

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

CAUSE NO: DF-24-18010

FILED
2026 MAY 22 AM 10:20

Jason McKemie § IN THE 301 Judicial District
APPLICANT §
VS. §
Gwendolyn Laura Ulijasz § OF Dallas DEPUTY CLERK
ONE RESTRAINED / PETITIONER § COUNTY, TEXAS
*GWENDOLYN ULIJASZ IS PETITIONER IN DF-24-18010

Application for Protective Order

1. Parties:

Jason McKemie Dallas
Applicant County of Residence
 Mark this box if you are completing and filing this application on behalf of the Applicant.
Jason McKemie Self
Name of Person Filing the Application Title of Person Filing the Application
Gwendolyn Laura Ulijasz
Respondent
Respondent's address for service: 11703 Huebner Rd, Suite 106, PMB 499, San Antonio, TX 78230

2. Reason(s) for Protective Order: (Mark all that apply)

- The Respondent committed family violence, dating violence, or child abuse.
- The Respondent committed sexual assault or abuse, indecent assault, indecency with a child, compelling prostitution, stalking, or trafficking.
- The Respondent violated a Protective Order that was active at the time of the violation but has since expired or will expire in 30 days or less. A copy of the Order is (Mark one)
 attached. not available now but will be filed before the hearing set for this Application.

3. Describe Applicant's Relationship to the Respondent: (Mark all that apply)

- Current or former spouses
- Current or former dating partners
- Are or were members of the same family or household
- Parents of the same child(ren)
- Relatives
- Parent or child of the Respondent
- Foster child or foster parent of the Respondent
- Applicant is dating or married to Respondent's current or former spouse or dating partner
- No relationship

4. Children Under Age 18 Who Need Protection:

	Name
a.	N/A _____
b.	_____
c.	_____
d.	_____

Is Respondent the parent or guardian	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Yes	<input type="checkbox"/> No

Mark all that apply:

- Other children are listed on a sheet attached to this Application.
- The children are or were members of the Applicant's family or household.
- The children have a court order that affects how and when they can visit their family or sets child support.

5. Other Adults: The Applicant requests protection for the following adults who are or were: members of the Applicant's family or household; or in a marital or dating relationship with the Applicant.

	Name
a.	N/A _____
b.	_____

6. Other Court Cases (other than criminal cases): Are there other court cases involving the Applicant, Respondent, or children?

Yes No

(a) If "Yes," what kind of case and is the case active or complete?

Divorce - Active, Bankruptcy - Active, ERISA Civil - Imminent, Eviction Appeal - Abatement Pending Bankruptcy Stay _____

(b) If "complete," (Mark all that apply):

<input type="checkbox"/>	A copy of the final order of the other case is attached.
<input type="checkbox"/>	A copy of the final order of the other case will be filed before the hearing on this Application.

(c) If the Texas Office of the Attorney General Child Support Division has been involved with a child support case: list the OAG case number for each open case, if known. Case Number: _____

7. Family Violence or Other Criminal Case(s): Has the Respondent ever been convicted of or placed on deferred adjudication community supervision for any crime under Title 5 or Title 6 of the Texas Penal Code? (See list of crimes at the end of the Instruction document)

Yes No Unknown

If "Yes," what kind of crime:

If the Respondent was convicted or placed on community supervision for a Title 5 crime, did the Court make a finding that the crime involved family violence?

- Yes No Unknown

Was the crime against a child listed in this application?

- Yes No Unknown

Have the Respondent's parental rights to a child listed in this application been terminated?

- Yes No Unknown

If Respondent's parental rights have been terminated, has the Respondent contacted or attempted to contact the child?

- Yes No Unknown

8. Terms and Conditions of the Protective Order – Mark all terms and conditions that the Applicant wants the Court to include in the Temporary Ex Parte Order, if the Applicant is requesting one, and the final Protective Order.

The Applicant asks the Court to order the Respondent: *(Mark all that apply)*

- a. Not to commit family violence.
- b. Not to commit further acts of sexual assault or abuse, indecent assault, stalking, or trafficking.
- c. Not to communicate a threat through any person to any person who is listed in this application as a person seeking protection or who is a member of the Applicant's family or household.
- d. Not to communicate in a threatening or harassing manner with any person who is listed in this application as a person seeking protection or who is a member of the Applicant's family or household.
- e. Not to communicate or attempt to communicate in any manner with *(Mark all that apply)*:

- Applicant children listed in this application other Adults listed in this application

except through Applicant's attorney or other person named by the Court, namely:

Direct communication should be prohibited because Respondent has made threats, escalated false

Please explain why the court should prohibit direct communication from the Respondent:
narratives, and acquired a firearm, creating a substantial risk of intimidation and further harm.

(If necessary, attach sheet with additional information)

- f. Not go within 500 yards of the: *(Mark all that apply)*
 Applicant children listed in this application other Adults listed in this application

- g. Not go to or within 500 yards of the residence, workplace, or school of the: *(Mark all that apply)*
 Applicant children listed in this application other Adults listed in this application.

Residence: 5609 La Foy Blvd, Dallas, TX 75209

Workplace: _____

School: _____

- h. Not go to or within _____ yards of the residence, child-care facility, or school of the children listed in this application, except as specifically authorized in a possession schedule or other order entered by the Court.

Residence: _____

Child-care facilities: _____

School: _____

- i. Not to engage in conduct that is reasonably likely to harass, annoy, alarm, abuse, torment, or embarrass any person who is listed in this application as a person seeking protection, or who is a member of the Applicant's family or household, including not tracking or monitoring the car or other property belonging to any person who is listed in this application as a person seeking protection, or who is a member of the Applicant's family or household, or by physically following or causing another to physically follow a person seeking protection or any member of the Applicant's family or household.

The Applicant further asks the Court to:

- j. Suspend the Respondent's license to carry a handgun.*
- k. Prohibit Respondent from possessing a firearm.*
- l. Require the Respondent to complete a battering intervention and prevention program.
- m. Prohibit the Respondent from taking, harming, threatening, or interfering with the care, custody, or control of the following pet, companion animal, or assistance animal: (describe the animal)

- n. Require the Respondent to do the following to prevent or reduce the likelihood of family violence or future harm to the Applicant or any person listed in this application as a person in need of protection.
Surrender any firearm in Respondent's possession as ordered by the Court; preserve all communications records, and electronically stored information relating to the April 16, 2026 residence-entry event, healthcare interference, and firearm acquisition; and refrain from deleting; and refrain from deleting, altering, or concealing any such device.

*NOTE: If the Respondent is a peace officer actively engaged in employment as a sworn, full-time paid employee of a state agency or political subdivision, the court may not suspend the Respondent's license to carry a handgun or prohibit the Respondent from possessing a firearm.

9. Property Orders: (Complete this section *only* if the Applicant shares, owns, or leases a residence with the Respondent)

The Residence located at: 5609 La Foy Blvd, Dallas, TX 75209

(Mark one):

- is jointly owned or leased by the Applicant and Respondent.
- is solely owned or leased by the Applicant.
- is solely owned or leased by the Respondent; and the Respondent is obligated to support the Applicant or a child in the Applicant's possession.

The Applicant asks the Court to make these orders about the residence: (Mark all that apply)

- Grant the Applicant exclusive use of the residence identified above, and order the Respondent to vacate the residence and its premises.

12. **Orders Related to Removal, Possession, and Support of Children** (Mark the box if asking for the removal, possession, or support of the children)

The Applicant and the Respondent are the parents or guardians of the following children:

N/A

The Applicant asks the Court to enter the following orders with respect to the children: (Mark all that apply):

- The Respondent must not remove children from the Applicant's possession or from their child-care facility or school, except as specifically authorized in a possession schedule or other order entered by the Court.
- The Respondent must not remove the children from the jurisdiction of the Court.
- An order establishing or modifying a schedule for the Respondent's possession of the children, subject to any terms and conditions necessary for the safety of the Applicant or the children.
- An order requiring the Respondent to pay child support in an amount set by the Court.

13. **Temporary Ex Parte Order** (Mark the box if requesting a temporary ex parte order)

Based on the information in the attached Affidavit or Declaration, the Applicant asks the Court to find that there is a clear and present danger of family violence, sexual assault or abuse, indecent assault, stalking, trafficking, or other harm to Applicant and/or a member of the family or household and issue a Temporary Ex Parte Order immediately without bond, notice, or hearing.

13a. **Temporary Ex Parte Order That Also Requires Respondent to Vacate Residence Immediately** (Mark the box if you are requesting that the temporary ex parte order also exclude Respondent from the shared residence)

NOTE: IF YOU MARK 13a, YOU MUST APPEAR FOR A HEARING BEFORE THE COURT CAN EXCLUDE OR REMOVE THE RESPONDENT FROM A SHARED RESIDENCE.

The Applicant lives with the Respondent at: N/A

or resided there within the 30 days prior to the filing of this Application. The Respondent committed family violence against the Applicant, or a member of the family or household, as described in the Affidavit or Declaration attached, within 30 days prior to the filing of this Application. There is a clear and present danger that the Respondent is likely to commit family violence against the Applicant and/or a member of the family or household. The Applicant is available for a hearing to justify the issuance of an order excluding the Respondent from the residence. If the Court grants this request, the Applicant asks the Court to issue a Temporary Ex Parte Order that:

- Grants the Applicant exclusive use and possession of the residence and orders the Respondent to vacate the residence immediately and remain at least 200 yards away from the residence pending further Order of the Court.
- Directs the sheriff, constable, or chief of police to provide a law enforcement officer to accompany the Applicant to the residence; to inform the Respondent that the Court has ordered the Respondent to vacate the residence; and to protect the Applicant while the Applicant takes possession of the residence, or while the Applicant takes possession of the Applicant's necessary personal property if the Respondent refuses to vacate the residence.

14. **Keep Information Confidential** (Mark the box if you want your information to remain confidential)

The Applicant requests the Court to exclude the following information from the protective order: the mailing address, county of residence, and telephone number of the Applicant and any person listed in this application as a person in need of protection; and the address and telephone number of a place of employment, business, child-care facility, or school, if any, of the Applicant and any person listed in this application as a person in need of protection. The Applicant further asks the Court to order the clerk of the court to strike the aforementioned information from the public records of the Court and keep a confidential record of the information for use only by the Court or law enforcement for the purpose of entering the information required by Section 411.042(b)(6), Government Code, into the statewide law enforcement information system maintained by the Texas Department of Public Safety.

WARNING: A copy of this application will be served on the Respondent and made available for public inspection. Marking Box No.14 means that you are asking the judge to remove your address and telephone numbers from the final order so the public cannot see this information. If you are requesting confidentiality, DO NOT INCLUDE personal information in this application or any other form related to your request.

