

**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

**AFFIDAVIT OF JONATHAN D. STEELE REGARDING PRODUCTION RECORD,  
BANKRUPTCY ORDERS, ABSENCE OF ATTACHED ORDERS, PROTECTIVE-  
ORDER NEED, AND FEES**

STATE OF ILLINOIS

COUNTY OF COOK

BEFORE ME, the undersigned authority, on this day personally appeared Jonathan D. Steele, who, being by me duly sworn, stated under oath as follows:

1. My name is Jonathan D. Steele. I am over eighteen years of age, of sound mind, competent to make this affidavit, and authorized to make it on behalf of Petitioner. I am counsel for Petitioner Gwendolyn Ulijasz-McKemie in this matter, admitted pro hac vice, and I have been actively involved in the preparation and review of Petitioner's discovery production in this case. The facts stated below are within my personal knowledge or are based on my review of the Court's file and counsel's production records, and they are true and correct.
2. Petitioner is represented by Armstrong Divorce & Family Law, PLLC, 5949 Sherry Lane, Suite 835, Dallas, Texas 75225, Tel. (972) 544-1662, Fax (972) 408-3455, as resident counsel, together with the undersigned, admitted pro hac vice.
3. Based on my review of the production and the production index in this case, Petitioner produced records to Respondent during the discovery period, and the production index identifies production from GU000001 through GU002225. The highest burned-in Bates stamp I have identified on a produced PDF is GU001922, and the production index reflects additional produced materials through GU002225.

4. Attached as Exhibit A is a true and correct copy of the production index and Bates log reflecting those productions.
5. I have reviewed Respondent's May 26, 2026 Motion. The Motion does not attach any proposed nonparty subpoena or Rule 205.3 notice, and based on my review of the file, Respondent did not, during the discovery period, serve on Petitioner any Rule 205 notice or proposed subpoena for the third-party records he now says he requires.
6. Respondent's May 26, 2026 Motion does not attach a signed January 6, 2026 discovery order, a signed January 9, 2026 discovery order, a signed January 20, 2026 discovery order, or a signed February 5, 2026 discovery order.
7. Respondent is a Chapter 7 debtor. He filed his Chapter 7 petition on January 12, 2026. The Chapter 7 trustee is Areya Holder. Attached as Exhibit B are true and correct copies of the relevant bankruptcy filings and orders, which include the notice of the Chapter 7 case identifying the trustee and petition date; the order terminating the automatic stay to permit the landlord to pursue eviction remedies; the order entered the afternoon of April 16, 2026 reinstating the automatic stay and directing that writ enforcement cease; and the later order extending Respondent's move-out deadline and reserving claims for rent, expenses, damages, and automatic-stay violations for separate motion or adversary proceeding. None of those orders adjudicates theft, spoliation, stay violation, damages, property ownership, or turnover against Petitioner.
8. Petitioner is confirming whether the discovery-control plan in effect is the default Level 2 plan or was modified by the September 8, 2025 302nd District Court pretrial order. Under either plan, ordinary nonparty discovery is not open on the eve of the June 11, 2026 trial.
9. Respondent's Motion required Petitioner to prepare a written response, counter-motion for protective order, proposed order language, evidentiary objections, hearing preparation, and

related protective relief to avoid a continuance, subpoena leave, and privilege-invasive discovery sixteen days before the June 11, 2026 trial setting.

10. Petitioner requests an award of reasonable attorney's fees, court costs, expenses, and protective expenses incurred in responding to Respondent's Motion and obtaining protective relief. The amount of fees, costs, expenses, and protective expenses is reserved for later prove-up by separate submission or hearing.

11. If the Court requires fee proof as to amount, Petitioner will submit lodestar detail, including date, timekeeper, hourly rate, task description, hours, total, reasonableness and necessity, and segregation to the May 26 Motion, the June 1 response, the protective-order work, and related hearing preparation.

12. In my opinion, the protective relief requested by Petitioner is reasonable and necessary to prevent undue burden, unnecessary expense, harassment, invasion of privilege, invasion of work product, and disruption of the June 11 trial setting.

Further affiant sayeth not.




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JONATHAN D. STEELE

Admitted Pro Hac Vice

Counsel for Petitioner

SUBSCRIBED AND SWORN TO BEFORE ME on this 29th day of  
May \_\_\_\_\_, 2026, to certify which witness my hand and seal of office.



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Notary Public in and for the State of Illinois

My commission expires: 5/26/2027



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Terra Aguirre on behalf of Rebecca Armstrong

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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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