Jason's stolen property went.
15. The denial or failure to order return of Jason McKemie's stolen evidence repositories and stolen property.
16. The denial or failure to address Petitioner's Counter-Motion for Protective Order in full, including the need to deny any protective order that blocks third-party source-record verification.
17. The denial, grant, implied grant, carry-forward, reservation, or failure to reject Petitioner's request for attorney's fees, costs, protective expenses, expert/vendor expenses, discovery expenses, or any cost shifting against Jason McKemie. Jason specifically requests that all such fee/protective-expense/cost-shifting requests by

Petitioner be denied in full, with no later prove-up, no reserved entitlement, and no cost shifting against Jason.

18. The denial or failure to address witness-protection issues involving Christopher McNally and Jonathan Drake Steele.
19. The denial or failure to address trial-readiness defects created by incomplete financial production, blocked source-record subpoenas, missing/stolen evidence repositories, unresolved healthcare access, lack of functional litigation infrastructure, and unresolved witness-protection issues.
20. Any finding, conclusion, recommendation, refusal, or omission that permits the June 11, 2026 trial to proceed before the District Judge conducts de novo review and before source-record verification, stolen-evidence relief, healthcare enforcement, and trial-readiness defects are resolved.
21. Any finding, conclusion, recommendation, refusal, or omission that treats the June 1 hearing as a merits adjudication.
22. Any finding, conclusion, recommendation, refusal, or omission that treats Jason's failure to admit exhibits during the compressed hearing as a merits failure.
23. Any finding, conclusion, recommendation, refusal, or omission that treats Petitioner's production index, Bates range, counsel affidavit, or prior production references as proof of complete financial compliance.
24. Any finding, conclusion, recommendation, refusal, or omission that denies Jason's requested written rulings identifying whether each denial was based on lack of evidence, lack of legal authority, procedural defect, timing, scope, jurisdiction, mootness, prior ruling, or another stated ground.

### **III. WHY DE NOVO REVIEW IS REQUIRED**

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The June 1 hearing did not produce a fair merits record.

Jason was delayed by an accident/travel emergency on the way to court and appeared under compressed conditions. The hearing time was then cut short. Jason was given only a severely limited opportunity to present issues that involve seventeen months of financial concealment, discovery obstruction, source-record nonproduction, healthcare interference, stolen evidence repositories, missing trial materials, third-party subpoena necessity, sanctions, and trial-readiness defects.

Jason did not understand in real time that he needed to call himself as a witness immediately. That issue consumed approximately fifteen minutes of the limited time available. Petitioner's counsel then repeatedly objected "hearsay" when Jason attempted to read or identify prior written positions, sworn statements, court-filed materials, pleadings, production records, and prior representations. Jason was unable to overcome those objections in the compressed setting.

As a result:

1. No meaningful exhibit record was admitted.
2. No Rule 1006 summary chart was admitted and tested.
3. No complete production-gap chart was admitted and tested.
4. No source-record deficiency chart was admitted and tested.
5. No witness testimony was fully developed.
6. No complete offer of proof was made.
7. No merits adjudication occurred on the actual source-record issues.
8. No merits adjudication occurred on the stolen-evidence issues.
9. No merits adjudication occurred on the healthcare/HSA/FSA issues.
- 10.No merits adjudication occurred on the witness-protection issues.
- 11.No merits adjudication occurred on the trial-readiness issues.
- 12.No merits adjudication occurred on the sanctions/counsel-certification issues.
- 13.No merits adjudication occurred on whether Petitioner's protective order seeks protection from improper discovery or protection from verification.

The Associate Judge's denial therefore rests on a procedurally incomplete presentation, not on a full evidentiary determination of the merits.

Texas Family Code § 201.015 exists for this exact reason: the District Judge must conduct a fresh hearing on the specified issues and permit the parties to present witnesses and evidence.

## **IV. THE DISTRICT JUDGE MUST HEAR EVIDENCE, NOT MERELY REVIEW THE REPORT**

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Jason requests a full evidentiary de novo hearing.

At the de novo hearing, Jason requests permission to present:

1. Jason McKemie's sworn testimony;
2. authenticated court-filed pleadings, reports, orders, notices, and prior filings;
3. Petitioner's sworn financial materials;
4. Jonathan Drake Steele's affidavit and fee/protective-expense request;
5. production indexes and Bates logs;
6. Rule 1006 source-record summary charts;
7. missing-statement and account-continuity charts;
8. VEIP/equity/payroll/Accenture compensation records;
9. HSA/FSA/healthcare/QLE/benefits records;
10. April 16 theft and chain-of-custody evidence;
11. records identifying missing/stolen hard drives, devices, litigation records, trial materials, financial records, and evidence repositories;
12. prior notices and motions showing repeated requests for discovery enforcement, subpoena authority, source-record verification, healthcare enforcement, trial abatement, and written rulings;
13. testimony and records concerning trial-readiness collapse;
14. any other evidence necessary to determine the specified issues.

Jason also requests a court reporter, an official verbatim record for the de novo hearing and all related proceedings.

## **V. NO ORDER SHOULD BE ENTERED ON THE ASSOCIATE JUDGE'S REPORT BEFORE DE NOVO REVIEW**

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Jason objects to entry of any order reducing the Associate Judge's Report into an enforceable order before the referring District Judge conducts de novo review.

Jason further objects to any proposed order submitted by Petitioner, Petitioner's counsel, or any person acting for Petitioner that:

1. expands the Associate Judge's Report;
2. adds findings not made at the hearing;
3. converts the denial into a trial-readiness finding;
4. grants or preserves Petitioner's protective order;
5. grants or preserves Petitioner's fees, costs, protective expenses, vendor expenses, expert expenses, or cost-shifting requests;
6. blocks third-party source-record verification;
7. restricts Jason's ability to obtain financial source records;
8. restricts Jason's ability to obtain QLE/benefits/HSA/FSA/healthcare source records;
9. restricts Jason's ability to obtain April 16 chain-of-custody records;
10. allows Petitioner, counsel, experts, vendors, contractors, agents, or anyone acting for her to access, use, inspect, image, copy, review, disclose, rely upon, or benefit from Jason's stolen hard drives, evidence repositories, source files, litigation materials, or derivative materials;
11. permits trial to proceed before de novo review and before the District Judge resolves trial-readiness defects.

## **VI. REQUEST TO CONTINUE OR ABATE JUNE 11, 2026, TRIAL PENDING DE NOVO REVIEW**

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Trial is presently set for **June 11, 2026**.

The District Judge cannot conduct meaningful de novo review after trial has already occurred. The denial of subpoena leave, refusal to consider continuance, failure to decide source-record verification, failure to address stolen evidence, failure to enforce healthcare, and failure to address trial-readiness defects directly affect whether trial can proceed at all.

Jason therefore requests that the Court immediately continue or abate the June 11, 2026 trial setting until:

1. the District Judge conducts the de novo hearing;
2. the Court makes written rulings on each specified issue;
3. third-party source-record subpoenas are authorized and returned;
4. healthcare/HSA/FSA/QLE/benefits issues are enforced;
5. stolen-evidence non-access, non-use, preservation, and return relief is entered;
6. Petitioner's protective-order and fee/protective-expense requests are denied in full;
7. the Court determines whether the marital estate can be reconstructed from complete, continuous, source-verifiable records.

Proceeding to trial before de novo review would convert a compressed, non-merits associate-judge hearing into a final trial advantage for Petitioner.

## **VII. REQUESTED DE NOVO RELIEF**

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Jason McKemie respectfully requests that the District Judge, after de novo hearing:

1. **VACATE, REJECT, OR DECLINE TO ADOPT** the June 1, 2026, Associate Judge's Report to the extent it denies Jason McKemie's requested relief;
2. **SET** this matter for an emergency de novo hearing before the referring District Judge before the June 11, 2026, trial setting, or continue/abate the June 11, 2026, trial setting until de novo review is completed;
3. **ORDER** that no order reducing the Associate Judge's Report shall be signed, entered, enforced, or used as a trial-readiness ruling before de novo review;
4. **GRANT** leave to issue third-party subpoenas and nonparty discovery for financial source records, account-continuity records, payroll/equity records, tax records, loan-funding records, VEIP/myHoldings/RSU records, HSA/FSA/QLE/benefits records, healthcare records, lease/rent/reimbursement records, vendor/payment records, legal-retainer records, and April 16 chain-of-custody records;
5. **MODIFY** discovery deadlines for the limited purpose of third-party source-record verification and related follow-up;

6. **CONTINUE or ABATE** the June 11, 2026, trial setting until the marital estate can be reconstructed from complete, continuous, source-verifiable records;
7. **DENY** Petitioner's Counter-Motion for Protective Order in full to the extent it blocks, restricts, burdens, delays, chills, or prevents source-record verification;
8. **DENY** Petitioner's request for attorney's fees, court costs, protective expenses, expert/vendor expenses, discovery expenses, or any cost shifting against Jason McKemie in full, with no later prove-up, no reserved entitlement, and no cost shifting;
9. **ORDER** Petitioner, Jonathan Drake Steele, Rebecca L. Armstrong, Sullivan & Cook, and any attorney who certified, sponsored, presented, defended, relied upon, or attempted to shield Petitioner's financial production to appear and show cause why sanctions should not issue;
10. **ORDER** sworn Rule 191.3 certification identifying every account, every missing statement month, every incomplete record, every replacement account/card number, every source record reviewed, every non-source record relied upon, and the factual basis for any representation of completeness;
11. **APPOINT** a court-appointed forensic accountant to reconstruct the estate from third-party financial source records and non-stolen financial records only. Nothing in this request permits Petitioner, counsel, experts, vendors, agents, or anyone acting for her to access, inspect, image, copy, use, or benefit from Jason McKemie's stolen hard drives, evidence repositories, source files, litigation materials, or derivative materials;
12. **ORDER** that Petitioner, her counsel, experts, vendors, contractors, movers, security personnel, investigators, consultants, agents, and anyone acting for her shall have no access to, no use of, and no benefit from Jason McKemie's stolen hard drives, evidence repositories, litigation files, digital storage devices, source files, or derivative materials;
13. **ORDER** preservation of all external April 16 chain-of-custody evidence, including communications, photographs, videos, inventories, booking records, dispatch records, payment records, location records, storage records, possession records, mover records, vendor records, security records, landlord records, and records concerning stolen hard drives, devices, GPUs, network storage, music studio equipment, medication, financial records, litigation records, safes, briefcases, and other stolen property;
14. **ORDER** return of Jason McKemie's stolen evidence repositories and stolen property;
15. **ENFORCE** healthcare, HSA/FSA, QLE, benefits, pharmacy, reimbursement, prescription, benefits-card, administrator-access, and healthcare-reinstatement relief;

16. **PRESERVE and SET FOR HEARING** Jason McKemie's requests for fraud-on-the-community findings, fraud-upon-the-Court findings, estate reconstitution under Texas Family Code § 7.009, disproportionate division under Texas Family Code § 7.001, adverse inferences, reimbursement, add-backs, fee shifting against Petitioner and responsible counsel, sanctions, healthcare enforcement, stabilization relief, and April 16 theft remedies;
17. **REQUIRE** written rulings on every item granted, denied, or otherwise decided, identifying whether any denial is based on lack of evidence, lack of legal authority, procedural defect, timing, scope, jurisdiction, mootness, prior ruling, or another stated ground;
18. **GRANT** all other relief to which Jason McKemie is entitled.
19. Jason further requests that the District Judge conduct de novo review of the sanctions, show-cause, counsel-certification, fee-shifting, protective-order abuse, and source-record verification issues to the extent those issues were raised by Petitioner's response, Petitioner's Counter-Motion for Protective Order, Jonathan Drake Steele's affidavit, Jason's reply filed before the June 1, 2026 hearing, the June 1 hearing record, or the Associate Judge's denial, refusal, failure to hear, failure to consider, or failure to rule.
20. Jason further requests that, after de novo review, the District Judge reject, modify, or decline to adopt any portion of the Associate Judge's Report that denies, refuses, omits, or fails to reach Jason's sanctions, show-cause, counsel-certification, source-record verification, protective-order abuse, fee-shifting, healthcare-enforcement, stolen-evidence, and trial-readiness relief; deny Petitioner's Counter-Motion for Protective Order in full to the extent it blocks, restricts, delays, burdens, chills, or prevents third-party source-record verification; deny Petitioner's request for attorney's fees, court costs, protective expenses, expert/vendor expenses, discovery expenses, or any cost shifting against Jason McKemie in full, with no later prove-up, no reserved entitlement, and no cost shifting; order Petitioner, Jonathan Drake Steele, Rebecca L. Armstrong, Sullivan & Cook, and any attorney who certified, sponsored, presented, defended, relied upon, or attempted to shield materially incomplete financial production to appear and show cause why sanctions should not issue; order sworn counsel certification at the account/month/source-record level; authorize third-party source-record subpoenas and limited post-cutoff discovery necessary to test Petitioner's production, sworn financial disclosures, claimed debts, payroll/equity records, healthcare/HSA/FSA/QLE records, lease/rent records, vendor/payment records, and April 16 external chain-of-custody records; set any issue the Court determines was not reached by the Associate Judge's Report for separate emergency

hearing before the June 11, 2026 trial setting; and require written rulings identifying whether each item is granted, denied, deferred for separate setting, or not reached.

21. Jason does not ask the Court to treat this de novo request as a newly filed omnibus sanctions motion. Jason requests de novo review of the sanctions, show-cause, counsel-certification, fee-shifting, protective-order abuse, and source-record verification issues to the extent those issues were already raised by the filings and hearing record before or at the June 1, 2026, hearing. To the extent the Court determines that any sanctions, counsel-certification, witness-protection, healthcare-enforcement, source-record verification, or trial-readiness issue was not reached by the Associate Judge's Report, Jason requests that the Court set those issues for a separate emergency evidentiary hearing before the June 11, 2026 trial setting. Jason does not waive those issues by requesting de novo review.

## **VIII. UNSWORN DECLARATION OF JASON MCKEMIE**

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My name is **Jason McKemie**. My date of birth is **April 8, 1976**. My address is **539 W. Commerce St., Suite 2010, Dallas, Texas 75208**.

I declare under penalty of perjury that the following is true and correct:

1. I appeared at the June 1, 2026, hearing before Associate Judge Stacy Dunlop.
2. I was delayed on the way to court by an accident/travel emergency and appeared under compressed conditions.
3. I notified the Court in advance of the incident and advised that I would be approximately one hour late because I had to complete a tire change following the incident. The clerk told me to proceed to the hearing, and I relied on that instruction.
4. When I realized how little time I was being allotted, I asked whether the incident that day had reduced the time available for my presentation. I was told my time had been reduced from one hour to only forty minutes. I informed the Court that, had I been advised of that reduction in advance, my decision to proceed would have been different and I would have sought another alternative. Once the proceeding had begun, no other meaningful option was provided.
5. The screen on my laptop was damaged while I was en route to the hearing. I did not learn the full extent of the damage until I was already present for the proceeding. The damage materially impaired my ability to display, locate, organize, share, and present the exhibits and evidence I had prepared for the hearing.

6. I was not provided the full amount of time originally allotted to present evidence and argument concerning enforcement, sanctions, continuance, third-party subpoena leave, source-record verification, healthcare enforcement, trial-readiness defects, stolen evidence repositories, and Petitioner's protective-order and fee/protective-expense requests.
7. When I attempted to present evidence concerning written email communications between me and Petitioner's former counsel, Petitioner's counsel repeatedly objected on hearsay grounds, even though I was attempting to identify, authenticate, and present opposing counsel's own written communications and prior representations. I did not understand in real time that I needed to immediately call myself as a witness to lay the foundation for those materials, and that issue consumed approximately fifteen minutes of the limited time available.
8. Petitioner's counsel repeatedly objected "hearsay" when I attempted to read, identify, or present prior written positions, sworn statements, court-filed materials, pleadings, records, email communications, and prior representations relevant to the issues noticed for hearing.
9. Because of the compressed time, the damaged laptop screen, the inability to display digitally prepared materials, and repeated objections, I was unable to admit the exhibits necessary to prove the source-record defects, stolen-evidence issues, healthcare issues, trial-readiness defects, sanctions issues, and counsel-certification issues.
10. No meaningful exhibit record was admitted.
11. The merits of the underlying issues were not heard.
12. The denial of my motion therefore did not result from a full evidentiary determination of the merits.
13. I request a de novo hearing so the District Judge can hear evidence, admit exhibits, hear witness testimony, decide the specified issues on the merits, and enter written rulings.
14. I was also unable to present critical evidence necessary for the Court to evaluate due process, trial readiness, source-record verification, stolen evidence, healthcare enforcement, and the prejudice created by forcing this case toward trial without complete records.
15. Opposing counsel repeatedly demanded "yes or no" answers to questions asking whether I had presented evidence about events or issues not noticed for that

particular hearing. That questioning created an incomplete and misleading record, because the evidence exists; it simply was not noticed, reached, admitted, or fully presented at that hearing.

16. I request denial of Petitioner's protective order, denial of all fees, costs, protective expenses, and cost shifting against me, authorization of third-party subpoenas, sworn counsel certification, trial continuance or abatement, healthcare enforcement, stolen-evidence non-access, non-use, preservation, and return relief, and a sanctions/show-cause hearing.
17. Due to the broken laptop screen, my inability to output to an external projector, and my inability to share digitally prepared evidence as planned, my ability to present and submit evidence was significantly impaired.

Executed in **Brazos County, Texas** on **June 4, 2026**.

Respectfully Submitted,



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**Jason McKemie**

539 W. Commerce St., Suite 2010  
Dallas, Texas 75208  
214-868-4901  
[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

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## **CERTIFICATE OF SERVICE**

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I certify that a true and correct copy of this filing and all attached exhibits was served on all counsel of record and/or parties entitled to notice through the Texas e-filing service provider and/or email in accordance with the Texas Rules of Civil Procedure on **June 4, 2026**.



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**Jason McKemie**

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## EXHIBIT INDEX

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- Exhibit 1      Order Reserving Sanctions, Fee Shifting, Estate Reconstitution, Adverse Inferences, And Healthcare Enforcement For Further Hearing
- Exhibit 2      Order Granting Leave to Issue Third-Party Subpoenas for Financial, Lease, QLE, Benefits, And Estate Source Records
- Exhibit 3      Order Granting Leave to Issue Third-Party Subpoenas Concerning April 16 Theft, Movers, Security, Contractors, And Chain of Custody
- Exhibit 4      Subpoena Targets
- Exhibit 5      Respondent's Motion for Enforcement, Sanctions, Continuance, And Leave to Issue Third-Party Subpoenas
- Exhibit 6      Petitioner's Response to Respondent's Motion for Enforcement, Sanctions, Continuance, And Leave to Issue Third-Party Subpoenas, And Counter-Motion for Protective Order And For Other Appropriate Relief
- Exhibit 7      Respondent's Reply in Support of Enforcement, Sanctions, Continuance, And Leave; Objection to Petitioner's Bad-Faith Protective Order And Fee Request; And Request for Sanctions, Show-Cause, Counsel Certification, Fee Shifting, Forensic Accounting, Estate Reconstitution, Disproportionate Division, And Source-Record Verification

*Continued Next Page...*

**EXHIBIT INDEX**

<b>Exhibit</b>	<b>Title</b>	<b>Purpose</b>
<b>Exhibit A</b>	Motion to Recuse – Pleading History	Procedural history demonstrating repeated filings, unresolved motions, discovery disputes, and case-management failures.
<b>Exhibit B</b>	Discovery Email	Notice to Petitioner and counsel regarding discovery deficiencies, missing records, and requests for compliance.
<b>Exhibit C</b>	Sworn Budget	Demonstrates Respondent's financial condition, expenses, inability to absorb continued delay, and need for relief.
<b>Exhibit D</b>	High Liquidity While Declaring Destitution	Contradicts claims of financial hardship by showing significant available funds or liquidity.
<b>Exhibit E</b>	AMEX Annual Summaries	Credit card spending analysis and reconstruction of financial activity.
<b>Exhibit F</b>	"Worthless" Investments	Petitioner statements minimizing value of assets later shown to have material value.
<b>Exhibit F-1</b>	No Intouch Statements	Demonstrates missing account continuity, missing statements, and inability to trace transactions.
<b>Exhibit G</b>	\$0 HSA	Evidence relating to HSA depletion, healthcare interference, and lack of available medical funds.
<b>Exhibit G-1</b>	Tax Transcripts	IRS-source tax records used to verify income, tax liability, withholding, and financial disclosures.
<b>Exhibit K</b>	Card Flipping	Demonstrates repeated account/card number changes, continuity issues, and tracing obstacles.
<b>Exhibit L</b>	Annual Snapshots Without Inflows or Outflows	Illustrates production of summary balances without underlying transactional support.
<b>Exhibit M</b>	Associate Judge's Report	Court findings, procedural history, and prior discovery-related determinations.
<b>Exhibit N</b>	Gwen Financial Discovery Compliance Matrix	Visual compliance chart showing discovery requests, deficiencies, missing records, and production failures.
<b>Exhibit J</b>	Overpayments / Missing Statements	Analysis of excessive card overpayments, missing statement periods, and inability to trace source funds.

Exhibit 8 Associate Judge's E-Served Cover Letter

Exhibit 9 Df24-18010 Associate Judge's Report

NO. DF-24-18010

IN THE MATTER OF	§	IN THE DISTRICT COURT
THE MARRIAGE OF	§	
	§	
<b>GWENDOLYN ULIJASZ-MCKEMIE</b>	§	<b>301<sup>ST</sup> JUDICIAL DISTRICT</b>
AND	§	
<b>JASON MCKEMIE</b>	§	<b>DALLAS COUNTY, TEXAS</b>

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**MOTION FOR ENFORCEMENT, SANCTIONS, CONTINUANCE,  
AND LEAVE TO ISSUE THIRD-PARTY SUBPOENAS**

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

Jason McKemie files this **Motion for Enforcement, Sanctions, Continuance, and Leave to Issue Third-Party Subpoenas** and respectfully shows the Court as follows:

**I. RELIEF REQUESTED**

Trial is set for **June 11, 2026**.

This motion requests multiple forms of relief, but the threshold issue for the June 1 hearing is trial readiness:

**No source records, no estate reconstruction. No estate reconstruction, no final trial.**

Movant requests that the Court:

1. **Continue the June 11, 2026 trial setting;**
2. **Grant leave to issue third-party subpoenas** for source records concerning financial accounts, VEIP/equity, tax records, loans, San Antonio housing/rent, lease payoff, QLE/benefits, Accenture records, legal retainers, third-party contractors, April 16 theft, movers, security contractors, All My Sons, Merritt McClayton, Decisive Resources, Jetty Partners, and all related custodians;
3. **Modify the discovery deadline** for the limited purpose of third-party source-record discovery and related follow-up discovery;
4. **Enforce prior discovery rulings and prior discovery obligations;**
5. **Reserve sanctions, fee shifting, adverse inferences, estate reconstitution, reimbursement, offsets, healthcare enforcement, and April 16 theft remedies** without prejudice pending subpoena returns and further hearing;
6. Set a status/compliance hearing after subpoena returns are received; and
7. Require written rulings on any relief granted, denied, or reserved.

## II. PROCEDURAL AUTHORITY

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- **Texas Rule of Civil Procedure 190.5** authorizes the Court to modify a discovery-control plan at any time and requires modification when the interest of justice requires. This rule is directly implicated because new and materially changed circumstances now prevent trial readiness without third-party source records.
- **Texas Rules of Civil Procedure 176 and 205.3** authorize third-party subpoenas and nonparty production of documents and tangible things.
- **Texas Rules of Civil Procedure 215.2 and 215.3** authorize sanctions, fee shifting, adverse findings, evidentiary limits, staying proceedings, and other just orders for failure to comply with discovery orders or abuse of the discovery process.
- **Texas Rules of Civil Procedure 251 and 252** authorize continuance for sufficient cause supported by affidavit or declaration.
- **Texas Family Code §§ 6.501 and 6.502** authorize temporary orders and injunctive relief to preserve property, protect the parties, require production, protect access to resources, and prevent further waste or concealment during a pending divorce.
- **Texas Family Code § 6.708** authorizes attorney's fees, court costs, and expenses in a dissolution suit.
- **Texas Family Code § 7.001** requires a just and right division of the estate. A just and right division is impossible unless the estate is first identified, traced, and reconstructed.
- **Texas Family Code § 7.009** authorizes reconstitution of the estate when actual or constructive fraud on the community has occurred, including appropriate legal and equitable relief.
- **Texas Rule of Evidence 1006** permits summary charts and calculations for voluminous records. Movant intends to attach a visual production-gap chart as a Rule 1006 summary exhibit, with underlying records identified and made available as required.

## III. WHY THIS MOTION IS NECESSARY: SYSTEMIC NONCOMPLIANCE

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This is not a routine discovery dispute.

These proceedings are now in their third district, and the discovery record reflects the same pattern across multiple courts: Petitioner avoids source-record production, creates procedural delay, then attempts to declare discovery closed or trial-ready before the estate can be reconstructed.

In the 254th District Court, Respondent served discovery in good faith. Petitioner's legal team then moved to withdraw and remained absent during the discovery period. With approximately one hour remaining before discovery closed, Petitioner's counsel reappeared, filed blanket objections to Respondent's discovery, and approximately one hour later declared discovery closed.

The same pattern repeated in the 302nd District Court. Respondent served discovery. Petitioner responded that Respondent had to identify and label every defect across thousands of pages of production. Respondent did that work. Petitioner then delayed for approximately two months and produced only two pages. Those two pages reflected the same transactions, on the same dates, at the same locations, for the same amounts, for the same account, but with different monthly headers. One or both of those documents are necessarily false, inaccurate, or fabricated. That was not compliance. It was an obvious refusal to provide reliable source records.

In the 302nd District Court, a motion to compel was granted or reflected as granted on or about January 6, 2026. Petitioner was then found noncompliant on or about January 9, January 20, and February 5, 2026. Each time, Petitioner represented with increasing force that she was finally compliant. Between January 6 and February 5, Respondent did not receive a single additional page that cured the defects.

Respondent was instructed to draft a proposed order to bring these proceedings to an expeditious conclusion. Respondent did so. That proposed order still has not been ruled on. Since then, Petitioner still has not produced source records sufficient to cure the defects. The only later production came on the eve of trial and showed further account depletion, not compliance.

That matters because the defect is not a missing page.

The defect is the destruction of traceability.

Petitioner has repeatedly treated financial disclosure as a tactical narrative exercise rather than a source-record obligation. The result is an estate that cannot be reconstructed from Petitioner-controlled production. Third-party source records are now the only available cure.

#### **IV. THIS IS NOT MISSING STATEMENTS; IT IS ARCHITECTED OBSTRUCTION**

This is not merely "missing statements."

It is obstruction by an architect of the financial record.

The available production reflects intentional corruption of tracing data and intentional destruction of practical continuity, including:

1. Approximately **nine credit cards tied to one account relationship;**
2. Card-number flipping approximately every **10 to 14 days;**

3. Credit-card balances paid off **multiple times per month;**
4. Significant overpayments to cards;
5. At least one card with approximately **\$67,000 in overpayments;**
6. No reliable way to determine payment source from party-produced statements;
7. No reliable way to determine whether overpayments generated refunds, credits, transfers, or concealed liquidity;
8. No reliable account-lineage records connecting old card numbers, new card numbers, reissued cards, replacement cards, or linked accounts;
9. No single account with contiguous statements from **August 2023 through present;**
10. No sufficient employer-origin records for San Antonio housing reimbursements;
11. No sufficient expense reports for work-paid housing;
12. No legitimate tax transcripts, only emails and printouts;
13. Loan claims without loan origination documents, proof of funds transfer, repayment records, or credible tracing;
14. Large pretrial transfers, including to family members and taxing authorities;
15. Large legal and third-party contractor spend with no source tracing; and
16. Prior production that included two pages showing the same transactions, same dates, same locations, and same account, but different monthly headers.

A further deadline for Petitioner to self-produce is not a remedy.

It is procedural cover.

## **V. PARTY PRODUCTION IS IMPOSSIBLE AS A CURE**

The Court should not give Petitioner more time to produce financials.

That remedy is impossible.

It cannot cure the defect.

No additional party-controlled production deadline can reconstruct:

1. Account continuity;
2. Replacement-card lineage;
3. Payment-source tracing;
4. Overpayment treatment;
5. Refund and credit history;

6. Payroll deductions;
7. Employer reimbursements;
8. VEIP/equity investment activity;
9. Tax withholding versus equity contribution classification;
10. IRS/tax payments;
11. Loan origination and funding;
12. San Antonio housing reimbursement;
13. Lease payoff/buyout records;
14. Legal retainer payment sources;
15. Third-party contractor payment sources; or
16. April 16 theft chain of custody.

Only third-party source records can do that.

If Petitioner has been fully forthcoming and compliant with discovery, then this will be a simple and painless process. The source records will confirm her position quickly.

If she has not, the source records are the only way to prevent a final trial based on financial fiction.

## **VI. VEIP / EQUITY INVESTMENT MISLABELED AS "EXTRA TAX WITHHOLDING"**

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One of the clearest examples is Petitioner's VEIP/equity investment activity.

Petitioner labeled or allowed a **\$130,000 equity investment** to be characterized as "extra tax withholding."

No one can mislabel a **\$130,000 equity investment** yielding approximately a **50% return in less than twelve months** – approximately **\$65,000 in gain** – and honestly claim it was merely a "tax" item.

That is beyond absurd.

The estate impact is massive:

<b>Item</b>	<b>Amount</b>
VEIP/equity investment principal	\$130,000
Approximate gain	\$65,000

Item	Amount
Total liquid asset value	\$195,000
Liability Effect of Mislabeling of Asset	-\$325,000
Total Variance in Estate Value	\$520,000

The net effect was the conversion of approximately **\$195,000 in liquid asset value** into an apparent **negative \$325,000 liability**, creating a more than **half-million-dollar estate distortion**.

This cannot be tried on party summaries, tax emails, or screenshots.

It requires employer-origin, payroll-origin, equity-plan-origin, tax-origin, and bank-origin source records.

## VII. VISUAL GAP CHART / RULE 1006 SUMMARY

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Movant intends to attach a visual summary showing missing account-statement continuity and production gaps.

The exhibit should be treated as:

### Exhibit A – Rule 1006 Summary Chart of Financial Production Gaps

The chart is offered to show the Court the structural record problem: no account has contiguous source-record coverage from August 2023 through present.

Movant will make the underlying statements, productions, and available records supporting the summary available for inspection as required by Texas Rule of Evidence 1006.

The chart is not a substitute for source records.

It proves why source records are necessary.

## VIII. NO CONTIGUOUS ACCOUNT HISTORY EXISTS

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Not a single account has contiguous statements from **August 2023 through present**.

That alone prevents final trial.

The Court cannot conduct a final property division where:

1. The accounts cannot be mapped;
2. Account numbers cannot be tied to replacement cards;
3. Payments cannot be sourced;
4. Overpayments cannot be traced;
5. Credits/refunds cannot be located;
6. Loans cannot be authenticated;
7. Tax claims cannot be verified;
8. Employer reimbursements cannot be traced;
9. Legal and contractor spending cannot be allocated; and
10. The estate cannot be reconstructed.

No source records, no estate reconstruction.

No estate reconstruction, no final trial.

## **IX. SAN ANTONIO HOUSING / RENT / EXPENSE REPORTS**

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Petitioner's San Antonio housing records require third-party verification.

Movant requests subpoenas to Accenture, benefits/payroll custodians, expense-report custodians, the landlord, property manager, landlord-side bank/payment custodians, and related entities to determine:

1. Whether San Antonio rent was paid or reimbursed by work;
2. Whether any rental income or reimbursement was omitted from the marital estate;
3. Whether housing reimbursements were deposited into disclosed or undisclosed accounts;
4. Whether Petitioner failed to disclose employer-paid housing or housing-related reimbursements;
5. Whether rent, lease, payoff, or buyout records were concealed;
6. Whether eviction/writ pressure was pursued despite rent or lease obligations being paid, resolved, reimbursed, bought out, or otherwise satisfied; and
7. Whether landlord-side activity was used to create the access window exploited in the April 16 theft.

If the San Antonio housing was paid 100% by work, then the estate requires 100% reimbursement or tracing of those funds.

## **X. DISSIPATION, WASTE, AND ADD-BACKS REQUIRING SOURCE RECORDS**

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Movant requests third-party source-record discovery concerning dissipation, waste, reimbursement, and add-back issues, including:

### **A. Elective Cosmetic Surgery**

- Petitioner pursued elective cosmetic surgery despite objection from Movant and Movant's prior counsel.
- Movant requests invoices, payment records, financing records, loan documents, card payments, bank payments, and any related communications so those amounts can be added back, reimbursed, offset, or charged to Petitioner's side of the estate.
- Movant is not paying for elective cosmetic surgery through community depletion.

### **B. Legal Retainers, Contractors, Security, OSINT, and Reputation Vendors**

- Petitioner's legal, security, investigative, risk-mitigation, OSINT, reputational-defense, bodyguard, and third-party contractor spending must be traced.
- These expenses did not benefit Movant.
- They were used to build, support, protect, package, or distribute narratives against Movant, including alleged crimes that did not occur.
- The subpoena scope must include, at minimum:
  1. Hargrave Law Office / Hargrave Family Law;
  2. Sullivan & Cook;
  3. Beerman / Biermann;
  4. Armstrong Law Texas;
  5. Connatser Family Law;
  6. Hughes Socol Piers Resnick & Dym;
  7. Any prior, shadow, consulting, or undisclosed counsel;
  8. Decisive Resources;
  9. Jetty Partners;
  10. Security contractors;
  11. Bodyguards;
  12. OSINT / security tech resources;

13. Risk-mitigation firms;
  14. Reputational-defense vendors;
  15. Due-diligence vendors;
  16. Employment-interference vendors;
  17. Investigators;
  18. All My Sons;
  19. Merritt McClayton;
  20. Movers, storage providers, booking entities, and third-party payers; and
  21. Any entity paid to investigate, package, transmit, publish, or support claims against Movant.
- Legal fees and legal-adjacent expenditures should be traced and allocated. Movant requests that legal fees be subject to 50% reimbursement/add-back where community funds were used, and that third-party contractors used against Movant be added back 100% to Petitioner's side of the estate unless Petitioner proves by source records that the expenditure was disclosed, necessary, non-wasteful, and beneficial to the community.

### **C. San Antonio Rent / Employer-Paid Housing**

- If San Antonio rent was work-paid or reimbursed by Accenture, those funds must be traced and reimbursed 100% to the estate or offset against Petitioner.

### **D. Loans**

- Petitioner paid off 100% of her loans before leaving the marriage, then took out multiple "loans" immediately after Movant obtained counsel.
- These loans require source records because the current record lacks:
  1. Loan origination documents;
  2. Proof of funds transfer;
  3. Proof of disbursement;
  4. Proof of repayment;
  5. Proof of lender capacity;
  6. Proof that alleged family loans were actually funded;
  7. Proof that Petitioner's sister was actually paid;

8. Proof that any alleged loan was community debt; and
  9. Proof that any loan was not used for elective cosmetic surgery, legal warfare, or litigation-adjacent spending.
- Petitioner’s January 7 testimony represented that certain loans had already been received. Later claims conflict with that testimony. Source records are required.

**E. Tax Records**

- Petitioner has not produced legitimate tax transcripts sufficient to verify tax claims, tax liabilities, tax payments, withholding, refunds, or the alleged tax treatment of VEIP/equity.
- Emails and printouts are not enough.
- The Court should authorize subpoenas for IRS transcripts, tax preparer records, employer payroll/tax records, bank-origin tax payments, and records sufficient to determine whether tax claims were legitimate or used to obscure equity investments and estate value.

**F. Gross Overpayments to Cards**

- Credit-card overpayments must be traced to determine whether they created refunds, credits, hidden liquidity, substituted accounts, or undisclosed transfers.
- Card overpayments are not self-explanatory. They require issuer-origin and bank-origin source records.