If the Applicant is requesting confidentiality, provide the information requested below:

The Applicant asks the Court to designate the following person to receive on Applicant's behalf all notices and documents filed with the Court, if related to this Application:

Name: JAMES MCKEMIE (JIM96@MCKEMIE.NET)

Address: 422 SOUTHCHESTER LANE, HOUSTON, TX 77079

15. Citations and Notices

The Applicant asks the Court to issue all citations and notices required by law for the application and any resultant order.

PRAYER

WHEREFORE, PREMISES CONSIDERED, the Applicant prays the Court issue the protective order as requested in this Application, and, if applicable, the Applicant further prays the Court issue a Temporary Ex Parte Order until a hearing can be held.

I have read the entire Application and it is true and correct to the best of my knowledge.

 **5/19/2026**
Applicant or Person filing on behalf of Applicant

Address and telephone number where Applicant or Person filing on behalf of Applicant may be contacted (*List another address/telephone if you want yours kept confidential*):

5609 LA FOY BLVD, DALLAS, TX 75209

(214) 868-4901

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

Use this form if you want your Date of Birth and Address to be public information (not confidential).

If you use the Declaration Form, a notary does not have to sign. Do NOT use the Affidavit form if you use this form.

DECLARATION

County of DALLAS
State of Texas

My name is JASON EMORY MCKEMIE
(First Middle Last)

my date of birth is 04.08.1976, and my address is
5609 LA FOY BLVD, DALLAS, TX 75209 USA
(Street) (City) (State) (Zip Code) (Country)

I declare under penalty of perjury that the foregoing is true and correct.
Executed in DALLAS County, State of Texas of the 19th
day of MAY (Month) 2026 (Year).

Jason Mckemie (Declarant Signature)

- 1. My relationship with Respondent is: SPOUSE
- 2. Describe the most recent time the Respondent hurt or threatened to hurt you, including any conduct involving sexual assault, stalking, or trafficking:

On April 16, 2026, an illegally executed writ of possession followed a concealed lease buyout by my estranged spouse after 16 months of financial cutoff, healthcare obstruction, false police reports, stalking/surveillance, and threats. Defective service was used to lure me out of the house to the courthouse; surviving cameras show she arrived with security guards, movers, contractors, and a 26-foot truck reserved under her friend's name. My medication, hard drives, computers, cameras, legal files, and evidence repositories were taken, destroyed, or made inaccessible while I was medically vulnerable and awaiting surgery. She told me I would "never see inside [her] account" and would "die trying"; after she discontinued six concealed psychiatric medications, her behavior changed severely, and a police report now documents firearm acquisition. This latest stunt proves she is out of control, and I am not safe.

- a. In what county did this happen? DALLAS
- b. On what date did this happen? APRIL 16, 2026
- c. Was a weapon involved? Yes No If yes, what kind?
Present, Not Used. SHE IS NOW CARRYING A GLOCK 9MM
- d. Does Respondent possess or have access to firearms? Yes No
- e. Were any of the children present? Yes No If yes, who?
- f. Did anyone call the police? Yes No If yes, what happened?
Dispatch officers deemed it civil, however I am goign to meet with a detetctive later today.
- g. Were you injured? Yes No If yes, describe your injuries:

I have been in constant pain for months from a fully torn rotator cuff, ruptured bicep, torn shoulder tendons, and compressed neck nerve, aggravated by defending myself pro se for 15-18 hours per day across divorce, ERISA, Department of Labor, eviction, appeal, and bankruptcy proceedings. I have typed over 1,000 pages in more than 110 divorce pleadings alone. After my healthcare access was cut off on October 31, I lost reliable medication access, gained over 52 pounds of fluid, was repeatedly hospitalized with congestive heart failure, and still have severe edema. I cannot sleep in a bed and have slept upright for months. After the April 16 cleanout, my critical medications were missing, and the 30-hour effort to move property back inside further worsened my condition.

- h. Did you seek medical care? Yes No

3. Has the Respondent threatened or hurt you **before**? Yes No
 If so, describe below how the Respondent threatened or hurt you, including date(s) if possible.

For months, she repeatedly told me I was going to die early and used sleep deprivation as a form of control. She would wait until I fell asleep, then wake me by screaming false accusations about events that never happened, leaving me disoriented, afraid, and unable to rest. In the mornings, she would put her face close to mine and scream "die," causing me to jerk awake and hit my head against the wall. After a spinal injury left me unable to walk and requiring emergency surgery, she placed my medication on another floor where she knew I was in pain and unable to walk. When I tried to get it, I collapsed down the stairs onto the hardwood floor and screamed in pain. She heard me scream in pain from no more than 20ft away, and never even stopped typing.

- a. Were weapons ever involved? Yes No If yes, what kind?
 b. Were the children present? Yes No If yes, who?
 c. Did anyone report the conduct to the police? Yes No
 d. Were you injured? Yes No If yes, describe your injuries:

I was already in horrific pain, and that fall made it exponentially worse. I was unable to stand after the fall and crawled into the living room and leaned back against the couch. She walked around the couch and stared silently at me smiling. I couldn't stand and I was in terrible pain, and she just continued to circle me. I felt so vulnerable, and I could not see where she was at all the time, and I started to feel panic. Then I could not catch my breath. It was as if I simply could not get any air into my lungs. Next thing, I was trying to get up from the floor after passing out. The greater harm has been slower: healthcare and medication cutoff, forced interruption of long-term GLP-1 treatment while I relied on a food pantry despite a seven-figure estate, medical destabilization through financial deprivation, and repeated procedural delay through false testimony, manufactured evidence, and narrative spin. Her most dangerous weapon is slow procedural delay, backed by a large legal team, risk-mitigation vendors, and "due diligence" reports, while I remain isolated without medication, money, housing stability, or counsel.

- e. Did you seek medical care? Yes No
 4. Has the Respondent ever been convicted of family violence? Yes No I do not know.
 If yes, list when and in which county and state the conviction(s) occurred:

Resisting an Officer
 Battery to Law Enforcement Officer
 She has filed multiple Protective Orders against former romantic partners & neighbors
 She has had multiple Protective Orders filed against her


5. Has the Respondent ever been convicted or placed on deferred adjudication community supervision for any of the following:

Trafficking of Persons	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Unknown
Continuous Trafficking of Persons	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Unknown
Sexual Assault	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Unknown
Indecent Assault	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Unknown
Aggravated Sexual Assault	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Unknown
Stalking	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Unknown
Compelling Prostitution	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Unknown

If yes, list when and in which county and state the conviction(s) occurred:

6. Are you requesting exclusive possession of a residence and to have the Respondent excluded from the residence? Yes No
- a. What is the location of the residence? 5609 LA FOY BLVD, DALLAS, TX 75209
- b. Do you currently reside at the residence or have resided there within the last 30 days?
 Yes No
- c. Please describe the facts and circumstances that require the Respondent to be excluded from the residence:

Respondent should be excluded because she does not live at the residence and previously used my forced absence to enter with security, movers, contractors, and a 26-foot truck. Afterward, cameras were removed, internet was disabled, and my medication, hard drives, computers, legal files, evidence repositories, and personal property were taken, destroyed, or made inaccessible. I am medically vulnerable and awaiting surgery. Given Respondent's threats, false reports, surveillance conduct, and firearm access, allowing her back would create immediate danger and further evidence destruction.

 Jason E McKemie 5/19/2026
Applicant signs here

**NOTICE: CONTAINS SENSITIVE CONTENT AND REFERENCES
MATERIALS REQUESTED FOR SEALED IN-CAMERA REVIEW**

NO. DF-24-18010

**IN THE MATTER OF
THE MARRIAGE OF**

§
§
§
§
§
§

IN THE DISTRICT COURT

GWENDOLYN ULIJASZ-MCKEMIE

301ST JUDICIAL DISTRICT &

JASON MCKEMIE

DALLAS COUNTY, TEXAS

**EMERGENCY APPLICATION FOR
TEMPORARY EX PARTE PROTECTIVE ORDER
AGAINST GWENDOLYN LAURA ULIJASZ**

Texas Family Code §§ 6.504, 71.004, 82.004, 82.009, 83.001, 83.002, 83.0025, 83.006, 85.001, 85.021, 85.022

TO THE HONORABLE JUDGE OF SAID COURT:

Applicant, Jason Emory McKemie, files this Emergency Application for Temporary Ex Parte Protective Order against Gwendolyn Laura Ulijasz, Petitioner in pending divorce Cause No. DF-24-18010 and the person from whom Applicant seeks protection.

Applicant resides in Dallas County, Texas. Petitioner resides in San Antonio, Bexar County, Texas. Applicant and Petitioner are spouses for purposes of Texas protective-order law, and their divorce remains pending in Dallas County.

This Application is intentionally focused on family violence and immediate physical danger. Applicant is not asking the Court, through this protective-order application, to adjudicate every divorce, discovery, bankruptcy, lease, ERISA, financial, writ, or property issue. Applicant separately submits a proposed Family Code Temporary Restraining Order under Texas Family Code §§ 6.501-6.503 to preserve the family-court status quo and restrain Petitioner and persons acting with her from causing or participating in another writ/lockout/cleanout event before the Court hears the matter.

I. IMMEDIATE DANGER SUMMARY

1. This is not ordinary divorce conflict. The immediate danger is the combined pattern: death statements, firearm escalation, medical-resource deprivation, false police narratives, stalking/tracking inversion, evidence theft, medication theft, third-party surveillance, and procedural delay used as a weapon.

2. Petitioner repeatedly told Applicant he would die, die young, die early, die soon, or die before he ever saw inside her accounts. Those statements tied death language directly to financial secrecy.
3. Petitioner later acquired or possessed a Glock 9mm firearm while account exposure, subpoena authority, and third-party verification became more likely.
4. Petitioner used Public Storage, stalking, tracking, and law-enforcement narratives to manufacture armed-fear justification against Applicant.
5. Petitioner has already caused physical harm through healthcare-payment obstruction, HSA/FSA obstruction, prescription-access obstruction, false compliance, and months of noncompliance with a signed emergency healthcare order.
6. Petitioner has already used third parties to access Applicant's residence, disable security systems, steal hard drives and medication, and destroy or make inaccessible litigation-critical property and evidence.
7. Notice-first relief creates immediate risk of retaliation, additional false reports, additional medication interference, additional data access/deletion, firearm escalation, and further third-party surveillance.
8. Delay is the weapon. Waiting until June 1 means Applicant may be homeless, without a vehicle, without medications, without communication access, and without evidence before the Court ever reaches the merits.

II. COMPACT EXHIBIT SET

Applicant relies on the following focused exhibit set:

- **Ex. A – Dane Patching Declaration**

Independent witness evidence regarding April 16 aftermath, destructive handling, valuables/electronics near trash, camera/security damage, and Applicant not being the dangerous actor.

