NO. DF-24-18010

IN THE MATTER OF THE MARRIAGE OF	IN THE DISTRICT COURT
	301ST JUDICIAL DISTRICT
GWENDOLYN ULIJASZ-MCKEMIE AND JASON MCKEMIE	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:

Respondent's request / allegation	**Record problem**	**Requested ruling**
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,

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By: /s/ Jonathan D. Steele

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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

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