**XI. PRELIMINARY FUNDS AND CLAIMED SHARES REQUIRING PRESERVATION AND TRACING**

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Movant identifies the following funds and shares requiring preservation, tracing, and third-party verification:

<b>Category</b>	<b>Calculation</b>	<b>Amount</b>
Sign-on bonus	1/2 of \$300,000	\$150,000
Cognizant settlement	1/2 of \$156,045	\$78,022.50
VEIP/equity	1/2 of \$195,000	\$97,500

<b>Category</b>	<b>Calculation</b>	<b>Amount</b>
Salary	1/2 of \$390,000	\$195,000
Annual bonus	1/2 of \$49,893	\$24,946.50
Rent reimbursement / lease guarantor issue	reimbursement claimed	\$30,000
Additional dissipation / add-backs	to be traced	TBD

Movant also asserts that approximately **\$650,000 went missing before the divorce proceedings** and requires source-record reconstruction.

These figures are not the full estate calculation. They are minimum categories proving why the estate cannot be tried without third-party records.

## **XII. APRIL 16 THEFT IS PART OF THE SAME PATTERN**

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The April 16 writ event is more of the same pattern.

Petitioner repeatedly requested access to the residence. Those requests were not granted in the manner she sought. Movant repeatedly stated that if Petitioner wanted property, it should occur only through a neutral third party because direct access created danger, theft risk, destruction risk, allegation risk, and evidence risk.

That is exactly what happened.

On April 16, Petitioner stole Movant's hard drives, litigation evidence, financial records, trial materials, GPUs, network storage, music studio equipment, medication, and livelihood infrastructure.

The stolen hard drives were Movant's separate property owned before the marriage.

Those stolen hard drives contained:

1. Seventeen months of exhibits;
2. Financial reconstruction work;
3. Discovery materials;
4. Records prepared for production;
5. Trial preparation;
6. Accenture-related contribution evidence;

7. Technical work;
8. Network designs;
9. Presentations;
10. Talking points;
11. Research;
12. Music/studio materials;
13. Professional records; and
14. Data necessary to rebut Petitioner's false non-contributor narrative.

Before April 16, party production was already impossible as a cure.

But Movant at least had his own records.

Now he has nothing.

Petitioner stole the records Movant built to reconstruct the estate, prove contribution, respond to discovery, and prepare for trial. She should not be permitted to steal the evidence, obstruct third-party records, and then demand trial before the theft can be addressed.

### **XIII. THE APRIL 16 THIRD-PARTY SUBPOENAS ARE NECESSARY**

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The Court should authorize subpoenas to all third parties involved in the April 16 theft, including:

1. All My Sons;
2. Merritt McClayton;
3. Moving-company booking entities;
4. Third-party payers;
5. Security contractors;
6. Bodyguards;
7. Storage providers;
8. Landlord;
9. Property manager;
10. Landlord-side agents;
11. Locksmith/access vendors;
12. Constable-related custodians;

13. Bodycam/dashcam/open-records custodians;
14. Jetty Partners;
15. Decisive Resources;
16. Any contractor involved in planning, funding, booking, executing, transporting, receiving, storing, accessing, using, or concealing stolen property; and
17. Any person or entity with records concerning stolen hard drives, devices, GPUs, network storage, music studio equipment, medication, financial records, litigation records, safes, briefcases, or other stolen property.

The purpose is source verification, chain of custody, preservation, and trial readiness.

#### **XIV. VEIP FRAUD, TAX FRAUD, LEASE FRAUD, LOAN FRAUD, QLE FRAUD, AND APRIL 16 WRIT RECORDS**

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Movant requests subpoena authority for source records concerning:

1. VEIP/equity fraud;
2. Tax fraud;
3. Lease fraud;
4. Loan fraud;
5. QLE fraud;
6. April 16 writ-related records;
7. Healthcare reinstatement and HSA/FSA functionality;
8. Accenture payroll, benefits, equity, reimbursement, and QLE records;
9. Landlord payoff, buyout, rent ledger, and eviction records;
10. Bank and credit-card continuity records; and
11. April 16 theft records.

These are not side issues.

They are the source-record foundation necessary to determine whether the estate exists in the form Petitioner claims, whether liabilities are real, whether assets were concealed, whether reimbursements were omitted, whether healthcare was fraudulently terminated, whether housing pressure was manufactured, and whether trial can proceed.

## **XV. THIS DIVORCE SHOULD HAVE ENDED LONG AGO**

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This divorce should have ended in March 2025.

It did not end because Petitioner's obstruction, false financial narratives, discovery gamesmanship, healthcare obstruction, lease/eviction manipulation, late production, source-record concealment, and April 16 theft kept expanding the dispute.

Petitioner has wasted Movant's time, the Court's time, and the resources of everyone forced into this litigation.

Petitioner has also caused severe harm to Movant and his parents through financial ambush, manufactured instability, and repeated emergency conditions. Parent-loan issues will be addressed in a separate filing, but the Court should recognize that this litigation posture has imposed collateral financial harm beyond ordinary divorce expense.

This is outright fraud.

It is not an accident.

## **XVI. DUE PROCESS REQUIRES THIRD-PARTY SOURCE RECORDS BEFORE TRIAL**

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- A final trial without source records would be a due process failure.
- The Court cannot divide an estate it cannot identify.
- The Court cannot classify property it cannot trace.
- The Court cannot evaluate dissipation without payment-source records.
- The Court cannot evaluate loans without loan origination and transfer records.
- The Court cannot evaluate VEIP/equity without employer and equity-plan records.
- The Court cannot evaluate tax claims without tax transcripts and bank-origin tax payments.
- The Court cannot evaluate San Antonio housing reimbursement without employer and landlord records.
- The Court cannot evaluate April 16 theft without movers, security, payment, landlord, constable, and chain-of-custody records.
- The Court cannot require Movant to defend against Petitioner's financial narrative after Petitioner stole his litigation hard drives and financial reconstruction materials.
- Proceeding to trial on June 11 without third-party source records would reward obstruction and punish the party seeking verification.

## **XVII. REQUEST TO SEQUENCE THE JUNE 1 HEARING**

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Movant urgently needs healthcare enforcement. However, Movant requests that the Court first address financial trial readiness because trial is set for June 11.

The June 1 hearing should first decide:

1. Whether trial can proceed without third-party source records;
2. Whether subpoenas should issue;
3. Whether discovery deadlines should be modified;
4. Whether trial should be continued; and
5. Whether sanctions and healthcare enforcement should be reserved or set for immediate follow-up.

Movant does not waive healthcare enforcement by asking the Court to address financial source records first.

## **XVIII. PRAYER**

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Movant respectfully requests that the Court grant this Motion and enter orders:

1. Continuing the June 11, 2026 trial setting;
2. Granting leave to issue third-party subpoenas;
3. Modifying discovery deadlines for source-record discovery;
4. Authorizing subpoenas concerning financial, VEIP/equity, tax, loan, San Antonio housing, lease/payoff, QLE/benefits, healthcare, Accenture, legal-retainer, contractor, and April 16 theft records;
5. Setting a status hearing after subpoena returns;
6. Reserving sanctions, fee shifting, adverse inferences, estate reconstitution, reimbursement, offsets, healthcare enforcement, property return, compensation, and April 16 theft remedies without prejudice;
7. Requiring written rulings; and
8. Granting all other relief to which Movant is entitled.

Respectfully Submitted,



**Jason McKemie**

539 W. Commerce St., #2010

Dallas, Texas 75208

214-868-4901

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

## VERIFICATION / UNSWORN DECLARATION

---

My name is Jason McKemie. I am over eighteen years of age, of sound mind, and competent to make this declaration. I have personal knowledge of the facts stated in this Motion, and they are true and correct to the best of my knowledge.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Dallas County, Texas, on **May 26, 2026**.



---

**Jason McKemie**

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## CERTIFICATE OF SERVICE

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I certify that a true and correct copy of this Motion was served through the Texas eFile and Serve system on all counsel of record and all parties entitled to service on **May 26, 2026**.



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**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.

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Filing Description: MOTION FOR ENFORCEMENT, SANCTIONS, CONTINUANCE, AND LEAVE TO ISSUE THIRD-PARTY SUBPOENAS

Status as of 5/28/2026 11:47 AM CST

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**NO. DF-24-18010**

IN THE MATTER OF  
THE MARRIAGE OF

GWENDOLYN ULIJASZ-MCKEMIE  
AND  
JASON MCKEMIE

IN THE DISTRICT COURT

301ST JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

**PETITIONER'S RESPONSE TO RESPONDENT'S MOTION FOR ENFORCEMENT,  
SANCTIONS, CONTINUANCE, AND LEAVE TO ISSUE THIRD-PARTY SUBPOENAS,  
AND COUNTER-MOTION FOR PROTECTIVE ORDER AND FOR OTHER  
APPROPRIATE RELIEF**

TO THE HONORABLE JUDGE OF SAID COURT:

Petitioner Gwendolyn Ulijasz-McKemie ("Petitioner" or "Gwen") files this Response to Respondent Jason McKemie's May 26, 2026 Motion for Enforcement, Sanctions, Continuance, and Leave to Issue Third-Party Subpoenas (the "Motion") and this Counter-Motion for Protective Order, and respectfully shows the Court as follows:

**I. Preliminary Statement**

Discovery in this case is closed. Respondent had the entire discovery period to ask this Court to issue third-party subpoenas through the procedure the Texas Rules provide. He did not. Nothing prevented him from serving Rule 205 notices, applying for subpoenas to banks, to Accenture, to the taxing authorities, or to any other custodian during the months this case was pending. He chose not to use the tools available to him, and he now asks the Court to continue a final-trial setting so he can begin that work sixteen days before trial.

That is not trial readiness. It is a request to reopen and reset a case that has been pending for roughly eighteen months over a marriage that lasted roughly five. Respondent asks the Court to continue the June 11, 2026 trial because he says he lacks proof today. He asks for third-party

subpoenas because he says the records he wants are not in his hands today. He asks to reserve sanctions, adverse inferences, estate reconstitution, property-return remedies, and April 16 remedies because he says those issues should be revisited after subpoena returns that do not yet exist. A party who sat on the discovery tools available to him cannot manufacture a continuance by pointing to the discovery he chose not to pursue.

Granting the Motion would transform a final-trial setting into a new third-party investigation, without proposed subpoenas, without custodian-specific requests, without account identifiers, without date ranges, without a Rule 252 diligence showing, and without a present evidentiary predicate for sanctions, adverse findings, forensic relief, or bankruptcy-related property remedies. The discovery period has run. This five-month marriage has consumed eighteen months of litigation across multiple courts. It is time to try the case on June 11 on the record the parties developed during the discovery period, and the Motion should be denied.

Petitioner does not oppose mutual preservation of relevant records. She opposes the continuance. She opposes blanket subpoena leave. She opposes any order that would authorize new nonparty discovery on the eve of trial, because any such discovery would furnish the very reason for the continuance the Motion seeks. And she opposes any order adjudicating April 16 theft, spoliation, stay violation, turnover, estate-property damages, property ownership, or forensic relief on the present record.

## **II. Relief Respondent Requests**

Respondent's Motion states that the threshold issue is trial readiness and uses the phrase: "No source records, no estate reconstruction. No estate reconstruction, no final trial." He asks the Court to:

1. continue the June 11, 2026 trial setting;
2. grant leave to issue third-party subpoenas for financial accounts, VEIP/equity, tax records, loans, San Antonio housing/rent, lease payoff, QLE/benefits, Accenture records, legal retainers, third-party contractors, April 16 theft, movers, security contractors, All My Sons, Merritt McClayton, Decisive Resources, Jetty Partners, and all related custodians;
3. modify the discovery deadline for third-party source-record discovery and related follow-up discovery;
4. enforce alleged prior discovery rulings and obligations;
5. reserve sanctions, fee shifting, adverse inferences, estate reconstitution, reimbursement, offsets, healthcare enforcement, property return, compensation, and April 16 theft remedies pending subpoena returns and further hearing;
6. set a status/compliance hearing after subpoena returns; and
7. require written rulings on any relief granted, denied, or reserved.

The Notice of Hearing likewise frames June 1 as a financial trial-readiness hearing and previews proposed orders for financial, lease, QLE, and benefits subpoenas, April 16 theft, mover, security, and contractor subpoenas, and reservation of sanctions, fee shifting, estate reconstitution, adverse inferences, and healthcare enforcement. Every category Respondent now seeks was available to him through ordinary discovery procedure during the discovery period.

### **III. Procedural History and Record Summary**

#### **A. A short marriage and a long-pending case.**

The parties' ceremonial marriage occurred on or about June 22, 2024. The parties separated within months. The original petition was filed December 16, 2024 and served by eService on December 18, 2024. This case has now been pending for roughly eighteen months and has moved through multiple settings and courts. It is set for final trial on June 11, 2026.

A marriage of roughly five months has generated roughly eighteen months of litigation. The discovery period has run its course. Rather than try the case on the developed record, Respondent's May 26 Motion seeks to reopen discovery and reset the trial so he can begin a new third-party investigation, without proposed subpoenas, without custodian-specific requests, and without the diligence showing the Rules require. The interest of finality, the age of this case relative to the length of the marriage, and the closed discovery period all weigh in favor of proceeding to trial on June 11.

**B. Record summary.**

The following summary identifies, for each category of relief Respondent seeks, the defect in his request and the ruling Petitioner requests:

<b>Respondent's request / allegation</b>	<b>Record problem</b>	<b>Requested ruling</b>
Continuance of June 11 trial	No Rule 252-compliant showing identifying specific missing witnesses, residences, expected testimony, materiality, diligence, or inability to obtain the evidence earlier. Discovery period has closed.	Deny continuance; preserve trial setting.
Blanket subpoena leave	No proposed subpoenas attached; no custodian, account, date-range, or category specificity; broad categories include "all related custodians," law firms, vendors, and contractors. Records were obtainable during the discovery period.	Deny leave; no new nonparty discovery on the eve of trial.
Prior discovery rulings / enforcement	Motion references rulings as "granted or reflected as granted" and alleges January and	Deny enforcement absent signed orders, exact

	February noncompliance without attaching signed orders establishing exact obligations.	obligations, and proof of violation.
"No source records" slogan	Petitioner has produced records. Respondent's complaint is alleged incompleteness, not zero production. The Rule 1006 chart referenced in the Motion is not a substitute for authenticated underlying records.	Reject slogan; require chart and underlying records before any Rule 1006 reliance.
VEIP/equity theory	No custodian declaration, CPA opinion, forensic accounting report, payroll-origin record, equity-plan-origin record, or tax-origin record attached supporting the alleged gain or estate-variance claim.	Treat as trial merits issue, not continuance predicate.
April 16 / alleged device theft	No serial-number inventory, make/model/capacity list, receipt, warranty record, police report, insurance claim, chain-of-custody document, photograph, or forensic declaration.	Mutual preservation only; no theft, spoliation, non-use, forensic, or adverse-inference findings.
Law firms / litigation vendors	Requests reach opposing counsel, law firms, legal retainers, consultants, investigators, and security, reputation, cyber, and OSINT vendors, plus witness-preparation materials and work product.	Protect privilege and work product; deny.
Sanctions / adverse inference / reconstitution	Respondent expressly seeks reservation pending subpoena returns and further hearing; predicate evidence is not before the Court.	Deny present relief without prejudice.
Bankruptcy / April 16 / property-return	Chapter 7 is pending; trustee is Areya Holder; the bankruptcy orders attached as exhibits reserve rent, expense, damage, and stay-violation issues; estate-property rights are not before this Court for adjudication on June 1.	No family-court findings on stay violation, theft, spoliation, estate-property damages, turnover, or property return now.
PHV-objection financial figures	Respondent's PHV-objection briefing references alleged overpayments and missing funds, including alleged \$67,000 and \$650,000 figures, without tying them to any produced source document.	Exclude or disregard absent foundation, authentication, relevance, and competent source proof.

#### **IV. Governing Standards**

##### **A. Continuance and diligence.**

A continuance may not be granted except for sufficient cause supported by affidavit, consent, or operation of law. Tex. R. Civ. P. 251. When the continuance is sought for want of testimony, Rule 252 requires the affidavit to state the missing testimony's materiality, the diligence used to procure

it, the cause of failure, that the testimony cannot be obtained from any other source, the witness's name and residence if the continuance is based on an absent witness, the expected testimony, and that the continuance is not sought for delay. Tex. R. Civ. P. 252.

Diligence is the heart of the inquiry. A party who failed to use the discovery tools available during the discovery period has not shown the diligence Rule 252 requires, and a continuance motion that does not set forth the evidence sought, its materiality, and the due diligence used to obtain it is properly denied. *Wal-Mart Stores Tex., L.P. v. Crosby*, 295 S.W.3d 346, 356 (Tex. App.-Dallas 2009, pet. denied); *Garner v. Fidelity Bank, N.A.*, 244 S.W.3d 855, 858 (Tex. App.-Dallas 2008, no pet.). Respondent's failure to pursue available nonparty discovery during the discovery period is not good cause to continue the trial.

**B. Discovery, nonparty subpoenas, and protective orders.**

Rule 190.5 permits modification of a discovery control plan only when the interest of justice requires it. Rule 191.2 requires a meaningful effort to resolve discovery disputes before court intervention. Rules 192.3 and 192.4 require discovery to be relevant, nonprivileged, reasonably tailored, and proportional. Rule 192.6 authorizes protective orders to prevent undue burden, unnecessary expense, harassment, annoyance, and invasion of personal, constitutional, or property rights.

Nonparty discovery under Rules 176 and 205.3 requires an actual notice and subpoena identifying the nonparty, the time and place for production, and the items or categories sought with reasonable particularity. Rule 176.7 requires the issuing party to take reasonable steps to avoid undue burden or expense on the person served and requires the Court to protect nonparties from undue burden, expense, and privilege invasion. Texas Supreme Court authority rejects category-level discovery

that functions as investigation rather than targeted discovery. See *Texaco, Inc. v. Sanderson*, 898 S.W.2d 813, 815 (Tex. 1995); *In re American Optical Corp.*, 988 S.W.2d 711, 713 (Tex. 1998); *In re CSX Corp.*, 124 S.W.3d 149, 152-53 (Tex. 2003); *In re State Farm Lloyds*, 520 S.W.3d 595, 599-610 (Tex. 2017).

### **C. Litigation-vendor, law-firm, and work-product protection.**

Rule 192.5 protects work product, including material prepared and communications made in anticipation of litigation or for trial by or for a party or a party's representatives, including attorneys, consultants, investigators, agents, and other representatives. Requests for counsel's files, law-firm billing records, litigation consultants, investigators, security vendors, cyber and OSINT vendors, reputation vendors, and witness-preparation materials are presumptively privilege-sensitive and require heightened protection. See *National Union Fire Ins. Co. v. Valdez*, 863 S.W.2d 458 (Tex. 1993); *In re National Lloyds Ins. Co.*, 532 S.W.3d 794 (Tex. 2017).

### **D. Sanctions and adverse findings.**

Sanctions must be just, directly related to the proven misconduct, and no more severe than necessary. *TransAmerican Natural Gas Corp. v. Powell*, 811 S.W.2d 913, 917-18 (Tex. 1991); *Chrysler Corp. v. Blackmon*, 841 S.W.2d 844, 849 (Tex. 1992); *Cire v. Cummings*, 134 S.W.3d 835, 839-42 (Tex. 2004). *Newkirk Logistics* reaffirms the same proportionality framework for discovery sanctions. *In re Newkirk Logistics, Inc.*, 718 S.W.3d 240 (Tex. 2025). Spoliation and adverse-inference relief require an evidentiary record and are not appropriate on conclusory allegations. *Brookshire Bros., Ltd. v. Aldridge*, 438 S.W.3d 9, 23-26 (Tex. 2014). Forensic imaging is intrusive and requires a predicate showing of specific devices, device characteristics,

examiner familiarity, and a reasonable likelihood that the proposed methodology will yield relevant information. In re Weekley Homes, L.P., 295 S.W.3d 309, 317-22 (Tex. 2009).

**E. Bankruptcy overlay.**

Respondent is a Chapter 7 debtor. He filed his Chapter 7 petition on January 12, 2026. The Chapter 7 trustee is Areya Holder. True and correct copies of the relevant bankruptcy orders are attached to the Affidavit of Jonathan D. Steele, and Petitioner describes them functionally here rather than by docket number alone. Those orders include an order terminating the automatic stay to permit the landlord to pursue eviction remedies; an order entered the afternoon of April 16, 2026 reinstating the automatic stay and directing that writ enforcement cease; and a later order extending Respondent's move-out deadline and expressly reserving claims for rent, expenses, damages, and automatic-stay violations for separate motion or adversary proceeding.

The Bankruptcy Code excepts certain domestic-relations matters from the automatic stay, including dissolution proceedings, but excludes from that exception proceedings to determine division of property that is property of the estate. 11 U.S.C. § 362(b)(2)(A)(iv). Section 541 includes property interests of the debtor and, in appropriate circumstances, community-property interests, and § 541(a)(5)(B) includes property the debtor becomes entitled to acquire within 180 days after filing as a result of a property settlement agreement or divorce decree. Because Respondent filed Chapter 7 on January 12, 2026, any property awarded to Respondent by decree entered before July 11, 2026 falls within that 180-day window.

The Texas family court can manage this case and proceed on dissolution and other matters expressly excepted from the automatic stay while preserving trustee and bankruptcy-court rights.

What the family court should not do at this June 1 trial-readiness hearing is adjudicate theft,

spoliation, turnover, stay violations, damages, or ownership of allegedly removed estate property on Respondent's conclusory record.

## **V. Argument**

### **A. The continuance should be denied because discovery is closed and Respondent was not diligent.**

The dispositive point is the simplest one. Discovery closed. During the discovery period, Respondent could have served Rule 205 notices and applied to this Court for leave to subpoena any bank, Accenture, the taxing authorities, the landlord, the moving company, or any other custodian he now claims he needs. Nothing prevented him from following that procedure. He did not. A continuance sought to conduct discovery that the movant could have pursued earlier, through available procedure, is not supported by the diligence Rule 252 requires.

Respondent does not identify a single missing bank witness by name, residence, or expected testimony. He does not identify an Accenture witness by name, residence, or expected testimony. He does not attach a subpoena return showing any missing witness failed to appear. He does not attach a forensic-accounting affidavit, a digital-forensic affidavit, an Accenture custodian declaration, a bank custodian declaration, IRS transcripts, or a tax-preparer affidavit. This is not a Rule 252 showing. It is a request to continue trial so Respondent can conduct, after the discovery period, the nonparty discovery he chose not to pursue during it. The Motion should be denied and the June 11 trial setting preserved.

### **B. Blanket subpoena leave should be denied, and no new nonparty discovery should issue on the eve of trial.**

Respondent did not attach the proposed subpoenas or Rule 205.3 notices. The Court therefore cannot evaluate actual text, burden, privilege, proportionality, timing, return date, date range, account identifiers, or document categories. Instead, Respondent asks for category-level permission first and actual subpoenas later. Texas law does not require the Court to authorize an undefined investigation.

More fundamentally, authorizing new nonparty discovery now would furnish the very ground for the continuance the Motion seeks. If the Court authorizes subpoenas sixteen days before trial, Respondent will return and argue that the trial must be reset so the subpoenas can issue and the returns can come back. The records Respondent seeks were obtainable during the discovery period through ordinary procedure. Allowing him to begin that process now, on the eve of trial, would reward the failure to pursue it earlier and would convert the final-trial setting into the new investigation the Rules do not permit. The request for blanket subpoena leave should be denied.

**C. Discovery-deadline modification should be denied.**

Rule 190.5 permits modification of the discovery control plan only when the interest of justice requires it. Absent a Level 3 or custom discovery-control order changing the deadline, default Level 2 discovery in a Family Code suit ends thirty days before trial. With trial set June 11, 2026, Respondent's May 26 request is facially outside ordinary nonparty-discovery timing. Petitioner is confirming whether a September 8, 2025 302nd District Court pretrial order modified the default schedule; either way, Respondent has not supplied the proposed subpoenas or the diligence record required to reopen discovery on the eve of trial. The interest of justice does not favor reopening discovery for a party who declined to use it when it was open.

**D. Respondent cannot import unsupported financial figures from PHV-objection briefing.**

Respondent has previously included characterizations of Petitioner's finances in PHV-objection or related briefing, including alleged credit-card overpayments and alleged missing funds, such as \$67,000 and \$650,000 figures. Those figures appear only in Respondent's PHV-objection briefing and are not tied to any produced source document in the May 26 Motion. To the extent Respondent attempts to introduce those characterizations at this hearing, Petitioner objects on grounds including foundation, authentication, hearsay, relevance, Rule 403, and lack of competent source proof.

**E. The Rule 1006 chart reference is not proof.**

The Motion states that Respondent "intends" to attach a visual summary or that the chart "should be treated" as Exhibit A. A missing or unsupported chart is not evidence. Even a proper Rule 1006 summary requires underlying records to be made available and a sponsoring witness competent to explain the summary. The Court should not continue a final trial because Respondent says he intends to prepare a summary of records he has not attached and subpoenas he has not served.

**F. The VEIP theory is not a continuance predicate.**

Respondent alleges a \$130,000 VEIP/equity investment was mislabeled as extra tax withholding, a \$65,000 gain, and a \$520,000 estate distortion. The Motion attaches no custodian declaration, expert report, CPA letter, tax-origin document, bank-origin tracing, or equity-plan-origin record proving that theory. Respondent's own Motion states that source records would be required to test his theory. That is a trial merits dispute, not a basis to continue trial, and certainly not a basis to reopen discovery the movant declined to pursue when it was available.

**G. The April 16 and bankruptcy issues do not justify theft, spoliation, turnover, stay-violation, damages, or property-return findings.**

The bankruptcy orders attached to the Steele Affidavit speak for themselves. One order terminated the automatic stay to permit the landlord to pursue forcible-detainer remedies. A second order, entered the afternoon of April 16, 2026, reinstated the automatic stay and directed that writ enforcement cease. A third order extended Respondent's move-out deadline and expressly reserved claims for rent, expenses, damages, and automatic-stay violations for separate motion or adversary proceeding. No bankruptcy order adjudicated theft, spoliation, stay violation, damages, property ownership, or turnover against Petitioner.

Petitioner's primary position is that the June 11 trial setting should be preserved and the Court should proceed on all matters properly before it, including dissolution, characterization of property, and any property division the Court can conduct with appropriate coordination with the trustee and the bankruptcy court. Respondent cannot use unadjudicated bankruptcy issues to manufacture a continuance.

In the alternative, if the Court determines that the property division portion of the June 11 trial requires coordination with the Chapter 7 trustee or further bankruptcy-court action beyond what is available at this setting, Petitioner does not oppose severance and reservation of the property division portion only, with the dissolution of marriage and any matters expressly excepted from the automatic stay under § 362(b)(2) proceeding on June 11 as scheduled.

Trustee Areya Holder's rights, bankruptcy-court jurisdiction, and any party's right to seek appropriate relief in the bankruptcy court are expressly preserved. Petitioner does not waive, and expressly reserves, any right to seek appropriate relief in the bankruptcy court or through the Chapter 7 trustee if Respondent asks this Court to adjudicate estate-property issues, alleged stay violations, or damages arising from property alleged to be property of the bankruptcy estate.

#### **H. Sanctions, adverse inference, reconstitution, and related remedies are premature.**

Respondent asks to reserve sanctions, fee shifting, adverse inferences, estate reconstitution, reimbursement, offsets, healthcare enforcement, property return, and April 16 remedies pending subpoena returns and further hearing. That request concedes that the current record is not the record on which those remedies can be decided. The Court should deny those requests without prejudice to properly noticed, evidence-supported motion practice if a proper record is later developed.

#### **VI. Petitioner's Counter-Motion for Protective Order**

Petitioner moves under Rules 192.6, 176.7, and 215.3 for a protective order. The requested order is necessary to prevent undue burden, unnecessary expense, harassment, annoyance, invasion of privacy and property rights, and invasion of attorney-client privilege, attorney work product, consulting-expert protections, and litigation strategy. Petitioner requests that the protective order issue regardless of the Court's disposition of Respondent's Motion, including in the event the Court grants any portion of Respondent's requested relief.

#### **A. Protection against renewed or expanded subpoena practice.**

Because discovery has closed and trial is imminent, Respondent should not be permitted to serve, or to apply for leave to serve, any nonparty subpoena absent a separate, properly supported motion demonstrating diligence, materiality, proportionality, and good cause to reopen discovery, and absent service of the actual proposed subpoena and Rule 205 notice identifying the named custodian, the account or precise subject matter, the date range, the document categories, and the return date. No subpoena should issue on open-ended terms such as "all related custodians," "any person," "any entity," "any contractor," "all communications," or "all documents." All objections,

motions to quash, motions for protection, privilege and work-product claims, confidentiality objections, cost and proportionality objections, and bankruptcy-estate objections are preserved.

**B. Litigation-vendor and law-firm protection.**

No subpoena should issue to any opposing counsel, law firm, legal-retainer custodian, litigation consultant, investigator, security vendor, communications vendor, reputation vendor, OSINT or cyber vendor, witness-preparation participant, consulting expert, or litigation-support vendor absent prior leave of Court, a specific nonprivileged relevance showing, and an express privilege and work-product protocol.

**C. Mutual preservation.**

Petitioner does not oppose mutual preservation with no findings of wrongdoing. Petitioner does oppose a continuance, blanket subpoena leave, any new nonparty discovery on the eve of trial, privilege-invasive discovery, and any order adjudicating April 16 theft, spoliation, stay violation, turnover, estate-property damages, property ownership, or forensic relief on the present record.

**VII. Attorney's Fees, Costs, and Protective Expenses**

Petitioner requests an award of reasonable attorney's fees, court costs, expenses, and protective expenses incurred in responding to the Motion and prosecuting this Counter-Motion for Protective Order under Texas Rule of Civil Procedure 215.3, the Court's discovery and protective-order authority, and applicable Family Code fee provisions, including Family Code §§ 6.502 and 6.708. Petitioner requests that any award be made to Petitioner or her counsel as the Court may direct. Petitioner will submit lodestar proof by separate affidavit or at a later prove-up if the Court requires additional evidence as to amount, rate, hours, task descriptions, reasonableness, necessity, and

segregation. Petitioner requests that entitlement to fees and expenses be granted or reserved and that the amount be determined by further submission or hearing.

### **VIII. Prayer**

Petitioner respectfully requests that the Court:

1. deny Respondent's request to continue the June 11, 2026 trial setting;
2. deny Respondent's request for leave to issue third-party subpoenas;
3. deny Respondent's request to modify discovery deadlines;
4. deny Respondent's request to enforce alleged prior discovery rulings absent signed orders, exact obligations, service, deadlines, and proof of violation;
5. deny Respondent's requests for sanctions, fee shifting, adverse inferences, estate reconstitution, reimbursement, offsets, healthcare enforcement, property return, compensation, April 16 theft remedies, forensic seizure, non-use relief, and spoliation findings on the current record;
6. enter a protective order prohibiting overbroad, privileged, harassing, and litigation-vendor discovery, and prohibiting renewed or expanded nonparty subpoena practice absent a separate, properly supported motion, service of actual proposed subpoenas, and a privilege protocol;
7. enter mutual preservation language with no findings of wrongdoing, theft, spoliation, property theft, evidence suppression, or stay violation;
8. preserve the June 11, 2026 trial setting;

8A.in the alternative, if the Court determines that the property division portion of the June 11, 2026 trial requires coordination with the Chapter 7 trustee or further bankruptcy-court action, sever and reserve the property division portion only, with the dissolution of marriage and any matters expressly excepted from the automatic stay under 11 U.S.C. § 362(b)(2) proceeding on June 11, 2026 as scheduled;

9. award Petitioner reasonable attorney's fees, court costs, expenses, and protective expenses incurred in responding to the Motion and obtaining protective relief, with the amount reserved for later prove-up if necessary; and

10. grant Petitioner all further relief to which she may be justly entitled.

Respectfully submitted,

Jonathan D. Steele  
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Chicago, Illinois 60601  
ARDC No. 6308171  
jsteele@beermannlaw.com

By: /s/ Jonathan D. Steele

JONATHAN D. STEELE  
Admitted Pro Hac Vice  
Counsel for Petitioner

**Certificate of Conference**

I certify that a reasonable effort has been made to resolve the issues addressed in this Counter-Motion for Protective Order without the necessity of court intervention, and the parties have been unable to resolve those issues.

By: /s/ Jonathan D. Steele

JONATHAN D. STEELE

**Certificate of Service**

I certify that a true and correct copy of the foregoing document was served in accordance with the Texas Rules of Civil Procedure through the Texas eFile and Serve system on all counsel of record and all parties entitled to service on the same date this document is filed.

By: /s/ Jonathan D. Steele

JONATHAN D. STEELE

### Automated Certificate of eService

This automated certificate of service was created by the e filing system. The filer served this document via email generated by the e filing 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.

Terra Aguirre on behalf of Rebecca Armstrong

Bar No. 24062589

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Envelope ID: 115516576

Filing Code Description: Response

Filing Description: TO MOTION FOR ENFORCEMENT AND COUNTER  
MOTION FOR PROTECTIVE ORDER

Status as of 6/1/2026 10:16 AM CST

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

<b>IN THE MATTER OF</b>	<b>§</b>	<b>IN THE DISTRICT COURT</b>
<b>THE MARRIAGE OF</b>	<b>§</b>	
	<b>§</b>	
<b>GWENDOLYN ULIJASZ-MCKEMIE</b>	<b>§</b>	<b>301<sup>st</sup> JUDICIAL DISTRICT</b>
<b>&amp;</b>	<b>§</b>	
<b>JASON MCKEMIE</b>	<b>§</b>	<b>DALLAS COUNTY, TEXAS</b>

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**RESPONDENT’S REPLY IN SUPPORT OF ENFORCEMENT, SANCTIONS, CONTINUANCE, AND LEAVE; OBJECTION TO PETITIONER’S BAD-FAITH PROTECTIVE ORDER AND FEE REQUEST; AND REQUEST FOR SANCTIONS, SHOW-CAUSE, COUNSEL CERTIFICATION, FEE SHIFTING, FORENSIC ACCOUNTING, ESTATE RECONSTITUTION, DISPROPORTIONATE DIVISION, AND SOURCE-RECORD VERIFICATION**

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

Jason McKemie files this Reply in Support of his Motion for Enforcement, Sanctions, Continuance, and Leave to Issue Third-Party Subpoenas, and objects to Petitioner’s Counter-Motion for Protective Order and fee request.

**I. PETITIONER’S RESPONSE IS NOT A DEFENSE. IT IS THE SAME OBSTRUCTION IN A NEW FORMAT.**

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Petitioner’s response confirms the emergency.

Jason McKemie came before this Court seeking source-record verification because Petitioner’s production cannot reconstruct the marital estate. Petitioner responded by asking the Court to protect her from the exact source records required to test whether her financial disclosures are truthful.

- That is not compliance.
- That is obstruction.

Petitioner’s protective-order request is not protection from improper discovery. It is protection from verification. It asks this Court to bless 17 months of missing statements, missing months, missing pages, missing account continuity, missing payroll records, missing VEIP/equity records, missing tax records, missing loan funding records, missing GLU Distribution LLC records, missing source documents, and missing third-party records – then force Jason to trial while the books remain closed.

- Petitioner wants the Court to treat Bates numbers as compliance.
- Bates numbers are not bank statements.
- A production index is not account continuity.
- A PDF range is not a payroll register.

- A screenshot is not a source record.
- A tax email is not an IRS transcript.
- A family note is not a funded loan.
- A “fraud/no access” claim is not a financial disclosure.

And a protective order filed after repeated noncompliance is not good-faith litigation. It is concealment with a certificate of service.

## **II. THIS IS NOT PETITIONER’S “ABUSE” OR “STALKING” CASE. IT IS A FRAUD CASE DISGUISED AS A VICTIM NARRATIVE.**

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Petitioner wants this Court to evaluate this case through the frame she created: abuse, stalking, fear, and victimhood. That frame is not the case. It is the mechanism used to divert attention away from the financial records.

The issue before this Court is not whether Jason McKemie should be punished for demanding source-record verification. The issue is why Petitioner and her counsel have spent seventeen months resisting it.

This is a fraud case. This is a source-record concealment case. This is a discovery-obstruction case. This is a financial-sabotage case. This is a healthcare-interference case. This is an evidence-theft case.

Petitioner’s narrative collapses the moment the Court asks objective questions.

Where are the complete account statements? Where are the account-continuity records? Where are the replacement-card records? Where are the payroll registers? Where are the VEIP records? Where are the myHoldings records? Where are the tax transcripts? Where are the funded loan transfers? Where are the QLE records? Where are the HSA/FSA access records? Where are the third-party contractor payment records? Where are the April 16 chain-of-custody records?