- **Ex. B – April 16 Writ Aftermath / Timeline / Photos / Videos**

Forced absence, camera disablement, outdated ID, "grab more of this evidence," medication theft, hard-drive/evidence theft, property destruction, and trash commingling.

- **Ex. D – Medical Harm**

Congestive-heart-failure harm, recurrent infection, GLP-1 interruption, HSA cancellation, edema/fluid retention, and physical harm from medical-resource obstruction.

- **Ex. E – Oncor Medical Critical Care / Chronic Condition Waiver**

Physician-supported medical-risk anchor showing Applicant's medical vulnerability and need for uninterrupted power, medication access, and healthcare-payment access.

- **Ex. G / G2 – Firearm / Public Storage / Officer-Battery Context**

Firearm escalation, gun-related fear narrative, Public Storage allegation, Applicant's denial, and law-enforcement physical-danger context.

- **Ex. M – Signed Healthcare Benefits Order and Noncompliance Evidence**

Existing signed healthcare order, continued noncompliance, nonfunctional HSA/FSA access, and false compliance.

III. RELATIONSHIP / FINANCIAL BASELINE

1. Marriage and shared financial life began in August 2023, well before Petitioner's later "six-month fling" narrative presented at the January 7, 2025 Temporary Order / Protective Order hearing.
2. The parties had joint accounts, shared residence, shared healthcare, shared investments, shared financial planning, and mutual marital commitments.
3. Applicant relied on Petitioner's financial representations and commitments.
4. Applicant pursued a high-risk / high-reward startup initiative strongly encouraged by Petitioner. Applicant turned the opportunity down three times before Petitioner convinced him they were a team and that he should take it.
5. Petitioner knew the role offered no salary and involved deferred compensation pending FDA-related product approval.
6. Petitioner later rewrote the relationship history and timeline after litigation began.

IV. PSYCHIATRIC / MEDICATION HISTORY AS DANGER CONTEXT

7. Petitioner represented to Applicant that she was taking only two SSRIs.
8. Petitioner said she intended to discontinue those medications temporarily for an ayahuasca retreat in Costa Rica in August 2024, and promised she would resume them afterward.
9. Petitioner did not resume them.
10. Applicant later learned Petitioner had discontinued six psychiatric medications, including two antipsychotics.
11. Petitioner's volatility, rage, control, emotional instability, retaliatory conduct, and cruelty escalated sharply after medication discontinuation.
12. The sealed in-camera submission includes objective psychiatric-risk context, including two life-insurance denials referencing DSM-5-related findings.
13. Petitioner's psychiatric history is not a distraction. It is risk context because the danger pattern escalated after medication discontinuation and is tied to false reporting, financial sabotage, medical abandonment, protective-order weaponization, and physical danger.

V. DEATH STATEMENTS, SLEEP DEPRIVATION, AND THREATS TIED TO ACCOUNT SECURITY

14. Petitioner repeatedly told Applicant he would die early, die soon, die young, or die before seeing inside her accounts.
15. Petitioner attributed death predictions to Applicant's mother and therapist.
16. Applicant called his mother, who denied making any such statement.
17. Applicant attempted to verify the therapist statement, and Petitioner interfered.
18. Petitioner used death language to create fear, panic, confusion, exhaustion, and sleep deprivation.
19. Petitioner screamed "DIE" in Applicant's face as part of the escalating pattern.
20. Petitioner's death statements were not isolated emotional outbursts; they were tied to secrecy, control, and account exposure.

VI. MEDICAL ABANDONMENT DURING PHYSICAL VULNERABILITY

21. Applicant was recovering from invasive spinal surgery.
22. Petitioner refused functional care and support.
23. Petitioner took or moved Applicant's medications while he was partially paralyzed and in severe pain.
24. On one occasion, after being left in bed for approximately an hour, Applicant attempted to retrieve medications, his back gave out, and he collapsed down the stairs.
25. Petitioner was approximately 20 feet away, did not stop typing, walked to the kitchen, stepped over Applicant's body, made coffee, sipped it, and smiled while Applicant crawled into the living room.
26. Petitioner knew Applicant's medical vulnerability and exploited it.

VII. DECEMBER 2024 FINANCIAL CUTOFF, RETAINER INTERFERENCE, AND FALSE POLICE SETUP

27. On December 10, 2024, Applicant underwent spinal surgery. Petitioner was supposed to take him, but abandoned him.
28. On December 11, 2024, Applicant discovered a documented pattern of false police reports, protective-order use, accusations against former spouses and others, and settlements extracted from prior employers.
29. Applicant called 911 and warned he was being set up for false police reports and a fraudulent protective order. Applicant specifically asked that the call be recorded in the official log and told the operator he would be unarmed.
30. Applicant paid a lawful legal retainer to protect himself.
31. On December 12, 2024, Applicant transferred \$30,000 on advice of counsel for three months of living expenses while recovering from spinal surgery.
32. Petitioner was alerted by text, asked whether the transfer was legitimate, and Applicant confirmed it was legitimate and asked her not to interfere.

33. Petitioner reported the legal retainer, the \$30,000 survival funds, and Applicant's spinal-surgery rehabilitation equipment as fraud.
34. Petitioner promised to remain amicable, promised she would "never leave him with nothing to live on," promised housing, medical insurance, and legal fees – while simultaneously paying a retainer, racing to file for annulment, filing for protective relief, and cutting off access to marital assets.
35. On December 14, 2024, the predicted false police reports began.
36. Petitioner stole procedural victim status and placed Applicant on defense while Applicant was the one being abused, medically abandoned, financially sabotaged, and stripped of legal access.

VIII. FALSE POLICE, TRACKING, AND AIRTAG NARRATIVE INVERSION

37. Petitioner accused Applicant of tracking and stalking.
38. Source records later showed the AirTags Petitioner turned over to police were registered to Petitioner's own devices / iCloud account.
39. Applicant found multiple AirTags placed on or near his own property.
40. Those AirTags also traced back to Petitioner.
41. AirTag / Apple / SAPD records inverted Petitioner's stalking narrative.
42. Petitioner filed or caused repeated police reports, creating constant law-enforcement harassment, interrogation, and defensive burden.
43. Applicant was repeatedly questioned and mirandized for allegations that failed when tested against third-party source records.
44. Applicant was told SAPD did not proceed with false-report prosecution because proving Petitioner knowingly made false reports would be difficult in light of psychiatric-history issues, and the matter was being referred to mental-health monitoring.

IX. PROTECTIVE-ORDER WEAPONIZATION

45. Petitioner filed protective relief after Applicant sought legal protection.
-

46. False abuse and stalking allegations became procedural weapons.
47. Applicant was forced into defensive litigation while medically and financially destabilized.
48. At the January 7, 2025 hearing, Petitioner's counsel sought withdrawal before proceedings began, stating continued representation would violate ethical obligations.
49. Petitioner brought her sister to testify that dozens of surveillance devices had been found in the residence, including a device allegedly hidden in a plant.
50. The plant device was a digital hydrometer – a simple device used to notify when to water the plant.
51. The residence access was captured on video, and no listening device or surveillance device was found.
52. Petitioner texted Applicant before coming to the residence and told him to leave the cameras on, even though the cameras automatically recorded based on sound and motion.
53. Applicant asked only that Petitioner leave his office alone.
54. Petitioner broke into Applicant's office, walked up to a camera, accused him of recording her against her will, ripped the camera from the wall, and broke it on the floor.

X. HEALTHCARE DEPRIVATION AS FAMILY VIOLENCE

55. Applicant has congestive heart failure and serious medical vulnerability.
56. A physician-supported medical-critical-care / chronic-condition waiver confirms Applicant's medical risk and need for uninterrupted power, medication access, and healthcare-payment access.
57. Petitioner knew healthcare disruption could endanger Applicant's life.
58. On October 31, 2025, a false divorce-based QLE was submitted treating Applicant as an ex-spouse despite no divorce decree.
59. That false QLE terminated benefits immediately before medically necessary care and contradicted Petitioner's sworn assurance that she had not and would not obstruct healthcare access.

60. After the October 31, 2025 termination of benefits, Applicant was ripped off medication without notice or taper, including a GLP-1 medication not available through the hospital.
61. Applicant gained approximately 52 pounds of fluid weight and was hospitalized for congestive heart failure.
62. Petitioner did not functionally comply with the December 17, 2025 signed healthcare order.
63. HSA/FSA access remained obstructed.
64. Medication access remained obstructed.
65. Petitioner has used nonfunctional cards, cancelled cards, screenshots, attorney statements, claimed administrative activity, and future promises as false compliance.
66. Applicant suffered actual physical harm: hospitalization, recurrent infection, unmanaged pain, medication interruption, lack of usable healthcare-payment access, and inability to proceed safely with necessary treatment.
67. This is not "benefits paperwork."
68. This is medical-resource coercion causing bodily injury and fear of imminent physical harm.
69. Under Texas Family Code § 71.004, this conduct qualifies as family violence because it has resulted in physical harm, reasonably places Applicant in fear of imminent physical harm, and was done with knowledge of Applicant's serious medical vulnerability.

XI. FIREARM ESCALATION

70. Petitioner repeatedly used death language.
71. Petitioner tied death language to account secrecy.
72. Petitioner told Applicant he would die before he ever saw inside her bank accounts.
73. Petitioner escalated false danger narratives as discovery pressure increased.
74. Directly after recusal in the 254th District Court, Petitioner went to a Public Storage unit, called police, accused Applicant of breaking into the unit, and stated she had a 9mm Glock.

75. The police report reflects she was not licensed and used a community-property dispute at Public Storage as justification for carrying a deadly weapon.
76. Applicant denies breaking into, accessing, or entering Petitioner's Public Storage unit after property separation.
77. Public Storage logs, cameras, employee records, payment records, and incident records can verify the truth.
78. Petitioner's firearm acquisition or possession must be viewed with the death statements, false reports, Public Storage narrative, and April 16 conduct.
79. Applicant reasonably fears imminent physical harm.

XII. APRIL 16, 2026 – EVIDENCE THEFT, MEDICATION THEFT, AND SECURITY DISABLEMENT

80. Applicant did not abandon the residence.
81. Defective service forced Applicant to leave for court to seek emergency relief.
82. Applicant left at approximately 2:37 p.m.
83. Petitioner's security personnel arrived within minutes.
84. The garage opened from inside.
85. Cameras were disabled.
86. Petitioner arrived by Uber with luggage.
87. Petitioner used outdated identification bearing Applicant's last name and the LaFoy address.
88. Petitioner represented current residence and access authority.
89. Those representations were false.
90. Petitioner was recorded saying she needed to hurry and "grab more of this evidence."
91. The internet and remaining camera systems were disabled.

92. Hard drives, medications, electronics, legal records, and evidence repositories were stolen, destroyed, discarded, or made inaccessible.