Petitioner does not want those questions answered.

That is why she seeks a protective order.

The problem is not merely that records are missing. The problem is that Petitioner’s conduct is fundamentally inconsistent with the narrative she asks this Court to accept.

- A person genuinely seeking protection does not need missing account statements, missing payroll records, unsupported loan claims, disguised equity investments, rotating credit-card accounts, missing tax records, or source-record concealment.

- A person genuinely seeking protection does not report a legal retainer as fraud, cut off access to counsel, and then escalate into protective-order litigation.
- A person genuinely seeking protection does not testify that she has not and will not interfere with healthcare and then submit a Qualifying Life Event terminating coverage before a scheduled surgery.
- A person genuinely seeking protection does not report a Health Savings Account card lost or stolen while the other party is hospitalized and actively seeking medical treatment.
- A person genuinely seeking protection does not register AirTags to her own phone and iCloud account and later present those same devices as evidence that someone else was tracking her.
- A person genuinely seeking protection does not request that surveillance cameras remain active so property retrieval can be documented and then attack the existence of those same recordings when they become inconvenient.
- A person genuinely seeking protection does not take possession of another party's devices, electronics, hard drives, litigation materials, financial records, and evidence repositories and then characterize the location of those items as evidence of stalking.
- A person genuinely seeking protection does not ask her husband to leave cameras running so he can "see what she is taking and feel safe," then enter his office, speak directly into those cameras, taunt him, and later accuse him of unlawfully recording her.

Most importantly, a person genuinely seeking protection does not spend seventeen months fighting to prevent independent verification of her own financial disclosures.

That is not protection.

That is concealment.

That is why Petitioner's response to source-record verification is so revealing.

- Jason McKemie sought the books. Petitioner sought a protective order.
- Jason McKemie sought verification. Petitioner sought fees.
- Jason McKemie sought third-party records. Petitioner sought to prevent them.

The pattern is consistent.

When Jason approaches the money trail, Petitioner changes the subject. When Jason seeks records, Petitioner claims fear. When Jason identifies missing statements, Petitioner points to Bates numbers. When Jason identifies contradictions, Petitioner demands protection from verification.

- The Court should reject that frame.
- This is not an abuse case.
- This is not a stalking case.
- This is a fraud case.
- And counsel are now inside it.

Jonathan Drake Steele voluntarily placed his review and certification process at issue through his affidavit. He did not identify a single complete continuous institution-origin account. He did not identify complete payroll records. He did not identify complete VEIP records. He did not identify complete myHoldings records. He did not identify complete tax records. He did not identify complete loan-funding records. He did not identify the source of card overpayments. He did not identify the source records necessary to reconstruct the estate.

- He identified a Bates range.
- A Bates range is not compliance.
- A production index is not truth.
- A lawyer's affidavit cannot transform incomplete financial fragments into source-record production.

If Mr. Steele certified, defended, presented, or relied upon Petitioner's production as complete without verifying account continuity, source-record continuity, and estate traceability, then he certified a false financial position to this Court. That is sanctionable. Rebecca L. Armstrong sponsored and supported his admission and remains counsel of record. Sullivan & Cook previously defended the same structurally defective production. Any attorney who certified, sponsored, presented, defended, relied upon, or failed to correct this production belongs in the sanctions inquiry.

Petitioner's protective order is the tell.

She is not seeking protection from improper discovery.

She is seeking protection from the records that will determine whether her disclosures are true.

The books either reconcile or they do not. The loans either have funded transfers or they do not. The VEIP records either exist or they do not. The tax transcripts either support her position or they do not. The April 16 records either explain what happened or they do not.

That is why source-record verification matters.

And that is why Petitioner is fighting so hard to stop it.

### **III. THE RECORD SHOWS REPEATED NOTICE, REPEATED COMPEL EFFORTS, REPEATED NONCOMPLIANCE, AND NO COMPLETE ACCOUNT.**

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Petitioner's "he waited until trial" argument is false by omission.

Jason did not wait. Jason repeatedly raised these defects. Jason repeatedly sought financial discovery, subpoena authority, source-record verification, written rulings, and enforcement. The record includes, among other filings and hearing entries:

- June 27, 2025 – Motion to Preserve Discovery Rights and Compel Discovery Responses;
- July 16, 2025 – Motion for Sanctions / fraud-upon-the-court track;
- July 17, 2025 – Notice of Material Discovery Concealment and reservation of rights;
- July 17, 2025 – Notice of Intent to Seek Disproportionate Division;
- December 19, 2025 – Motion to Compel;
- December 23, 2025 – Motion for Leave and Proposed Order Granting Leave to Serve Subpoenas;
- December 29, 2025 – Supplemental Submission in Support of Motion to Compel;
- January 8, 2026 – Proposed Order on Motion to Compel;
- January 20, 2026 – noncompliance concerning certified financial production;
- February 2, 2026 – Motion to Compel Complete Financials;
- February 5, 2026 – repeated noncompliance concerning certified financial production;
- February 10, 2026 – proposed verification/status orders;
- May 26, 2026 – present Motion for Enforcement, Sanctions, Continuance, and Leave.
- Petitioner and counsel were told exactly what was missing.
- Petitioner and counsel were given repeated opportunities to cure.
- Petitioner and counsel did not cure.

Instead, Petitioner and counsel defended the defective production, demanded trial, sought fees against the party harmed by the obstruction, and now ask for a protective order to prevent third-party source verification.

That is not a procedural defect by Jason.

That is the litigation strategy Petitioner has used from the beginning: obstruct, accuse, delay, manufacture collapse, then blame Jason for the collapse Petitioner created.

#### **IV. STEELE'S AFFIDAVIT DOES NOT PROVE COMPLIANCE. IT CERTIFIES THE FALSEHOOD.**

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Jonathan Drake Steele voluntarily placed counsel review and certification directly at issue.

His affidavit states that he was actively involved in the preparation and review of Petitioner's discovery production. He identifies a production index and Bates range. He does not identify a single complete continuous institution-origin account. He does not identify a single account/month/source-record chart proving continuity. He does not identify the missing replacement-card lineage. He does not identify payroll registers. He does not identify VEIP election records. He does not identify myHoldings source records. He does not identify tax transcripts. He does not identify loan funding transfers. He does not identify GLU Distribution LLC source records. He does not identify the payment source for card overpayments. He does not identify the destination of equity liquidation or replacement liquidity.

Mr. Steele's affidavit proves exactly one thing: counsel has now attached his name to the false premise that a Bates range equals compliance.

That is a flat-out false certification narrative.

- A lawyer may advocate.
- A lawyer may object.
- A lawyer may argue burden.

But a lawyer may not certify or defend a financial production as adequate when the record cannot identify even one complete continuous institution-origin account sufficient to reconstruct the marital estate.

Mr. Steele has stepped into the record. He is no longer merely arguing from the sideline. He has sworn into the record that he reviewed the production and production index. That makes his certification, his review process, and his factual basis proper subjects for Rule 191.3 certification review and Rule 215 sanctions.

Local counsel Rebecca L. Armstrong is not ceremonial wallpaper. She is counsel of record. She sponsored, supported, presented, relied upon, or failed to correct the same defective production position. Sullivan & Cook and any attorney who certified, sponsored, presented, defended, relied upon, or failed to correct Petitioner's defective financial production are likewise within the sanctions inquiry to the extent their conduct contributed to this fraud, concealment, and delay.

Jason expressly seeks sanctions against Petitioner, Jonathan Drake Steele, Rebecca L. Armstrong, Sullivan & Cook, and any attorney who certified, sponsored, presented, defended, relied upon, or attempted to shield materially incomplete financial production from verification.

## **V. PETITIONER'S PROTECTIVE ORDER IS BAD-FAITH DISCOVERY OBSTRUCTION.**

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Petitioner's protective order should be denied in full.

Petitioner is not asking the Court to protect privileged communications. She is asking the Court to protect missing source records from being tested. She wants protection from banks, payroll custodians, Accenture, equity administrators, VEIP records, tax records, loan records, lease records, landlord records, benefits records, HSA/FSA records, contractor payment records, and April 16 chain-of-custody records.

That is not privilege.

That is the crime scene tape around financial fraud.

The requested source records are not exotic. They are ordinary divorce records:

- complete monthly bank statements;
- credit-card statements;
- account continuity records;
- replacement-card lineage;
- payment-source records;
- overpayment/refund records;
- payroll registers;
- bonus worksheets;
- VEIP election and transaction records;
- myHoldings equity records;
- RSU grant/release/withholding records;
- tax transcripts;
- loan origination and funding records;
- employer reimbursement records;
- lease payoff and rent ledgers;
- QLE/benefits records;
- HSA/FSA functionality records;
- vendor invoices and payment records;
- April 16 chain-of-custody records.

If Petitioner's production is truthful, complete, and defensible, third-party records will prove it.

If Petitioner's production is false, incomplete, and fraudulent, third-party records will expose it.

That is why she seeks protection.

## **VI. THE VEIP / "EXTRA TAX WITHHOLDING" ISSUE IS FRAUD, NOT CONFUSION.**

---

Petitioner labeled or allowed equity investment activity to be treated as "extra tax withholding."

### **That is fraud.**

The Accenture compensation record shows the compensation structure was not ambiguous. Petitioner's compensation included salary, sign-on bonuses, annual bonus, VEIP/equity deductions, RSUs, taxable RSU activity, and equity-plan benefits. VEIP is not "extra tax withholding." VEIP is an elective stock-purchase/equity program. RSU share withholding is not ordinary tax withholding. A net paycheck is not the full compensation record.

Petitioner's paystubs show "Federal 2c/Extra Withholding: No/\$0.00," while separately showing VEIP deductions and RSU activity. If Petitioner disclosed VEIP/equity activity as "extra tax withholding," that was a false characterization of marital asset movement.

- This was not a typo.
- This was not accounting noise.
- This was a half-million-dollar estate distortion.
- The present record identifies the VEIP/equity problem as follows:

VEIP/equity investment principal: approximately \$130,000;  
approximate 50% employer/equity gain or match: approximately \$65,000;  
total liquid/equity value: approximately \$195,000;  
mischaracterization effect: converting asset value into supposed tax/liability pressure;  
estate distortion: more than \$500,000.

That cannot be tried on emails, screenshots, annual summaries, or counsel argument. It requires Accenture payroll records, myHoldings records, VEIP plan records, equity custodian records, RSU release records, share-withholding records, W-2 support records, and bank-origin tracing.

Petitioner's attempt to block those records is not a burden objection. It is fraud protection.

## **VII. PETITIONER'S LOAN CLAIMS ARE NOT LOANS WITHOUT TRACEABLE FUNDS TRANSFERS.**

---

Petitioner cannot simultaneously claim financial hardship, claim the need for undocumented family loans, funnel five-figure sums into VEIP equity investments, accumulate employer-matched stock compensation, and schedule elective cosmetic procedures at a luxury aesthetic clinic. Those positions are mutually incompatible. If sufficient funds existed for equity accumulation and elective cosmetic

spending, then the alleged hardship underlying the claimed loan did not exist. If the hardship did exist, then the equity purchases and elective expenditures become evidence of dissipation and waste. Either way, absent source records proving the loan was actually funded, received, and used for a legitimate community purpose, the alleged obligation fails as a credible community debt claim.

- A claimed loan is not a loan because Petitioner says so.
- A promissory note without traceable funding is not proof of a loan.
- A tax "prediction" email is not a tax transcript.
- A claimed sister loan without funds transfer is not a community liability.
- A loan without proof of funds entering Petitioner's account from a traceable account number is not a debt Jason should carry.

Petitioner paid off her own obligations, moved money, claimed hardship, then attempted to burden Jason with debts and liabilities while shielding the source records needed to test whether those debts were real, separate, community, reimbursable, fabricated, litigation-funded, or used to replace liquidity from equity investment.

The AIG loan began before the August 2023 common-law marriage date asserted by Jason. It cannot be dumped wholesale onto the community without tracing. If Petitioner insists the marriage was a "five-month fling" with no commingled assets, then she cannot simultaneously use pre-marriage loans and opaque pre-marriage liabilities to burden Jason.

The \$50,000 Advantigen investment – one-half of the total \$100,000 investment – was a joint investment event. Attempts to recast it and other joint investment activity as Petitioner's separate property while using incomplete records and missing source proof is bad faith.

Petitioner cannot have it both ways:  
no marriage when assets must be shared,  
marriage when debts must be shifted,  
privacy when records expose fraud,  
and fees when her obstruction causes the hearing.

## **VIII. THE APRIL 16 THEFT IS PART OF THE SAME OBSTRUCTION PATTERN.**

---

April 16 was not "property removal."

It was theft.

Petitioner stole Jason's hard drives, evidence repositories, litigation materials, financial reconstruction records, trial materials, medical/legal records, computer equipment, GPUs, network storage, music studio equipment, medication, and livelihood infrastructure.

Those stolen hard drives were Jason's separate property owned before the marriage.

They contained 17 months of exhibits, financial reconstruction work, discovery materials, trial preparation, Accenture contribution evidence, professional records, music/studio materials, technical work, and evidence necessary to rebut Petitioner's false non-contributor narrative.

Petitioner then attempted to transform her possession of Jason's stolen property into a victim narrative. She stole devices and property from Jason's residence, took them to her own residence or into her control, and then treated the presence/location of Jason's devices as evidence that Jason was stalking her. If Petitioner does not want Jason's Apple TV, AirTags, electronics, or device identifiers appearing in her house, she should stop stealing Jason's property from his house.

That is not stalking.

That is possession of stolen property.

If Petitioner fled after being told not to leave, that is fleeing the scene.

If Petitioner stole evidence repositories and then seeks trial while Jason lacks the records she stole, that is evidence theft and litigation sabotage.

Petitioner cannot steal Jason's evidence, block third-party source records, claim he lacks proof, demand trial, and ask the Court to make Jason pay her fees for the privilege of being ambushed. That is not due process. That is procedural arson followed by an invoice for smoke damage.

Jason requests categorical relief: Petitioner, her counsel, experts, vendors, contractors, movers, security personnel, investigators, consultants, agents, and anyone acting for her shall have no access to, no use of, and no benefit from Jason's stolen hard drives, evidence repositories, litigation files, source records, or derivative materials. They shall preserve all external chain-of-custody records, communications, payment records, dispatch records, photographs, video, location data, inventory records, possession records, and storage records. The stolen evidence repositories and stolen property shall be returned to Jason.

1. No inspection.
2. No imaging.
3. No copying.
4. No in-camera workaround.
5. No expert workaround.
6. No derivative use.
7. No benefit from theft.

---

## **IX. PETITIONER'S FEE REQUEST IS OBSCENE AND SHOULD BE DENIED IN FULL.**

---

Petitioner now asks the Court to shift fees, costs, protective expenses, and litigation expenses against Jason.

That request is offensive.

Petitioner has stretched this divorce across 17 months of financial concealment, discovery obstruction, healthcare obstruction, false narratives, protective-order gamesmanship, late production, source-record concealment, housing destabilization, forced bankruptcy pressure, and April 16 theft.

- Jason is homeless.
- Jason has been denied functional healthcare access.
- Jason has been blocked from heart medication and surgical care.
- Jason has been forced into bankruptcy.
- Jason is facing loss of transportation.
- Jason has had his residence destroyed, his property stolen, his hard drives stolen, his evidence repositories stolen, his tools stolen, and his ability to litigate crippled.

Now Petitioner asks him to pay her fees because he demanded the books.

No.

Petitioner's request for attorney's fees, costs, protective expenses, expert/vendor expenses, and any cost shifting against Jason should be denied in full. No later prove-up. No reservation. No "without prejudice." No deferred entitlement. Petitioner caused this hearing through obstruction. Petitioner and the responsible counsel should pay the cure.

## **X. THE COURT SHOULD ORDER COUNSEL CERTIFICATION AND SHOW-CAUSE SANCTIONS BEFORE TRIAL.**

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Jason requests that the Court order Petitioner, Jonathan Drake Steele, Rebecca L. Armstrong, Sullivan & Cook, and any attorney who certified, sponsored, presented, defended, relied upon, or attempted to shield Petitioner's financial production to appear and show cause why sanctions should not issue for:

1. false certification;
2. discovery obstruction;
3. source-record concealment;
4. protective-order misuse;
5. bad-faith resistance to verification;
6. fraud on the community;
7. fraud upon the Court;
8. counsel-assisted concealment;
9. failure to correct false completeness representations;

10. litigation conduct designed to convert missing records into trial advantage.

Jason further requests that the Court require sworn counsel certification within three calendar days identifying:

1. every financial account known to Petitioner or counsel;
2. every account number, replacement account number, replacement card number, closed account, successor account, and related account lineage;
3. every month for which a complete institution-origin statement was produced;
4. every month missing or incomplete;
5. every document Petitioner claims is a source record;
6. every document that is merely a screenshot, annual summary, account overview, one-day report, attorney summary, party-created spreadsheet, tax email, or non-source record;
7. whether counsel reviewed institution-origin records or only client-selected PDFs;
8. whether counsel reviewed Accenture payroll records, myHoldings records, VEIP plan records, equity custodian records, tax transcripts, loan funding records, GLU Distribution LLC records, and Chase account-continuity records;
9. the factual basis for any representation that the production is complete;
10. the factual basis for any request to prevent third-party verification.

If counsel cannot certify complete source-record compliance at the account/month/source-record level, the Court should not accept counsel's production index as compliance.

## **XI. RECONSTITUTION, DISPROPORTIONATE DIVISION, FORENSIC ACCOUNTING, AND STABILIZATION ARE NOW REQUIRED.**

This is no longer ordinary discovery enforcement.

Petitioner's conduct directly affects the Court's ability to determine the true composition and value of the marital estate. The Court cannot make a just and right division of an estate that cannot be identified. The Court cannot reject reconstitution while source records are blocked. The Court cannot decide disproportionate division while Petitioner's financial production remains structurally defective.

Jason requests preservation and active enforcement of remedies for:

1. fraud on the community;
2. fraud upon the Court;
3. reconstitution of the estate under Texas Family Code § 7.009;
4. disproportionate division under Texas Family Code § 7.001;
5. fee shifting against Petitioner and responsible counsel;
6. sanctions against Petitioner and counsel;
7. adverse inferences;
8. reimbursement/add-backs;

9. healthcare enforcement;
10. stabilization relief;
11. neutral court-appointed forensic accounting;
12. source-record subpoenas;
13. trial continuance or abatement until the estate can be reconstructed.

The forensic accountant must be court-appointed and neutral, but the accountant's work must be limited to third-party source records, Petitioner's financial production, institutional records, payroll records, equity records, tax records, bank records, loan records, lease records, and vendor/payment records. Nothing in this request permits Petitioner, counsel, experts, vendors, agents, or anyone acting for her to access, inspect, image, copy, use, or benefit from Jason's stolen hard drives or evidence repositories.

## **XII. THE COURT SHOULD NOT CONVERT OBSTRUCTION INTO FINAL JUDGMENT.**

Petitioner wants the Court to proceed to trial while the estate cannot be reconstructed.

That would reward obstruction.

A final trial without source records would force Jason to defend against a financial narrative built from missing statements, rotated accounts, unexplained overpayments, unsupported loans, mislabeled equity, missing tax transcripts, missing payroll records, missing VEIP records, missing myHoldings records, missing loan funding records, missing contractor payment records, and stolen evidence repositories.

- Petitioner created the evidentiary collapse.
- Petitioner now seeks protection from the cure.
- The Court should not permit that.

## **XIII. PRAYER**

Jason McKemie respectfully requests that the Court:

1. DENY Petitioner's Counter-Motion for Protective Order in full;
2. DENY Petitioner's request for attorney's fees, costs, protective expenses, expert/vendor expenses, and any cost shifting against Jason McKemie in full, with no later prove-up and no reservation;
3. FIND that Petitioner's protective-order request is a bad-faith attempt to block source-record verification after prolonged noncompliance;

4. GRANT Jason McKemie's request for leave to issue third-party subpoenas for source records concerning financial accounts, credit cards, overpayments, payment sources, account continuity, replacement-card lineage, VEIP/equity, Accenture payroll, myHoldings, RSUs, tax records, loans, GLU Distribution LLC, San Antonio housing, lease payoff, rent ledgers, QLE/benefits, HSA/FSA functionality, legal retainers, third-party contractors, vendors, April 16 theft, movers, security, bodyguards, All My Sons, Merritt McClayton, Decisive Resources, Jetty Partners, landlord records, constable records, and related source-record custodians;
5. MODIFY discovery deadlines for the limited purpose of third-party source-record verification and related follow-up;
6. CONTINUE or ABATE the June 11, 2026 trial setting until the marital estate can be reconstructed from complete, continuous, source-verifiable records;
7. ORDER Petitioner, Jonathan Drake Steele, Rebecca L. Armstrong, Sullivan & Cook, and any counsel who certified, sponsored, presented, defended, relied upon, or attempted to shield Petitioner's financial production to appear and show cause why sanctions should not issue;
8. ORDER sworn Rule 191.3 certification identifying every account, every missing statement month, every incomplete record, every replacement account/card number, every source record reviewed, and the factual basis for any representation of completeness;
9. APPOINT a neutral court-appointed forensic accountant to reconstruct the estate from third-party source records and non-stolen financial records, with fees advanced or paid by Petitioner and/or responsible counsel as sanctions, fee shifting, or discovery-cure expenses;
10. PRESERVE and SET FOR HEARING Jason McKemie's requests for fraud-on-the-community findings, fraud-upon-the-Court findings, estate reconstitution under Texas Family Code § 7.009, disproportionate division under Texas Family Code § 7.001, adverse inferences, reimbursement, offsets, add-backs, fee shifting, sanctions, healthcare enforcement, stabilization relief, and April 16 theft remedies;
11. ORDER that Petitioner, her counsel, experts, vendors, contractors, movers, security personnel, investigators, consultants, agents, and anyone acting for her shall have no access to, no use of, and no benefit from Jason McKemie's stolen hard drives, evidence repositories, litigation files, digital storage devices, source files, or derivative materials;
12. ORDER preservation of all April 16 chain-of-custody evidence, including communications, photographs, videos, inventories, booking records, dispatch records, payment records, location records, storage records, possession records, and records concerning stolen hard drives, devices, GPUs, network storage, music studio equipment, medication, financial records, litigation records, safes, briefcases, and other stolen property;
13. ORDER return of Jason McKemie's stolen evidence repositories and stolen property;

14. ENFORCE healthcare/HSA/FSA functionality and stabilization relief necessary to prevent further medical and financial harm;
15. REQUIRE written rulings on every item granted, denied, or reserved;
16. GRANT all other relief to which Jason McKemie is entitled.

## **XVI. SUPPLEMENTAL UNSWORN DECLARATION OF JASON MCKEMIE**

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My name is **Jason McKemie**. My date of birth is April 8, 1976. My address is **539 W. Commerce St., Suite 2010, Dallas, Texas 75208**. I declare under penalty of perjury that the following is true and correct based on my personal knowledge and review of the records referenced in this filing.

1. I have repeatedly sought complete financial discovery, source-record verification, subpoena authority, and enforceable compliance throughout this case.
2. I served deficiency notices and identified missing pages, missing months, missing accounts, missing VEIP records, missing GLU Distribution LLC records, missing Chase continuity records, missing overpayment tracing, missing payroll records, missing equity records, and missing source records.
3. Counsel demanded specific defects. I identified them. Counsel then responded with Bates ranges and prior production references instead of producing complete source records.
4. I still do not have one complete, continuous, institution-origin account sequence sufficient to reconstruct the marital estate.
5. Petitioner's production contains missing months, missing pages, mixed-year page inserts, out-of-sequence statements, one-day snapshots, summaries, redacted account identifiers, replacement card/account discontinuities, and incomplete records that prevent tracing.
6. The missing source records are material because they are necessary to reconstruct the marital estate, verify income, trace payments, test claimed debts, verify VEIP/equity classification, determine whether "extra tax withholding" was actually tax withholding or elective equity investment, identify RSU taxable events, verify employer reimbursements, verify HSA/FSA functionality, verify QLE/benefits actions, and determine the April 16 chain of custody.
7. Petitioner's Fraud Budget / sworn financial materials identify "Extra monthly Tax Withholding" in the amount of \$13,300. Based on the Accenture compensation records and payroll/equity materials, this requires verification because VEIP equity investment cannot be accepted as tax withholding without source records.

8. Paystubs, payroll records, VEIP records, RSU records, myHoldings records, equity-custodian records, and tax records are necessary to determine the truth.
9. The requested continuance and subpoenas are not sought for delay. They are necessary because trial without source records would convert Petitioner's noncompliance, false certification, discovery obstruction, and evidence theft into litigation advantage.
10. I request denial of Petitioner's protective order, denial of all fees/costs/protective expenses against me, authorization of third-party subpoenas, sworn counsel certification, trial continuance, and a sanctions/show-cause hearing.

Executed in Dallas County, Texas on June 1st, 2026.



---

**Jason McKemie**

539 W. Commerce St., Suite 2010  
Dallas, Texas 75208  
214-868-4901  
[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

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**CERTIFICATE OF SERVICE**

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I certify that a true and correct copy of this filing and all attached exhibits was served on all counsel of record and/or parties entitled to notice through the Texas e-filing service provider and/or email in accordance with the Texas Rules of Civil Procedure on June \_\_\_\_, 2026.



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Jason McKemie

## EXHIBIT INDEX

<b>Exhibit</b>	<b>Title</b>	<b>Purpose</b>
<b>Exhibit A</b>	Motion to Recuse – Pleading History	Procedural history demonstrating repeated filings, unresolved motions, discovery disputes, and case-management failures.
<b>Exhibit B</b>	Discovery Email	Notice to Petitioner and counsel regarding discovery deficiencies, missing records, and requests for compliance.
<b>Exhibit C</b>	Sworn Budget	Demonstrates Respondent's financial condition, expenses, inability to absorb continued delay, and need for relief.
<b>Exhibit D</b>	High Liquidity While Declaring Destitution	Contradicts claims of financial hardship by showing significant available funds or liquidity.
<b>Exhibit E</b>	AMEX Annual Summaries	Credit card spending analysis and reconstruction of financial activity.
<b>Exhibit F</b>	"Worthless" Investments	Petitioner statements minimizing value of assets later shown to have material value.
<b>Exhibit F-1</b>	No Intouch Statements	Demonstrates missing account continuity, missing statements, and inability to trace transactions.
<b>Exhibit G</b>	\$0 HSA	Evidence relating to HSA depletion, healthcare interference, and lack of available medical funds.
<b>Exhibit G-1</b>	Tax Transcripts	IRS-source tax records used to verify income, tax liability, withholding, and financial disclosures.
<b>Exhibit K</b>	Card Flipping	Demonstrates repeated account/card number changes, continuity issues, and tracing obstacles.
<b>Exhibit L</b>	Annual Snapshots Without Inflows or Outflows	Illustrates production of summary balances without underlying transactional support.
<b>Exhibit M</b>	Associate Judge's Report	Court findings, procedural history, and prior discovery-related determinations.
<b>Exhibit N</b>	Gwen Financial Discovery Compliance Matrix	Visual compliance chart showing discovery requests, deficiencies, missing records, and production failures.
<b>Exhibit J</b>	Overpayments / Missing Statements	Analysis of excessive card overpayments, missing statement periods, and inability to trace source funds.

NO.	NOTICE:	CONTAINS SENSITIVE DATA
IN THE MATTER OF	§	IN THE DISTRICT COURT
THE MARRIAGE OF	§	
	§	
GWENDOLYN ULIJASZ-MCKEMIE	§	302 <sup>nd</sup> JUDICIAL DISTRICT
&	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

**VERIFIED MOTION TO RECUSE**  
 (CONDITIONAL UPON DENIAL OF A STRUCTURAL CURE)

TO THE HONORABLE JUDGE OF SAID COURT:

Respondent, **Jason McKemie**, files this *Verified Motion to Recuse* not as an opening position, but only as a procedural safeguard.

Respondent does not seek recusal if the structural defects presently before this Court are acknowledged and cured. Respondent seeks only the minimum procedural relief necessary to make a fair trial legally possible:

- A continuance sufficient to allow meaningful review;
- Leave for narrowly tailored **third-party subpoena authority for certified, institution-origin financial records;**
- Leave to subpoena the **Accenture QLE submission and audit trail;**
- Leave to subpoena the **lease buyout contract and related landlord ledger;**
- Enforcement of the **Court’s December 17 Reinstatement of Healthcare Order** which orders the reactivation of all of Respondent’s benefits which were terminated on **October 31st, 2026**, through the submission of a false Qualifying Life Event (QLE) and a sworn attestation affirming that divorce proceedings had been finalized and that a divorce decree had been signed by a Judge of this Court. **No such decree exists.**
- **This order, if enforced by the District Judge, will provide Respondent with access back to critically needed Healthcare services & Prescription’s which have been continually obstructed since December, 18, 2024.** This enforcement additionally reimburses Respondent for the lost Flexible Spending Account Benefits; and the allocated Health Spending Account funds; and removes Petitioner’s control over benefits enrollment, card cancellations, and/or delays. This will permit Respondent to (1) resume the critically needed medications he has been obstructed from since December 18, 2024; (2) gain access to the needed MRI’s so that he can reschedule the missed surgery from December 2025; and (3) will significantly diminish Petitioner’s ability to delay and obstruct Respondent’s access to care and prescriptions; as the lump sum will cover deductibles sufficient to proceed with surgical care.

If those structural defects are remedied through written rulings and enforceable compliance mechanisms, Respondent will proceed.

If they are not remedied, then there exists no procedural pathway to a fair adjudication, and recusal becomes mandatory to preserve due process.

This Motion is therefore filed in advance of the hearing to preserve Respondent's rights should the Court decline to cure the structural failures outlined below.

## **I. PRIOR RECUSAL & STRUCTURAL DISCOVERY COLLAPSE IN DISTRICT 254**

This case arrived in District 302 after a judicial recusal in District 254 precipitated by structural discovery failure.

In District 254:

- Respondent served discovery in good faith.
- Petitioner's legal team withdrew during the discovery period citing financial difficulty.
- Petitioner did not declare herself pro se.
- With approximately forty minutes remaining in discovery, counsel reappeared at 11:08 p.m., filed blanket objections to nearly every request, and declared discovery closed approximately one hour later.

Despite Respondent's Protests:

- Trial was forced despite discovery being completely skipped.
- Respondent was denied meaningful enforcement.
- Recusal followed.

These facts are reflected in the discovery-collapse submission .

## **II. SEPTEMBER 8 PRETRIAL CONFERENCE – DISTRICT 302**

At the September 8 pretrial conference, Respondent advised Judge Jackson that this case did not resemble a routine divorce matter and that meaningful discovery had never occurred in District 254.

Respondent explained that in District 254:

- He served discovery in good faith;
- Petitioner’s counsel moved to withdraw citing financial hardship;
- Petitioner did not formally proceed pro se, creating service ambiguity;
- With less than one hour remaining in the discovery period, counsel reappeared at 11:08 p.m., filed a notice of appearance, and simultaneously lodged blanket objections to nearly every discovery request;
- Approximately one hour later, discovery was declared closed;
- Trial proceeded despite unresolved discovery disputes and without complete financial disclosure.

Respondent further advised Judge Jackson that there could be no fair trial absent:

1. Third-party subpoena authority;
2. Institution-origin certified financial statements;
3. A neutral forensic accountant to reconstruct the estate.

Judge Jackson stated she could not grant subpoena authority at that procedural setting but assured Respondent that he would have ninety (90) days with certified financials to prepare. When Respondent expressed concern that prior counsel had obstructed discovery in District 254, Judge Jackson replied, “That was not my courtroom,” and directed Ethan Scroggins to release the certified financials. Counsel agreed.

Respondent relied upon that representation.

### **III. ON OCTOBER 31, 2026, RESPONDENT APPEARED BEFORE ASSOCIATE JUDGE TAMIKA ABENDROTH SEEKING REIMBURSEMENT FOR FINANCIAL BURDENS IMPOSED THROUGH FALSE FINANCIAL REPRESENTATIONS AND RELATED PROCEEDINGS.**

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At that hearing, Respondent informed the Court that Petitioner had produced less than fifteen percent of the necessary certified financial documentation. Respondent further stated that if he filed a Motion to Compel, Petitioner’s counsel would again move to withdraw, and that if withdrawal were permitted prior to compliance, discovery would collapse once more.

The following business day, Respondent filed his Motion to Compel. Petitioner’s legal team filed a Motion to Withdraw. Respondent objected, arguing that:

- The District Judge had already directed release of certified financials;

- Oral directives are binding;
- Withdrawal prior to compliance would nullify enforcement;
- There was no path to a fair trial without third-party custodian subpoena authority;
- Statement-only production cannot reconstruct accounts involving layered transfers and rotating credit facilities;
- A neutral forensic tracing mechanism remained necessary.

The Associate Judge permitted withdrawal. No complete certified financial production followed.

### **III. WHAT OCCURRED AFTER THE NINETY-DAY ASSURANCE**

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What followed was not compliance with a directive for complete, certified financials.

Instead, the production record reflects:

- Monthly statements missing transaction-detail pages (see Exhibit A deficiency chart);
- Editable CSV or activity exports substituted for institution-issued monthly statements;
- Duplicate documents containing identical transactions labeled as separate months;
- Promised “substantive responses” followed by recycled Bates productions;
- Production delivered in inaccessible format;
- Counsel withdrawal immediately after filing of the Motion to Compel;
- No uninterrupted sequence of institution-origin monthly statements sufficient for tracing.

These deficiencies are not isolated clerical errors. They are structural defects that prevent meaningful estate reconstruction.

### **IV. PRESENT STRUCTURAL IMPOSSIBILITY**

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The estate cannot be evaluated because:

- There is no uninterrupted monthly sequence for any account;
- Institution-origin statements have not been produced;

- Accounts have been rotated, renamed, and layered;
- Funds conceded in mediation were not escrowed;
- Healthcare enforcement remains incomplete;
- An active bankruptcy stay exists under Trustee oversight.

**These facts are extensively documented and;**

**Proceeding to trial under these conditions would:**

- Convert discovery collapse into adjudication;
- Freeze dissipation into final division;
- Render third-party verification impossible;
- Permanently impair Respondent's ability to challenge false or incomplete production.

## **V. CONDITIONAL NATURE OF THIS MOTION**

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Respondent does not seek recusal if:

1. The Court grants limited third-party subpoena rights;
2. The Court enforces its December 17 healthcare order through verified plan-administrator confirmation or escrow replacement;
3. The Court sets a sanctions/compliance hearing prior to trial;
4. The Court enters written rulings clarifying compliance.

If those actions occur, Respondent will proceed.

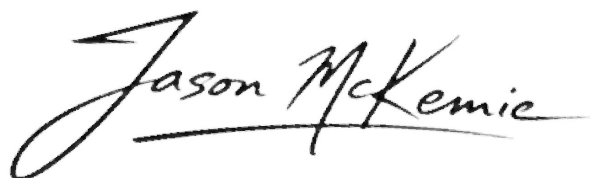
If they do not, Respondent has no procedural remedy remaining within this Court, and recusal becomes necessary to preserve due process and appellate review.

## **VI. VERIFIED UNSWORN DECLARATION (TEX. CIV. PRAC. & REM. CODE § 132.001)**

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My name is Jason McKemie. My date of birth is **April 8th, 1976**. My address is **539 W. Commerce St., Suite 2010, Dallas, Texas 75208**. I declare under penalty of perjury that the factual statements in this Motion are true and correct based on my personal knowledge and review of the documents referenced herein.

Executed in **Dallas County, Texas** on **February 24, 2026**.



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**Jason McKemie**

539 W. Commerce St., Suite 2010

Dallas, TX 75208

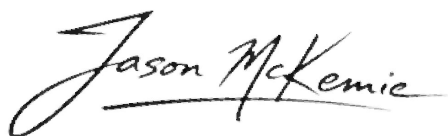
214-868-4901

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

## **CERTIFICATE OF SERVICE**

---

I certify that a true and correct copy of this Motion and proposed order were served on all counsel of record and/or parties entitled to notice in accordance with the Texas Rules of Civil Procedure and applicable e-service rules on the date of filing.