XIII. APRIL 16 AFTERMATH

93. Property was not packed; it was destroyed.

94. Electronics and valuables were placed near trash.

95. A MacBook Pro was found stuffed into discarded trash / pizza-box context.

96. Cameras were ripped from walls.

97. Litigation hard drives and evidence repositories were missing or inaccessible.

98. Independent witness Dane Patching observed destruction, disorder, electronics near trash, and conditions inconsistent with any normal move.

99. Applicant worked through the night trying to preserve what remained.

XIV. CURRENT EMERGENCY – MAY 22, 2026

100. Another writ / lockout attempt is active or imminent today.

101. Applicant has no safe alternate housing.

102. Applicant has no available funds to move or preserve remaining property.

103. Applicant has no usable medication access.

104. Applicant has no food funds.

105. Applicant's phone, utilities, storage units, remaining evidence, and vehicle are at immediate risk.

106. Applicant currently has a roof over his head.

107. Applicant will not have that roof if the writ / lockout proceeds today.

108. Applicant currently has a vehicle.
109. Applicant loses that vehicle on May 27 absent emergency relief.
110. The June 1 hearing will not preserve status quo if Applicant is homeless, without a vehicle, without medications, without communication access, and without evidence before then.
111. On May 21, 2026, during a court proceeding, another unauthorized access event occurred at approximately 1:30 p.m.
112. AirTags not belonging to Applicant were found near the front-door area.
113. Applicant requests preservation and subpoena authority for those AirTags and related owner/source records.

XV. RELIEF REQUESTED – PROTECTIVE ORDER

Applicant requests that the Court enter a Temporary Ex Parte Protective Order ordering that Gwendolyn Laura Ulijasz:

1. Shall not commit family violence.
2. Shall not threaten, harass, stalk, surveil, track, intimidate, or communicate with Applicant directly or through third parties.
3. Shall not communicate a threat through any person to Applicant or to any member of Applicant's household.
4. Shall not communicate in a threatening or harassing manner with Applicant.
5. Shall not go within 500 yards of Applicant.
6. Shall not go within 500 yards of Applicant's residence at 5609 La Foy Blvd., Dallas, Texas 75209.
7. Shall not enter, approach, access, coordinate access to, or cause third-party access to Applicant's residence, property, vehicle, storage, devices, medications, evidence repositories, or records.
8. Shall not possess, carry, purchase, transfer, conceal, or control any firearm pending further hearing.

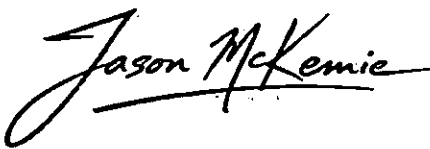
9. Shall surrender any firearm in her possession, custody, or control to law enforcement as directed by the Court.
10. Shall not access, review, copy, image, alter, delete, transfer, conceal, publish, disclose, rely on, or use Applicant's hard drives, security footage, legal work product, case records, medical records, financial records, cloud data, creative work, professional files, or evidence repositories.
11. Shall preserve all April 16, writ, eviction, landlord, lease-buyout, mover, security, vendor, benefits, HSA/FSA, firearm, AirTag, Apple, SAPD, DPD, constable bodycam, CAD, dispatch, and property-handling records.
12. Shall immediately authorize Applicant as an approved dependent/user/contact for purposes of communicating directly with Petitioner's employer benefits department, HR benefits personnel, HSA administrator, FSA administrator, COBRA administrator, plan administrator, pharmacy-benefits administrator, medical insurer, dental insurer, vision insurer, and any third-party benefits administrator concerning Applicant's own healthcare coverage, dependent coverage, HSA/FSA access, claims, reimbursements, cards, portals, prescription benefits, and medical-payment tools.
13. Shall not cancel, report lost/stolen, block, restrict, intercept, delay, misdirect, or interfere with any HSA/FSA card, healthcare reimbursement, prescription benefit, medical-payment tool, benefits portal, COBRA access, insurance access, pharmacy-benefit access, or replacement card connected to Applicant.
14. Shall deposit any reimbursement received for Applicant's medical expenses into the registry of the Court within 72 hours of receipt.
15. Shall provide a sworn inventory identifying all medications, hard drives, storage media, computers, devices, documents, evidence, cloud credentials, security equipment, and property accessed, removed, copied, imaged, altered, discarded, damaged, or possessed from December 2024 through present, with special focus on April 16, 2026.
16. Shall not retaliate against Applicant for seeking this Order through police reports, welfare checks, fraud reports, benefits reports, stalking/tracking reports, employer reports, financial-institution reports, storage reports, or accusations unsupported by source records.
17. Shall comply with any further temporary ex parte protective conditions necessary to protect Applicant from family violence, medical endangerment, firearm escalation, stalking/tracking, false reporting, evidence theft, and third-party harassment.

XVI. REQUEST FOR SAME-DAY PROTECTIVE RELIEF

Applicant requests that this Court sign the temporary ex parte protective order today because:

1. harm is occurring today;
2. notice will not prevent harm;
3. June 1 is too late;
4. homelessness cannot be unwound;
5. medication loss cannot be papered over;
6. destroyed evidence cannot be recreated;
7. firearm escalation cannot be ignored;
8. false compliance has repeatedly failed;
9. screenshots and attorney assurances have repeatedly failed; and
10. only immediate restraint and neutral verification will preserve safety.

Respectfully submitted,



Jason Emory McKemie

539 W Commerce St, Ste 2010

Dallas, TX 75208

214-868-4901

jmckemie@mckemie.net

**NOTICE: CONTAINS SENSITIVE CONTENT AND REFERENCES
MATERIALS REQUESTED FOR SEALED IN-CAMERA REVIEW**

NO. DF-24-18010

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

UNSWORN DECLARATION OF JASON MCKEMIE

I, **Jason Emory McKemie**, declare under penalty of perjury as follows:

1. My name is **Jason Emory McKemie**. My date of birth is **April 8, 1976**. My address is **539 W Commerce St, Ste 2010, Dallas, Texas 75208**. I am over eighteen years old, competent to make this declaration, and have personal knowledge of the facts stated here.
2. I am the Applicant seeking protection from Gwendolyn Laura Ulijasz, Petitioner in pending divorce **Cause No. DF-24-18010**.
3. I submit this declaration because immediate same-day relief is necessary.
4. The emergency is active today.
5. I currently have a roof over my head.
6. If the writ / lockout proceeds today, I will not.
7. I currently have a vehicle.
8. I will lose it on May 27 unless the Court preserves the status quo.
9. The June 1 hearing does not preserve status quo if I become homeless, without a vehicle, without medications, and without evidence before then.
10. I have congestive heart failure and serious medical vulnerability.
11. I do not have usable medication access.
12. I have searched the residence and my medications are gone.

13. My medication loss followed months of healthcare-benefits obstruction.
14. Petitioner knew healthcare disruption could endanger my life.
15. Petitioner nevertheless obstructed healthcare-payment access, HSA/FSA access, benefits access, prescription access, and compliance with the December 17 healthcare order.
16. I have suffered actual physical harm, including congestive-heart-failure hospitalization, recurrent infection, medication interruption, unmanaged pain, and inability to proceed safely with needed care.
17. This is not an insurance dispute.
18. It is medical-resource deprivation causing physical harm.
19. Petitioner repeatedly told me I would die, die young, die early, die soon, or die before I saw inside her accounts.
20. Petitioner attributed those death statements to people I trusted.
21. My mother denied making the statement.
22. Petitioner interfered when I attempted to verify the statement with my therapist.
23. Petitioner used death language to create fear, panic, sleep deprivation, exhaustion, and control.
24. Petitioner screamed "DIE" in my face.
25. Petitioner represented to me that she was only taking two SSRIs.
26. Petitioner told me she intended to stop those medications for an ayahuasca retreat in Costa Rica and resume them afterward.
27. Petitioner did not resume them.
28. I later learned Petitioner had discontinued six psychiatric medications, including two antipsychotics.
29. Petitioner's volatility, rage, control, emotional instability, retaliatory behavior, and cruelty escalated sharply after medication discontinuation.

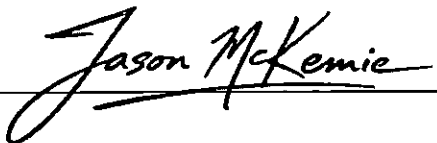
30. Records show firearm escalation involving a Glock 9mm.
31. I fear the firearm issue because it followed death statements, account secrecy, false danger narratives, and property/evidence escalation.
32. I deny breaking into, entering, or accessing Petitioner's Public Storage unit after property separation.
33. I request preservation and subpoena authority for Public Storage logs, cameras, payment records, employee records, and incident records because those records can verify the truth.
34. I did not abandon the residence or my property on April 16, 2026.
35. Defective service forced me to leave for court to seek emergency relief.
36. I left at approximately 2:37 p.m.
37. Within minutes, security personnel arrived.
38. The garage opened from inside.
39. Cameras were disabled.
40. Petitioner arrived by Uber with luggage.
41. Petitioner used outdated identification with my last name and the LaFoy residence address.
42. Petitioner represented that she currently lived there and had authority to remove property.
43. Those representations were false.
44. Petitioner was recorded saying she needed to hurry and "grab more of this evidence."
45. The remaining camera system and internet were then disabled.
46. My hard drives, medications, legal materials, computer equipment, evidence repositories, and property were stolen, destroyed, discarded, or made inaccessible.
47. A MacBook Pro was later found in trash / pizza-box context.
48. Cameras were ripped from walls.

49. Valuable electronics and property were placed near trash.
50. Independent witness Dane Patching observed the destructive aftermath.
51. I worked through the night trying to preserve what remained.
52. On May 21, 2026, during a court proceeding, another unauthorized access event occurred at approximately 1:30 p.m.
53. AirTags not belonging to me were found near the front-door area.
54. I request preservation and subpoena authority for those AirTags and owner/source records.
55. Another writ / lockout attempt is active or imminent today.
56. I have no safe alternate housing.
57. I have no funds to move remaining property.
58. I have no funds for food.
59. My storage units, phone service, utilities, remaining evidence, and property are at immediate risk.
60. Delayed reimbursement will not prevent the harm.
61. Future compliance will not prevent the harm.
62. Screenshots will not prevent the harm.
63. Attorney assurances will not prevent the harm.
64. Nonfunctional benefits access will not prevent the harm.
65. The only relief that preserves status quo is a same-day order restraining Petitioner and anyone acting with her from causing, financing, coordinating, assisting, facilitating, or participating in any further writ execution, lockout, re-key, cleanout, property removal, utility interruption, storage sale, or evidence-removal event before this Court hears the matter.
66. I request that the Court preserve the status quo as it exists today: housing, vehicle access, utility access, phone access, medical access, evidence access, and remaining property access.

67. I request that the Court treat healthcare deprivation as family violence because it has caused physical harm, continues to create immediate physical danger, and was done with knowledge of my serious medical condition.
68. I request same-day monetary enforcement or registry deposit sufficient to cure the December 17 healthcare order and prevent further medical harm.
69. I request a sworn inventory of all medications, hard drives, storage media, electronics, documents, records, evidence, credentials, and property accessed, removed, copied, imaged, altered, discarded, damaged, or possessed by Petitioner or anyone acting with her.
70. I request immediate preservation of all April 16, writ, eviction, landlord, lease-buyout, mover, security, vendor, benefits, HSA/FSA, firearm, AirTag, Apple, SAPD, DPD, constable bodycam, CAD, dispatch, and property-handling records.
71. Without same-day relief, I face homelessness, loss of vehicle access, loss of communication, loss of utilities, loss of storage property, loss of evidence, lack of food, lack of medication, and further physical danger before any ordinary hearing can provide relief.

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

Executed in **Dallas County, Texas**, on **May 27, 2026**.



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

**NOTICE: CONTAINS SENSITIVE CONTENT AND REFERENCES
MATERIALS REQUESTED FOR SEALED IN-CAMERA REVIEW**

NO. DF-24-18010

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

FAMILY CODE TEMPORARY RESTRAINING ORDER

TO PRESERVE STATUS QUO AND RESTRAIN WRIT / LOCKOUT / CLEANOUT ACTIVITY PENDING HEARING

On this day, the Court considered Applicant **Jason Emory McKemie's** request for a **Family Code Temporary Restraining Order** to preserve **Status Quo** pending hearing.

The Court considered the application, declaration, exhibits, proposed order, and applicable law.

The Court finds that this case is a pending suit for dissolution of marriage and that the Court has authority under **Texas Family Code §§ 6.501, 6.502, and 6.503**, and **Texas Rules of Civil Procedure 680 and 683**, to issue temporary restraining relief preserving the parties, property, evidence, and family-court status quo pending hearing.

This Order is directed to **Gwendolyn Laura Uljasz**, Petitioner, and to persons acting in active concert or participation with her who receive actual notice of this Order. This Order does not purport to adjudicate the validity of another court's writ. It restrains Petitioner and persons acting with her from causing, financing, coordinating, requesting, assisting, facilitating, participating in, or using any writ / lockout / cleanout / property-removal process to destroy the status quo before this Court hears the matter.

FINDINGS:

The Court finds:

1. Applicant and Petitioner are parties to a pending divorce.
2. Applicant currently has access to shelter, remaining property, communication tools, utilities, medical access, evidence, and transportation.

3. The status quo as of today includes Applicant having a roof over his head, access to remaining property and evidence, access to phone/utilities, access to medical resources, and access to a vehicle necessary for medical, court, food, pharmacy, and evidence-preservation needs.
4. Applicant faces active or imminent writ / lockout / cleanout activity today.
5. Applicant faces immediate and irreparable harm before notice can be served and a hearing held.
6. The immediate harm includes homelessness, loss of remaining property, loss of evidence, loss of medications, loss of utility access, loss of phone access, loss of storage property, loss of vehicle access, and medical endangerment.
7. Applicant has congestive heart failure and serious medical vulnerability.
8. Applicant has presented evidence of medical-resource obstruction, medication loss, and physical harm.
9. Applicant has presented evidence that on April 16, 2026, defective service forced him away from the residence, after which security personnel entered, cameras were disabled, Petitioner arrived with outdated identification, and property/evidence/medications were removed, destroyed, discarded, or made inaccessible.
10. Applicant has presented evidence that Petitioner described the April 16 activity as needing to "grab more of this evidence."
11. Applicant has presented evidence that April 16 was not a normal move, but a destructive teardown involving electronics near trash, cameras ripped from walls, hard drives/evidence repositories missing or inaccessible, and property destruction.
12. Applicant has presented evidence of current emergency conditions, including no safe alternate housing, no funds to move remaining property, no food funds, no usable medication access, phone/utility/storage risk, and active writ risk.
13. If relief is not entered today, the family-court status quo will be destroyed before the Court can hear the matter.
14. A temporary restraining order is necessary to preserve property, protect the parties, preserve evidence, prevent medical endangerment, and prevent another writ / lockout / cleanout / removal event pending hearing.

IT IS THEREFORE ORDERED that Gwendolyn Laura Ulijasz, Petitioner, and all persons acting in active concert or participation with her who receive actual notice of this Order, including agents, representatives, security personnel, movers, contractors, vendors, landlord-side actors, storage actors, investigators, and any other person acting at her direction or for her benefit, are

TEMPORARILY RESTRAINED as follows:

1. WRIT / LOCKOUT / CLEANOUT / REMOVAL RESTRAINT

Petitioner shall not directly or indirectly cause, request, finance, coordinate, assist, encourage, facilitate, participate in, or complete any writ execution, lockout, re-key, residence cleanout, property removal, property transfer, property disposal, storage transfer, storage sale, utility interruption, access event, third-party entry, or removal/disposal event affecting Applicant, Applicant's residence, Applicant's remaining property, Applicant's medications, Applicant's evidence, Applicant's electronic data, or Applicant's ability to remain safely housed pending hearing.

2. STATUS QUO PRESERVATION

Petitioner shall preserve the status quo existing as of the date and time this Order is signed, including Applicant's access to shelter, remaining property, medications, evidence, communication tools, utilities, storage, vehicle access, and medical-access resources pending hearing.

3. RESIDENCE ACCESS RESTRAINT

Petitioner shall not go to, enter, access, approach, coordinate access to, or cause any person to access 5609 La Foy Blvd., Dallas, Texas 75209, or any area where Applicant's remaining property, records, evidence, medications, devices, or personal effects are located, except by further written order of this Court.

4. NO PROXY CONDUCT

Petitioner shall not use any third party, including security personnel, movers, contractors, vendors, landlord-side actors, investigators, attorneys acting outside legitimate litigation functions, friends, family members, agents, or representatives to do anything Petitioner is restrained from doing directly.

5. PROPERTY AND EVIDENCE PRESERVATION

Petitioner shall not access, review, copy, image, alter, delete, transfer, conceal, publish, disclose, rely on, use, destroy, discard, move, sell, transfer, or interfere with Applicant's security footage, hard drives, legal work product, drafts, case records, medical records, financial records, cloud data, creative work, professional files, devices, medications, or evidence repositories.

6. RECORD PRESERVATION

Petitioner shall preserve all April 16, writ, eviction, landlord, lease-buyout, All My Sons, Merritt McClayton Rahilly, security, Jetty Partners, Decisive Resources, vendor, payment, encrypted-message, benefits/QLE, HSA/FSA, Accenture, Public Storage, firearm, AirTag, Apple, SAPD, DPD, constable bodycam, CAD, dispatch, incident-note, property-handling, storage, utility, vehicle, and communications records.

7. SWORN INVENTORY

Petitioner shall preserve all medications, electronic devices, storage media, documents, records, evidence, and personal property of Applicant that are in Petitioner's possession, custody, or control, or in the possession, custody, or control of any person acting at her direction or for her benefit.

Within forty-eight (48) hours after service or actual notice of this Order, Petitioner shall serve Applicant with a sworn inventory, signed under penalty of perjury, identifying any such items presently known to be in her possession, custody, or control, including any items removed, handled, damaged, discarded, or retained during or after the April 16, 2026 residence-entry and property-removal event.

The inventory shall identify each item or category of items by general description, current location, and current condition. This provision is for preservation and chain-of-custody purposes only and does not require public disclosure of passwords, access keys, privileged material, or security-sensitive information absent further order of the Court.

8. VEHICLE STATUS QUO

Petitioner shall not directly or indirectly cause, finance, request, coordinate, assist, encourage, facilitate, or participate in any repossession, surrender, cancellation, disablement, transfer, interference, insurance interruption, registration interference, or possession interference affecting any vehicle currently used by Applicant, including any vehicle required for medical access, court access, housing access, pharmacy access, food access, or evidence preservation.

9. UTILITIES / PHONE / STORAGE / COMMUNICATIONS

Petitioner shall not directly or indirectly cause, finance, request, coordinate, assist, encourage, facilitate, or participate in any interruption, cancellation, disconnection, lockout, deletion, sale, transfer, destruction, or access restriction affecting Applicant's utilities, phone service, internet service, storage units, evidence storage, cloud accounts, communication tools, or remaining property.

10. NO RETALIATION

Petitioner shall not retaliate against Applicant for seeking this Order by making or causing police reports, welfare checks, fraud reports, benefits reports, storage reports, tracking/stalking reports,

employer reports, credit-card reports, financial-institution reports, landlord reports, or third-party accusations unsupported by source records.

11. NOTICE TO THIRD PARTIES

Applicant may present this Order to any constable, sheriff, mover, security vendor, landlord, locksmith, storage facility, utility provider, vehicle lender, benefits administrator, or other person or entity involved in any writ, lockout, cleanout, removal, service disruption, benefits access, vehicle access, storage sale, or property/evidence handling.

Any person acting in active concert or participation with Petitioner who receives actual notice of this Order is restrained to the extent permitted by Texas Rule of Civil Procedure 683.

12. NO COLLATERAL APPEAL FINDING

This Order does not vacate, reverse, or adjudicate the validity of any order issued by another court. This Order restrains Petitioner and persons acting in active concert with her from using, causing, financing, coordinating, facilitating, assisting, or participating in a writ / lockout / cleanout / removal process to destroy the family-court status quo, remove evidence, interfere with medications, or render Applicant homeless before this Court hears the matter.

HEARING

This matter is set for hearing on temporary injunction, protective order, healthcare enforcement, evidence preservation, emergency funds release, and further status-quo relief on:

Date: _____

Time: _____

Location: _____

EXPIRATION

This Temporary Restraining Order expires fourteen days from the date and hour of signing unless extended by written order, agreement, or further order of this Court.

BOND

Because this Order is entered under Texas Family Code §§ 6.501 and 6.503, the Court finds that no affidavit, verified pleading, or bond is required. Alternatively, if bond is required, bond is set at \$_____.

SIGNED on _____, 2026, at _____.m.

JUDGE PRESIDING

NO. **DF-24-18010****IN THE MATTER OF
THE MARRIAGE OF**§
§
§
§
§
§**IN THE DISTRICT COURT****GWENDOLYN ULIJASZ-MCKEMIE****301ST JUDICIAL DISTRICT****&****JASON MCKEMIE****DALLAS COUNTY, TEXAS****ORDER ON TEMPORARY EX PARTE PROTECTIVE ORDER****Texas Family Code §§ 71.004, 82.004, 83.001, 83.002, 83.0025, 85.001, 85.022**

On this day, the Court considered **Jason McKemie's Application for Temporary Ex Parte Protective Order** and supporting **Affidavit / Unsworn Declaration**. The Court finds from the information contained in the Application and Affidavit that there is a clear and present danger of family violence and that this Temporary Ex Parte Protective Order is necessary to protect Applicant before a noticed hearing can occur.