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Jason McKemie

## **EXHIBIT LIST (TO BE ATTACHED)**

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- Exhibit A: Respondent/Movant Pleadings Index by Category (100 filings / 1,110 pages).
- Exhibit B: Motion to Compel with Color Production Grid
- Exhibit D: Credit Card Over Payment
- Exhibit E: Signed Order to Reinstate Healthcare
- Exhibit F: Motion to Compel Docket Sheet
- Exhibit G: Benefits Summary generated February 2, 2026, reflecting multiple coverages waived.
- Exhibit H: Motion to Obtain Certified Transcript of January 7, 2025 Hearing (with proposed order).
- Exhibit I: Motion to Establish Conditions for Re-Entry of Counsel and Preserve Fair Trial.
- Exhibit K: Unified Proposed Order drafted at the Associate Judge's direction following the February 5 compliance hearing (pending).

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**RESPONDENT’S HISTORICAL PLEADINGS REQUESTING MEDICAL STABILIZATION, HOUSING STABILITY, ENFORCEABLE RELIEF, AND THIRD-PARTY VERIFICATION**

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<b>Category</b>	<b>Count</b>	<b>Pages</b>
1. Affidavits / Declarations / Character-type statements	7	135
2. Motions (all)	61	807
3. Motions seeking to "compel"	7	50
4. Healthcare / Medical / HSA / Abatement or Stay / Standing or Temporary Orders	41	507
5. Financial relief / reimbursements / fraud / rent / stabilization / Standing or Temporary Orders	39	354
6. Discovery obstruction / compel / subpoenas / enforcement	24	199
7. Due process / record / ex parte / court reporter / verbatim record / procedural fairness	43	516
8. Eviction / housing stability	10	108

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## **1. AFFIDAVITS / DECLARATIONS / CHARACTER REFERENCES**

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### **2025**

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- **07/10/2025** (Entry 81) — **43 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – DECLARATION OF CHRISTINA SEGURA IN SUPPORT OF JASON MCKEMIE
- **07/11/2025** (Entry 83) — **66 pages** — REQUEST FOR EMERGENCY HEARING TO PREVENT EVICTION DURING MEDICAL HARDSHIP WITH DECLARATION AND WITNESS STATEMENTS REQUEST FOR ER HEARING TO PREVENT EVICTION DURING MED. HARDSHIP WITH DECLARATION AND STATEMENTS
- **07/24/2025** (Entry 99) — **5 pages** — DECLARATION OF RESPONDENT'S DISASSOCIATION FROM BINDER INTRODUCED BY PETITIONER'S COUNSEL

- **07/24/2025** (Entry 96) — **3 pages** — ERRONEOUS PUBLIC FILING AND EMERGENCY MOTION TO SEAL PREVIOUSLY SUBMITTED DECLARATION
- **11/25/2025** (Entry 134) — **6 pages** — NOTICE OF FILING OF SWORN AFFIDAVIT - CORRECTING FALSE RECORDING ALLEGATIONS AND EX PARTE PREJUDICE

## 2026

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- **01/12/2026** (Entry 176) — **8 pages** — AFFIDAVIT ON PUBLIC STORAGE THEFT ACCUSATIONS AND PETITIONERS ACQUISITION OF WEAPON DURING PROCEEDINGS AFFIDAVIT ON PUBLIC STORAGE THEFT ACCUSATIONS AND PETITIONERS ACQUISITION OF WEAPON DURING PROCEEDIN
- **01/12/2026** (Entry 166) — **4 pages** — AFFIDAVIT ON MANUFACTURED ALLEGATIONS & CONCERN FOR PROPERTY RETRIEVAL / CLEAN OUT AFFIDAVIT - MANUFACTURED ALLEGATIONS

## 2. Motions (all Respondent motions & motion-like applications)

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### 2025

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- **03/14/2025** (Entry 48) — **4 pages** — MOTION - AGREED - WITHDRAW ATTORNEY - BRANT WEBB
- **03/28/2025** (Entry 51) — **2 pages** — NOTICE OF FAILED MEDIATION AND MOTION FOR CONTINUANCE OF APRIL 7th, 2025, PRE-TRIAL HEARING MOTION FOR CONTINUANCE-NOTICE OF FAILED MEDIATION AND OF APRIL 7th, 2025, PRE-TRIAL HEARING
- **04/14/2025** (Entry 55) — **5 pages** — MOTION TO STRIKE IMPROPER EXPERT DESIGNATIONS AND TO LIMIT TESTIMONY OF OPPOSING COUNSEL
- **04/24/2025** (Entry 56) — **1 page** — MOTION FOR NOTICE PRIOR TO ANY DISMISSAL PROPOSED ORDER ON MOTION FOR NOTICE PRIOR TO ANY DISMISSAL
- **04/24/2025** (Entry 60) — **3 pages** — MOTION TO DESIGNATE PRO SE REPRESENTATION AND REQUEST FOR EQUAL ACCESS
- **04/24/2025** (Entry 57) — **4 pages** — MOTION FOR NOTICE PRIOR TO ANY DISMISSAL NOTICE PRIOR TO ANY DISMISSAL
- **04/24/2025** (Entry 58) — **1 page** — ORDER ON MOTION TO DESIGNATE PRO SE REPRESENTATION AND REQUEST FOR EQUAL ACCESS PROPOSED ORDER ON MOTION TO DESIGNATE PRO SE REPRESENTATION AND REQUEST FOR EQUAL ACCESS
- **04/24/2025** (Entry 59) — **1 page** — MOTION TO DESIGNATE PRO SE REPRESENTATION AND REQUEST FOR EQUAL ACCESS PROPOSED ORDER ON MOTION TO DESIGNATE PRO SE REPRESENTATION AND REQUEST FOR EQUAL ACCESS

- **06/24/2025** (Entry 66) — **8 pages** — EMERGENCY MOTION FOR TEMPORARY FINANCIAL RELIEF DUE TO IMMINENT HOUSING LOSS, MEDICAL HARDSHIP EMERGENCY M/FINANCIL
- **06/27/2025** (Entry 67) — **4 pages** — MOTION TO PRESERVE DISCOVERY RIGHTS AND COMPEL DISCOVERY RESPONSES MOTION TO PRESERVE DISCOVERY RIGHTS AND COMPELL DISCOVERY RESPONSES
- **06/27/2025** (Entry 69) — **5 pages** — OBJECT IN MATERIAL DISCOVERY NOTICE OF MATERIAL DISCOVERY NOTICE OF MATERIAL DISCOVERY
- **07/10/2025** (Entry 70) — **1 page** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – ESERVED COPY OF ORDER DENYING JASON MCKEMIE'S RELIEF
- **07/10/2025** (Entry 79) — **26 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – FINANCIAL RELIEF, CONTINUANCE, ENFORCEMENT OF STANDING ORDERS
- **07/10/2025** (Entry 80) — **149 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – EVIDENCE AND EXHIBITS
- **07/10/2025** (Entry 71) — **2 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – ESERVE COVER LETTER (ORDER DENYING JASON MCKEMIE'S RELIEF)
- **07/10/2025** (Entry 76) — **1 page** — ORDER TO ENFORCE STANDING ORDERS AND PREVENT LITIGATION INTERFERENCE PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 77) — **1 page** — ORDER GRANTING EMERGENCY MOTION TO STAY EXECUTION OF WRIT OF POSSESSION PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 78) — **1 page** — FINDING OF FACT AND FRAUD UPON THE COURT PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 75) — **2 pages** — ORDER TO PREVENT ANY FURTHER OBSTRUCTION AND TO COMPEL ACCESS TO HSA CARD/ FUNDS PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 81) — **43 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – DECLARATION OF CHRISTINA SEGURA IN SUPPORT OF JASON MCKEMIE
- **07/11/2025** (Entry 83) — **66 pages** — REQUEST FOR EMERGENCY HEARING TO PREVENT EVICTION DURING MEDICAL HARDSHIP WITH DECLARATION AND WITNESS STATEMENTS REQUEST FOR ER HEARING TO PREVENT EVICTION DURING MED. HARDSHIP WITH DECLARATION AND STATEMENTS

- **07/16/2025** (Entry 84) — **4 pages** — ORDER GRANTING M/SANCTION AND REFERRAL PROPOSED MOTION SANCTION FOR AGGRAVATED PERJURY AND FRAUD UPON THE COURT
- **07/16/2025** (Entry 86) — **75 pages** — EMERGENCY M/PRESERVE EVIDENCE AND CONTINUE TRIAL DUE TO PROCEDURAL SABOTAGE AND BREAKDOWN IN JUDICIAL OVERSIGHT
- **07/16/2025** (Entry 87) — **4 pages** — TO SEEK DISPROPORTIONATE DIVISION OF MARITAL ESTATE NOTICE OF INTENT SEEK DISPROPORTIONATE DIVISION OF
- **07/17/2025** (Entry 85) — **5 pages** — ORDER GRANTING M/SANCTIONS AND REFERRAL PROPOSED MOTION SANCTION FOR AGGRAVATED PERJURY AND FRAUD UPON THE OCURT AGAINST
- **07/17/2025** (Entry 88) — **2 pages** — EMERGENCY NOTICE OF COUNSEL MISCONDUCT, PRIOR COMMUNICATIONS, AND DEMAND FOR IMMEDIATE COURT ACTION
- **07/24/2025** (Entry 91) — **8 pages** — RESPONDENT VERIFIED M/RECUSE
- **07/24/2025** (Entry 97) — **1 page** — RESPONDENT'S EMERGENCY MOTION FOR CONTINUANCE PROPOSED ORDER/JUDGMENT
- **07/24/2025** (Entry 96) — **3 pages** — ERRONEOUS PUBLIC FILING AND EMERGENCY MOTION TO SEAL PREVIOUSLY SUBMITTED DECLARATION
- **07/24/2025** (Entry 97) — **1 page** — RESPONDENT'S EMERGENCY MOTION FOR CONTINUANCE PROPOSED ORDER/JUDGMENT
- **07/24/2025** (Entry 99) — **5 pages** — DECLARATION OF RESPONDENT'S DISASSOCIATION FROM BINDER INTRODUCED BY PETITIONER'S COUNSEL
- **07/24/2025** (Entry 100) — **11 pages** — EMERGENCY MOTION FOR IMMEDIATE RELIEF, OBJECTION TO TRIAL, AND REQUEST FOR ACKNOWLEDGEMENT
- **07/30/2025** (Entry 103) — **5 pages** — COVER PAGE OBJECTION INVENTORY PROCEDURAL NOTIFICATION 1801(b) COVER PAGE OBJECTION INVENTORY PROCEDURAL NOTIFICATION
- **08/06/2025** (Entry 104) — **7 pages** — EMERGENCY MOTION TO ABATE TRIAL SETTING AND WITHHOLD FINAL ORDERS PENDING RESOLUTION OF OUTSTANDING MOTIONS, PROCEDURAL VIOLATIONS, AND DISCOVERY COLLAPSE
- **08/07/2025** (Entry 105) — **11 pages** — JUDICIAL NOTICE OF UNRULED MOTIONS REQUIRING DETERMINATION PRIOR TO ANY PRETRIAL HEARING, TRIAL, OR FINAL JUDICIAL NOTICE OF UNRULED MOTIONS
- **10/02/2025** (Entry 119) — **6 pages** — MOTION FOR REINSTATEMENT OF WRONGFULLY REPORTED AND WITHHELD MARITAL FUNDS
- **10/02/2025** (Entry 120) — **6 pages** — WAITING FOR \$80.00- REQUEST
- **10/02/2025** (Entry 121) — **6 pages** — MOTION TO OBTAIN CERTIFIED TRANSCRIPT FOR JANUARY 7, 2025, HEARING AND REQUEST FOR PAYMENT FROM

- **10/31/2025** (Entry 124) — **1 page** — JASON MCKEMUE'S RELIEF ORDER - DENYING JASON MCKEMIE'S RELIEF
- **11/04/2025** (Entry 125) — **8 pages** — EMERGENCY OBJECTION TO MOTION TO WITHDRAW AS COUNSEL AND REQUEST FOR EXPEDITED HEARING (INCLUDES
- **11/10/2025** (Entry 130) — **4 pages** — EMERGENCY M/ VACATE SETTING BEFORE ASSOCIATE JUDGE AND RESET ENFORCE EMERGENCY MOTION TO VACATE
- **11/21/2025** (Entry 133) — **6 pages** — MOTION FOR DE NOVO DISTRICT JUDGE REVIEW OF PRIOR RULINGS AND EMERGENCY APPLICATION FOR TEMPORARY RESTRAINING ORDER MOTION - MISCELLANEOUS
- **12/12/2025** (Entry 136) — **25 pages** — EMERGENCY MOTION FILING SEEKING IMMEDIATE RELIEF REQUIRING MEDICAL ACCESS
- **12/19/2025** (Entry 143) — **26 pages** — MOTION TO COMPEL (ENVELOPE #109297794 DOC001)
- **12/19/2025** (Entry 145) — **18 pages** — EMERGENCY ENFORCEMENT ORDER FOR MEDICAL PRESERVATION ORDER - MISC.
- **12/23/2025** (Entry 146) — **2 pages** — TEMPORARY RESTRAINING ORDER PROPOSED ORDER/JUDGMENT
- **12/23/2025** (Entry 148) — **2 pages** — TEMPORARY RESTRAINING ORDER HEALTHCARE REINSTATEMENT & CONTINUITY PROPOSED ORDER/JUDGMENT
- **12/23/2025** (Entry 150) — **3 pages** — TO ISSUE SUBPOENA REGARDING LEASE BUYOUT AND ASSOCIATED PAYMENTS MOTION - LEAVE
- **12/23/2025** (Entry 151) — **181 pages** — MOTION - SEALED SUBMISSION FOR IN CAMERA REVIEW ONLY (CONFIDENTIAL) MOTION SEAL SUBMISSION FOR CAMERA REVIEW
- **12/29/2025** (Entry 152) — **13 pages** — SUPPLEMENTAL SUBMISSION IN SUPPORT OF MOTION TO COMPEL (REQUEST FOR CUSTODIAN CONTINUITY RECORDS / SUBPOENA LEAVE) SUPPLEMENTAL SUBMISSION IN SUPPORT OF MOTION TO COMPEL

## **2026**

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- **01/12/2026** (Entry 164) — **6 pages** — EMERGENCY MOTION ON MEDICAL HARM
- **01/12/2026** (Entry 175) — **7 pages** — EMERGENCY MOTION TO STAY EVICTION PROCEEDINGS
- **01/12/2026** (Entry 173) — **10 pages** — EMERGENCY MOTION TO TEMPORARY STAY OR IN THE ALTERNATIVE, IMPOSE PROTECTIVE CONDITIONS ON COURT-AUTHORIZED PROPERTY RETRIEVAL DUE TO MEDICAL INCAPACITY
- **01/12/2026** (Entry 180) — **11 pages** — MOTION TO ABATE TRIAL, ENFORCE DISCOVERY ORDERS AND HEALTHCARE REINSTATEMENT

- **01/15/2026** (Entry 182) — **4 pages** — RESPONDENT'S MOTION TO ESTABLISH CONDITIONS FOR RE-ENTRY OF COUNSEL AND TO PRESERVE FAIR TRIAL
- **01/26/2026** (Entry 185) — **5 pages** — NOTICE OF PRESERVATION OF WITNESSES, & LARGE DISCOVERY PRODUCTION IN FINAL HOUR NOTICE OF PRESERVATION OF WITNESSES, & LARGE DISCOVERY PRODUCTION IN FINAL HOUR

### 3. Motions seeking to "compel" something

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#### 2025

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- **06/27/2025** (Entry 67) — **4 pages** — MOTION TO PRESERVE DISCOVERY RIGHTS AND COMPEL DISCOVERY RESPONSES MOTION TO PRESERVE DISCOVERY RIGHTS AND COMPELL DISCOVERY RESPONSES
- **07/10/2025** (Entry 75) — **2 pages** — ORDER TO PREVENT ANY FURTHER OBSTRUCTION AND TO COMPEL ACCESS TO HSA CARD/ FUNDS PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 72) — **1 page** — ORDER ON MOTION TO COMPELL DISCOVERY AND REQUEST FOR SANCTIONS PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 73) — **1 page** — ORDER ON MOTION TO COMPEL DISCOVERY AND REQUEST FOR SANCTIONS PROPOSED ORDER/JUDGMENT
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#### 2026

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- **01/08/2026** (Entry 159) — **4 pages** — ORDER ON MOTION TO COMPEL PROPOSED ORDER ON MOTION TO COMPEL

### 4. Healthcare / medical / HSA / abatement or stay to stabilize / standing or temporary orders

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#### 2024

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- **12/27/2024** (Entry 24) — **3 pages** — REQUEST FOR TEMPORARY ORDERS NOTICE OF COURT PROCEEDING - REQUEST FOR TEMPORARY ORDERS

## 2025

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- **06/24/2025** (Entry 66) — **8 pages** — EMERGENCY MOTION FOR TEMPORARY FINANCIAL RELIEF DUE TO IMMINENT HOUSING LOSS, MEDICAL HARDSHIP EMERGENCY M/FINANCIL
- **07/10/2025** (Entry 70) — **1 page** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – ESERVED COPY OF ORDER DENYING JASON MCKEMIE'S RELIEF
- **07/10/2025** (Entry 71) — **2 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – ESERVE COVER LETTER (ORDER DENYING JASON MCKEMIE'S RELIEF)
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- **07/10/2025** (Entry 76) — **1 page** — ORDER TO ENFORCE STANDING ORDERS AND PREVENT LITIGATION INTERFERENCE PROPOSED ORDER/JUDGMENT
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- **07/10/2025** (Entry 80) — **149 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – EVIDENCE AND EXHIBITS
- **07/10/2025** (Entry 81) — **43 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – DECLARATION OF CHRISTINA SEGURA IN SUPPORT OF JASON MCKEMIE
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- **08/06/2025** (Entry 104) — **7 pages** — EMERGENCY MOTION TO ABATE TRIAL SETTING AND WITHHOLD FINAL ORDERS PENDING RESOLUTION OF OUTSTANDING MOTIONS, PROCEDURAL VIOLATIONS, AND DISCOVERY COLLAPSE
- **11/21/2025** (Entry 132) — **2 pages** — ORDER FOR DE NOVO REVIEW AND TRO PROPOSED ORDER/JUDGMENT
- **11/21/2025** (Entry 133) — **6 pages** — MOTION FOR DE NOVO DISTRICT JUDGE REVIEW OF PRIOR RULINGS AND EMERGENCY APPLICATION FOR TEMPORARY RESTRAINING ORDER MOTION - MISCELLANEOUS
- **11/25/2025** (Entry 134) — **6 pages** — NOTICE OF FILING OF SWORN AFFIDAVIT - CORRECTING FALSE RECORDING ALLEGATIONS AND EX PARTE PREJUDICE
- **12/12/2025** (Entry 136) — **25 pages** — EMERGENCY MOTION FILING SEEKING IMMEDIATE RELIEF REQUIRING MEDICAL ACCESS
- **12/15/2025** (Entry 137) — **2 pages** — NOTICE OF SERVICE - MOTION FOR THE REINSTATEMENT OF HEALTHCARE - CERT MAIL
- **12/17/2025** (Entry 138) — **3 pages** — ORDER ON EMERGENCY REINSTATEMENT OF HEALTHCARE PROPOSED ORDER/JUDGMENT
- **12/19/2025** (Entry 141) — **2 pages** — NOTICE OF NONCOMPLIANCE WITH 24-HOUR HEALTHCARE REINSTATEMENT ORDER
- **12/19/2025** (Entry 145) — **18 pages** — EMERGENCY ENFORCEMENT ORDER FOR MEDICAL PRESERVATION ORDER - MISC.
- **12/19/2025** (Entry 140) — **4 pages** — NOTICE REGARDING OF HEALTH COVERAGE, QUALIFYING LIFE EVENT AND REQUEST FOR LEAVE TO ISSUE SUBPOENA TO EMPLOYER HR NOTICE REGARDING OF HEALTH COVERAGE, QUALIFYING LIFE EVENT AND REQUEST FOR LEAVE TO ISSUE SUBPOENA
- **12/22/2025** (Entry 147) — **2 pages** — TEMPORARY RESTRAINING ORDER PROPOSED ORDER/JUDGMENT
- **12/23/2025** (Entry 148) — **2 pages** — TEMPORARY RESTRAINING ORDER HEALTHCARE REINSTATEMENT & CONTINUITY PROPOSED ORDER/JUDGMENT
- **12/23/2025** (Entry 149) — **2 pages** — ORDER GRANTING LEAVE TO SERVE SUBPOENAS PROPOSED ORDER GRANTING LEAVE TO SERVE SUBPOENAS
- **12/23/2025** (Entry 150) — **3 pages** — TO ISSUE SUBPOENA REGARDING LEASE BUYOUT AND ASSOCIATED PAYMENTS MOTION - LEAVE
- **12/23/2025** (Entry 151) — **181 pages** — MOTION - SEALED SUBMISSION FOR IN CAMERA REVIEW ONLY (CONFIDENTIAL) MOTION SEAL SUBMISSION FOR CAMERA REVIEW
- **12/29/2025** (Entry 152) — **13 pages** — SUPPLEMENTAL SUBMISSION IN SUPPORT OF MOTION TO COMPEL (REQUEST FOR CUSTODIAN CONTINUITY RECORDS / SUBPOENA LEAVE) SUPPLEMENTAL SUBMISSION IN SUPPORT OF MOTION TO COMPEL

- **01/02/2026** (Entry 154) — **10 pages** — NOTICE REGARDING ORDER FOR HEALTHCARE REINSTATEMENT AND IMMINENT ESCALATION DUE TO MEDICAL NECESSITY AND NON-COMPLIANCE NOTICE REGARDING ORDER FOR HEALTHCARE REINSTATEMENT AND IMMINENT ESCALATION DUE TO MEDICAL NECESSITY
- **01/08/2026** (Entry 161) — **3 pages** — ORDER ON MOTION TO COMPEL PROPOSED ORDER/JUDGMENT
- **01/08/2026** (Entry 160) — **2 pages** — ORDER ON EMERGENCY TRO PROPOSED ORDER/JUDGMENT
- **01/12/2026** (Entry 176) — **8 pages** — AFFIDAVIT ON PUBLIC STORAGE THEFT ACCUSATIONS AND PETITIONERS ACQUISITION OF WEAPON DURING PROCEEDINGS AFFIDAVIT ON PUBLIC STORAGE THEFT ACCUSATIONS AND PETITIONERS ACQUISITION OF WEAPON DURING PROCEEDIN
- **01/12/2026** (Entry 175) — **7 pages** — EMERGENCY MOTION TO STAY EVICTION PROCEEDINGS
- **01/12/2026** (Entry 174) — **3 pages** — PROPOSED ORDER ON EMERGENCY MOTION TO STAY EVICTION PROCEEDINGS
- **01/12/2026** (Entry 173) — **10 pages** — EMERGENCY MOTION TO TEMORARY STAY OR IN THE ALTERNATIVE, IMPOSE PROTECTIVE CONDITIONS ON COURT-AUTHORIZED PROPERTY RETRIEVAL DUE TO MEDICAL INCAPACITY
- **01/12/2026** (Entry 172) — **5 pages** — PROPOSED ORDER ON EMERGENCY MOTION TO TEMPORARILY STAY OR, IN THE ALTERNATIVE, IMPOSE PROTECTIVE CONDITIONS ON COURT-AUTHORIZED PROPERTY RETRIEVAL DUE TO MEDICAL INCAPACITY
- **01/12/2026** (Entry 170) — **4 pages** — ORDER ON EMERGENCY TRO PROPOSED ORDER FOR EMERGENCY TRO
- **01/12/2026** (Entry 169) — **5 pages** — ORDER ON EMERGENCY MOTION FOR MEDICAL PRESERVATION, INTERIM MAKE-WHOLE RELIEF, JUDICIAL FINDINGS MISREPRESENTATION/IMPOSSIBILITY, CONDITIONAL SANCTIONS, AND THIRD-PARTY SUBPOENA AUTHORITY (QLE RECORDS) PROPOSED ORDER
- **01/12/2026** (Entry 168) — **3 pages** — ORDER ON EMERGENCY MOTION TO STAY EVICTION PROCEEDINGS EXTEND RENT REGISTRY DEADLINE, AND PRESERVE PROPERTY PROPOSED ORDER ON EMERGENCY MOTION TO STAY EVICTION PROCEEDINGS
- **01/12/2026** (Entry 166) — **4 pages** — AFFIDAVIT ON MANUFACTURED ALLEGATIONS & CONCERN FOR PROPERTY RETRIEVAL / CLEAN OUT AFFIDAVIT - MANUFACTURED ALLEGATIONS
- **01/12/2026** (Entry 164) — **6 pages** — EMERGENCY MOTION ON MEDICAL HARM
- **01/12/2026** (Entry 162) — **4 pages** — ORDER ON EMERGENCY TRO PROPOSED ORDER/JUDGMENT
- **01/12/2026** (Entry 180) — **11 pages** — MOTION TO ABATE TRIAL, ENFORCE DISCOVERY ORDERS AND HEALTHCARE REINSTATEMENT

- **01/20/2026** (Entry 184) — **34 pages** — RESPONDENT'S NOTICE OF DISCOVERY AND HEALTHCARE COMPLIANCE, REQUEST FOR REMOTE APPEARANCE, REQUEST FOR ACCESS TO PERSONAL PROPERTY, REQUEST FOR CONSOLIDATION & HEARING LIMITS, AND CASE MANAGEMENT CLARIFICATION

## 5. Financial relief / reimbursements / fraud / rent & stabilization / standing or temporary orders

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### 2025

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- **06/24/2025** (Entry 66) — **8 pages** — EMERGENCY MOTION FOR TEMPORARY FINANCIAL RELIEF DUE TO IMMINENT HOUSING LOSS, MEDICAL HARDSHIP EMERGENCY M/FINANCIL
- **07/10/2025** (Entry 70) — **1 page** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – ESERVED COPY OF ORDER DENYING JASON MCKEMIE'S RELIEF
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- **08/07/2025** (Entry 113) — **10 pages** — EMERGENCY EX PARTE MOTION TO AUTHORIZE WITHDRAWAL FROM IRA
- **10/02/2025** (Entry 115) — **1 page** — LETTER
- **10/02/2025** (Entry 119) — **6 pages** — MOTION FOR REINSTATEMENT OF WRONGFULLY REPORTED AND WITHHELD MARITAL FUNDS

- **10/02/2025** (Entry 120) — **6 pages** — WAITING FOR \$80.00- REQUEST
- **10/02/2025** (Entry 118) — **6 pages** — WAITING FOR \$80.00- REQUEST
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- **11/25/2025** (Entry 133) — **6 pages** — MOTION FOR DE NOVO DISTRICT JUDGE REVIEW OF PRIOR RULINGS AND EMERGENCY APPLICATION FOR TEMPORARY RESTRAINING ORDER MOTION - MISCELLANEOUS
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- **12/23/2025** (Entry 150) — **3 pages** — TO ISSUE SUBPOENA REGARDING LEASE BUYOUT AND ASSOCIATED PAYMENTS MOTION - LEAVE
- **12/23/2025** (Entry 151) — **181 pages** — MOTION - SEALED SUBMISSION FOR IN CAMERA REVIEW ONLY (CONFIDENTIAL) MOTION SEAL SUBMISSION FOR CAMERA REVIEW
- **12/29/2025** (Entry 152) — **13 pages** — SUPPLEMENTAL SUBMISSION IN SUPPORT OF MOTION TO COMPEL (REQUEST FOR CUSTODIAN CONTINUITY RECORDS / SUBPOENA LEAVE) SUPPLEMENTAL SUBMISSION IN SUPPORT OF MOTION TO COMPEL

## 2026

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- **01/02/2026** (Entry 154) — **10 pages** — NOTICE REGARDING ORDER FOR HEALTHCARE REINSTATEMENT AND IMMINENT ESCALATION DUE TO MEDICAL NECESSITY AND NON-COMPLIANCE NOTICE REGARDING ORDER FOR HEALTHCARE REINSTATEMENT AND IMMINENT ESCALATION DUE TO MEDICAL NECESSITY
- **01/12/2026** (Entry 169) — **5 pages** — ORDER ON EMERGENCY MOTION FOR MEDICAL PRESERVATION, INTERIM MAKE-WHOLE RELIEF, JUDICIAL FINDINGS MISREPRESENTATION/IMPOSSIBILITY, CONDITIONAL SANCTIONS, AND THIRD-PARTY SUBPOENA AUTHORITY (QLE RECORDS) PROPOSED ORDER
- **01/14/2026** (Entry 180) — **11 pages** — MOTION TO ABATE TRIAL, ENFORCE DISCOVERY ORDERS AND HEALTHCARE REINSTATEMENT

## 6. Discovery obstruction / compel / subpoena requests

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### 2025

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- **06/27/2025** (Entry 67) — **4 pages** — MOTION TO PRESERVE DISCOVERY RIGHTS AND COMPEL DISCOVERY RESPONSES MOTION TO PRESERVE DISCOVERY RIGHTS AND COMPELL DISCOVERY RESPONSES

- **06/27/2025** (Entry 69) — **5 pages** — OBJECT IN MATERIAL DISCOVERY NOTICE OF MATERIAL DISCOVERY NOTICE OF MATERIAL DISCOVERY
- **07/10/2025** (Entry 72) — **1 page** — ORDER ON MOTION TO COMPELL DISCOVERY AND REQUEST FOR SANCTIONS PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 73) — **1 page** — ORDER TO REOPEN A LIMITED DISCOVERY DUE TO PROCEDURAL MISCONDUCT AND OBSTRUCTION PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 72) — **1 page** — ORDER ON MOTION TO COMPELL DISCOVERY AND REQUEST FOR SANCTIONS PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 73) — **1 page** — ORDER ON MOTION TO COMPEL DISCOVERY AND REQUEST FOR SANCTIONS PROPOSED ORDER/JUDGMENT
- **07/10/2025** (Entry 75) — **2 pages** — ORDER TO PREVENT ANY FURTHER OBSTRUCTION AND TO COMPEL ACCESS TO HSA CARD/ FUNDS PROPOSED ORDER/JUDGMENT
- **08/06/2025** (Entry 104) — **7 pages** — EMERGENCY MOTION TO ABATE TRIAL SETTING AND WITHHOLD FINAL ORDERS PENDING RESOLUTION OF OUTSTANDING MOTIONS, PROCEDURAL VIOLATIONS, AND DISCOVERY COLLAPSE
- **08/07/2025** (Entry 105) — **11 pages** — JUDICIAL NOTICE OF UNRULED MOTIONS REQUIRING DETERMINATION PRIOR TO ANY PRETRIAL HEARING, TRIAL, OR FINAL JUDICIAL NOTICE OF UNRULED MOTIONS
- **08/08/2025** (Entry 106) — **4 pages** — NOTICE OF PROCEDURAL BAR TO PRETRIAL OR TRIAL SETTING AND PRESERVATION OF OBJECTION
- **08/08/2025** (Entry 108) — **2 pages** — EXHIBITS
- **12/19/2025** (Entry 140) — **4 pages** — NOTICE REGARDING OF HEALTH COVERAGE, QUALIFYING LIFE EVENT AND REQUEST FOR LEAVE TO ISSUE SUBPOENA TO EMPLOYER HR NOTICE REGARDING OF HEALTH COVERAGE, QUALIFYING LIFE EVENT AND REQUEST FOR LEAVE TO ISSUE SUBPOENA
- **12/23/2025** (Entry 149) — **2 pages** — ORDER GRANTING LEAVE TO SERVE SUBPOENAS PROPOSED ORDER GRANTING LEAVE TO SERVE SUBPOENAS
- **12/23/2025** (Entry 150) — **3 pages** — TO ISSUE SUBPOENA REGARDING LEASE BUYOUT AND ASSOCIATED PAYMENTS MOTION - LEAVE
- **12/29/2025** (Entry 152) — **13 pages** — SUPPLEMENTAL SUBMISSION IN SUPPORT OF MOTION TO COMPEL (REQUEST FOR CUSTODIAN CONTINUITY RECORDS / SUBPOENA LEAVE) SUPPLEMENTAL SUBMISSION IN SUPPORT OF MOTION TO COMPEL

## 2026

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- **01/12/2026** (Entry 169) — **5 pages** — ORDER ON EMERGENCY MOTION FOR MEDICAL PRESERVATION, INTERIM MAKE-WHOLE RELIEF, JUDICIAL FINDINGS MISREPRESENTATION/IMPOSSIBILITY,

CONDITIONAL SANCTIONS, AND THIRD-PARTY SUBPOENA AUTHORITY (QLE RECORDS) PROPOSED ORDER

- **01/14/2026** (Entry 180) — **11 pages** — MOTION TO ABATE TRIAL, ENFORCE DISCOVERY ORDERS AND HEALTHCARE REINSTATEMENT
- **01/26/2026** (Entry 185) — **5 pages** — NOTICE OF PRESERVATION OF WITNESSES, & LARGE DISCOVERY PRODUCTION IN FINAL HOUR NOTICE OF PRESERVATION OF WITNESSES, & LARGE DISCOVERY PRODUCTION IN FINAL HOUR

## 7. Due process / record preservation / ex parte concerns / court reporter / verbatim record

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### 2025

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- **04/24/2025** (Entry 56) — **1 page** — MOTION FOR NOTICE PRIOR TO ANY DISMISSAL PROPOSED ORDER ON MOTION FOR NOTICE PRIOR TO ANY DISMISSAL
- **04/24/2025** (Entry 60) — **3 pages** — MOTION TO DESIGNATE PRO SE REPRESENTATION AND REQUEST FOR EQUAL ACCESS
- **04/24/2025** (Entry 57) — **4 pages** — MOTION FOR NOTICE PRIOR TO ANY DISMISSAL NOTICE PRIOR TO ANY DISMISSAL
- **04/24/2025** (Entry 58) — **1 page** — ORDER ON MOTION TO DESIGNATE PRO SE REPRESENTATION AND REQUEST FOR EQUAL ACCESS PROPOSED ORDER ON MOTION TO DESIGNATE PRO SE REPRESENTATION AND REQUEST FOR EQUAL ACCESS
- **04/24/2025** (Entry 59) — **1 page** — MOTION TO DESIGNATE PRO SE REPRESENTATION AND REQUEST FOR EQUAL ACCESS PROPOSED ORDER ON MOTION TO DESIGNATE PRO SE REPRESENTATION AND REQUEST FOR EQUAL ACCESS
- **06/27/2025** (Entry 68) — **4 pages** — NOTICE OF OBJECTION TO PROCEDURAL REENTRY AND MOTION FILING BY RESPONDENT'S COUNSEL
- **07/10/2025** (Entry 70) — **1 page** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – ESERVED COPY OF ORDER DENYING JASON MCKEMIE'S RELIEF
- **07/10/2025** (Entry 71) — **2 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – ESERVE COVER LETTER (ORDER DENYING JASON MCKEMIE'S RELIEF)
- **07/10/2025** (Entry 73) — **1 page** — ORDER TO REOPEN A LIMITED DISCOVERY DUE TO PROCEDURAL MISCONDUCT AND OBSTRUCTION PROPOSED ORDER/JUDGMENT