This Order is entered without further notice or hearing pursuant to **Texas Family Code Chapter 83**. The Court further finds that limited evidence-preservation, no-contact, no-surveillance, healthcare noninterference, and medication/evidence protection terms are necessary to prevent irreparable harm pending hearing.

I. Protected Person and Person Restrained**1. Protected Person / Applicant: Jason McKemie (jmckemie@mckemie.net)**

- Mailing Address: 539 W Commerce St, Ste 2010, Dallas, Texas 75208
- Physical Address: 5609 La Foy Blvd., Dallas, TX 75209
- Phone/Text: (214) 868-4901

2. Person Restrained: Gwendolyn Uljasz-McKemie (guljasz@gmail.com)

- Mailing Address: 11703 Huebner Rd., PMB 499, STE 106, San Antonio, TX 78230
- (Physical) San Antonio: 12802 Kings Forest St., San Antonio, TX 78230
- (Physical) Dallas: Unknown
- Phone/Text: (210) 278-6377 & (917) 471-1979

II. No Family Violence, Threats, Harassment, and Retaliation

1. The Person Restrained shall not commit family violence against Applicant.
2. The Person Restrained shall not threaten Applicant directly or indirectly.
3. The Person Restrained shall not harass, intimidate, stalk, surveil, follow, photograph, monitor, abuse, torment, alarm, or retaliate against Applicant directly or indirectly.
4. The Person Restrained shall not communicate with Applicant in a threatening, harassing, abusive, alarming, coercive, or intimidating manner.

III. No Contact / Limited Case Logistics Exception

5. The Person Restrained shall have no direct or indirect contact with Applicant, including in person, by phone, text, email, social media, messaging app, anonymous communication, third-party message, or through another person.
6. This no-contact provision does not prohibit formal court filings, service through eFileTexas or a court-authorized method, communications through counsel, or a court-approved written platform strictly limited to necessary case logistics and containing no threats, harassment, intimidation, or personal commentary.

IV. Stay-Away Order

7. The Person Restrained shall stay at least 500 yards away from Applicant, Applicant's residence, vehicle, workplace, medical providers, pharmacies, storage locations, and any location where Applicant is receiving medical care, unless otherwise ordered by the Court or required for a court appearance.
8. The Person Restrained shall not appear at, enter, access, or direct another person to access Applicant's residence, storage areas, vehicle, workplace, medical providers, pharmacies, or evidence/property storage locations.

V. No Third-Party Stalking, Surveillance, Investigation, Reputation Interference, or Indirect Conduct

9. The Person Restrained shall not use, direct, fund, retain, instruct, encourage, or permit any third party, investigator, vendor, security provider, cyber-security vendor, reputation-management vendor, due-diligence vendor, contractor, employee, agent, landlord, mover, benefits personnel, law-enforcement contact, family member, friend, or payment proxy to do indirectly what this Order prohibits directly.

10. The Person Restrained shall not cause or permit any person or entity to monitor, surveil, photograph, follow, approach, intimidate, gather information about, investigate, profile, report on, interfere with, or communicate about Applicant for the purpose of harassment, intimidation, retaliation, employment interference, reputational harm, litigation leverage, access to property, access to devices/accounts, or evidence collection outside formal court process.
11. The Person Restrained shall immediately suspend and shall not continue, renew, expand, fund, or initiate any third-party work, service, inquiry, report, investigation, cyber review, reputation review, due-diligence review, employment-related contact, social-media monitoring, background review, device/account access effort, location tracking, surveillance, or information-gathering activity concerning Applicant, Applicant's residence, vehicle, property, devices, accounts, employment, professional reputation, medical providers, storage locations, court activity, family, helpers, or evidence, unless expressly authorized by further Court order.
12. The Person Restrained shall not disclose, distribute, publish, transmit, file, summarize, characterize, rely upon, or use any report, communication, data, screenshot, recording, photograph, account information, device information, employment-related information, reputation-related material, or other information concerning Applicant obtained from or through any third party, vendor, investigator, contractor, security provider, cyber-security vendor, reputation vendor, due-diligence vendor, or proxy unless and until the Court determines lawful acquisition, chain of custody, completeness, context, and permitted use.
13. Nothing in this section prohibits formal court filings, lawful service, communications through counsel, or discovery conducted under Court order. This section prohibits third-party surveillance, investigation, reputation interference, employment interference, cyber/account access, proxy harassment; and information-gathering concerning Applicant outside formal court process or further Court order.
14. The Person Restrained and anyone acting with or for her shall preserve all existing third-party records, reports, communications, invoices, scopes of work, data, screenshots, notes, recordings, payment records, access logs, device/account records, employment-related communications, reputation-related materials, and electronically stored information concerning Applicant, and shall not delete, alter, conceal, destroy, overwrite, transfer, or make unavailable any such materials.

VI. No Tracking, AirTags, GPS, Spyware, Account Monitoring, or Digital Interference

15. The Person Restrained shall not place, enable, maintain, fund, purchase, activate, or cause any tracking device, including AirTags or similar devices, to be placed on or near Applicant, Applicant's vehicle, Applicant's belongings, Applicant's residence, or any property under Applicant's control.
16. The Person Restrained shall not monitor or attempt to monitor Applicant's location, accounts, devices, communications, cloud storage, cameras, email, phone records, financial accounts, medical portals, benefits portals, or electronic records through any device, account, credential, service, third party, contractor, or vendor.

17. The Person Restrained shall not access, attempt to access, delete, alter, copy, image, transfer, encrypt, conceal, or interfere with Applicant's computers, phones, hard drives, storage devices, cameras, routers, cloud accounts, password stores, MFA, email, phone records, legal files, financial records, medical records, or evidence repositories.

VII. Healthcare, Medication, HSA/FSA, Benefits, and Medical-Access Noninterference

18. The Person Restrained shall not interfere with Applicant's healthcare coverage, prescriptions, pharmacy access, medical appointments, medical records, medical providers, medical devices, HSA, FSA, COBRA rights, benefits cards, benefits portals, plan-administrator communications, or insurance communications.
19. The Person Restrained shall not submit, alter, withdraw, modify, delete, conceal, or interfere with any healthcare, benefits, QLE, COBRA, HSA, FSA, dependent-coverage, prescription, pharmacy, medical-provider, or plan-administration record concerning Applicant.
20. The Person Restrained shall not take, conceal, withhold, destroy, damage, transfer, alter, access, or dispose of Applicant's medications, prescription medication, medical devices, medical records, health insurance cards, HSA/FSA cards, benefits information, pharmacy access, or healthcare communications.

VIII. Return and Preservation of Medication, Devices, Evidence, and Records

21. Upon service of this Order, the Person Restrained shall preserve and not use, alter, delete, copy, image, transfer, destroy, conceal, encrypt, access, or dispose of any medication, medical devices, hard drives, storage devices, computers, cameras, phones, SD cards, USB drives, documents, records, legal files, financial records, medical records, benefit records, or evidence taken from or concerning Applicant.
22. Upon service of this Order, the Person Restrained shall return or make available through law enforcement, a court-approved neutral, or another safe neutral process ordered by the Court all medications, prescription medication, medical devices, hard drives, storage devices, computers, cameras, evidence repositories, legal files, medical records, benefit records, and property taken from Applicant or the residence.
23. The Court finds that Applicant has presented evidence that certain computers, hard drives, and storage devices are his separate, pre-marital property and were removed from his possession or residence during the April 16, 2026 residence/property event, contrary to existing court orders.
24. Pending further order of the Court, the Person Restrained shall not access, review, copy, analyze, distribute, disclose, or use any data, files, communications, or materials from any such devices or

systems, whether directly or indirectly, including through any third party, expert, investigator, or counsel.

25. The Person Restrained shall not use, reference, or rely upon any such materials in any filing, communication, report, or proceeding unless and until the Court determines lawful acquisition, chain of custody, completeness, context, and admissibility.
26. The Person Restrained shall not use, access, review, copy, analyze, reference, rely upon, distribute, disclose, or otherwise exploit any material taken from Applicant's devices, accounts, hard drives, legal files, medical records, financial records, or evidence repositories in any proceeding, filing, communication, report, or other context unless and until the Court determines lawful acquisition, chain of custody, completeness, context, and admissibility.
27. All such devices and materials shall be preserved in their current state. The Person Restrained shall not alter, delete, overwrite, encrypt beyond access, transfer, conceal, or make unavailable any such devices or data.

IX. Firearms and Ammunition

28. To the extent permitted by state and federal law, the Person Restrained shall not possess, purchase, receive, carry, access, transfer, hide, or direct any third party to possess any firearm, ammunition, magazine, firearm accessory, safe, lockbox, or firearm-related item during the term of this Order.
29. Upon service of this Order, the Person Restrained shall surrender any firearm, ammunition, magazines, and firearm accessories in her possession, custody, or control to law enforcement or another court-approved lawful custodian as directed by the Court, and shall file or present proof of surrender at the hearing.

X. Law-Enforcement and Emergency Reports

30. The Person Restrained shall not initiate, cause, encourage, or procure law-enforcement, emergency, wellness-check, or third-party reports containing knowingly false statements or made for the purpose of intimidation, leverage, retaliation, harassment, or litigation advantage.
31. Nothing in this Order prohibits a good-faith report of an actual emergency.

XI. Preservation of Records

32. The Person Restrained shall preserve all documents, communications, recordings, photographs, videos, metadata, audit logs, system records, administrator notes, field records, mover records,

security communications, contractor records, payment records, benefits records, QLE records, HSA/FSA records, firearm records, Public Storage records, law-enforcement statements, encrypted-message records, vendor records, AirTag/Apple/iCloud/Find My records, and property/evidence records relating to healthcare access, dependent coverage termination, firearm acquisition, the Public Storage allegation, the April 16, 2026 residence/property event, tracking/surveillance allegations, false police reports, and any property or evidence removed from the residence.

33. The Person Restrained shall not delete, overwrite, alter, purge, encrypt beyond access, destroy, transfer, conceal, or make unavailable any responsive records.

XII. Third-Party Records / Nonparty Evidence

34. The Court authorizes Applicant to present a proposed preservation order directed to Dallas County Constable Precinct 5 and any records custodian for preservation of body-worn camera footage, dashcam footage, dispatch audio, CAD logs, incident reports, supervisor notes, deputy/officer notes, communications, photos/videos/metadata/device logs, identities of all personnel present, and identities of all recording devices used in connection with the April 16, 2026 writ/eviction/property event.
35. Nothing in this Temporary Ex Parte Protective Order adjudicates nonparty discovery rights; however, the Court finds that preservation of April 16 records is necessary to prevent loss of evidence before the protective-order hearing.

XIII. Rule 204.1 / Case-Management Hearing

36. The Court does not order a mental, psychological, or psychiatric examination ex parte in this Temporary Ex Parte Protective Order.
37. The Court sets, or directs the Court Coordinator to set, Applicant's forthcoming Texas Rule of Civil Procedure 204.1 request for neutral psychological or psychiatric examination, sealed/in-camera handling, and related case-management relief for expedited hearing on:
- _____
38. The Court further orders that any psychiatric, mental-health, sealed, AirTag/source-record, law-enforcement, former-partner, life-insurance/underwriting, or third-party pattern materials submitted for in-camera review shall remain sealed and shall not be publicly docketed, disclosed, or released absent further order of the Court.

XIV. Hearing, Duration, and Enforcement

39. This Temporary Ex Parte Protective Order remains in effect until the hearing set below, but not more than twenty (20) days unless extended as permitted by Texas Family Code § 83.002 or further order of the Court.

40. Hearing on final protective-order relief is set for: Date: _____ Time: _____
Courtroom/Zoom: _____.

41. This Order is enforceable according to law after service on the Person Restrained. Violation may subject the Person Restrained to contempt, arrest, criminal penalties, and any other remedy authorized by law.

SIGNED on _____, 2026, at _____ m.

JUDGE PRESIDING

NO. DF-24-18010

IN THE MATTER OF § IN THE DISTRICT COURT
 THE MARRIAGE OF §
 §
 GWENDOLYN ULIJASZ-MCKEMIE § 301ST JUDICIAL DISTRICT
 & §
 JASON MCKEMIE § DALLAS COUNTY, TEXAS

ORDER ENFORCING 24-HOUR EMERGENCY HEALTHCARE ORDER

On this day, the Court considered **Jason McKemie's Motion to Enforce 24-Hour Emergency Healthcare Order and Request for Same-Day Registry Deposit.**

The Court finds that on December 17, 2025, the Court signed an emergency healthcare order requiring Petitioner to restore healthcare access within twenty-four (24) hours and requiring access sufficient for Jason McKemie to use healthcare coverage, prescriptions, HSA/FSA benefits, and medical-payment tools without obstruction.

The Court further finds that Petitioner did not timely provide functional compliance and that the delay prevented full restoration of benefits while restoration remained possible.

IT IS ORDERED that Petitioner shall deposit **\$20,643.56** into the **registry of the Court** no later than **8:00 p.m. on the date this Order is signed.**

IT IS FURTHER ORDERED that the \$20,643.56 payment is enforcement of the Court's prior emergency healthcare order and is not an offset against Jason McKemie's share of the marital estate.

IT IS FURTHER ORDERED that issues concerning additional reimbursement, waived benefits, Supplemental Life Insurance, Dependent AD&D, Critical Care Coverage, Flexible Spending Account loss, HSA underfunding, medical harm, surgery obstruction, and additional damages are reserved for later hearing.

IT IS FURTHER ORDERED that Petitioner shall not interfere with Jason McKemie's healthcare coverage, prescription access, HSA/FSA access, benefits cards, COBRA rights, plan-administrator communications, provider communications, pharmacy benefits, reimbursement tracking, claim access, or medical-payment tools.

IT IS FURTHER ORDERED that upon confirmation of deposit, the Clerk shall immediately release and disburse the \$20,643.56 to Jason McKemie without further hearing, further order, offset, withholding, or administrative delay.

END OF ORDER.

Copy from re:SearchTX

SIGNED on _____, 2026, at _____m.

JUDGE PRESIDING

NO: **DF - 24 - 18010**

**IN THE MATTER OF
THE MARRIAGE OF**

§
§
§
§
§
§

IN THE DISTRICT COURT

**GWENDOLYN ULIJASZ-MCKEMIE
&
JASON MCKEMIE**

301ST JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

**MOTION TO ENFORCE 24-HOUR EMERGENCY
HEALTHCARE BENEFITS REINSTATEMENT ORDER
AND REQUEST FOR SAME-DAY REGISTRY DEPOSIT**

TO THE HONORABLE JUDGE OF SAID COURT:

Jason McKemie moves to enforce the Court's December 17, 2025, emergency healthcare order and requests same-day monetary enforcement in the amount of **\$20,643.56**.

1. **On December 17, 2025**, the Court signed an emergency healthcare order requiring Petitioner to restore healthcare access within twenty-four (24) hours. The order required reinstatement of dependent healthcare coverage and access sufficient for Jason McKemie to use HSA/FSA benefits without obstruction. It also provided a monetary cure of **\$20,643.56** for COBRA preservation and HSA/FSA replacement amounts.
2. The 24-hour deadline was critical because Jason McKemie needed functional healthcare coverage, HSA/FSA access, and medical-payment tools to proceed with scheduled surgery and preserve 2025 and 2026 healthcare benefits.
3. Petitioner did not timely restore functional access. Instead, Petitioner delayed restoration, obstructed access to surgery, failed to provide a functional HSA card, and engaged in performative compliance, including providing a concealed or nonfunctional card in January 2026.
4. Petitioner also failed to renew benefits at the same or better levels/plans available in 2025. She waived or allowed waiver of Dependent AD&D, Supplemental Life Insurance for which Jason McKemie was a beneficiary, Critical Care Coverage, Flexible Spending Account coverage, and then virtually defunded the HSA.
5. Those waivers cannot now be cured through ordinary open-enrollment correction. The 2025 HSA/FSA funds cannot be restored through late promises, screenshots, attorney statements, or claimed future compliance.
6. Because Petitioner failed to comply when compliance was still possible, the only practical remedy is enforcement of the monetary cure already ordered: \$20,643.56.

7. **Jason McKemie requests that the Court order Petitioner to deposit \$20,643.56 into the Court registry by 8:00 p.m. on the date this enforcement order is signed.**
8. Jason McKemie further requests that the Court reserve all issues regarding reimbursement for waived benefits, lost dependent coverage, Supplemental Life Insurance, Dependent AD&D, Critical Care Coverage, FSA loss, HSA underfunding, medical harm, surgery obstruction, and additional damages for a subsequent hearing.
9. This restoration and reimbursement order is an enforcement remedy only. It is not a substitute for, waiver of, offset against, limitation on, or satisfaction of any separate healthcare-related benefit, coverage, reimbursement, funding mechanism, HSA/FSA access, insurance benefit, COBRA right, dependent benefit, medical-payment tool, or benefit-protection obligation owed to Jason McKemie under the Standing Orders, Temporary Orders, prior healthcare orders, employer plan documents, or applicable law. All other healthcare-related rights, benefits, funding mechanisms, reimbursement rights, and enforcement remedies are expressly preserved.

Respectfully Submitted,



Jason Emory McKemie

539 W Commerce St, Ste 2010

Dallas, TX 75208

214-868-4901

jmckemie@mckemie.net

Applicant, Pro Se

UNSWORN DECLARATION

My name is Jason Emory McKemie. My date of birth is April 8, 1976. My address is 539 W Commerce St, Ste 2010, Dallas, Texas 75208. I am over eighteen years of age, competent to make this declaration, and I have personal knowledge of the facts stated in this motion. I declare under penalty of perjury that the facts stated in this Application are true and correct.

Executed in **Dallas County, Texas** on **May 19th, 2026**.



Jason Emory McKemie

NO. DF-24-18010

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

ORDER ENFORCING 24-HOUR EMERGENCY HEALTHCARE ORDER

On this day, the Court considered **Jason McKemie's Motion to Enforce 24-Hour Emergency Healthcare Order and Request for Same-Day Registry Deposit.**

The Court finds that on December 17, 2025, the Court signed an emergency healthcare order requiring Petitioner to restore healthcare access within twenty-four (24) hours and requiring access sufficient for Jason McKemie to use healthcare coverage, prescriptions, HSA/FSA benefits, and medical-payment tools without obstruction.

The Court further finds that Petitioner did not timely provide functional compliance and that the delay prevented full restoration of benefits while restoration remained possible.

IT IS ORDERED that Petitioner shall deposit **\$20,643.56** into the **registry of the Court** no later than **8:00 p.m. on the date this Order is signed.**

IT IS FURTHER ORDERED that the \$20,643.56 payment is enforcement of the Court's prior emergency healthcare order and is not an offset against Jason McKemie's share of the marital estate.

IT IS FURTHER ORDERED that issues concerning additional reimbursement, waived benefits, Supplemental Life Insurance, Dependent AD&D, Critical Care Coverage, Flexible Spending Account loss, HSA underfunding, medical harm, surgery obstruction, and additional damages are reserved for later hearing.

IT IS FURTHER ORDERED that Petitioner shall not interfere with Jason McKemie's healthcare coverage, prescription access, HSA/FSA access, benefits cards, COBRA rights, plan-administrator communications, provider communications, pharmacy benefits, reimbursement tracking, claim access, or medical-payment tools.

IT IS FURTHER ORDERED that upon confirmation of deposit, the Clerk shall immediately release and disburse the \$20,643.56 to Jason McKemie without further hearing, further order, offset, withholding, or administrative delay.

END OF ORDER.

SIGNED on _____, 2026, at _____m.

JUDGE PRESIDING

NO. _____

JASON EMORY MCKEMIE	§	IN THE DISTRICT COURTS
APPLICANT	§	
	§	_____ JUDICIAL DISTRICT
GWENDOLYN LAURA ULIJASZ	§	
PETITIONER/ONE RESTRAINED	§	DALLAS COUNTY, TEXAS

[PROPOSED]

ORDER GRANTING LIMITED LEAVE TO ISSUE THIRD-PARTY SUBPOENAS AND PRESERVE SOURCE RECORDS

On this day, the Court considered Applicant Jason Emory McKemie's request for limited leave to issue third-party subpoenas and preserve source records related to the April 16, 2026, residence/property event, the lease/buyout and eviction issues, and healthcare/QLE benefits issues.

The Court finds that limited third-party source records are necessary to verify payment history, identify participants, preserve evidence, determine authority, trace property handling, and prepare for the noticed hearing. The Court further finds that neutral third-party records are necessary because self-generated summaries, screenshots, attorney letters, selective account images, or internally prepared representations are insufficient where neutral source records are available.

IT IS ORDERED that Applicant is authorized to issue subpoenas, subpoenas duces tecum, or other lawful third-party records requests to the following persons or entities:

1. The landlord, property manager, landlord-side agents, and any related records custodians concerning lease/buyout payments, rent ledgers, payment dates, payment amounts, security-deposit treatment, settlement funds, eviction communications, writ-related-communications, and any payment or agreement involving Petitioner or persons acting with or for her.
2. Moving Companies, Hired Crew, All My Sons Moving & Storage, and any other logistical agents including Merritt McClayton, Pamela Ulijasz Woodman, and any payment proxy or person involved in scheduling, funding, authorizing, modifying, dispatching, photographing, loading, unloading, moving, storing, damaging, destroying, or removing property on or around April 16, 2026.
3. Any security personnel, bodyguards, investigators, contractors, subcontractors, vendors, agents, payment proxies, or third parties involved in planning, funding, accessing, securing, monitoring, photographing, documenting, moving, storing, damaging, destroying, or removing property on or around April 16, 2026.
4. Dallas County Constable Precinct 5 and any related records custodian concerning body-worn camera footage, dashcam footage, dispatch audio, CAD logs, incident reports, supervisor notes, deputy/officer notes, photographs, videos, metadata, communications, identities of personnel present, and records concerning the April 16, 2026, writ/property event.