- **07/10/2025** (Entry 80) — **149 pages** — FINANCIAL RELIEF, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEES, MARITAL DEBT AND EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP – EVIDENCE AND EXHIBITS
- **07/24/2025** (Entry 91) — **8 pages** — RESPONDENT VERIFIED M/RECUSE
- **07/24/2025** (Entry 100) — **11 pages** — EMERGENCY MOTION FOR IMMEDIATE RELIEF, OBJECTION TO TRIAL, AND REQUEST FOR ACKNOWLEDGEMENT
- **08/06/2025** (Entry 104) — **7 pages** — EMERGENCY MOTION TO ABATE TRIAL SETTING AND WITHHOLD FINAL ORDERS PENDING RESOLUTION OF OUTSTANDING MOTIONS, PROCEDURAL VIOLATIONS, AND DISCOVERY COLLAPSE
- **08/07/2025** (Entry 105) — **11 pages** — JUDICIAL NOTICE OF UNRULED MOTIONS REQUIRING DETERMINATION PRIOR TO ANY PRETRIAL HEARING, TRIAL, OR FINAL JUDICIAL NOTICE OF UNRULED MOTIONS
- **08/08/2025** (Entry 106) — **4 pages** — NOTICE OF PROCEDURAL BAR TO PRETRIAL OR TRIAL SETTING AND PRESERVATION OF OBJECTION
- **10/29/2025** (Entry 123) — **3 pages** — STANDING REQUEST FOR COURT REPORTER FOR OCTOBER 31, 2025 HEARING AND ALL SUBSEQUENT PROCEEDINGS REQUEST FOR COURT REPORTER FOR HEARING AND ALL SUBSEQUENT PROCEEDINGS
- **10/29/2025** (Entry 121) — **6 pages** — MOTION TO OBTAIN CERTIFIED TRANSCRIPT FOR JANUARY 7, 2025, HEARING AND REQUEST FOR PAYMENT FROM
- **11/04/2025** (Entry 125) — **8 pages** — EMERGENCY OBJECTION TO MOTION TO WITHDRAW AS COUNSEL AND REQUEST FOR EXPEDITED HEARING (INCLUDES
- **11/10/2025** (Entry 130) — **4 pages** — EMERGENCY M/ VACATE SETTING BEFORE ASSOCIATE JUDGE AND RESET ENFORCE EMERGENCY MOTION TO VACATE
- **11/11/2025** (Entry 131) — **2 pages** — ORDER FOR DE NOVO REVIEW AND TRO PROPOSED ORDER/JUDGMENT
- **11/21/2025** (Entry 132) — **2 pages** — ORDER FOR DE NOVO REVIEW AND TRO PROPOSED ORDER/JUDGMENT
- **11/21/2025** (Entry 133) — **6 pages** — MOTION FOR DE NOVO DISTRICT JUDGE REVIEW OF PRIOR RULINGS AND EMERGENCY APPLICATION FOR TEMPORARY RESTRAINING ORDER MOTION - MISCELLANEOUS
- **11/25/2025** (Entry 134) — **6 pages** — NOTICE OF FILING OF SWORN AFFIDAVIT - CORRECTING FALSE RECORDING ALLEGATIONS AND EX PARTE PREJUDICE

## 2026

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- **01/02/2026** (Entry 154) — **10 pages** — NOTICE REGARDING ORDER FOR HEALTHCARE REINSTATEMENT AND IMMINENT ESCALATION DUE TO MEDICAL NECESSITY AND NON-COMPLIANCE NOTICE
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VERIFIED MOTION TO RECUSE

DF-24-18010

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REGARDING ORDER FOR HEALTHCARE REINSTATEMENT AND IMMEDIATE ESCALATION DUE TO MEDICAL NECESSITY

- **01/05/2026** (Entry 155) — **8 pages** — NOTICE OF PRIOR STANDING REQUEST FOR COURT REPORTER/OFFICIAL RECORD NOTICE PRIOR COURT REPORTER REQUEST & OBJECTION TO OFF RECORD HEARING
- **01/20/2026** (Entry 183) — **3 pages** — NOTICE OF PRIOR STANDING REQUEST FOR COURT REPORTER/VERBATIM RECORD
- **01/20/2026** (Entry 184) — **34 pages** — RESPONDENT'S NOTICE OF DISCOVERY AND HEALTHCARE COMPLIANCE, REQUEST FOR REMOTE APPEARANCE, REQUEST FOR ACCESS TO PERSONAL PROPERTY, REQUEST FOR CONSOLIDATION & HEARING LIMITS, AND CASE MANAGEMENT CLARIFICATION
- **01/15/2026** (Entry 182) — **4 pages** — RESPONDENT'S MOTION TO ESTABLISH CONDITIONS FOR RE-ENTRY OF COUNSEL AND TO PRESERVE FAIR TRIAL
- **01/20/2026** (Entry 183) — **3 pages** — NOTICE OF PRIOR STANDING REQUEST FOR COURT REPORTER/VERBATIM RECORD
- **01/20/2026** (Entry 184) — **34 pages** — RESPONDENT'S NOTICE OF DISCOVERY AND HEALTHCARE COMPLIANCE, REQUEST FOR REMOTE APPEARANCE, REQUEST FOR ACCESS TO PERSONAL PROPERTY, REQUEST FOR CONSOLIDATION & HEARING LIMITS, AND CASE MANAGEMENT CLARIFICATION
- **01/15/2026** (Entry 182) — **4 pages** — RESPONDENT'S MOTION TO ESTABLISH CONDITIONS FOR RE-ENTRY OF COUNSEL AND TO PRESERVE FAIR TRIAL

## 8. Eviction / housing stability

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### 2025

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- **06/24/2025** (Entry 66) — **8 pages** — EMERGENCY MOTION FOR TEMPORARY FINANCIAL RELIEF DUE TO IMMEDIATE HOUSING LOSS, MEDICAL HARDSHIP EMERGENCY M/FINANCIAL
- **07/10/2025** (Entry 77) — **1 page** — ORDER GRANTING EMERGENCY MOTION TO STAY EXECUTION OF WRIT OF POSSESSION PROPOSED ORDER/JUDGMENT
- **07/11/2025** (Entry 83) — **66 pages** — REQUEST FOR EMERGENCY HEARING TO PREVENT EVICTION DURING MEDICAL HARDSHIP WITH DECLARATION AND WITNESS STATEMENTS REQUEST FOR ER HEARING TO PREVENT EVICTION DURING MED. HARDSHIP WITH DECLARATION AND STATEMENTS
- **12/23/2025** (Entry 150) — **3 pages** — TO ISSUE SUBPOENA REGARDING LEASE BUYOUT AND ASSOCIATED PAYMENTS MOTION - LEAVE

### 2026

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VERIFIED MOTION TO RECUSE

DF-24-18010

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99 of 110

- **01/12/2026** (Entry 176) — **8 pages** — AFFIDAVIT ON PUBLIC STORAGE THEFT ACCUSATIONS AND PETITIONERS ACQUISITION OF WEAPON DURING PROCEEDINGS AFFIDAVIT ON PUBLIC STORAGE THEFT ACCUSATIONS AND PETITIONERS ACQUISITION OF WEAPON DURING PROCEEDIN
- **01/12/2026** (Entry 175) — **7 pages** — EMERGENCY MOTION TO STAY EVICTION PROCEEDINGS
- **01/12/2026** (Entry 174) — **3 pages** — PROPOSED ORDER ON EMERGENCY MOTION TO STAY EVICTION PROCEEDINGS
- **01/12/2026** (Entry 172) — **5 pages** — PROPOSED ORDER ON EMERGENCY MOTION TO TEMPORARILY STAY OR, IN THE ALTERNATIVE, IMPOSE PROTECTIVE CONDITIONS ON COURT-AUTHORIZED PROPERTY RETRIEVAL DUE TO MEDICAL INCAPACITY
- **01/12/2026** (Entry 168) — **3 pages** — ORDER ON EMERGENCY MOTION TO STAY EVICTION PROCEEDINGS EXTEND RENT REGISTRY DEADLINE, AND PRESERVE PROPERTY PROPOSED ORDER ON EMERGENCY MOTION TO STAY EVICTION PROCEEDINGS
- **01/12/2026** (Entry 166) — **4 pages** — AFFIDAVIT ON MANUFACTURED ALLEGATIONS & CONCERN FOR PROPERTY RETRIEVAL / CLEAN OUT AFFIDAVIT - MANUFACTURED ALLEGATIONS

NO. DF-24-18010

NOTICE: THIS DOCUMENT CONTAINS  
SENSITIVE DATA

IN THE MATTER OF  
THE MARRIAGE OF

§  
§  
§  
§  
§

GWENDOLYN ULJASZ

JASON MCKEMIE

IN THE DISTRICT COURT

302<sup>ND</sup> JUDICIAL DISTRICT &

DALLAS COUNTY, TEXAS

---

## EMERGENCY MOTION TO COMPEL FINANCIAL DISCOVERY

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**CONFIDENTIAL - FILED UNDER SEAL**

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TO THE HONORABLE JUDGE OF THE 302<sup>ND</sup> DISTRICT COURT:

Respondent Jason McKemie respectfully files this Emergency Motion to Compel, and shows:

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### I. BACKGROUND

Full financial discovery has never occurred in this case. In the prior court (254th District), opposing counsel withdrew on the eve of their discovery deadline while still drafting and filing objections behind the scenes, and Petitioner did not declare herself pro se during that period. This created a service gap that prevented any meaningful discovery before the case transferred to this Court following recusal. The same discovery-avoidance patterns used in the 254th District have now resurfaced here.

At the **September 9 pre-trial conference**, I informed Judge Sandra Jackson that discovery had been materially skipped in the prior court and that the same issues were reappearing here, including counsel withdrawal, shadow filings, and Petitioner refusing to declare herself pro se. Judge Jackson responded that those issues had not occurred in her courtroom and that she expected disclosure to proceed properly in the 302nd.

At that hearing, I requested:

1. subpoena authority,
2. a court-appointed forensic accountant for tracing, and
3. legal fees so I could secure representation after losing counsel during discovery.

Judge Jackson stated she could not grant those requests at that procedural stage. She then directed opposing counsel, **Ethan Scroggins**, to immediately release the missing financial statements. After hesitation, she repeated the directive and he agreed.

Judge Jackson further stated that although she could not grant the relief I requested that day, I **should have a minimum of 90 days with complete, certified financials before trial exhibits were due**. I told her that timeline would materially assist me.

That 90-day window never materialized.

**Following Judge Jackson's directive, I immediately provided opposing counsel with a detailed list of every missing page, missing month, missing account, and continuity failure, along with a full deficiency inventory and demonstratives.** In response, Ethan Scroggins stated he would provide a "substantive response" by October 7, 2025. When his response arrived, it consisted only of a list of Bates numbers from prior productions — simply restating the same GU000001–GU001668 materials I had already audited and identified as incomplete. No new statements, no missing pages, and no corrected financials were provided. The only documents produced after the Court's directive were **two pages**, not two statements, each containing identical transactions but labeled with different months, indicating that one or both were altered. No further documents have been produced. Following this, opposing counsel again withdrew, Petitioner again refused to declare herself, and I still do not have a **single complete account**.

Without institution-origin financial records, I cannot comply with the timeline the Court established for pre-trial preparation.

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## II. SUMMARY OF DEFICIENCIES

The deficiencies summarized here are **only examples**, not a complete list. Across every account and every production cycle, I have not received a single complete, consecutive, unaltered monthly statement.

Every account produced contains:

- missing months,
- missing pages,
- mixed-year page inserts,
- unexplained gaps,
- out-of-sequence statements, or
- substituted one-day "snapshot" balance pages.

Less than **20%** of required financial statements exist, and even those are structurally unusable. Petitioner remains responsible for providing complete financial discovery for **all accounts**, not just those listed here.

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### III. STRUCTURAL DEFECTS THAT MAKE SUPPLEMENTATION IMPOSSIBLE

- **The credit-card records are functionally unusable.**

Nine different card numbers route into a single undisclosed Chase source account, making continuity impossible. Entire months are missing, pages are fragmented, and early-cycle payments repeatedly wipe unsettled transactions. On Chase Sapphire x2372 alone, more than **\$70,000** in 2024 overpayments artificially inflated balances and masked transfers. As shown in the attached inventory, only the green-coded items are actual monthly statements; the red items are missing, incomplete, or snapshot pages that cannot be used for tracing. No accountant could reconstruct spending, reimbursements, or estate value from this. **Only native institution-origin records will resolve these gaps.**

- **These disclosures were structured, not sloppy.**

Pages from different years appear inside the same monthly statement. Consecutive pages are removed and replaced with unrelated months. Statements that should download sequentially appear as spliced, mixed-year PDFs. These patterns required planning, time, and coordination; they are not clerical mistakes but deliberate document fragmentation.

- **The GLU Distribution LLC account was withheld for eight months.**

Petitioner produced nothing but a screenshot of a login-error page while claiming she could not obtain statements. No monthly statements, no historical activity, and no CSV data were produced. Only after multiple deficiency notices did Petitioner supply a single “current balance” page with no historical information. This account cannot be traced without institution-origin statements.

- **Petitioner’s projected legal-fee disclosures appear intentionally structured.**

Her financial-planning documents include a **\$260,000–\$480,000** projected legal-fee range with no corresponding invoices or billing records. A \$220,000 variation cannot be reconciled with counsel’s prior claim of two-week billing. These figures appear strategically embedded for fee-shifting or estate-allocation positioning, not reflective of actual expenses.

- **The burden imposed on me shows why supplementation is futile.**

I have spent days without sleep trying to identify missing pages, missing months, and continuity gaps across more than ten accounts. The issue is not missing documents — **the issue is deliberate structural manipulation.** These records cannot be reconstructed by any pro se litigant, attorney, or forensic accountant without native institution-issued statements.

- **These disclosures were built to prevent tracing and cannot be repaired.**

The effort required to break apart statements, reorder pages, mix years, and substitute one-day snapshots demonstrates intentional, methodical obstruction. No amount of supplementation can cure disclosures engineered to obscure continuity. **Only institution-origin records will allow accurate evaluation of the marital estate.**

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#### IV. REQUEST FOR RELIEF

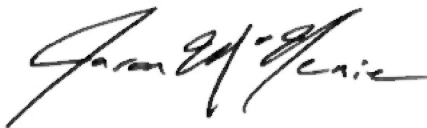
I respectfully request that the Court:

1. **Grant this Motion** and recognize that the financial disclosures produced to date are materially incomplete and unusable;
2. **Acknowledge that further supplementation cannot cure the structural defects** documented in this Motion;
3. **Preserve my right to immediately seek third-party subpoenas** for native, institution-issued financial statements and transaction histories;
4. **Set a short deadline** for any remaining documents Petitioner can realistically produce, with the understanding that such production cannot replace institution-origin records; and
5. **Reserve the Court's authority to impose sanctions or other appropriate relief** if Petitioner continues to obstruct discovery or withhold required financial information.

I request any additional relief the Court deems appropriate.

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Respectfully submitted,



**Jason McKemie**  
539 W. Commerce St., Suite 2010  
Dallas, TX 75208  
jmckemie@mckemie.net  
214-868-4901

NO. **DF-24-18010**

**IN THE MATTER OF  
THE MARRIAGE OF**

**GWENDOLYN ULIJASZ-MCKEMIE  
&  
JASON MCKEMIE**

§  
§  
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§  
§

**IN THE DISTRICT COURT**

**302<sup>nd</sup> JUDICIAL DISTRICT**

**DALLAS COUNTY, TEXAS**

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**LETTER TO THE COURT**

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**To: The Honorable Judge Sandra Jackson**

302nd District Court  
Dallas County, Texas

**From: Jason McKemie**

539 W. Commerce St., #2010  
Dallas, TX 75208  
jmckemie@mckemie.net

**Date:** October 9<sup>th</sup>, 2025

**Subject:** Expression of Appreciation Regarding the September 9, 2025, Pre-Trial Conference

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**Dear Judge Jackson:**

I wanted to thank you for the way you conducted the pre-trial conference on September 9, 2024. At that time, I was frightened and overwhelmed. After months of filings and hearings, I felt as if I had spent nine months writing motions that no one would ever read, much less rule on. When I spoke too quickly, trying to explain too much, you stayed calm. When I mentioned how many motions I had filed, you said, "That was not in my courtroom." When comments were made over what I was trying to share, you stayed present with me, let me finish, and then said that in your courtroom it is your intention that everyone—especially on their first day—feels heard.

In that instant, I understood what it truly meant to stand before a judge. It was the first time in this process that I felt heard and understood, and I left the courtroom that day with a calm I hadn't felt in months. And on that day, I needed that. Thank you.

It takes effort to stay present and attuned in a courtroom that moves as fast as yours does. That calm focus mattered to me. You have my respect, and I hope others follow your example. If that becomes part of your legacy, it's a meaningful one – its steadiness will certainly stay with those of us who have witnessed it.

With Respect & Gratitude,



**Jason Emory McKemie**

Respondent, Pro Se' (\*nbc)

(\*nbc) = \*Not by Choice

GRATITUDE LETTER \* JUDGE SANDRA JACKSON

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**45 of 110**



P2P PAYMENT SERVICE PROVIDERS
<b>VENMO</b>
PAYPAL
APPLEPAY
CASHAPP
GOOGLEPAY
CHECKING ACCOUNTS
Chase Checking xx3898 (~9259)
Chase Checking xx9259 (~3898)
Chase Checking xxREDACTED
Chase GLU Checking xx8627
Chase Checking xx9941
Chase Checking xx6893
Chase Checking xx2110
CREDIT CARDS
Chase Sapphire xx2372
Chase Sapphire xx4005 (~7555, ~3444)
Chase Sapphire xx7555 (~4005, ~3444)
Chase Sapphire xx3444 (~4005, ~7555)
Chase Sapphire xx4400
Chase Sapphire xx8801
Chase Sapphire xx7496 (~7396)
Chase Sapphire x7396 (~7496)
AMEX PLATINUM xx5000 (~6008, ~7006)
AMEX PLATINUM xx6008 (~5000, ~7006)
AMEX PLATINUM xx7006 (~5000, ~6008)
CITI Advantage xx2295
INVESTMENT AND RETIREMENT ACCOUNTS
AIG 401k
E*TRADE STOCK / Morgan Stanley at Work / Grant number: A44637 / AUG 16TH, 2024
Empower Cognizant Technology Solutions 401k Savings Plan
Vanbguard Value Index Fund / Vanguard Growth Index
Accenture 401k
Voya - Cognizant 401(k) Retirement Savings Plan
E-Trade x8274
E-Trade x5029
E-Trade x6977
E-Trade x6587
E-Trade x201
Cognizant Tecnology 401(k) Savings Plan
E-Trade Roth IRA
Traditional IRA Account #7
Vanguard IRA
Advantigen Biosciences, LLC shares

9 CARD NUMBERS FOR 1 ACCOUNT

**Subject:** Discovery  
**Date:** Friday, October 10, 2025 at 1:33:20 PM Central Daylight Time  
**From:** Ethan Scroggins <escroggins@sullivancook.com>  
**To:** Jason McKemie <jmckemie@mckemie.net>, Jason McKemie <mckemie76@gmail.com>  
**CC:** Will Cook <wcook@sullivancook.com>, Chandler Alt <calt@sullivancook.com>  
**Attachments:** 2025-10-09 Exhibit A - Discovery Log.xlsx, Dec 2024 Page 3.pdf, Nov 2024 Page 3.pdf

Mr. McKemie,

Your "exhibits" to your requests for information appear to be based only on the 2024-02-24 production and the issues are addressed in the subsequent production from 2025-06-23. We do not have to explain every item or statement to you. We have produced what you requested. That said, still see the below regarding some of the discovery:

- Statements for Chase x7369 – See GU001599, GU001639 for the first pages of previous statements (different account number transfer) that show the previous account balance transferring over
- Chase x2372 – See GU001648 for Jan 2025 3<sup>rd</sup> page
- VEIP statements – See GU000615-648 and GU000492-521.
- AIG 401(k) - See GU000595-614. These statements show all transactions and complete information regarding deposits, withdrawals, etc. Also show loan repayments.
- Chase x3898 – See "Statements" GU001598-1650
- Chase x2372 – See "Statements" GU001598-1650
  - Nov 2024 page 3 attached
  - Dec 2024 page 3 attached

Sincerely,

**ETHAN SCROGGINS**  
**Sullivan & Cook LLC**

*Attorney*  
600 East Las Colinas Blvd, Suite 1300  
Irving, TX 75039  
(214) 520-7494  
[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)

The following four pages includes everything produced by opposing counsel since receiving Judge Sandra Jackson's directive to release the missing financials. Please note that the first two pages are the same document, simply titled Nov for one and Dec for the other. And the third document is simply a list of all the documents submitted in prior discovery releases, which I spent a significant amount of time itemizing all of the deficiencies only to wait 2 months to receive the list again with no response for all the deficiencies.

ACCOUNT ACTIVITY (CONTINUED)

Date of Transaction	Merchant Name or Transaction Description	\$ Amount
10/25	WWW.WAGGINWATER.COM WWW.WAGGINWAT IL	69.00
10/25	EATZI'S - OAK LAWN DALLAS TX	166.19
10/26	NOHEMY TEAROOM DALLAS TX	16.78
10/25	TM *LANE 800-653-8000 CA	105.70
10/26	7-ELEVEN 32924 DALLAS TX	11.78
10/26	7-ELEVEN 32924 DALLAS TX	39.95
10/25	& SLING.COM 888-363-1777 CO	79.01
10/26	FORESTWOOD ANTIQUE MALL DALLAS TX	150.47
10/27	& KASA YOGA DALLAS 972-7465991 TX	280.00
10/28	VZWLSS*APOCC VISA 800-922-0204 FL	321.60
10/28	7-ELEVEN 50711 HTTPSWWW.7ELE TX	40.00
10/29	CELEBRATION RESTAURANT D DALLAS TX	65.21
10/30	SQ *BEYOND THE DOOR AND M gosq.com TX	571.07
10/29	CVS/PHARMACY #07742 800-746-7287 TX	101.25
10/30	Prime Video Channels amzn.com/bill WA	14.06
10/28	TOM THUMB #2990 DALLAS TX	109.82
10/29	KROGER #0528 DALLAS TX	36.27
10/29	CVS/PHARMACY #07742 DALLAS TX	6.81
10/29	BRK PARKING DALLAS TX	5.00
10/29	APPLE.COM/BILL 866-712-7753 CA	64.94
10/29	& KASA YOGA DALLAS 972-7465991 TX	220.00
10/31	APPLE.COM/BILL 866-712-7753 CA	1.07
10/30	TARGET.COM WWW.TARGET.CO MN	14.06
10/30	APPLE.COM/BILL 800-275-2273 CA	3.24
10/29	TOM THUMB #2990 DALLAS TX	4.99
10/30	APPLE.COM/BILL 866-712-7753 CA	21.65
10/29	CVSExtraCare 8007467287RI 800-746-7287 RI	5.00
10/30	TARGET 00008755 DALLAS TX	13.78
10/30	NORDSTROM DIRECT #0808 800-285-5800 IA	16.16
10/31	APPLE.COM/BILL 866-712-7753 CA	3.24
10/31	APPLE.COM/BILL 866-712-7753 CA	7.57
10/30	RACETRAC569 00005694 DALLAS TX	49.63
10/31	APPLE.COM/BILL 866-712-7753 CA	6.46
10/30	RACETRAC569 00005694 DALLAS TX	54.11
10/31	ALTO PHARMACY HTTPSALTO.COM CA	107.78
10/30	PARKPLACE DAL 17 HHND DALLAS TX	10.00
11/01	Idolize Brows and Bea Dallas TX	47.50
11/01	APPLE.COM/BILL 800-275-2273 CA	19.47
11/01	7-ELEVEN 37329 DALLAS TX	18.71
11/02	KROGER #0528 DALLAS TX	27.09
11/01	SERVICE FEE 888-658-5465 TN	148.14
11/02	APPLE.COM/BILL 866-712-7753 CA	42.20
11/01	US TREAS TAX PYMT 888-658-5465 TN	7,922.00
11/02	UPS*1Z588YT70391781825 800-811-1648 GA	13.09
11/02	UBER *ONE HELP.UBER.COM CA	9.99
11/02	NORDSTROM #0738 DALLAS TX	204.01
11/02	USPS KIOSK 482229553 DALLAS TX	21.05
11/02	NFG*EZEKIEL TAYLOR SCH 888-284-7978 DC	257.50
11/01	HOLLYWOOD STAR NAILS & S UNIVERSITY PA TX	63.25
11/01	EATZI'S - LOVERS DALLAS TX	127.81
11/02	RAISING CANES 0295 DALLAS TX	21.20
11/02	KASA YOGA DALLAS DALLAS TX	75.00
11/03	APPLE.COM/BILL 866-712-7753 CA	40.00
11/03	NORDSTROM DIRECT #0808 800-285-5800 IA	138.56
11/02	TLF*SURROUNDINGS EVENTS A 608-8457888 WI	229.99
11/03	WHATABURGER 176 Q26 DALLAS TX	19.23
11/05	CHILDREN INTERNATIONAL HTTPSWWW.CHIL MO	87.00
11/05	APPLE.COM/BILL 866-712-7753 CA	27.03
11/05	APPLE.COM/BILL 866-712-7753 CA	2.99
11/06	SP EMPORIUM PIES HTTPSWWW.EMPO TX	110.00
11/07	APPLE.COM/BILL 866-712-7753 CA	31.36
11/06	APPLE.COM/BILL 866-712-7753 CA	8.65
11/07	STUBHUB, INC. 866-788-2482 CA	215.00
11/06	PARKWHIZ, INC. 888-472-7594 IL	40.60
11/06	TEXAS BB CONCESSIONS ARLINGTON TX	15.55
11/08	APPLE.COM/BILL 866-712-7753 CA	29.99
11/09	APPLE.COM/BILL 866-712-7753 CA	6.46



GU000970 33 of 69 f 110



**EXHIBIT A  
GWEN'S PRODUCTION**

Description	Start	End	Date Produced	Responsive To RFP
2022-06-22 AdvantiGen Subscription Agreement.pdf	GU000001	GU000002	2/24/25	1A
2023-03-19 AdvantiGen Subscription Agreement.pdf	GU000003	GU000004	2/24/25	1A
2024 AIG 401(k).pdf	GU000005	GU000010	2/24/25	1A
2024 AMEX Platinum x6008 Statements.pdf	GU000011	GU000031	2/24/25	1A
2024 Chase Acct x3898 Statements.pdf	GU000032	GU000075	2/24/25	1A
2024 Chase Acct x6893 Statements.pdf	GU000076	GU000105	2/24/25	1A
2024-07 through 2025-01 Chase Sapphire x2372.pdf	GU000106	GU000126	2/24/25	1A
2024-12-31 Met.life HSA Summary.pdf	GU000127	GU000127	2/24/25	1A
2025 Accenture HSA Election Details.pdf	GU000128	GU000128	2/24/25	1A
2025 Accenture Life Insurance Summary.pdf	GU000129	GU000133	2/24/25	1A
2025-01-11 Email re Retainer loan terms.pdf	GU000134	GU000135	2/24/25	1A
2025-01-31 Accenture 401(k) Summary.pdf	GU000136	GU000137	2/24/25	1A
2025-02-01 Accenture Investment Summary.pdf	GU000138	GU000154	2/24/25	1A
2025-02-01 Ameriprise IRA & Roth IRA Acct. Summary.pdf	GU000155	GU000161	2/24/25	1A
2025-02-14 Email re Beerman Law Fees Judgment McNally.pdf	GU000162	GU000162	2/24/25	1A
2025-02-16 Accenture Employment Agreement (showing clawback of bonus).pdf	GU000163	GU000168	2/24/25	1A
2025-02-16 Overview of Offer from Accenture.pdf	GU000169	GU000171	2/24/25	1A
Amex Acct. x1009 Loan Disclosure.pdf	GU000172	GU000173	2/24/25	1A
Chase GLU Acct. Cannot Access.pdf	GU000174	GU000174	2/24/25	1A
Chase Visa x4005 Dec 2024.pdf	GU000175	GU000180	2/24/25	1A
Chase Visa x7396 Dec-Jan 2024.pdf	GU000181	GU000186	2/24/25	1A
ChaseVisa2024 Spending Report PDF.pdf	GU000187	GU000218	2/24/25	1A
Hartford ADD policy 25k from Cognizant.pdf	GU000219	GU000220	2/24/25	1A
Hartford Life Insurance Info. (Jason).pdf	GU000221	GU000223	2/24/25	1A
HSPRD History Bill - Uljasz.pdf	GU000224	GU000227	2/24/25	1A
Jan 2025 USAA 20250104 bank checking statement 9941.pdf	GU000228	GU000229	2/24/25	1A
Sofi Loan.pdf	GU000230	GU000230	2/24/25	1A
April 2024 Chase Visa x2372.pdf	GU000231	GU000236	3/11/25	1A
August 2024 Chase Visa x2372.pdf	GU000237	GU000242	3/11/25	1A
February 2024 Chase Visa x2372.pdf	GU000243	GU000246	3/11/25	1A
January 2024 Chase Visa x2372.pdf	GU000247	GU000250	3/11/25	1A
July 2024 Chase Visa x2372.pdf	GU000251	GU000256	3/11/25	1A
June 2024 Chase Visa x2372.pdf	GU000257	GU000262	3/11/25	1A
March 2024 Chase Visa x2372.pdf	GU000263	GU000266	3/11/25	1A
May 2024 Chase Visa x2372.pdf	GU000267	GU000272	3/11/25	1A
all chase accounts except GLU distr - no money market or savings account.pdf	GU000273	GU000273	3/11/25	1A
citibank - no charges. Redacted.pdf	GU000274	GU000274	3/11/25	1A
Citicard no charges membership fee only.pdf	GU000275	GU000275	3/11/25	1A
wellsfargo auto loan closed 2023.pdf	GU000276	GU000276	3/11/25	1A
SAPPHIRE CHECKING (...3898) - balance transferred to new checking bc of fraud	GU000277	GU000279	3/11/25	1A
Chase Sapphire x3898 Account Restricted	GU000280	GU000280	3/11/25	1A
2024-01-26 AMEX.pdf	GU000281	GU000287	3/13/25	1A
2024-02-23 AMEX.pdf	GU000288	GU000298	3/13/25	1A
2024-03-26 AMEX.pdf	GU000299	GU000305	3/13/25	1A
2024-04-25 AMEX.pdf	GU000306	GU000316	3/13/25	1A
2024-05-26 AMEX.pdf	GU000317	GU000326	3/13/25	1A
2024-06-25 AMEX.pdf	GU000327	GU000336	3/13/25	1A
2024-07-26 AMEX.pdf	GU000337	GU000346	3/13/25	1A
2024-08-26 AMEX.pdf	GU000347	GU000354	3/13/25	1A
2024-09-25 AMEX.pdf	GU000355	GU000362	3/13/25	1A
2024-10-25 AMEX.pdf	GU000363	GU000368	3/13/25	1A
2024-11-25 AMEX.pdf	GU000369	GU000376	3/13/25	1A
2024-12-26 AMEX.pdf	GU000377	GU000384	3/13/25	1A
2025-01-26 AMEX.pdf	GU000385	GU000394	3/13/25	1A
2025-02-23 AMEX.pdf	GU000395	GU000402	3/13/25	1A
2023 Cognizant Incentive Award Plan Final.pdf	GU000403	GU000436	6/23/25	3, 12
2024 Jason Ameriprise.pdf	GU000437	GU000446	6/23/25	1, 12
2024 W2.pdf	GU000447	GU000447	6/23/25	2, 12
2024Cognizant Technology Solutions2024 W-2.pdf	GU000448	GU000450	6/23/25	2, 12
Accenture 401(k).pdf	GU000451	GU000474	6/23/25	1, 12
Accenture Investment Summary.pdf	GU000475	GU000491	6/23/25	1,3,9, 12
Accenture Paystubs Final.pdf	GU000492	GU000521	6/23/25	2, 12
Advantigen Confirmation.pdf	GU000522	GU000522	6/23/25	1, 9, 21
Advantigen Shares Final.pdf	GU000523	GU000555	6/23/25	3, 12
Advantigen Subscription Final.pdf	GU000556	GU000594	6/23/25	3, 12
AIG 401(k).pdf	GU000595	GU000614	6/23/25	1, 12
All 4 VEIP 2025 statements - inception Jan 2025 Final.pdf	GU000615	GU000648	6/23/25	1, 3, 12
Ameriprise Statements.pdf	GU000649	GU000746	6/23/25	1, 12
Amex.pdf	GU000747	GU000921	6/23/25	12, 15
Chase x3898 Final.pdf	GU000922	GU000985	6/23/25	1, 10, 12
Chase x6893 Final.pdf	GU000986	GU001029	6/23/25	1, 10, 12
Cognizant 401(k) Empower Statements.pdf	GU001030	GU001065	6/23/25	1, 12
Cognizant 401(k) Empower to Voya.pdf	GU001066	GU001069	6/23/25	1, 12
Cognizant 401(k) Voya Tax Final.pdf	GU001070	GU001073	6/23/25	1, 12
Cognizant 401(k) Voya to Ameriprise.pdf	GU001074	GU001076	6/23/25	1, 12
Cognizant 401(k) Voya.pdf	GU001077	GU001115	6/23/25	1, 12
Cognizant Paystubs.pdf	GU001116	GU001150	6/23/25	2, 12
Cognizant Separation Agreement Final.pdf	GU001151	GU001158	6/23/25	9, 12
Etrade Final.pdf	GU001159	GU001281	6/23/25	1, 12
E-Trade Final.pdf	GU001282	GU001303	6/23/25	1, 10, 12
HSA Final.pdf	GU001304	GU001318	6/23/25	1, 10, 12
Jetty Invoice Final.pdf	GU001319	GU001319	6/23/25	12
Lease Final.pdf	GU001320	GU001337	6/23/25	6, 12

**They emailed this list of defective discovery docs I spent 24 hours detailing all the deficiencies within** 35 of 110

My Holdings All RSUs and Stock w. vesting schedules Final.pdf	GU001338	GU001352	6/23/25	1, 3, 12
New CC Account Paid Off Final.pdf	GU001353	GU001356	6/23/25	12
Payment to IRS for 2024 Taxes.pdf	GU001357	GU001357	6/23/25	12
Pictures of Software and Jason.pdf	GU001358	GU001595	6/23/25	12, 13
Promisorry Note.pdf	GU001596	GU001597	6/23/25	4, 12
Statements.pdf	GU001598	GU001650	6/23/25	1, 10, 12, 15
Texts with Sister.pdf	GU001651	GU001656	6/23/25	5, 11, 12
Tracking Devices Final.pdf	GU001657	GU001662	6/23/25	12
ULIJASZ LETTER - Procedure.pdf	GU001663	GU001663	6/23/25	7, 12
Woodman.pdf	GU001664	GU001664	6/23/25	4, 12
Audio Jason			6/23/25	12, 13, 14
Advantigen Subs Final.pdf	GU001665	GU001668	6/23/25	3, 12
Dec 2024 page 3.pdf	GU001669	GU001669	10/9/25	1, 10, 12, 15
Nov 2024 page 3.pdf	GU001670	GU001670	10/9/25	1, 10, 12, 15

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**Subject:** Re: Subject: Court-Ordered Financials — Immediate Production Required  
**Date:** Thursday, September 25, 2025 at 2:20:51 PM Central Daylight Time  
**From:** Jason McKemie <jmckemie@mckemie.net>  
**To:** Ethan Scroggins <escroggins@sullivancook.com>  
**CC:** Will Cook <wcook@sullivancook.com>, Chandler Alt <calt@sullivancook.com>, Kim Jones <kjones@sullivancook.com>, Jason McKemie <mckemie76@gmail.com>  
**Priority:** High  
**Attachments:** Disc Demand\_Gwen - Disc List (Master).pdf

Ethan,

I know there's a lot to pull together but can you prioritize these for quick turn around? Would be much appreciated. Thanks.

1. Chase Sapphire Visa x2372
  - Nov 2024 - Missing Pages 3, 5-7
  - Dec 2024 - Missing Page 3
  - Jan 2025 - Missing Page 3

Loan Amount following statements for separate property calculation:

- Sept 2023
- June 2024

Also, please expedite the statements for Chase Sapphire x7396. The only statement provided was Jan of 2025. The card had a balance of roughly \$35k in Dec, so this was not a new card and had been used heavily. Need Statements for June 2023 - Present.

Attached are the line items you requested.

Jason McKemie  
214.868.4901

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**From:** Jason McKemie <jmckemie@mckemie.net>  
**Date:** Wednesday, September 24, 2025 at 8:13 AM  
**To:** Ethan Scroggins <escroggins@sullivancook.com>

TYPE	COMPANY / INSTITUTION	IDENTIFIER	Description	Start	COMMENTS
			Tracing for All Cash/E Withdrawals >\$499		Chase x3898 Jan 2025 \$13k, 10/24 \$500, 11/24 \$600, 9/24 \$1,600, etc. All accounts please.
			All transfers		All accounts, w/ account #'s, names
			GLU DISTRIBUTION X8627 Statements		I have received no statements.
			Tracing for All Overpayments towards Credit Cards		Chase Sapphire x3444 - Aug 2025 \$13,210, Chase Sapphire x2372 Feb 2024 \$5,796, Etc. (Lots). Need full tracing
			FULL Statements Released for VENMO (JUNE 2023 - PRESENT)		need all
			Tracing for Daily Account Balances		all accounts
			Create Contiguous Summary for all Checking Accounts		contiguous with legend showing mapping to credit card swapping
			COGNIZANT SETTLEMENT		Tort Claim was False. Community Asset. \$ requires full tracing. Used Community Property to Fund Litigation
			Divorce Legal Costs		All legal is separate per the Agmt between Will Cook and Brant Webb via email; full accounting of SC billing required to ensure charges are applied solely to Petitioner; as SC moved Owen to two-week billing during discovery, her maximum exposure cannot exceed two weeks of charges, and I bear none.
			Other Legal Expenses Paid		
			COGNIZANT SETTLEMENT		All Billing needed from all law offices
			Legal Costs for Protective Order, Contempt, Extension of Protective Order		Billing Statements Needed.
			MISSING VEIP SUMMARY		Monthly Statements Required
RETIREMENT	AIG	AIG	2024 AIG 401(k).pdf	GU000005	Daily Snapshots, 6mo Summary are Not Acceptable, Lacks Monthly Statements
RETIREMENT	AMERIPRISE	AMERIP	2025-02-01 Ameriprise IRA & Roth IRA Annu. Summary.pdf	GU000155	Annual Reports are not Acceptable
CREDIT	AMERICAN EXPRESS	AMEX LOAN	Amex Acct. x1009 Loan Disclosure.pdf	GU000172	Require Monthly Statement: Loan Disclosure from Aug 2024 tells me nothing about what payments have been made, and what is outstanding
BANK	CHASE	CHASE	2024 Chase Acct x3898 Statements.pdf	GU000032	Missing: June 2023 - Dec 2023, June 2025 - Sept 2025
CREDIT	CHASE	CHASE 2372	August 2024 Chase Visa x2372.pdf	GU000237	Missing: June 2023 - March 2024, Aug 2024 - Sept 2025
BANK	CHASE	CHASE 3898	Chase Sapphire x3898 Account Restricted	GU000280	June 2023 - Dec 2023, June 2025 - Sept 2025
BANK	CHASE	CHASE 3898	SAPPHIRE CHECKING (...3898) - balance transferred to new checking bc of fraud	GU000277	Balance Transferred shows \$13,000 Missing. Need full tracing.
CREDIT	CHASE	CHASE 4005	Chase Visa x4005 Dec 2024.pdf	GU000175	Missing: June 2023 - Nov 2024, erggggfFeb - Sept 2025
CREDIT	CHASE	CHASE 7396	Chase Visa x7396 Dec-Jan 2024.pdf	GU000181	Only Jan 2025 Statement Provided. Dec had \$34,857 balance - was not a new card. \$13K Overpayment Dec 2024 Need June 2023 - Present
BANK	CHASE	REDACTED	Personal Checking		REDACTIONS ARE NOT PERMITTED
CREDIT	CHASE	CHASE SPD RPT	ChaseVisa2024_Spending Report PDF.pdf	GU000187	Spending Reports are Not Acceptable
BANK	CHASE	CHS ACTS	all chase accounts except GLU distr - no money market or savings account.pdf	GU000273	Spending Reports are Not Acceptable
CREDIT	CHASE	CHS SAP	2024-07 through 2025-01 Chase Sapphire x2372.pdf	GU000106	Nov 2024 - Missing Page 3, 5-7, Dec 2024 - Missing Page 3, January 2025 Missing Page 3
CREDIT	CITIBANK	CITI	citibank- no charges_Redacted.pdf	GU000274	Need MonthlyStatements
COMP	COGNIZANT	COG PAY	2024-09-13 Cognizant Paystub.pdf	GU000279	Missing June. - Nov 2023,
COMP	GLU DISTRIBUTION	GLU D	Chase GLU Acct. Cannot Access.pdf	GU000174	Monthly Statements Required
LEGAL	LEGAL	HSPRD	HSPRD History Bill - Ulljazz.pdf	GU000224	Need Full Accounting for All Legal Billing, Marita) and Not. Her legal bills are separate from mine, however value needs to be established for wasted assets
LEGAL	LEGAL	LEGAL	2025-02-14 Email re Baerman Law Fees Judgment McNally.pdf	GU000162	Need all legal billing accounted for.
HSA	HSA	METLIFE	2024-12-31 MetLife HSA Summary.pdf	GU000127	Release HSA Card Immediately
LOANS	LOANS	RETAINER LOANS	2025-01-11 Email re Retainer loan terms.pdf	GU000134	proof of funds + notarized agmt prior to standing / temp orders or remove it
LOANS	LOANS	SOFI	Sofi Loan.pdf	GU000230	Need Current Months Statement
LOANS	AUTO LOAN	WR AUTO	wellsfargo auto loan closed 2023.pdf	GU000276	Why do you have your previous car loan versus your current?

**Cc:** "[wcook@sullivancook.com](mailto:wcook@sullivancook.com)" <[wcook@sullivancook.com](mailto:wcook@sullivancook.com)>, Chandler Alt <[calt@sullivancook.com](mailto:calt@sullivancook.com)>, Kim Jones <[kjones@sullivancook.com](mailto:kjones@sullivancook.com)>, Jason Mckemie <[mckemie76@gmail.com](mailto:mckemie76@gmail.com)>

**Subject:** Re: Subject: Court-Ordered Financials — Immediate Production Required

Ethan,

This should get you started. Thx.

Please reply with full and complete documentation by Tuesday, Sept 30, 2025.

Jason McKemie

---

**From:** Ethan Scroggins <[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)>

**Date:** Tuesday, September 23, 2025 at 3:12 PM

**To:** Jason McKemie <[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)>

**Cc:** "[wcook@sullivancook.com](mailto:wcook@sullivancook.com)" <[wcook@sullivancook.com](mailto:wcook@sullivancook.com)>, Chandler Alt <[calt@sullivancook.com](mailto:calt@sullivancook.com)>, Kim Jones <[kjones@sullivancook.com](mailto:kjones@sullivancook.com)>, Jason Mckemie <[mckemie76@gmail.com](mailto:mckemie76@gmail.com)>

**Subject:** RE: Subject: Court-Ordered Financials — Immediate Production Required

Mr. McKemie,

The Court directed and made sure that production would be made in response to legitimate and reasonable requests for production made under proper procedure. You already asked for these documents, and we have already produced documents bates labeled GU000001 – GU001668 in response. The manner at which we have produced documents follows the rules.

If you have identified specific instances of missing pages in statements, provide those specific instances. You cannot just state that the entire production is incomplete while ignoring what we have produced.

I will not address the arguments you are making about community property and separate property in this email. That is a matter for the Court and an issue for final trial.

Sincerely,

**ETHAN SCROGGINS**  
**Sullivan & Cook LLC**

*Attorney*  
600 East Las Colinas Blvd, Suite 1300  
Irving, TX 75039  
(214) 520-7494  
[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)

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**From:** Jason McKemie <[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)>

**Sent:** Sunday, September 21, 2025 9:32 PM

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**Subject:** RE: Subject: Court-Ordered Financials — Immediate Production Required  
**Date:** Tuesday, September 30, 2025 at 5:47:54 PM Central Daylight Time  
**From:** Ethan Scroggins <escroggins@sullivancook.com>  
**To:** Jason McKemie <jmckemie@mckemie.net>  
**CC:** Will Cook <wcook@sullivancook.com>, Chandler Alt <calt@sullivancook.com>, Kim Jones <kjones@sullivancook.com>, Jason McKemie <mckemie76@gmail.com>

Mr. McKemie,

I had an emergency TRO come up today that took up most of my day and an all day mediation yesterday.

Six days is too short a turnaround for the amount of items you identified. We will have a substantive response to you regarding the identified items by end of day October 7, 2025 (one week from now).

Sincerely,

**ETHAN SCROGGINS**  
**Sullivan & Cook LLC**

*Attorney*  
600 East Las Colinas Blvd, Suite 1300  
Irving, TX 75039  
(214) 520-7494  
[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)

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**From:** Jason McKemie <[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)>  
**Sent:** Wednesday, September 24, 2025 8:13 AM  
**To:** Ethan Scroggins <[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)>  
**Cc:** Will Cook <[wcook@sullivancook.com](mailto:wcook@sullivancook.com)>; Chandler Alt <[calt@sullivancook.com](mailto:calt@sullivancook.com)>; Kim Jones <[kjones@sullivancook.com](mailto:kjones@sullivancook.com)>; Jason McKemie <[mckemie76@gmail.com](mailto:mckemie76@gmail.com)>  
**Subject:** Re: Subject: Court-Ordered Financials — Immediate Production Required  
**Importance:** High

Ethan,

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Jason McKemie

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**Date:** Tuesday, September 23, 2025 at 3:12 PM  
**To:** Jason McKemie <[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)>  
**Cc:** "[wcook@sullivancook.com](mailto:wcook@sullivancook.com)" <[wcook@sullivancook.com](mailto:wcook@sullivancook.com)>, Chandler Alt

<[calt@sullivancook.com](mailto:calt@sullivancook.com)>, Kim Jones <[kjones@sullivancook.com](mailto:kjones@sullivancook.com)>, Jason Mckemie <[mckemie76@gmail.com](mailto:mckemie76@gmail.com)>

**Subject:** RE: Subject: Court-Ordered Financials — Immediate Production Required

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I will not address the arguments you are making about community property and separate property in this email. That is a matter for the Court and an issue for final trial.

Sincerely,

**ETHAN SCROGGINS**  
**Sullivan & Cook LLC**

*Attorney*  
600 East Las Colinas Blvd, Suite 1300  
Irving, TX 75039  
(214) 520-7494  
[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)

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**From:** Jason McKemie <[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)>

**Sent:** Sunday, September 21, 2025 9:32 PM

**To:** Ethan Scroggins <[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)>

**Cc:** Will Cook <[wcook@sullivancook.com](mailto:wcook@sullivancook.com)>; Chandler Alt <[calt@sullivancook.com](mailto:calt@sullivancook.com)>; Kim Jones <[kjones@sullivancook.com](mailto:kjones@sullivancook.com)>; Jeff Cook <[jcook@sullivancook.com](mailto:jcook@sullivancook.com)>; Jason McKemie <[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)>; Jason McKemie <[mckemie76@gmail.com](mailto:mckemie76@gmail.com)>

**Subject:** Subject: Court-Ordered Financials — Immediate Production Required

**Importance:** High

Ethan,

On **September 8**, the Court directed your client to provide **full and complete financials**, and you confirmed on the record that production would be made. Two weeks later, no additional statements have been received. Ten months have now passed without compliance, which has prevented resolution and caused considerable harm; I want to move forward, but cannot until your client complies.

**A. Scope of Required Production (June 2023 – June 2025)**

1. **All accounts.** Bank, credit card, investment, retirement, and brokerage

accounts. No account may be excluded on the ground it is “separate property.” If an account is asserted to be separate, your client bears the burden to establish separate character through **complete statements and tracing**.

2. **Monthly statements only.** Produce official, institution-issued **monthly** statements. **No quarterlies, annual summaries, or daily “snapshots”** (e.g., AIG one-day reports). These do not satisfy the Court’s directive.
3. **Sequential, gap-free coverage.** Statements must be consecutive and **cover every day** in the period. The closing balance of one statement must equal the opening balance of the next. If an account or card number changed, production must show **continuous coverage from the prior number’s last day through the successor’s first day**.
4. **Complete documents. All pages** for each statement set. No missing pages.
5. **Format and organization.** Pages must be right-side-up, legible, and searchable (OCR). Each account must be produced as **one consolidated PDF** (labeled by institution, last-4, and month sequence).
6. **Account tracing (renumbered/reissued cards).** Provide a **cross-reference spreadsheet** linking prior and successor numbers and the effective date(s) of change(s).
7. **Supporting pay records.** Produce **complete pay stubs and full accountings** for the period.

#### **B. Third-Party Services and Security Personnel**

1. **Vendors (e.g., Jetty Partners; any security/investigative/contractor services).** Produce **full invoices, proof of funds transfers or canceled checks,** and **service documentation** describing dates, locations, personnel, scope, and findings.
2. **Interrogatory disclosure (witness identification).** Identify by **full legal name, current residential and business addresses, telephone numbers, email addresses, and employer:**
  - a. The **three security personnel** who accompanied Respondent at the marital residence on **January 2, 2024;**
  - b. **All** individuals who searched Respondent’s **new residence;** and
  - c. The individual(s) who inspected Respondent’s **vehicle** and allegedly discovered a device.

This information is required so that subpoenas may be issued timely for trial.

#### **C. Loans, Contributions, and Non-community Items**

1. **Loans.** Any loan your client intends to list must be supported by:
  - a. **Executed, notarized loan agreement** dated **prior** to issuance; and
  - b. **Proof of funds transfer** into your client’s account (wire/ACH/canceled check).
1. **Loans incurred after December 16, 2024** are excluded from this production as taken against standing/temporary orders and will not be treated as community obligations.
2. **Concurrent equity contributions.** Ongoing contributions (approximately

**\$10,000/month, ~\$130,000/year)** to equity funds initiated **after** entry of the orders are inconsistent with any asserted loan-based “need” and must be fully disclosed in the statements and accountings.

3. **Elective cosmetic procedures.** Elective cosmetic surgery is **not** a community obligation and must be **excluded** from community expense accounting.
4. **GLU Distribution (...8627).** Produce **monthly statements** in the same consolidated, sequential, complete manner as all other accounts.
5. **Reimbursements and allowances.** Provide a **full accounting of all reimbursements/allowances** (including housing/rent reimbursements) and all **business-related expenses** during the period; statements must reflect receipt of reimbursements where claimed.

#### **D. Production Mechanics (to avoid disputes)**

- **Native data for validation.** In addition to PDFs, produce **native transaction exports** (CSV/Excel) for each account with at least: transaction date, posting date, description/merchant, debit/credit, running balance, instrument/ID, and transfer source/destination.
- **No redactions** other than PII masking to last-4 where legally required.
- **Bates numbering** and clear file naming (Institution\_Last4\_YYYYMM-YYYYMM.pdf).
- **Privilege log** required for any withheld material, with sufficient detail for evaluation.
- **Custodian certification.** Provide a signed statement (by Respondent and/or the records custodian, as applicable) that production is **complete, consecutive, and gap-free** for the stated period and that the **card/account renumbering mapping is accurate.**

#### **E. Immediate and Final Deadlines**

- **Immediate:** The **December 2024** statement for the card ending **2372** is incomplete (**page 3 missing**). Provide the complete **four-page** statement within **24 hours**.
- **Final:** All remaining responsive financial records **in the format above** must be produced **no later than Monday, September 29, 2025**. By that date, three weeks will have elapsed since the Court’s directive—a **sufficient and reasonable period**.

#### **F. HSA Access**

Additionally, I demand immediate release of the **HSA card credentials**, which are protected by the standing and temporary orders and which I have requested at least **28 times**. Attached are prior requests and medical documentation reflecting the progression of harm since **May 2025**, including **three emergency-room visits** and a **six-day hospitalization**.

Attached is a letter another letter, this one documenting my diagnosis of Congestive Heart Failure, and reiterating the criticality of access to this card.

\_\_\_\_\_

Timely production is also critical for trial preparation. Trial exhibits must be exchanged 30 days before trial. If full and complete financials are not produced at least 90 days before trial, I

cannot reasonably prepare exhibits or submit materials to a forensic accountant. Any attempt to delay production until exhibits are due will require me to seek a continuance of the trial date.

---

**Non-compliance:** If production is not made **in this format** and **by these deadlines**, I will file notice with the Court and seek appropriate relief, including an order compelling proper production or authorizing subpoenas to custodians of records **at your client's expense**, as well as any other relief the Court deems just.

Please confirm receipt, provide the complete **December 2024 Chase x2372 statement within 24 hours**, and confirm the **September 29 production timing**.

Sincerely,

Jason McKemie  
(214) 868-4901  
[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

Ethan,

Thank you for confirming production **GU000001-GU001668**. I'm not "ignoring" what was produced; I'm identifying the **specific defects** that prevent the Court-ordered "full and complete" financials. Please cure the items below or point me to the exact **Bates range** that already satisfies each request. Attached are **Demonstrative Exs. A-1 and A-2** marking missing months/pages; they are **illustrative only** and not a substitute for production.

This should get you started. I will advise if I find any additional documentation missing.

---

**A. Global completeness (all accounts).** Based on my review of **GU000001-GU001668**, **no account** includes a full set of **consecutive monthly statements** for the Court-ordered period. The specific items listed below are **illustrative**, not exhaustive. To close the loop for **every account produced to date**:

1. **Consecutive monthlies.** Produce **official monthly statements (all pages)** for each **account** from **June 1, 2023 to present**, so that the **closing balance of one month equals the next month's opening balance**, with **no gaps**.
2. **Native detail.** For each account, also produce the **CSV/Excel transaction export** (transaction date, posting date, description/merchant, debit/credit, running balance, transfer source/destination).
3. **Production map.** Provide a **production map** listing **account** → **months produced (Bates)** → **missing months**, for all personal, joint, business, credit, and plan accounts.
4. **If unavailable.** If you contend any monthly statement **cannot be obtained**, identify the **specific month** and provide (a) the institution's written confirmation or portal notice showing unavailability, and (b) the **steps and dates** you took to request it (e.g., branch request number or ticket).
5. **Page completeness.** Where a month has been produced **without all pages**, re-produce the **complete set**. If a provider omits "Page x of y" footers, state the **total page count** for that month so completeness can be verified.

---

**B. Missing or incomplete statements (monthly required)**

1. **Chase Sapphire Visa x2372**
  - **Nov 2024 - Missing Pages 3, 5-7**
  - **Dec 2024 - Missing Page 3**
  - **Jan 2025 - Missing Page 3**

Please ensure produced **statements do not have omitted pages of transaction history.**

2. **AIG 401(k)** – Only a **06/22/2024 one-day snapshot** and a **01/01/2025-06/01/2025 roll-up** were produced. These are not monthly statements. Please produce **consecutive monthly statements (all pages)** from **Sept 2023-present** and the **CSV/Excel** export with **date, posting date, description, source code, amount, and running balance.**
3. **GLU Distribution LLC (Chase)** – **Monthly statements June 2023-present** have not been produced. The fee-only report is not a monthly statement. Chase confirms monthly statements are available at any branch with authorization. Please produce **full monthly statements (all pages)** plus **check images, wires/ACH/Zelle**, and a **CSV/Excel** ledger.

---

#### **C. Retirement/equity deferrals (VEIP/ESPP) & employer match (Oct 2024-present)**

4. **Payroll elections/changes** – Produce **VEIP/ESPP election/change confirmations** (Nov/Dec 2024) and any HR/benefits emails memorializing effective dates/amounts.
5. **Payroll registers/pay stubs** – Produce the **per-pay registers** showing **VEIP** line items and **tax** withholdings to reconcile any entries labeled “extra tax withholding.”
6. **Plan/provider postings** – Provide **plan statements** reflecting each payroll deferral and the associated **employer match/true-up and vesting**, and the **remittance files** (employer→plan) showing **source codes** and dates.

---

#### **D. AIG 401(k) loan history (separate vs community; reimbursement)**

7. The plan shows an active loan (orig. **10/11/2019**). Please produce:
  - **Loan principal balance as of Sept 1, 2023,**
  - **Amortization schedule;** and
  - **Each loan payment** posted **Sept 2023-present** (principal/interest).
  - If available, provide the administrator’s **“balance as of Sept 1, 2023”** letter.

---

#### **E. Production map (to avoid more back-and-forth)**

8. Provide a simple **production map** linking each account to **Bates ranges & months covered**, and identifying missing months.

For example:

Account	Leaf-4	Institution	Months Produced (Bates)	Missing Months	CSV?
Chase Visa	x2372	Chase	2024-11 (GU ___-); 2024-12 (GU ___-)	2024-12 p.3 missing	No
AG 401(k)	—	AIG	2025 H1 roll-up (GU ___-); 2024-06-22 snapshot (GU)	2023-08..present <b>monthlies</b>	No
GLU LLC DDA	x8627	Chase	—	2023-06..present	Yes
Payroll (VEIP)	—	Employer	—	Oct 2024..present registers	—

If you contend any item above is already produced, please identify the **Bates range and month**.

### Format & timing

- **Format:** Statements as **OCR PDFs**; payroll/registers & remittances as **CSV/Excel** (or legible PDF if CSV not kept).
- **Cure date:** Please produce the missing pages/monthlies and provide the production map by **close of business (5:00 p.m. CT) Tuesday, Sept 30, 2025**. If you need **one business day**, say so now.
- **If not cured:** I will file a short **motion to compel** seeking (i) a production map, (ii) replacement of snapshots/roll-ups with **true monthlies + CSV**, and (iii) **fees**.

---

To keep lanes clean: **HSA access** will be addressed by **separate emergency motion and proposed order** (same-day digital provisioning).

---

**F. Discovery.** As a courtesy for the time required to compile the deficiency inventory, I am extending the response deadline by one business day. **Please provide a full and complete response—either producing the missing materials or citing exact Bates ranges—no later than close of business (5:00 p.m. CT) on Tuesday, September 30, 2025.**

---

Best,

Jason McKemie  
 (214) 868-4901  
[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

---

**Attachments:**

- **Demonstrative Ex. A-1** – Missing Monthly Statements by Account/Month (compiled from GU000001-GU001668).
- **Demonstrative Ex. A-2** – Chase Sapphire x2372 – Missing Statements/Pages (compiled from GU000001-GU001668).

*(Demonstratives only; no work-product waiver / no admissions.)*

### 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: 109297794

Filing Code Description: Motion - Compel

Filing Description: ENVELOPE #109297794 DOC001

Status as of 12/19/2025 10:45 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jason McKemie		jmckemie@mckemie.net	12/19/2025 10:03:55 AM	SENT
Gwendolyn Ulijasz McKemie		GUlijasz@gmail.com	12/19/2025 10:03:55 AM	SENT
JASON EMORYMCKEMIE		jason@callvital.com	12/19/2025 10:03:55 AM	SENT

IN THE MATTER OF:  
McKenzie

IN THE 302 FAMILY DISTRICT  
COURT OF DALLAS COUNTY, TEXAS

ASSOCIATE JUDGE'S REPORT (Divorce/SAPCR)  
Temporary \_\_\_\_\_ Final \_\_\_\_\_

Pursuant to an Order of Referral, a hearing in this matter has been held by a duly appointed Associate Judge as authorized by Chapter 201, Texas Family Code. The parties are hereby given notice of the findings and recommendations contained herein and of their right to be heard by a District Judge upon compliance with the terms of Chapter 201, Texas Family Code. A copy of this Report has been given to each party or the party's attorney who appeared at the hearing.

AGREEMENT  DEFAULT  CONTESTED HEARING  Reporter/Interpreter Present \_\_\_\_\_

APPEARANCES: Husband/Father: / and Attorney: \_\_\_\_\_  
Wife/Mother: / and Attorney: \_\_\_\_\_  
Other: \_\_\_\_\_ and Attorney: \_\_\_\_\_

The parties appeared Jan 6, 2026 on Motion to Compel Discovery & requests regarding hsa

The court grants respondents request that financial documents be turned over by Jan. 9, 2026

The hsa card was provided to respondent, Mr. McKenzie at the time of the hearing

On January 12, 2026, Mr. McKenzie (Husband) appeared & present a ex parte relief regarding eviction proceedings, temporary stay & temporary support. These requests were denied.

Attorney for  Husband/Father  Wife/Mother will reduce this Report to written Order and submit to other side and Court within fourteen (14) days.  
 Orders require proof of submission to other attorney OR signature of all  attorneys or  parties for entry.

Jan. 12, 2026  
Date

[Signature]  
Associate Judge

Agreed \_\_\_\_\_ Agreed \_\_\_\_\_ Agreed \_\_\_\_\_ Agreed \_\_\_\_\_

Copy from re:SearchTX  
Copy from re:SearchTX

# Benefit Summary

Benefit Summary Generated On 02/02/2026 At 12:32:54 CST

## About You

### Your Information

<b>Name</b>	Jason E McKemie
<b>Address</b>	5609 La Foy Blvd Dallas, TX 75209 US
<b>Date of Birth</b>	04/08/1976
<b>Gender</b>	Male
<b>Cell Phone</b>	214-868-4901

## Election Information

Current

# Current

## My Health

Medical - Aetna HealthFund HDHP

### Medical Covered Members

Members	Covered
Jason E McKemie Effective Date: 01/01/2026	Yes

Dental - Aetna DMO Plan

### Dental Covered Members

Members	Covered
Jason E McKemie Effective Date: 01/01/2026	Yes

Vision - UnitedHealthcare Vision Plan

### Vision Covered Members

Members	Covered
Jason E McKemie Effective Date: 01/01/2026	Yes

Employee Critical Illness - Coverage Waived

Spouse/Domestic Partner Critical Illness - Coverage Waived

Child Critical Illness - Coverage Waived

## My Savings

Health Savings Account - Health Savings Account

Health Care Flexible Spending Account - Health Care Flexible  
Spending Account

Limited Purpose Flex

Dependent Care Flexible Spending Account - Coverage Waived

### My Security

Basic Life Insurance - Basic Life Insurance

Basic Accidental Death & Dismemberment (AD&D) Insurance - Basic  
AD&D Insurance

Optional Life Insurance - Coverage Waived

Optional Accidental Death & Dismemberment (AD&D) Insurance - Coverage Waived

Spouse or Domestic Partner Life AD&D Insurance - Coverage Waived

Dependent Child Life/AD&D - Coverage Waived

Long-Term Disability Insurance - LTD \$15,000 Monthly Maximum

Short-Term Disability Insurance - Short-Term Disability

Legal Plan - Legal Plan

Personal Excess Liability - 2. Personal Excess Liability - 2 Million

## Dependent Child-Only Life/AD&D - Coverage Waived

This online benefit summary is reflective of benefits information contained within the Businessolver, Inc. database on the date this information is being displayed. This information is not intended to be an all inclusive or exhaustive list of benefit enrollment information. Modifications, deletions, and additions to coverage are not immediately effective upon submission. Please contact the Benefits Center at 888-259-6059 if you have any questions.

Important Note: The insurance carriers make the final determination regarding the payable benefit amount and the designated beneficiaries. The information shared reflects the current enrollment system data, but the ultimate benefit recipient or benefit amount to be paid may change based on plan rules, Evidence of Insurability and approvals, and other factors.

Every effort has been made to report information accurately, but the possibility of error exists. In case of any conflict between your benefits election confirmation and an official plan document, the plan document will be the final authority. Please note, some insurance coverage elections only become effective upon approval of your Evidence of Insurability (EOI) by the carrier.

\* -Any personal or dependent information that appears in red font indicates a change that is currently pending approval.

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. DF-24-18010

NOTICE: DOCUMENT CONTAINS  
SENSITIVE INFORMATION.

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

**MOTION TO OBTAIN CERTIFIED TRANSCRIPT OF JANUARY 7, 2025, HEARING AND REQUEST FOR PAYMENT FROM COMMUNITY FUNDS UNDER PETITIONER'S CONTROL**

I, Jason McKemie, Respondent, appearing *pro se*, respectfully request authorization for a certified transcript of the **January 7, 2025 Temporary Restraining Order hearing** held before the Honorable Judge Kimberly Brown (then sitting for the 254th District Court).

**1. CERTIFIED TRANSCRIPT REQUIRED.**

- The hearing included **extensive testimony** on matters still material to this case—including financial issues, counsel withdrawal, property interests, prior and pending civil litigation, security and safety matters, third-party statements, alleged criminal conduct, and the timeline and duration of the marriage.
- To ensure that testimony is not taken out of context or reviewed in incomplete form, a **certified transcript of the entire hearing** is necessary, so all parties and the Court have an accurate and complete record.

**2. Existing Recording.**

- I possess an unofficial digital recording of approximately **three hours and forty-four minutes** of the hearing; however, it omits the first **ten to fifteen minutes** of proceedings.
- A **complete, court-certified transcript** is required so that the record used for trial preparation is full and accurate and ensures a **fair, just, and equitable resolution** of these proceedings.

**3. Preparation Authority.**

- The hearing was recorded digitally rather than by a court reporter.
- I request that the **Clerk of the 254th District Court**, or that court's designated transcription vendor, be authorized to prepare and certify the **complete transcript** of the digital recording and release it to the **302nd District Court** for use in this cause.

**4. Payment of Costs / Reservation of Rights.**

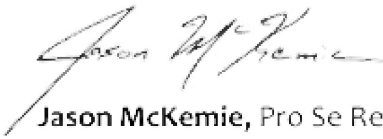
- Temporary Orders entered after that hearing assign me responsibility for all expenses of the marital estate, while all community accounts and liquid funds remain solely under **Petitioner Gwendolyn Ulijasz's control**.
  - I ask that the Clerk or transcription vendor bill the cost of preparing the certified transcript to be **paid from community funds under Petitioner's exclusive control**, and I reserve my right to reimbursement of my community share of that cost at the final division of the estate.
5. **Access to the Record.**
- A certified transcript of the January 7, 2025, hearing is fundamental to these proceedings.
  - Both parties and the Court must have equal access to an accurate record to ensure **transparency and due process**.
  - There is no valid reason for either party to oppose its preparation.
6. **Request for Prompt Ruling.**
- Because this motion concerns preservation of the record for trial and requires no additional evidence, I respectfully ask the Court to **rule promptly by submission** and notify both parties by email.
  - Delay would prejudice my ability to prepare for trial.
- 

**WHEREFORE, PREMISES CONSIDERED,**

I respectfully ask the Court to:

1. Authorize the **Clerk of the 254th District Court of Dallas County, Texas**, or that court's designated transcription vendor, to prepare and certify the **complete transcript** of the **January 7, 2025 hearing** before Judge Kimberly Brown and release it to the **302nd District Court** for use in this cause;
  2. Direct that the reasonable cost of preparing the transcript be **billed to Petitioner Gwendolyn Ulijasz** and paid from **community funds under her control**;
  3. Reserve Respondent's right to reimbursement of his community share of such cost at the final division of the estate; and
  4. Grant all other relief to which Respondent may be justly entitled.
-

Respectfully submitted,



**Jason McKemie**, Pro Se Respondent  
539 W Commerce St, Suite #2010  
Dallas, TX 75208  
(214) 868-4901 | jmckemie@mckemie.net

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. DF-24-18010

NOTICE: DOCUMENT CONTAINS SENSITIVE INFORMATION.

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

**ORDER AUTHORIZING PREPARATION OF CERTIFIED TRANSCRIPT**  
*of the January 7, 2025, Hearing w/ Payment from Community Funds*

On this day, the Court considered **Respondent Jason McKemie's Motion to Obtain Certified Transcript of the January 7, 2025, TRO Hearing and Request for Payment from Community Funds under Petitioner's Control.**

After reviewing the motion and the record, the Court finds that good cause exists to grant the requested relief and that a certified transcript of the hearing is necessary to ensure an accurate record for use in these proceedings.

**IT IS THEREFORE ORDERED** that the **Clerk of the 254th District Court of Dallas County, Texas**, or that court's designated transcription vendor, is **authorized to prepare and certify the complete transcript of the January 7, 2025 hearing held before the Honorable Judge Kimberly Brown** and to **release the certified transcript to the 302nd District Court** for use in this cause.

**IT IS FURTHER ORDERED** that the **reasonable cost of preparing the certified transcript shall be billed directly to Petitioner, Gwendolyn Ulijasz, and paid from community funds under her control.**

**IT IS FURTHER ORDERED** that Respondent **retains the right** to reimbursement of his community share of such cost at the final division of the estate and to seek equitable reallocation of expenses as appropriate.

All other relief not expressly granted herein is **DENIED.**

SIGNED on this \_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
**JUDGE PRESIDING**  
 302nd Judicial District Court  
 Dallas County, Texas

APPROVED AS TO FORM:



**Jason McKemie**, Pro Se Respondent  
539 W Commerce St, Suite #2010  
Dallas, TX 75208  
(214) 868-4901 | jmckemie@mckemie.net

### Automated Certificate of eService

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Envelope ID: 107431776

Filing Code Description: Motion - Miscellaneous

Filing Description: MOTION TO OBTAIN CERTIFIED TRANSCRIPT OF JANUARY 7, 2025, HEARING AND REQUEST FOR PAYMENT FROM COMMUNITY FUNDS UNDER PETITIONER'S CONTROL

Status as of 10/30/2025 11:18 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Ethan Scroggins		escroggins@sullivancook.com	10/29/2025 1:08:07 PM	SENT
Jason McKemie		jmckemie@mckemie.net	10/29/2025 1:08:07 PM	SENT
Gwendolyn Ulijasz McKemie		GUlijasz@gmail.com	10/29/2025 1:08:07 PM	SENT
JASON EMORYMCKEMIE		jason@callvital.com	10/29/2025 1:08:07 PM	SENT

## **EXHIBIT LIST (TO BE ATTACHED)**

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- Exhibit A: Respondent/Movant Pleadings Index by Category (100 filings / 1,110 pages).
- Exhibit B: Motion to Compel with Color Production Grid
- Exhibit D: Credit Card Over Payment
- Exhibit E: Signed Order to Reinstate Healthcare
- Exhibit F: Motion to Compel Docket Sheet
- Exhibit G: Benefits Summary generated February 2, 2026, reflecting multiple coverages waived.
- Exhibit H: Motion to Obtain Certified Transcript of January 7, 2025 Hearing (with proposed order).
- Exhibit I: Motion to Establish Conditions for Re-Entry of Counsel and Preserve Fair Trial.
- Exhibit K: Unified Proposed Order drafted at the Associate Judge's direction following the February 5 compliance hearing (pending).

NO. **DF-24-18010**

IN THE MATTER OF THE MARRIAGE OF

§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT

GWENDOLYN LAURA ULIJASZ-MCKEMIE

302<sup>ND</sup> JUDICIAL DISTRICT &

JASON MCKEMIE

DALLAS COUNTY, TEXAS

**PROPOSED UNIFIED ORDER REGARDING (1) MATERIAL DEVELOPMENTS, (2) THIRD-PARTY VERIFICATION, (3) HEALTHCARE + HSA/FSA FUNCTIONALITY, (4) INTERIM HSA/FSA MAKE-WHOLE RELIEF, AND (5) PRETRIAL SEQUENCING**

On this day, the Court considered Respondent’s filings requesting (i) the Court’s awareness of material developments affecting healthcare access and enforcement of prior orders, (ii) authorization of limited third-party verification to resolve disputed issues, (iii) safeguards to ensure functional healthcare and HSA/FSA access without disruption, and (iv) pretrial sequencing necessary to ensure the matter proceeds on a complete and accurate record.

The Court enters this Order to **enforce existing orders, preserve due process, prevent ongoing or foreseeable harm, and maintain the status quo pending final adjudication**, and further finds that the procedures and structures set forth herein are **not intended to delay these proceedings**, but to **reduce uncertainty, promote transparency, and ensure reliable compliance**.

The Court finds that by addressing potential sources of harm, clarifying obligations, and relying on **objective, outcome-based verification** rather than repeated motion practice, this Order is intended to **protect the parties from avoidable injury, preserve procedural fairness, and facilitate the most expeditious, orderly, and informed resolution of this case**.

**I. MATTERS REQUIRING IMMEDIATE STRUCTURE AND THIRD-PARTY VERIFICATION**

Without adjudicating fault or final relief, the Court notes the following issues require immediate structure and neutral verification:

**A. BANKRUPTCY TRUSTEE INVOLVEMENT / SEQUENCING**

Respondent has filed bankruptcy relief and a bankruptcy trustee is now involved. Trustee review necessarily overlaps with disputed financial issues in this case and supports careful sequencing so proceedings are not conducted on an incomplete or conflicting record.

**B. HEALTHCARE ACCESS IS DISPUTED AS “FUNCTIONAL,” NOT MERELY “ON PAPER”**

The parties present irreconcilable positions regarding whether Respondent has uninterrupted, usable access to medically necessary care, prescriptions, and benefits functionality.

### C. HSA/FSA FUNCTIONALITY REMAINS A CENTRAL, TIME-SENSITIVE DISPUTE

Respondent contends that HSA/FSA access has been repeatedly non-functional and that he does not possess independent, reliable access. Petitioner contends compliance has occurred and any issues are administrative. Because disruption creates immediate, non-substitutable harm, a self-executing safeguard is warranted to prevent repeat disputes and repeat disruption.

### D. THIRD-PARTY INSTITUTIONAL RECORDS ARE REQUIRED

The Court finds these disputes cannot be reliably resolved by party testimony alone and require neutral, third-party verification from the institutions that maintain the source records.

## II. DEFINITIONS

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- A. **“Healthcare Reinstatement Order”** means the Court’s Signed Order on Emergency Reinstatement of Healthcare signed December 17, 2025.
- B. **“Functional Access”** means that Respondent can actually obtain medically necessary care and prescriptions using active plan eligibility and benefit functionality, including: medical and pharmacy processing, and usable HSA and/or FSA funds for qualified expenses, without needing cooperation from an adverse party.
- C. **“Coverage Preservation Cash-Value Equivalent” (CPCVE)** means the cash-value equivalent of \$20,643.56, defined as a lump sum in the Court’s **December 17, 2025 Order on Emergency Reinstatement of Healthcare**, adopted as a substitute remedy where functional access to healthcare or related benefit functionality fails or cannot be reliably preserved.

## III. SUMMARY OF MATERIAL DISPUTES REQUIRING THIRD-PARTY VERIFICATION

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The Court finds the parties present materially irreconcilable positions on issues central to Respondent’s health and procedural capacity, including:

- A. Healthcare Access and Continuity (medical + pharmacy)
- B. HSA and FSA functionality, enrollment, funding, card status, and access control history
- C. QLE / eligibility actions affecting dependent coverage status and system audit trails
- D. Housing / lease modification, buyout, rent ledgers, and eviction-related records (to the extent implicated by pending motions)
- E. Financial disclosure completeness and accuracy (to the extent implicated by pending motions)
- F. Bankruptcy-trustee overlap requiring sequencing

## **IV. AUTHORIZATION OF LIMITED THIRD-PARTY SUBPOENAS (NEUTRAL VERIFICATION)**

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Respondent is authorized to issue limited third-party subpoenas (and/or written authorizations where appropriate) narrowly tailored to the disputes above, including subpoenas necessary to trace, verify, or exclude undisclosed payments made directly or indirectly on Petitioner's behalf through banking institutions, peer-to-peer payment platforms, or payment intermediaries.

The Court finds that good cause exists under Texas Rule of Civil Procedure 205.3 to authorize the limited third-party subpoenas described herein. The records sought are relevant, material, proportional, and necessary to obtain independent source-of-truth records that are not reliably obtainable through party production alone, and are required for fair case administration, enforcement of existing orders, and trial preparation.

### **A. EMPLOYER / PLAN ADMINISTRATOR / BENEFITS CENTER / VENDORS (SOURCE RECORDS) RECORDS SUFFICIENT TO VERIFY:**

- 1) Dependent eligibility and any QLE submission(s), uploads/attestations, reason codes, effective dates, cure/reinstatement workflow, and system/audit trail reflecting who initiated and approved changes;
- 2) Pharmacy benefit manager (PBM) eligibility updates and processing dates;
- 3) HSA and FSA enrollment and funding for 2025 and 2026 plan years;
- 4) HSA/FSA card issuance, replacement, activation/deactivation, lost/stolen reporting history, credential/access control events, and any relevant call logs/tickets.

### **B. FINANCIAL INSTITUTIONS**

Complete records necessary to verify disputed disclosures (account statements, transaction history, and account ownership/authority records as applicable).

### **C. ORDER GRANTING LEAVE FOR TARGETED THIRD-PARTY SUBPOENAS**

This authorization **constitutes leave of court under Rule 205.3** notwithstanding any discovery control plan, scheduling order, or discovery cutoff, and is entered as a targeted exception necessary to ensure record integrity and due process.

### **D. LANDLORD, PROPERTY MANAGER, AND ASSOCIATED FINANCIAL INSTITUTIONS**

Lease files, modifications, buyouts, rent ledgers, payment history, notices, eviction filings/records, and complete banking and payment records sufficient to verify whether rent or housing-related payments were made directly or indirectly on Petitioner's behalf, including but not limited to:

- 1) records from any financial institution holding accounts for the landlord or property manager, including Wells Fargo Bank, N.A., reflecting deposits, Zelle transactions, ACH credits, wires, checks, or other payment activity originating from or attributable to Petitioner;

- 2) records reflecting peer-to-peer or third-party payment processing used to transmit funds for rent or housing obligations, whether labeled as rent or otherwise characterized;
- 3) records sufficient to confirm the absence or presence of any such payments during the relevant period.

#### **E. PEER-TO-PEER AND PAYMENT SERVICE PROVIDERS (PETITIONER ACCOUNTS)**

Complete account statements, transaction histories, payment logs, metadata, and account linkage records for any peer-to-peer or payment service provider used by Petitioner, including but not limited to Venmo, Zelle, Apple Pay, Cash App, PayPal, or similar platforms, sufficient to verify the source, destination, purpose, and timing of any payments relevant to disputed housing, financial disclosure, or enforcement issues.

### **V. HEALTHCARE + HSA/FSA FUNCTIONALITY SAFEGUARD (SELF-EXECUTING)**

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#### **A. INDEPENDENT FUNCTIONAL ACCESS REQUIREMENT**

Petitioner shall not interfere with, restrict, disable, or obstruct Respondent's access to healthcare, prescriptions, or benefit functionality pending further order of the Court.

#### **B. OBJECTIVE PROOF OF NON-FUNCTIONALITY (TRIGGER STANDARD)**

If Respondent experiences a denial, disruption, or non-functionality of healthcare coverage, prescription access, or HSA and/or FSA functionality, Respondent may file a "Notice of Healthcare or HSA/FSA Non-Functionality" attaching objective proof, including but not limited to:

- 1) a pharmacy point-of-sale decline, reversal, or inability-to-fill notice;
- 2) a provider or pharmacy statement reflecting inability to schedule, bill, or dispense due to coverage issues;
- 3) a vendor or plan status page reflecting inactive, blocked, or non-functional coverage or account status.

#### **C. 24-HOUR OUTCOME-BASED CURE, RE-ATTEMPT, AND AUTOMATIC DEPOSIT REQUIREMENT**

##### **1) RESPONDENT-INITIATED FAILURE AND NOTICE**

If Respondent experiences a denial, disruption, or non-functionality of healthcare coverage, prescription access, or HSA/FSA functionality, Respondent may file and serve a **Notice of Healthcare or HSA/FSA Non-Functionality** pursuant to Section B, attaching objective proof of the failed transaction or access attempt.

##### **2) OPPORTUNITY TO CURE (24 HOURS)**

Upon service of the Notice, Petitioner shall have **twenty-four (24) hours** to remediate the specific failure identified, such that Respondent can complete the **same transaction** without obstruction or dependence on Petitioner.

### 3) RE-ATTEMPT AND CONFIRMATION

Following the 24-hour cure period, Respondent shall re-attempt the same transaction or access. If the transaction **successfully completes**, no further action is required under this subsection.

### 4) AUTOMATIC DEPOSIT UPON SECOND FAILURE

If the transaction does not successfully complete upon re-attempt after the cure period, Petitioner shall deposit the Coverage Preservation Cash-Value Equivalent (\$20,643.56) into the Court Registry **within twenty-four (24) hours of the failed re-attempt** as interim parity relief, consistent with the valuation adopted by the Court in its December 17, 2025 Order, without regard to the present availability or applicability of COBRA.

### 5) HEARING AND DISPOSITION OF FUNDS

Upon deposit, the Court shall set a prompt hearing to determine whether the failure or non-functionality was caused, in whole or in part, by Petitioner's actions or omissions.

- If the Court so finds, the deposited funds shall be released to Respondent **as interim protective and parity relief**, intended solely to preserve access to medically necessary care and benefits pending final adjudication, **and not as compensation for past harm, damages, or injury**.
- If the Court does not so find, the Court shall retain, reallocate, or otherwise dispose of the funds as equity and due process require.
- The deposit obligation under subsection (4) is mandatory and not stayed by any request for hearing, clarification, or reconsideration.
- Any determination made at such hearing shall be limited to the administration of interim relief under this Order and shall not constitute findings for purposes of any separate civil action.

## D. PURPOSE AND RESERVATION

This structure is entered to prevent repeated disruption of medical access, to eliminate reliance on assurances or administrative delay, and to protect Respondent from ongoing harm. The Court expressly reserves all ultimate determinations regarding fault, reimbursement, offsets, fee shifting, sanctions, or disproportionate division for later adjudication.

Nothing in this Order shall be construed as a finding, adjudication, waiver, release, satisfaction, or limitation of any claim, cause of action, remedy, or right that may exist outside the scope of this proceeding. This Order does not preclude Respondent from seeking additional relief, including

compensatory damages, exemplary damages, sanctions, statutory remedies, or other civil relief, nor does it waive any right to pursue such claims in a court of competent jurisdiction, including any right to a jury trial where applicable.

**E. THIRD-PARTY PRODUCTION DEADLINE**

Unless otherwise agreed in writing or ordered by the Court, any third-party custodian served pursuant to this Order shall produce responsive documents and electronically stored information within fourteen (14) days of service. Production may be made electronically via secure link or other reasonable method.

**F. MANDATORY SHARING OF THIRD-PARTY PRODUCTIONS**

Any documents, data, statements, exports, logs, notices, or records received by either party from any third-party custodian pursuant to this Order shall be produced to the other party within three (3) business days of receipt, without awaiting further request.

**G. PHASED SERVICE; AVOIDANCE OF DUPLICATION**

Respondent may serve subpoenas authorized by this Order in phases. Respondent shall make reasonable efforts to avoid duplicative subpoenas where prior third-party production fully covers the same custodian, accounts, time period, and record categories.

**H. BUSINESS-RECORDS AUTHENTICATION**

Respondent may elect to utilize deposition by written questions solely for the purpose of business-records authentication under the Texas Rules of Evidence and Texas Rules of Civil Procedure.

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**VI. BANKRUPTCY / PRETRIAL SEQUENCING**

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Because the bankruptcy trustee’s review overlaps with disputed financial issues, and because third-party institutional verification is required, the Court orders the following sequencing:

**A. VERIFIED-RECORD FIRST**

The Court will prioritize receipt of third-party records authorized by this Order so that pretrial hearings and/or trial are conducted on an accurate, neutral factual record.

**B. CASE MANAGEMENT CONFERENCE / HEARING STRUCTURE**

Upon receipt of third-party productions (or expiration of compliance deadlines), the Court may set a focused pretrial hearing to address:

- 1) healthcare/HSA/FSA functionality verification and enforcement,
- 2) disputed disclosure completeness (if applicable),

- 3) housing/lease verification (if applicable),
- 4) and the effect of trustee review on sequencing and scope.

**VII. NO ERISA ADJUDICATION / ENFORCEMENT OF EXISTING ORDERS ONLY**

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Nothing in this Order adjudicates ERISA claims or determines federal rights. The Court enters this Order to enforce its existing temporary orders and to ensure neutral verification of facts directly impacting access to care and the fairness and safety of the proceedings.

**VIII. EFFECTIVE DATE**

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**This Order is effective immediately upon judicial signature.**

**SO ORDERED.**

SIGNED on FEBRUARY \_\_\_\_\_, 2026.

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**JUDGE PRESIDING**  
302ND JUDICIAL DISTRICT COURT  
DALLAS COUNTY, TEXAS

### 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: 111070477

Filing Code Description: Proposed Order/Judgment

Filing Description: ORDER ON STATUS, VERIFICATION, INTERIM RELIEF, AND PRETRIAL MANAGEMENT

Status as of 2/11/2026 4:23 PM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jason McKemie		jmckemie@mckemie.net	2/10/2026 11:57:36 AM	SENT
Gwendolyn Ulijasz McKemie		GUlijasz@gmail.com	2/10/2026 11:57:36 AM	SENT

**Subject:** Discovery  
**Date:** Friday, October 10, 2025 at 1:33:20 PM Central Daylight Time  
**From:** Ethan Scroggins <escroggins@sullivancook.com>  
**To:** Jason McKemie <jmckemie@mckemie.net>, Jason McKemie <mckemie76@gmail.com>  
**CC:** Will Cook <wcook@sullivancook.com>, Chandler Alt <calt@sullivancook.com>  
**Attachments:** 2025-10-09 Exhibit A - Discovery Log.xlsx, Dec 2024 Page 3.pdf, Nov 2024 Page 3.pdf

Mr. McKemie,

Your “exhibits” to your requests for information appear to be based only on the 2024-02-24 production and the issues are addressed in the subsequent production from 2025-06-23. We do not have to explain every item or statement to you. We have produced what you requested. That said, still see the below regarding some of the discovery:

- Statements for Chase x7369 – See GU001599, GU001639 for the first pages of previous statements (different account number transfer) that show the previous account balance transferring over
- Chase x2372 – See GU001648 for Jan 2025 3<sup>rd</sup> page
- VEIP statements – See GU000615-648 and GU000492-521.
- AIG 401(k) - See GU000595-614. These statements show all transactions and complete information regarding deposits, withdrawals, etc. Also show loan repayments.
- Chase x3898 – See “Statements” GU001598-1650
- Chase x2372 – See “Statements” GU001598-1650
  - Nov 2024 page 3 attached
  - Dec 2024 page 3 attached

Sincerely,

**ETHAN SCROGGINS**  
**Sullivan & Cook LLC**

*Attorney*  
600 East Las Colinas Blvd, Suite 1300  
Irving, TX 75039  
(214) 520-7494  
[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)

The following four pages includes everything produced by opposing counsel since receiving Judge Sandra Jackson’s directive to release the missing financials. Please note that the first two pages are the same document, simply titled Nov for one and Dec for the other. And the third document is simply a list of all the documents submitted in prior discovery releases, which I spent a significant amount of time itemizing all of the deficiencies only to wait 2 months to receive the list again with no response for all the deficiencies.

# ACCOUNT ACTIVITY (CONTINUED)

Date of Transaction	Merchant Name or Transaction Description	\$ Amount
10/25	WWW.WAGGINWATER.COM WWW.WAGGINWAT IL	69.00
10/25	EATZI'S - OAK LAWN DALLAS TX	166.19
10/26	NOHEMY TEAROOM DALLAS TX	16.78
10/25	TM *LANE 800-653-8000 CA	105.70
10/26	7-ELEVEN 32924 DALLAS TX	11.78
10/26	7-ELEVEN 32924 DALLAS TX	39.95
10/25	& SLING.COM 888-363-1777 CO	79.01
10/26	FORESTWOOD ANTIQUE MALL DALLAS TX	150.47
10/27	& KASA YOGA DALLAS 972-7465991 TX	280.00
10/28	VZWRLSS*APOCC VISN 800-922-0204 FL	321.60
10/28	7-ELEVEN 50711 HTTPSWWW.7ELE TX	40.00
10/29	CELEBRATION RESTAURANT D DALLAS TX	65.21
10/30	SQ *BEYOND THE DOOR AND M gosq.com TX	571.07
10/29	CVS/PHARMACY #07742 800-746-7287 TX	101.25
10/30	Prime Video Channels amzn.com/bill WA	14.06
10/28	TOM THUMB #2990 DALLAS TX	109.82
10/29	KROGER #0528 DALLAS TX	36.27
10/29	CVS/PHARMACY #07742 DALLAS TX	6.81
10/29	BRK PARKING DALLAS TX	5.00
10/29	APPLE.COM/BILL 866-712-7753 CA	64.94
10/29	& KASA YOGA DALLAS 972-7465991 TX	220.00
10/31	APPLE.COM/BILL 866-712-7753 CA	1.07
10/30	TARGET.COM WWW.TARGET.CO MN	14.06
10/30	APPLE.COM/BILL 800-275-2273 CA	3.24
10/29	TOM THUMB #2990 DALLAS TX	4.99
10/30	APPLE.COM/BILL 866-712-7753 CA	21.65
10/29	CVSExtraCare 8007467287RI 800-746-7287 RI	5.00
10/30	TARGET 00008755 DALLAS TX	13.78
10/30	NORDSTROM DIRECT #0808 800-285-5800 IA	16.18
10/31	APPLE.COM/BILL 866-712-7753 CA	3.24
10/31	APPLE.COM/BILL 866-712-7753 CA	7.57
10/30	RACETRAC569 00005694 DALLAS TX	49.63
10/31	APPLE.COM/BILL 866-712-7753 CA	6.48
10/30	RACETRAC569 00005694 DALLAS TX	54.11
10/31	ALTO PHARMACY HTTPSALTO.COM CA	107.78
10/30	PARKPLACE DAL 17 HHND DALLAS TX	10.00
11/01	Idolize Brows and Bea Dallas TX	47.50
11/01	APPLE.COM/BILL 800-275-2273 CA	19.47
11/01	7-ELEVEN 37329 DALLAS TX	18.71
11/02	KROGER #0528 DALLAS TX	27.09
11/01	SERVICE FEE 888-658-5465 TN	148.14
11/02	APPLE.COM/BILL 866-712-7753 CA	42.20
11/01	US TREAS TAX PYMT 888-658-5465 TN	7,922.00
11/02	UPS*1Z588YT70391781825 800-811-1648 GA	13.09
11/02	UBER *ONE HELP.UBER.COM CA	9.99
11/02	NORDSTROM #0738 DALLAS TX	204.01
11/02	USPS KIOSK 4822229553 DALLAS TX	21.05
11/02	NFG*EZEKIEL TAYLOR SCH 888-284-7978 DC	257.50
11/01	HOLLYWOOD STAR NAILS & S UNIVERSITY PA TX	63.25
11/01	EATZI'S - LOVERS DALLAS TX	127.81
11/02	RAISING CANES 0295 DALLAS TX	21.20
11/02	KASA YOGA DALLAS DALLAS TX	75.00
11/03	APPLE.COM/BILL 866-712-7753 CA	40.00
11/03	NORDSTROM DIRECT #0808 800-285-5800 IA	138.56
11/02	TLF*SURROUNDINGS EVENTS A 608-8457888 WI	229.99
11/03	WHATABURGER 176 Q26 DALLAS TX	19.23
11/05	CHILDREN INTERNATIONAL HTTPSWWW.CHIL MO	87.00
11/05	APPLE.COM/BILL 866-712-7753 CA	27.03
11/05	APPLE.COM/BILL 866-712-7753 CA	2.99
11/06	SP EMPORIUM PIES HTTPSWWW.EMPO TX	110.00
11/07	APPLE.COM/BILL 866-712-7753 CA	31.36
11/06	APPLE.COM/BILL 866-712-7753 CA	8.65
11/07	STUBHUB, INC. 866-788-2482 CA	215.00
11/06	PARKWHIZ, INC. 888-472-7594 IL	40.60
11/06	TEXAS BB CONCESSIONS ARLINGTON TX	15.55
11/08	APPLE.COM/BILL 866-712-7753 CA	29.99
11/09	APPLE.COM/BILL 866-712-7753 CA	6.44



My Holdings All RSUs and Stock w. vesting schedules Final.pdf	GU001338	GU001352	6/23/25	1, 3, 12
New CC Account Paid Off Final.pdf	GU001353	GU001356	6/23/25	12
Payment to IRS for 2024 Taxes.pdf	GU001357	GU001357	6/23/25	12
Pictures of Software and Jason.pdf	GU001358	GU001595	6/23/25	12, 13
Promisorry Note.pdf	GU001596	GU001597	6/23/25	4, 12
Statements.pdf	GU001598	GU001650	6/23/25	1, 10, 12, 15
Texts with Sister.pdf	GU001651	GU001656	6/23/25	5, 11, 12
Tracking Devices Final.pdf	GU001657	GU001662	6/23/25	12
ULIJASZ LETTER - Procedure.pdf	GU001663	GU001663	6/23/25	7, 12
Woodman.pdf	GU001664	GU001664	6/23/25	4, 12
Audio Jason			6/23/25	12, 13, 14
Advantigen Subs Final.pdf	GU001665	GU001668	6/23/25	3, 12
Dec 2024 page 3.pdf	GU001669	GU001669	10/9/25	1, 10, 12, 15
Nov 2024 page 3.pdf	GU001670	GU001670	10/9/25	1, 10, 12, 15

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**Subject:** Re: Subject: Court-Ordered Financials — Immediate Production Required  
**Date:** Thursday, September 25, 2025 at 2:20:51 PM Central Daylight Time  
**From:** Jason McKemie <jmckemie@mckemie.net>  
**To:** Ethan Scroggins <escroggins@sullivancook.com>  
**CC:** Will Cook <wcook@sullivancook.com>, Chandler Alt <calt@sullivancook.com>, Kim Jones <kjones@sullivancook.com>, Jason McKemie <mckemie76@gmail.com>  
**Priority:** High  
**Attachments:** Disc Demand\_Gwen - Disc List (Master).pdf

Ethan,

I know there's a lot to pull together but can you prioritize these for quick turn around? Would be much appreciated. Thanks.

1. Chase Sapphire Visa x2372

- Nov 2024 - Missing Pages 3, 5-7
- Dec 2024 - Missing Page 3
- Jan 2025 - Missing Page 3

Loan Amount following statements for separate property calculation:

- Sept 2023
- June 2024

Also, please expedite the statements for Chase Sapphire x7396. The only statement provided was Jan of 2025. The card had a balance of roughly \$35k in Dec, so this was not a new card and had been used heavily. Need Statements for June 2023 - Present.

Attached are the line items you requested.

Jason McKemie  
214.868.4901

---

**From:** Jason McKemie <[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)>  
**Date:** Wednesday, September 24, 2025 at 8:13 AM  
**To:** Ethan Scroggins <[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)>

**Cc:** "[wcook@sullivancook.com](mailto:wcook@sullivancook.com)" <[wcook@sullivancook.com](mailto:wcook@sullivancook.com)>, Chandler Alt <[calt@sullivancook.com](mailto:calt@sullivancook.com)>, Kim Jones <[kjones@sullivancook.com](mailto:kjones@sullivancook.com)>, Jason Mckemie <[mckemie76@gmail.com](mailto:mckemie76@gmail.com)>

**Subject:** Re: Subject: Court-Ordered Financials — Immediate Production Required

Ethan,

This should get you started. Thx.

Please reply with full and complete documentation by Tuesday, Sept 30, 2025.

Jason McKemie

---

**From:** Ethan Scroggins <[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)>

**Date:** Tuesday, September 23, 2025 at 3:12 PM

**To:** Jason McKemie <[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)>

**Cc:** "[wcook@sullivancook.com](mailto:wcook@sullivancook.com)" <[wcook@sullivancook.com](mailto:wcook@sullivancook.com)>, Chandler Alt <[calt@sullivancook.com](mailto:calt@sullivancook.com)>, Kim Jones <[kjones@sullivancook.com](mailto:kjones@sullivancook.com)>, Jason Mckemie <[mckemie76@gmail.com](mailto:mckemie76@gmail.com)>

**Subject:** RE: Subject: Court-Ordered Financials — Immediate Production Required

Mr. McKemie,

The Court directed and made sure that production would be made in response to legitimate and reasonable requests for production made under proper procedure. You already asked for these documents, and we have already produced documents bates labeled GU000001 – GU001668 in response. The manner at which we have produced documents follows the rules.

If you have identified specific instances of missing pages in statements, provide those specific instances. You cannot just state that the entire production is incomplete while ignoring what we have produced.

I will not address the arguments you are making about community property and separate property in this email. That is a matter for the Court and an issue for final trial.

Sincerely,

**ETHAN SCROGGINS**  
**Sullivan & Cook LLC**

*Attorney*  
600 East Las Colinas Blvd, Suite 1300  
Irving, TX 75039  
(214) 520-7494  
[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)

---

**From:** Jason McKemie <[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)>

**Sent:** Sunday, September 21, 2025 9:32 PM

**90 of 110**

2 of 5

TYPE	COMPANY / INSTITUTION	IDENTIFIER	Description	Start	COMMENTS
			Tracing for All Cash/E Withdrawals > \$499		Chase x3898 Jan 2025 \$13k, 10/24 \$500, 11/24 \$600, 9/24 \$1,600, etc. All accounts please.
			All transfers		All accounts, w/ account #'s, names
			GLU DISTRIBUTION X8627 Statements		I have received no statements.
			Tracing for All Overpayments towards Credit Cards		Chase Sapphire x3444 – Aug 2025 \$13,210, Chase Sapphire x2372 Feb 2024 \$5,796, Etc. (Lots). Need full tracing
			FULL Statements Released for VENMO (JUNE 2023 – PRESENT)		need all
			Tracing for Daily Account Balances		all accounts
			Create Contiguous Summary for all Checking Accounts		contiguous with legend showing mapping to credit card swapping
			COGNIZANT SETTLEMENT		Tort Claim was False. Community Asset. \$ requires full tracing. Used Community Property to Fund Litigation
			Divorce Legal Costs		All legal is separate per the Agmt between Will Cook and Brant Webb via email; full accounting of SC billing required to ensure charges are applied solely to Petitioner; as SC moved Gwen to two-week billing during discovery, her maximum exposure cannot exceed two weeks of charges, and I bear none.
			Other Legal Expenses Paid		
			COGNIZANT SETTLEMENT		All Billing needed from all law offices
			Legal Costs for Protective Order, Contempt, Extension of Protective Order		Billing Statements Needed.
			MISSING VEIP SUMMARY		Monthly Statements Required
RETIREMENT	AIG	AIG	2024 AIG 401(k).pdf	GU000005	Daily Snapshots, 6mo Summary are Not Acceptable, Lacks Monthly Statements
RETIREMENT	AMERIPRISE	AMERIP	2025-02-01 Ameriprise IRA & Roth IRA Acct. Summary.pdf	GU000155	Annual Reports are not Acceptable
CREDIT	AMERICAN EXPRESS	AMEX LOAN	Amex Acct. x1009 Loan Disclosure.pdf	GU000172	Require Monthoy Statement: Loan Disclosure from Aug 2024 tells me nothing about what payments have been made, and what is outstanding
BANK	CHASE	CHASE	2024 Chase Acct x3898 Statements.pdf	GU000032	Missing: June 2023 – Dec 2023, June 2025 – Sept 2025
CREDIT	CHASE	CHASE 2372	August 2024 Chase Visa x2372.pdf	GU000237	Missing: June 2023 – March 2024, Aug 2024 – Sept 2025
BANK	CHASE	CHASE 3898	Chase Sapphire x3898 Account Restricted	GU000280	June 2023 – Dec 2023, June 2025 – Sept 2025
BANK	CHASE	CHASE 3898	SAPPHIRE CHECKING (...3898) – balance transferred to new checking bc of fraud	GU000277	Balance Transferred shows \$13,000 Missing. Need full tracing.
CREDIT	CHASE	CHASE 4005	Chase Visa x4005 Dec 2024.pdf	GU000175	Missing: June 2023 – Nov 2024, ergggfsgFeb – Sept 2025
CREDIT	CHASE	CHASE 7396	Chase Visa x7396 Dec-Jan 2024.pdf	GU000181	Only Jan 2025 Statement Provided. Dec had \$34,857 balance – was not a new card. \$13K Overpayment Dec 2024 Need June 2023 – Present
BANK	CHASE	REDACTED	Personal Checking		REDACTIONS ARE NOT PERMITTED
CREDIT	CHASE	CHASE SPD RPT	ChaseVisa2024_Spending Report PDF.pdf	GU000187	Spending Reports are Not Acceptable
BANK	CHASE	CHS ACTS	all chase accounts except GLU distr – no money market or savings account.pdf	GU000273	Spending Reports are Not Acceptable
CREDIT	CHASE	CHS SAP	2024-07 through 2025-01 Chase Sapphire x2372.pdf	GU000106	Nov 2024 – Missing Page 3, 5-7, Dec 2024 – Missing Page 3, January 2025 Missing Page 3
CREDIT	CITIBANK	CITI	citibank- no charges_Redacted.pdf	GU000274	Need MonthlyStatements
COMP	COGNIZANT	COG PAY	2024-09-13 Cognizant Paystub.pdf	GU000279	Missing June. – Nov 2023;
COMP	GLU DISTRIBUTION	GLU D	Chase GLU Acct. Cannot Access.pdf	GU000174	Monthly Statements Required
LEGAL	LEGAL	HSPRD	HSPRD History Bill - Ulijasz.pdf	GU000224	Need Full Accounting for All Legal Billing, Marital and Not. Her legal bills are separate from mine, however value needs to be established for wasted assets
LEGAL	LEGAL	LEGAL	2025-02-14 Email re Beerman Law Fees Judgment McNally.pdf	GU000162	Need all legal billing accounted for.
HSA	HSA	METLIFE	2024-12-31 MetLife HSA Summary.pdf	GU000127	Release HSA Card Immediately
LOANS	LOANS	RETAINER LOANS	2025-01-11 Email re Retainer loan terms.pdf	GU000134	proof of funds + notarized agmnt prior to standing / temp orders or remove it
LOANS	LOANS	SOFI	Sofi Loan.pdf	GU000230	Need Current Months Statement
LOANS	AUTO LOAN	WR AUTO	wellsfargo auto loan closed 2023.pdf	GU000276	Why do you have your previous car loan versus your current?

---

**Subject:** RE: Subject: Court-Ordered Financials — Immediate Production Required  
**Date:** Tuesday, September 30, 2025 at 5:47:54 PM Central Daylight Time  
**From:** Ethan Scroggins <escroggins@sullivancook.com>  
**To:** Jason McKemie <jmckemie@mckemie.net>  
**CC:** Will Cook <wcook@sullivancook.com>, Chandler Alt <calt@sullivancook.com>, Kim Jones <kjones@sullivancook.com>, Jason McKemie <mckemie76@gmail.com>

Mr. McKemie,

I had an emergency TRO come up today that took up most of my day and an all day mediation yesterday.

Six days is too short a turnaround for the amount of items you identified. We will have a substantive response to you regarding the identified items by end of day October 7, 2025 (one week from now).

Sincerely,

**ETHAN SCROGGINS**  
**Sullivan & Cook LLC**

*Attorney*  
600 East Las Colinas Blvd, Suite 1300  
Irving, TX 75039  
(214) 520-7494  
[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)

---

**From:** Jason McKemie <jmckemie@mckemie.net>  
**Sent:** Wednesday, September 24, 2025 8:13 AM  
**To:** Ethan Scroggins <escroggins@sullivancook.com>  
**Cc:** Will Cook <wcook@sullivancook.com>; Chandler Alt <calt@sullivancook.com>; Kim Jones <kjones@sullivancook.com>; Jason McKemie <mckemie76@gmail.com>  
**Subject:** Re: Subject: Court-Ordered Financials — Immediate Production Required  
**Importance:** High

Ethan,

This should get you started. Thx.

Please reply with full and complete documentation by Tuesday, Sept 30, 2025.

Jason McKemie

---

**From:** Ethan Scroggins <escroggins@sullivancook.com>  
**Date:** Tuesday, September 23, 2025 at 3:12 PM  
**To:** Jason McKemie <jmckemie@mckemie.net>  
**Cc:** "wcook@sullivancook.com" <wcook@sullivancook.com>, Chandler Alt

<[calt@sullivancook.com](mailto:calt@sullivancook.com)>, Kim Jones <[kjones@sullivancook.com](mailto:kjones@sullivancook.com)>, Jason Mckemie <[mckemie76@gmail.com](mailto:mckemie76@gmail.com)>

**Subject:** RE: Subject: Court-Ordered Financials — Immediate Production Required

Mr. McKemie,

The Court directed and made sure that production would be made in response to legitimate and reasonable requests for production made under proper procedure. You already asked for these documents, and we have already produced documents bates labeled GU000001 – GU001668 in response. The manner at which we have produced documents follows the rules.

If you have identified specific instances of missing pages in statements, provide those specific instances. You cannot just state that the entire production is incomplete while ignoring what we have produced.

I will not address the arguments you are making about community property and separate property in this email. That is a matter for the Court and an issue for final trial.

Sincerely,

**ETHAN SCROGGINS**  
**Sullivan & Cook LLC**

*Attorney*  
600 East Las Colinas Blvd, Suite 1300  
Irving, TX 75039  
(214) 520-7494  
[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)

---

**From:** Jason McKemie <[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)>  
**Sent:** Sunday, September 21, 2025 9:32 PM  
**To:** Ethan Scroggins <[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)>  
**Cc:** Will Cook <[wcook@sullivancook.com](mailto:wcook@sullivancook.com)>; Chandler Alt <[calt@sullivancook.com](mailto:calt@sullivancook.com)>; Kim Jones <[kjones@sullivancook.com](mailto:kjones@sullivancook.com)>; Jeff Cook <[jcook@sullivancook.com](mailto:jcook@sullivancook.com)>; Jason McKemie <[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)>; Jason McKemie <[mckemie76@gmail.com](mailto:mckemie76@gmail.com)>  
**Subject:** Subject: Court-Ordered Financials — Immediate Production Required  
**Importance:** High

Ethan,

On **September 8**, the Court directed your client to provide **full and complete financials**, and you confirmed on the record that production would be made. Two weeks later, no additional statements have been received. Ten months have now passed without compliance, which has prevented resolution and caused considerable harm; I want to move forward, but cannot until your client complies.

**A. Scope of Required Production (June 2023 – June 2025)**

1. **All accounts.** Bank, credit card, investment, retirement, and brokerage

accounts. No account may be excluded on the ground it is “separate property.” If an account is asserted to be separate, your client bears the burden to establish separate character through **complete statements and tracing**.

2. **Monthly statements only.** Produce official, institution-issued **monthly** statements. **No quarterlies, annual summaries, or daily “snapshots”** (e.g., AIG one-day reports). These do not satisfy the Court’s directive.
3. **Sequential, gap-free coverage.** Statements must be consecutive and **cover every day** in the period. The closing balance of one statement must equal the opening balance of the next. If an account or card number changed, production must show **continuous coverage from the prior number’s last day through the successor’s first day**.
4. **Complete documents. All pages** for each statement set. No missing pages.
5. **Format and organization.** Pages must be right-side-up, legible, and searchable (OCR). Each account must be produced as **one consolidated PDF** (labeled by institution, last-4, and month sequence).
6. **Account tracing (renumbered/reissued cards).** Provide a **cross-reference spreadsheet** linking prior and successor numbers and the effective date(s) of change(s).
7. **Supporting pay records.** Produce **complete pay stubs** and **full accountings** for the period.

#### **B. Third-Party Services and Security Personnel**

1. **Vendors (e.g., Jetty Partners; any security/investigative/contractor services).** Produce **full invoices, proof of funds transfers or canceled checks,** and **service documentation** describing dates, locations, personnel, scope, and findings.
2. **Interrogatory disclosure (witness identification).** Identify by **full legal name, current residential and business addresses, telephone numbers, email addresses, and employer:**
  - a. The **three security personnel** who accompanied Respondent at the marital residence on **January 2, 2024;**
  - b. **All** individuals who searched Respondent’s **new residence;** and
  - c. The individual(s) who inspected Respondent’s **vehicle** and allegedly discovered a device.

This information is required so that subpoenas may be issued timely for trial.

#### **C. Loans, Contributions, and Non-community Items**

1. **Loans.** Any loan your client intends to list must be supported by:
  - a. **Executed, notarized loan agreement** dated **prior** to issuance; and
  - b. **Proof of funds transfer** into your client’s account (wire/ACH/canceled check).
1. **Loans incurred after December 16, 2024** are excluded from this production as taken against standing/temporary orders and will not be treated as community obligations.
2. **Concurrent equity contributions.** Ongoing contributions (approximately

**\$10,000/month, ~\$130,000/year)** to equity funds initiated **after** entry of the orders are inconsistent with any asserted loan-based “need” and must be fully disclosed in the statements and accountings.

3. **Elective cosmetic procedures.** Elective cosmetic surgery is **not** a community obligation and must be **excluded** from community expense accounting.
4. **GLU Distribution (...8627).** Produce **monthly statements** in the same consolidated, sequential, complete manner as all other accounts.
5. **Reimbursements and allowances.** Provide a **full accounting of all reimbursements/allowances** (including housing/rent reimbursements) and all **business-related expenses** during the period; statements must reflect receipt of reimbursements where claimed.

#### D. Production Mechanics (to avoid disputes)

- **Native data for validation.** In addition to PDFs, produce **native transaction exports** (CSV/Excel) for each account with at least: transaction date, posting date, description/merchant, debit/credit, running balance, instrument/ID, and transfer source/destination.
- **No redactions** other than PII masking to last-4 where legally required.
- **Bates numbering** and clear file naming (Institution\_Last4\_YYYYMM-YYYYMM.pdf).
- **Privilege log** required for any withheld material, with sufficient detail for evaluation.
- **Custodian certification.** Provide a signed statement (by Respondent and/or the records custodian, as applicable) that production is **complete, consecutive, and gap-free** for the stated period and that the **card/account renumbering mapping is accurate.**

#### E. Immediate and Final Deadlines

- **Immediate:** The **December 2024** statement for the card ending **2372** is incomplete (**page 3 missing**). Provide the complete **four-page** statement within **24 hours**.
- **Final:** All remaining responsive financial records **in the format above** must be produced **no later than Monday, September 29, 2025**. By that date, three weeks will have elapsed since the Court’s directive—a **sufficient and reasonable period**.

#### F. HSA Access

Additionally, I demand immediate release of the **HSA card credentials**, which are protected by the standing and temporary orders and which I have requested at least **28 times**. Attached are prior requests and medical documentation reflecting the progression of harm since **May 2025**, including **three emergency-room visits** and a **six-day hospitalization**.

Attached is a letter another letter, this one documenting my diagnosis of Congestive Heart Failure, and reiterating the criticality of access to this card.

\_\_\_\_\_

Timely production is also critical for trial preparation. Trial exhibits must be exchanged 30 days before trial. If full and complete financials are not produced at least 90 days before trial, I

cannot reasonably prepare exhibits or submit materials to a forensic accountant. Any attempt to delay production until exhibits are due will require me to seek a continuance of the trial date.

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**Non-compliance:** If production is not made **in this format** and **by these deadlines**, I will file notice with the Court and seek appropriate relief, including an order compelling proper production or authorizing subpoenas to custodians of records **at your client's expense**, as well as any other relief the Court deems just.

Please confirm receipt, provide the complete **December 2024 Chase x2372 statement within 24 hours, and confirm the September 29 production timing.**

Sincerely,

Jason McKemie  
(214) 868-4901  
[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

Ethan,

Thank you for confirming production **GU000001-GU001668**. I'm not "ignoring" what was produced; I'm identifying the **specific defects** that prevent the Court-ordered "full and complete" financials. Please cure the items below or point me to the exact **Bates range** that already satisfies each request. Attached are **Demonstrative Exs. A-1 and A-2** marking missing months/pages; they are **illustrative only** and not a substitute for production.

This should get you started. I will advise if I find any additional documentation missing.

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**A. Global completeness (all accounts).** Based on my review of **GU000001-GU001668**, **no account** includes a full set of **consecutive monthly statements** for the Court-ordered period. The specific items listed below are **illustrative**, not exhaustive. To close the loop for **every account produced to date**:

1. **Consecutive monthlies.** Produce **official monthly statements (all pages)** for **each account** from **June 1, 2023 to present**, so that the **closing balance of one month equals the next month's opening balance**, with **no gaps**.
  2. **Native detail.** For each account, also produce the **CSV/Excel transaction export** (transaction date, posting date, description/merchant, debit/credit, running balance, transfer source/destination).
  3. **Production map.** Provide a **production map** listing **account** → **months produced (Bates)** → **missing months**, for all personal, joint, business, credit, and plan accounts.
  4. **If unavailable.** If you contend any monthly statement **cannot be obtained**, identify the **specific month** and provide (a) the institution's written confirmation or portal notice showing unavailability, and (b) the **steps and dates** you took to request it (e.g., branch request number or ticket).
  5. **Page completeness.** Where a month has been produced **without all pages**, re-produce the **complete set**. If a provider omits "Page x of y" footers, state the **total page count** for that month so completeness can be verified.
- 

**B. Missing or incomplete statements (monthly required)**

1. **Chase Sapphire Visa x2372**
  - **Nov 2024 - Missing Pages 3, 5-7**
  - **Dec 2024 - Missing Page 3**
  - **Jan 2025 - Missing Page 3**

Please ensure produced **statements do not have omitted pages of transaction history.**

2. **AIG 401(k)** – Only a **06/22/2024 one-day snapshot** and a **01/01/2025-06/01/2025 roll-up** were produced. These are not monthly statements. Please produce **consecutive monthly statements (all pages)** from **Sept 2023-present** and the **CSV/Excel** export with **date, posting date, description, source code, amount, and running balance.**
3. **GLU Distribution LLC (Chase)** – **Monthly statements June 2023-present** have not been produced. The fee-only report is not a monthly statement. Chase confirms monthly statements are available at any branch with authorization. Please produce **full monthly statements (all pages)** plus **check images, wires/ACH/Zelle,** and a **CSV/Excel** ledger.

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#### **C. Retirement/equity deferrals (VEIP/ESPP) & employer match (Oct 2024-present)**

4. **Payroll elections/changes** – Produce **VEIP/ESPP election/change confirmations** (Nov/Dec 2024) and any HR/benefits emails memorializing effective dates/amounts.
5. **Payroll registers/pay stubs** – Produce the **per-pay registers** showing **VEIP** line items and **tax** withholdings to reconcile any entries labeled “extra tax withholding.”
6. **Plan/provider postings** – Provide **plan statements** reflecting each payroll deferral and the associated **employer match/true-up and vesting,** and the **remittance files** (employer→plan) showing **source codes** and dates.

---

#### **D. AIG 401(k) loan history (separate vs community; reimbursement)**

7. The plan shows an active loan (orig. **10/11/2019**). Please produce:
  - **Loan principal balance as of Sept 1, 2023,**
  - **Amortization schedule;** and
  - **Each loan payment** posted **Sept 2023-present** (principal/interest).
  - If available, provide the administrator’s **“balance as of Sept 1, 2023”** letter.

---

#### **E. Production map (to avoid more back-and-forth)**

8. Provide a simple **production map** linking each account to **Bates ranges & months covered**, and identifying missing months.

For example:

Account	Last-4	Institution	Months Produced (Bates)	Missing Months	CSV?
Chase Visa	x2372	Chase	2024-11 (GU -); 2024-12 (GU -)	2024-12 p.3 missing	No
AIG 401(k)	—	AIG	2025 H1 roll-up (GU -); 2024-06-22 snapshot (GU)	2023-09..present monthlies	No
GLU LLC DDA	x8627	Chase	—	2023-06..present	No
Payroll (VEIP)	—	Employer	—	Oct 2024..present registers	—

If you contend any item above is already produced, please identify the **Bates range and month**.

### Format & timing

- **Format:** Statements as **OCR PDFs**; payroll/registers & remittances as **CSV/Excel** (or legible PDF if CSV not kept).
- **Cure date:** Please produce the missing pages/monthlies and provide the production map by **close of business (5:00 p.m. CT) Tuesday, Sept 30, 2025**. If you need **one business day**, say so now.
- **If not cured:** I will file a short **motion to compel** seeking (i) a production map, (ii) replacement of snapshots/roll-ups with **true monthlies + CSV**, and (iii) **fees**.

---

To keep lanes clean: **HSA access** will be addressed by **separate emergency motion and proposed order** (same-day digital provisioning).

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**F. Discovery.** As a courtesy for the time required to compile the deficiency inventory, I am extending the response deadline by one business day. **Please provide a full and complete response—either producing the missing materials or citing exact Bates ranges—no later than close of business (5:00 p.m. CT) on Tuesday, September 30, 2025.**

---

Best,

Jason McKemie  
 (214) 868-4901  
[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

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**Attachments:**

- **Demonstrative Ex. A-1** – Missing Monthly Statements by Account/Month (compiled from GU000001-GU001668).
- **Demonstrative Ex. A-2** – Chase Sapphire x2372 – Missing Statements/Pages (compiled from GU000001-GU001668).

*(Demonstratives only; no work-product waiver / no admissions.)*

Category	Amount (\$)	Frequency
TV & Streaming	\$ 250	Monthly
Verizon Phone	\$ 120	Monthly
T-Mobile Phone	\$ 160	Monthly
Toiletries & Makeup	\$ 80	Monthly
Dry Cleaning	\$ 70	Monthly
Charitable Contributions	\$ 120	Monthly
Hair (Quarterly)	\$ 200	Monthly
Car Wash	\$ 40	Monthly
Nails	\$ 150	Monthly
Prescriptions	\$ 30	Monthly
Apple Subscriptions	\$ 100	Monthly
House Cleaning	\$ 260	Monthly
Gas	\$ 90	Monthly
Car Insurance (Semi-Annual)	\$ 267	Monthly
Car Loan (InTouch CU)	\$ 1,161	Monthly
Public Storage (Dallas)	\$ 250	Monthly
SoFi Personal Loan	\$ 1,605	Monthly
Lightstream Personal Loan	\$ 1,408	Monthly
Credit Card Membership Fees (Annual)	\$ 150	Monthly
Checking Account Fee	\$ 25	Monthly
Yoga/Gym Membership	\$ 220	Monthly
Groceries	\$ 500	Monthly
Dining Out	\$ 150	Monthly
Cybersecurity Contractor	\$ 2,000	Monthly
<b>Subtotal monthly spend</b>	<b>\$ 9,406</b>	
Plus		
<b>Extra monthhly Tax Withholding</b>	<b>\$ 13,300</b>	<b>Monthly</b>
<b>Total monthly expenses w/ taxes due</b>	<b>\$ 22,706</b>	

**The financial disclosures systematically transform assets into liabilities and wealth accumulation into apparent financial distress.**

**NOT A COMMUNITY BENEFIT, NOR IS JUSTIFIED**

**FRAUD - VEIP INVESTMENT  
NET EFFECT - CONVERTS \$190,000 ASSET INTO \$320,000 LIABILITY**

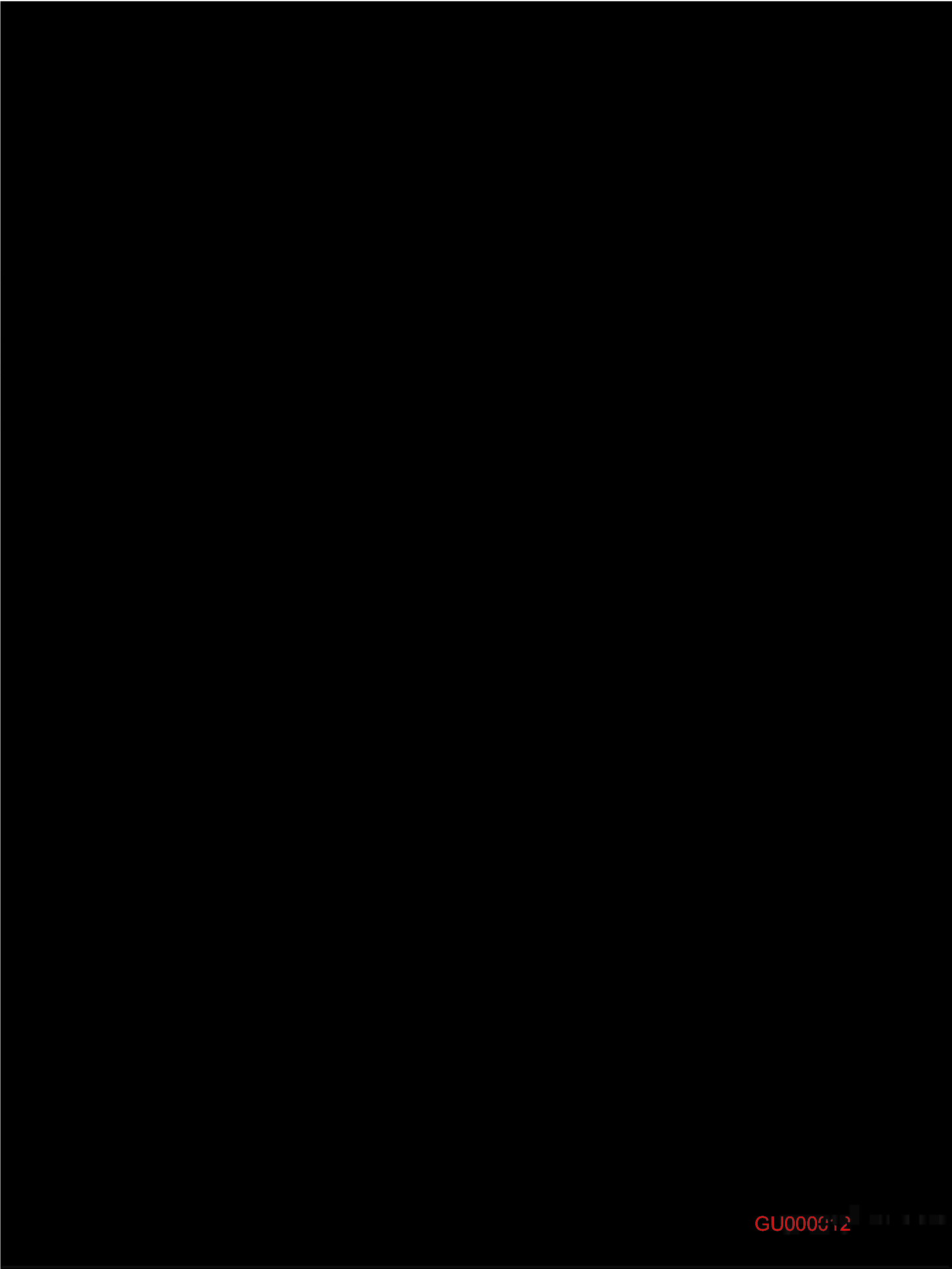
**Total Debt outstanding: ALL INCURRED DURING MARRIAGE**

tax payments 2025 - est and due	\$ 118,000
tax payment - Cognizant \$104k	\$ 41,600
Sofi	\$ 23,000
Lightstream	\$ 27,000
Cyber contract	\$ 14,000
Pam and clint	\$ 65,000

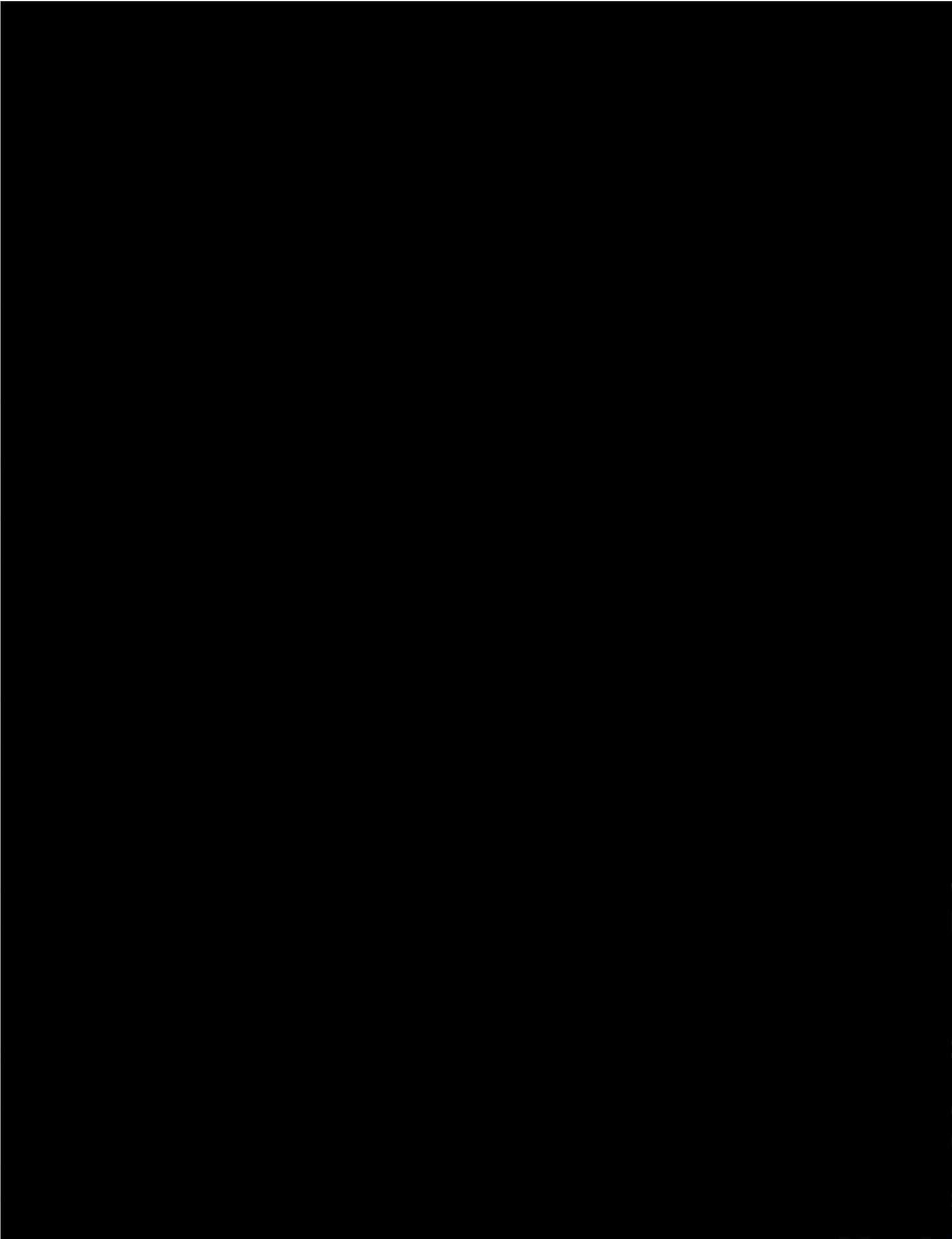
**Tax Transcript  
Tax Transcript  
Proof of Funds/Statements  
Not Funding Cosmetic Surgery  
Contrived Distress/Not a Benefit to the Community**

**No Proof of Funds Transfer – This is not merely an undocumented loan. It is part of a broader pattern in which assets are transformed into liabilities, equity accumulation is disguised as expense, and wealth is systematically removed from the apparent marital estate while Respondent is simultaneously deprived of access to marital resources. The result is an artificially impoverished financial picture that bears little resemblance to the underlying economic reality.**





GU000012



Name of owner: Gwendolyn Ulijasz  
 Type of insurance: Term Life  
 Amount of premiums [monthly/quarterly/ semiannually]: Company-paid, unknown.  
 Date of issue: 10/16/2024  
 Face amount: \$1,500,000  
 Cash surrender value on date of marriage: 0  
 Current cash surrender value: \$0  
 Designated beneficiary(ies): Jason McKemie  
 Balance of loan against policy: n/a  
 Value of community interest: \$0  
 Source(s) of value: Accenture employer contract.

*12.B. Annuities*

12.B.1. None.

*12.C. Health Savings Accounts*

12.C.1. Institution holding account: MetLife Account number: MEC1796C361722457  
 Name of high-deductible health plan with which the HSA is coupled: Cognizant Aetna Healthplan  
 Value of assets in account (as of 2/07/2026) - closed: \$0

12.C.2. Institution holding account: Metlife FSA  
 Account number: TBD / same as Metlife HAS

**13. Motor Vehicles, Boats, Airplanes, Cycles, Etc.** (include mobile homes, trailers, and recreational vehicles, but do not include vehicles owned by a business entity)

**FRAUD  
 +  
 HEALTHCARE  
 OBSTRUCTION**

**OVER \$18K IN HSA Currently**

**TERMINATED BENEFITS DUE TO FALSE QLE:**

- **DEPENDENT AD&D**
- **SUPPLEMENTAL LIFE INSURANCE**
- **FLEXIBLE SPENDING ACCOUNT**
- **HSA - NO CARD ACCESS**
- **CRITICAL CARE COVERAGE**

PLEASE PROVIDE FULL ACCOUNT TRACING FOR ALL CREDIT CARD OVERPAYMENTS  
 THIS IS ONLY A PARTIAL LIST OF SUCH OVERPAYMENTS FOR CHASE SAPPHIRE X2372.  
 PLEASE PROVIDE FOR ALL CARDS.

Missing Statements					AMOUNT PAID IN CREDIT CARD OVERPAYMENTS				
	MISSING STATEMENTS	STATEMENT DUE DATE	DATE RANGE INCLUDED	REMARKS	OVERPAYMENTS		OVERPAYMENTS		TOTAL OVERPAYMENTS
<b>CHASE SAPPHIRE X2372</b> <b>19 STATEMENTS REMAIN MISSING</b>	June 2023 - Jan 2024	---	3/16/23 - 12/16/2023	Not Received	Feb-24	\$5,796	Jan-25	\$12,551	<b>\$66,356</b>
	Nov-24	11/12/24	9/16/24 - 10/15/24	Pages 3, 5-7 Missing	Mar-24	\$12,729	Feb-25	\$3,754	
	Dec-24	12/12/24	10/16/24 - 11/15/24	Page 3 Missing	Apr-24	\$14,267			
	Jan-25	01/12/25	11/16/24 - 12/15/24	Page 3 Missing	May-24	\$11,231			
	Feb 2025 - Sept 2025	---	12/16/24 - PRESENT	Not Received	Nov-24	\$6,028			
					<b>x2372 Total \$66,356</b>				

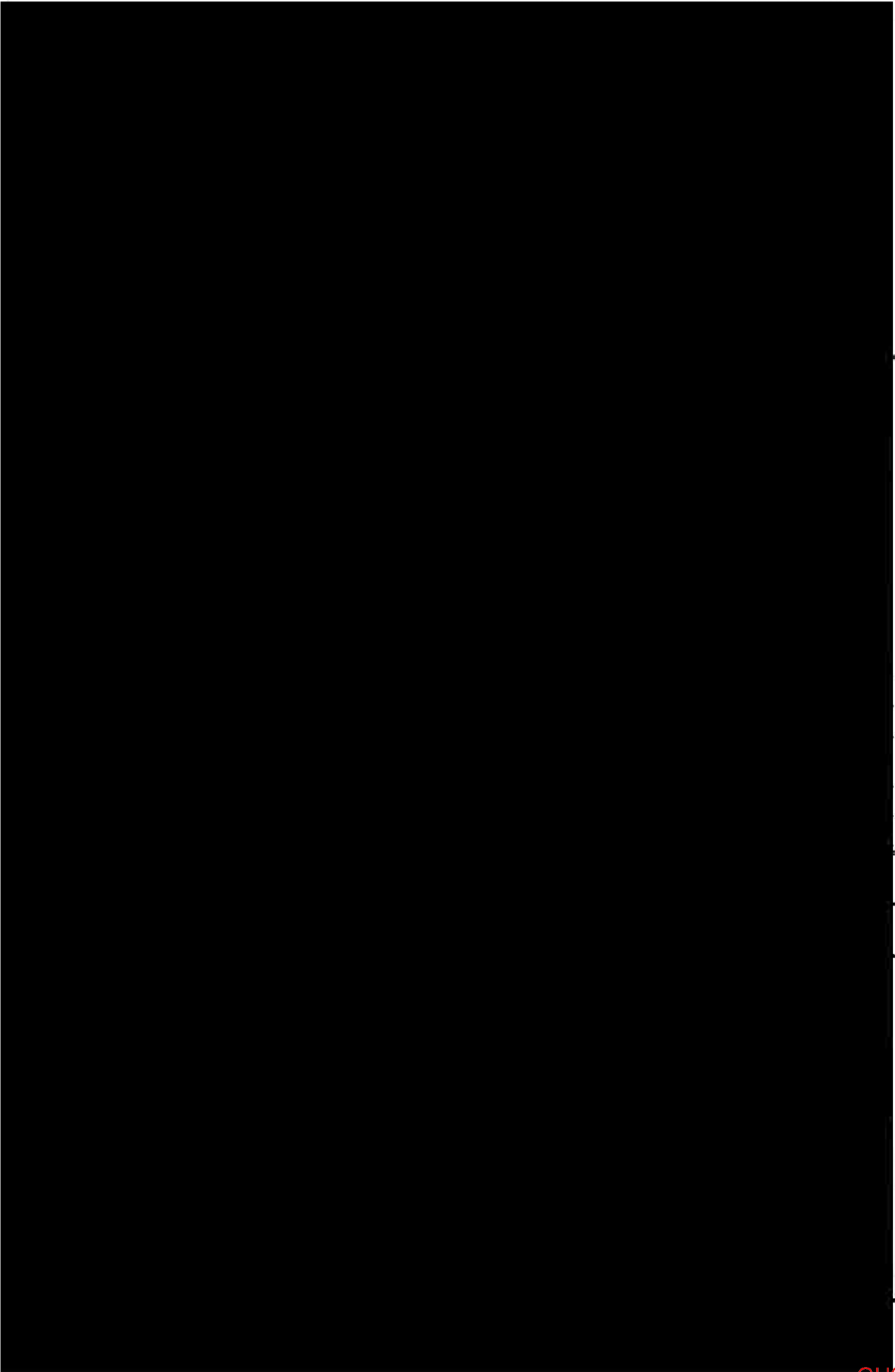
Petitioner has produced thousands of pages of documents, where even a single account is broken up between dozens of files, which have with multiple accounts in that file, much of which are missing crucial pages, with gaps throughout the dates requested (June 2023 – PRESENT / OCT 2025). Despite being consistent reminders, the majority of the documents are unusable as they do not show inflows/outflows into the accounts. Examples: Annual Summaries, running a Report and with only a 1 duration (10/1/25 – 10/2/25) and pretending it's a statement, etc. These only provide snapshot balances, and provide no understading of what has flowed into and out of the account making growth calculation and asset tracing impossible.

OFFICIAL MONTHLY STATEMENTS MARKED IN GREEN. RED – AWAITING STATEMENTS.

	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25		
<b>P2P PAYMENT SERVICE PROVIDERS</b>				\$90	-\$20	\$3,100	\$165.97 (-)	\$82	\$3,937	-\$480	66-880	\$100	7	\$358	7	\$80										
<b>VENMO</b>																										
<b>VENMO</b>																										
<b>APPLEPAY</b>																										
<b>GOOGLEPAY</b>																										
<b>GOOGLEPAY</b>																										
<b>CHROME CHECKING</b>																										
Chase Checking x03898 (-8259)																										
Chase Checking x03259 (-3888)																										
Chase Checking x01042 (-110)																										
Chase GLU Checking x06027																										
USAA Checking x09941																										
Chase Checking x06993																										
Chase Checking x02110																										
Chase Checking x01695																										
Chase Checking x08118																										
<b>CREDIT CARDS</b>																										
Chase Sapphire x02372																										
Chase Sapphire x01881 (-4000, -7905, -7396)																										
Chase Sapphire x02025 (-7200, -3498, -7398)																										
Chase Sapphire x0440																										
Chase Sapphire x0730 (-355, -3444, -4493)																										
Chase Sapphire x0400 (-2355, -488, -7097)																										
Chase Sapphire x0486 (-7396, -4935, -3444)																										
Chase Sapphire x0935 (-4805, -3444, -7396, -8801)																										
Chase Sapphire x0801 (-4400, -1344, -7396, -7055)																										
AMEX PLATINUM x00000 (-5000, -7000)																										
AMEX PLATINUM x00008 (-5000, -7000)																										
AMEX PLATINUM x00006 (-5000, -8000)																										
CITI Advantego x0709																										
<b>INVESTMENT AND RETIREMENT ACCOUNTS</b>																										
Accenture Savings Plan																										
Accenture 401k																										
Accenture 401k																										
Cognizant Technology Solutions 401(k) Savings Plan																										
E-Trade Brokerage Account (RIBAVSOA) 775-129027-201																										
E-Trade RIA																										
E-Trade Roth IRA																										
E-Trade Trad IRA																										
Empower Cognizant Technology Solutions 401k Savings Plan																										
Vanguard Value Index Fund / Vanguard Growth Index																										
Vanguard Trad 401k																										
Vanguard Roth 401k																										
Emp - Cognizant 401(k) Retirement Savings Plan																										
EMPSWB- Cognizant 401(k) Retirement Savings Plan																										
Advantego BioSciences, LLC shares																										
<b>SUBSTANTIAL DISTRIBUTIONS UNACCOUNTED FOR</b>																										
<b>COGNIZANT EXPENSE REIMBURSEMENT</b>																										
CHASE 10555 CHASE																										
CHASE 10555 CHASE																										
<b>ELECTIVE SUBSIDY</b>																										

<b>P2P PAYMENT SERVICE PROVIDERS</b>
<b>VENMO</b>
PAYPAL
APPLEPAY
CASHAPP
GOOGLEPAY
<b>CHECKING ACCOUNTS</b>
Chase Checking xx3898 (~9259)
Chase Checking xx9259 (~3898)
Chase Checking xxREDACTED
Chase GLU Checking xx8627
Chase Checking xx9941
Chase Checking xx6893
Chase Checking xx2110
<b>CREDIT CARDS</b>
Chase Sapphire xx2372
Chase Sapphire xx4005 (~7555, ~3444)
Chase Sapphire xx7555 (~4005, ~3444)
Chase Sapphire xx3444 (~4005, ~7555)
Chase Sapphire xx4400
Chase Sapphire xx8801
Chase Sapphire xx7496 (~7396)
Chase Sapphire x7396 (~7496)
AMEX PLATINUM xx5000 (~6008, ~7006)
AMEX PLATINUM xx6008 (~5000, ~7006)
AMEX PLATINUM xx7006 (~5000, ~6008)
CITI Advantage xx2295
<b>INVESTMENT AND RETIREMENT ACCOUNTS</b>
AIG 401k
E*TRADE STOCK / Morgan Stanley at Work / Grant number: A44637 / AUG 16TH, 2024
Empower Cognizant Technology Solutions 401k Savings Plan
Vanbguard Value Index Fund / Vanguard Growth Index
Accenture 401k
Voya - Cognizant 401(k) Retirement Savings Plan
E-Trade x8274
E-Trade x5029
E-Trade x6977
E-Trade x6587
E-Trade x201
Cognizant Tecnology 401(k) Savings Plan
E-Trade Roth IRA
Traditional IRA Account #7
Vanguard IRA
Advantigen Biosciences, LLC shares

9 CARD NUMBERS FOR 1 ACCOUNT



IN THE MATTER OF:

IN THE 302 FAMILY DISTRICT

McKenzie

COURT OF DALLAS COUNTY, TEXAS

ASSOCIATE JUDGE'S REPORT (Divorce/SAPCR)

Temporary \_\_\_\_\_ Final \_\_\_\_\_

Pursuant to an Order of Referral, a hearing in this matter has been held by a duly appointed Associate Judge as authorized by Chapter 201, Texas Family Code. The parties are hereby given notice of the findings and recommendations contained herein and of their right to be heard by a District Judge upon compliance with the terms of Chapter 201, Texas Family Code. A copy of this Report has been given to each party or the party's attorney who appeared at the hearing.

AGREEMENT  DEFAULT  CONTESTED HEARING  Reporter/Interpreter Present \_\_\_\_\_

APPEARANCES: Husband/Father: ✓ and Attorney: \_\_\_\_\_

Wife/Mother: ✓ and Attorney: \_\_\_\_\_

Other: \_\_\_\_\_ and Attorney: \_\_\_\_\_

The parties appeared Jan 6, 2026 on Motion to Compel Discovery & requests regarding hsa

The court grants respondents request that financial documents be turned over by Jan. 9, 2026

The hsa card was provided to respondent, Mr. McKenzie at the time of the hearing

On January 12, 2026, Mr. McKenzie (Husband) appeared to present ex parte relief regarding eviction proceedings, temporary stay & temporary support. Those requests were denied.

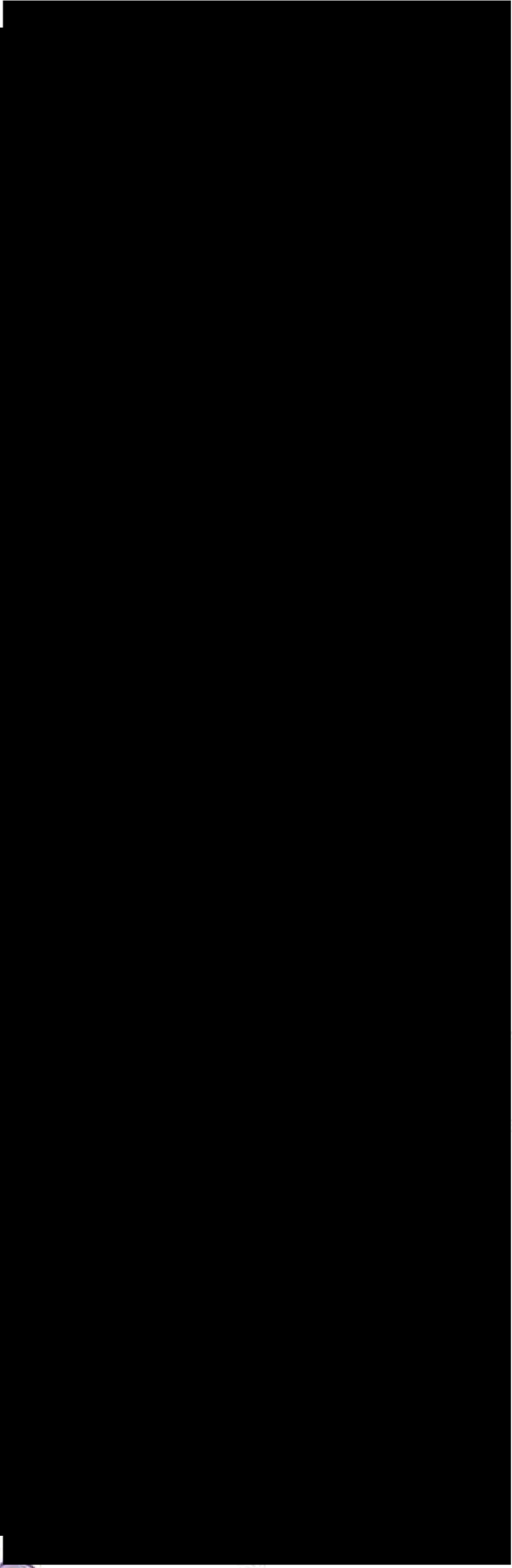
Attorney for  Husband/Father  Wife/Mother will reduce this Report to written Order and submit to other side and Court within fourteen (14) days.  
 Orders require proof of submission to other attorney OR signature of all  attorneys or  parties for entry.

Jan. 12, 2026  
Date

[Signature]  
Associate Judge

Agreed \_\_\_\_\_ Agreed \_\_\_\_\_

Agreed \_\_\_\_\_ Agreed \_\_\_\_\_



no protection vests for 1 year  
no protection as of today  
(until 2020)

GU000138



**FELICIA PITRE**  
District Clerk

**NINA MOUNTIQUE**  
Chief Deputy

**DALLAS COUNTY DISTRICT CLERK'S OFFICE**

To: ALL ATTORNEYS/PARTIES

Please see the attached order signed and entered in your case.

Regards,

A handwritten signature in black ink, appearing to read "Felicia Pitre". The signature is written in a cursive style with a large, prominent "F" and "P".

Felicia Pitre  
Dallas County District Clerk

CAUSE NO. DF 24-18010

IN THE MATTER OF: Gwendolyn Williams-McKee IN THE 201st FAMILY DISTRICT  
v. JASON MCKEEM COURT OF DALLAS COUNTY, TEXAS.

ASSOCIATE JUDGE'S REPORT (Divorce/SAPCR)

Temporary  Final

Pursuant to an Order of Referral, a hearing in this matter has been held by a duly appointed Associate Judge as authorized by Chapter 201, Texas Family Code. The parties are hereby given notice of the findings and orders contained herein and of their right to be heard by a District Judge upon compliance with the terms of Chapter 201, Texas Family Code. A copy of this Report has been given to each party or the party's attorney who appeared at the hearing.

[ ] AGREEMENT [ ] DEFAULT  CONTESTED HEARING [ ] Reporter/Translator Present

APPEARANCES: Husband/Father: JASON MCKEEM and Attorney: [Signature]

Wife/Mother: Gwendolyn Williams-McKee and Attorney: Steele

Other: \_\_\_\_\_ and Attorney: \_\_\_\_\_

This matter coming on to be heard upon the Respondent's Motion For Enforcement, sanctions, continuance and leave to issue third-party subpoenas and counter-motion for protective order and for other appropriate relief, the court having arguments and testimony of Respondent and being fully advised,  
IT IS HEREBY ORDERED:

1) Respondent's motion is denied in all requested relief ~~with~~ with the exception of the request for continuance which is neither granted or denied as the court declines to adjudicate that specific request.

Attorney for  Husband/Father  Wife/Mother  will reduce this Report to a written Order and submit to the other side and Court within fourteen (14) days.  
[ ] Orders require proof of submission to other side OR signature of all [ ] attorneys or [ ] parties for entry.

6/1/2026  
Date

[Signature]  
Associate Judge

Agreed \_\_\_\_\_ Agreed \_\_\_\_\_ Agreed \_\_\_\_\_ Agreed \_\_\_\_\_

PAGE 1 OF 1

[ ] SUBJECT TO PROOF OF SERVICE

(Rev. 06/10)

### Automated Certificate of eService

This automated certificate of service was created by the e filing system. The filer served this document via email generated by the e filing 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: 115743214

Filing Code Description: REQUEST FOR DE NOVO HEARING

Filing Description:

Status as of 6/5/2026 9:14 AM CST

#### Case Contacts

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