5. Accenture HR/Benefits, benefits administrators, COBRA administrators, HSA/FSA administrators, pharmacy-benefits administrators, and related custodians concerning any QLE, divorce-related benefits termination, healthcare reinstatement, HSA/FSA access, prescription access, benefits-card access, administrator communications, audit logs, call logs, and records concerning compliance or noncompliance with the December 17, 2025 Healthcare Reinstatement Order.

IT IS FURTHER ORDERED that any subpoena issued under this Order may request records sufficient to show dates, amounts, participants, payment sources, communications, instructions, authorizations, invoices, receipts, account records, metadata, call logs, emails, text messages, photographs, videos, reports, dispatch records, and records identifying any person who planned, funded, authorized, entered, accessed, secured, photographed, documented, moved, damaged, destroyed, stored, retained, or removed property on April 16, 2026.

IT IS FURTHER ORDERED that all subpoena recipients and parties shall preserve responsive records, including electronic records, metadata, photographs, videos, payment records, communications, call logs, text messages, emails, account records, invoices, dispatch records, and benefits records pending further order of the Court.

This Order is limited to source-record preservation, subpoena authorization, compliance verification, participant identification, payment tracing, and preparation for the noticed hearing. This Order does not finally adjudicate property ownership, contempt, sanctions, trespass, theft, fraud, discovery merits, or liability.

SIGNED on _____, 2026.

JUDGE PRESIDING

NO. **DF-24-18010**

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

**MOTION FOR LIMITED LEAVE TO ISSUE
THIRD-PARTY SUBPOENAS AND PRESERVE
SOURCE RECORDS BEFORE JUNE 1 HEARING**

TO THE HONORABLE JUDGE OF SAID COURT:

Jason Emory McKemie files this *Emergency Motion for Limited Leave to Issue Third-Party Subpoenas and Preserve Source Records Before June 1 Hearing*, and respectfully shows as follows:

I. RELIEF REQUESTED

Applicant requests limited leave to issue third-party subpoenas, subpoenas duces tecum, and related lawful records requests for neutral source records necessary to verify the facts before the June 1, 2026 hearing.

This motion is narrow.

Applicant is not asking the Court to decide theft, fraud, sanctions, contempt, trespass, liability, or final discovery merits through this motion.

Applicant is asking for source-record verification before the Court is forced to decide emergency relief based on competing self-generated documents, screenshots, attorney letters, selective summaries, and curated representations.

II. WHY THIS IS NECESSARY BEFORE JUNE 1

1. The June 1 hearing cannot provide meaningful relief without neutral third-party verification.
2. Every time Applicant appears with documentation, Petitioner produces competing documentation, screenshots, attorney letters, selective account images, or internally prepared narratives.

3. Without source records, the Court is left with document-versus-document conflict instead of neutral verification.
4. Procedural delay is the weapon.
5. Procedural delay has worked for seventeen months.
6. Procedural delay worked again when emergency relief was moved from the prior hearing date to June 1.
7. Without third-party verification, there will be no practical relief on June 1 because the record will remain artificially disputed.
8. Neutral source records are the only way to test payment history, participant identity, authority, instructions; communications, benefits/QLE compliance, and property handling.

III. LIMITED SUBJECT AREAS

Applicant requests leave limited to the following source-record categories:

1. Writ / Lockout / Residence / Property Records

Records from the landlord, property manager, landlord-side agents, constables, movers, security personnel, contractors, vendors, payment proxies, and anyone involved in planning, funding, authorizing, accessing, securing, photographing, documenting, moving, damaging, destroying, storing, retaining, or removing property during or related to the April 16, 2026 residence/property event and any later writ / lockout / cleanout attempt.

2. Lease / Buyout / Eviction / Payment Records

Records concerning lease-buyout payments, rent ledgers, payment dates, payment sources, payment amounts, security-deposit treatment, settlement funds, eviction communications, writ-related communications, landlord communications, and any payment or agreement involving Petitioner or persons acting with or for her.

3. Constable / Law-Enforcement / Writ Records

Records from Dallas County Constable Precinct 5 and related custodians concerning body-worn camera footage, dashcam footage, dispatch audio, CAD logs, incident reports, supervisor notes, deputy notes, photographs, videos, metadata, communications, identities of personnel present, and records concerning the April 16, 2026 writ/property event or any later writ attempt.

4. Accenture / QLE / Healthcare / Benefits Records

Records from Accenture HR/Benefits, benefits administrators, COBRA administrators, HSA/FSA administrators, pharmacy-benefits administrators, and related custodians concerning any QLE, divorce-related benefits termination, healthcare reinstatement, HSA/FSA access, prescription access, benefits-card access, administrator communications, audit logs, call logs, and records concerning compliance or noncompliance with the December 17, 2025 Healthcare Reinstatement Order.

IV. GOOD CAUSE

Good cause exists because the requested records are neutral source records held by third parties.

The records are necessary to:

1. identify who participated in the writ / lockout / residence event;
2. determine who funded, directed, authorized, or coordinated the event;
3. verify whether Petitioner or persons acting with her used a writ / lockout / cleanout process to remove property, evidence, medications, devices, or records;
4. preserve bodycam, dashcam, CAD, dispatch, mover, security, vendor, landlord, and payment records before they are lost or deleted;
5. verify lease, buyout, rent, eviction, and writ-related communications;
6. verify Accenture/QLE/benefits facts from source systems instead of screenshots or attorney summaries;
7. determine whether the December 17, 2025 Healthcare Reinstatement Order was functionally obeyed;
8. prepare for the June 1 hearing with source-record evidence instead of curated adversarial narratives.

V. WHY PARTY-GENERATED RECORDS ARE INSUFFICIENT

This case has repeatedly involved competing claims of compliance, selective documents, screenshots, internally prepared summaries, attorney letters, and self-serving narratives.

Those materials are not enough where neutral source records exist.

The Court should not be forced to decide emergency housing, healthcare, evidence-preservation, and status-quo relief based on documents controlled, filtered, or characterized by the very party whose conduct is at issue.

Third-party verification is the only practical way to prevent June 1 from becoming another procedural stall where the absence of source records is used to deny relief.

VI. REQUEST FOR LIMITED ORDER

Applicant requests that the Court sign the attached proposed order granting limited leave to issue third-party subpoenas and preserve source records.

Applicant further requests that the order authorize subpoenas or lawful records requests to the following categories:

1. landlord, property manager, landlord-side agents, and related records custodians;
2. moving companies, hired crews, All My Sons Moving & Storage, Merritt McClayton, Pamela Ulijasz Woodman, and any payment proxy or person involved in scheduling, funding, authorizing, modifying, dispatching, photographing, loading, unloading, moving, storing, damaging, destroying, or removing property;
3. security personnel, bodyguards, investigators, contractors, subcontractors, vendors, agents, payment proxies, and third parties involved in the April 16, 2026 residence/property event or later writ / lockout / cleanout activity;
4. Dallas County Constable Precinct 5 and related records custodians;
5. Accenture HR/Benefits, COBRA administrators, HSA/FSA administrators, pharmacy-benefits administrators, and related benefits custodians.

VII. LIMITING LANGUAGE

Applicant requests only limited source-record preservation and subpoena authority.

The requested order does not finally adjudicate property ownership, theft, fraud, contempt, sanctions, trespass, discovery merits, or liability.

The requested order is necessary so the Court has neutral source records before the June 1 hearing and so the record does not collapse again into delay, counter-documentation, and unverified representations.

VIII. PRAYER

Applicant respectfully requests that the Court:

1. grant limited leave to issue third-party subpoenas and subpoenas duces tecum;
2. authorize preservation of source records by third-party custodians;
3. authorize subpoenas and records requests related to the April 16, 2026 residence/property event, any later writ / lockout / cleanout attempt, lease/buyout/eviction issues, and Accenture/QLE/healthcare benefits issues;
4. permit expedited production before the June 1 hearing to the extent permitted by law, court order, and third-party ability;
5. order that responsive source records be preserved pending further order of the Court;
6. sign the attached proposed order; and
7. grant all other relief to which Applicant is entitled.

Respectfully Submitted,

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

**NOTICE: CONTAINS SENSITIVE CONTENT AND REFERENCES
MATERIALS REQUESTED FOR SEALED IN-CAMERA REVIEW**

NO. DF-24-18010

IN THE MATTER OF	§	IN THE DISTRICT COURT
THE MARRIAGE OF	§	
	§	
GWENDOLYN ULIJASZ-MCKEMIE	§	301ST JUDICIAL DISTRICT
&	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

FAMILY CODE TEMPORARY RESTRAINING ORDER

TO PRESERVE STATUS QUO AND RESTRAIN WRIT / LOCKOUT / CLEANOUT ACTIVITY PENDING HEARING

On this day, the Court considered Applicant **Jason Emory McKemie's** request for a **Family Code Temporary Restraining Order** to preserve **Status Quo** pending hearing.

The Court considered the application, declaration, exhibits, proposed order, and applicable law.

The Court finds that this case is a pending suit for dissolution of marriage and that the Court has authority under **Texas Family Code §§ 6.501, 6.502, and 6.503**, and **Texas Rules of Civil Procedure 680 and 683**, to issue temporary restraining relief preserving the parties, property, evidence, and family-court status quo pending hearing.

This Order is directed to **Gwendolyn Laura Uljasz**, Petitioner, and to persons acting in active concert or participation with her who receive actual notice of this Order. This Order does not purport to adjudicate the validity of another court's writ. It restrains Petitioner and persons acting with her from causing, financing, coordinating, requesting, assisting, facilitating, participating in, or using any writ / lockout / cleanout / property-removal process to destroy the status quo before this Court hears the matter.

FINDINGS:

The Court finds:

1. Applicant and Petitioner are parties to a pending divorce.
2. Applicant currently has access to shelter, remaining property, communication tools, utilities, medical access, evidence, and transportation.

3. The status quo as of today includes Applicant having a roof over his head, access to remaining property and evidence, access to phone/utilities, access to medical resources, and access to a vehicle necessary for medical, court, food, pharmacy, and evidence-preservation needs.
4. Applicant faces active or imminent writ / lockout / cleanout activity today.
5. Applicant faces immediate and irreparable harm before notice can be served and a hearing held.
6. The immediate harm includes homelessness, loss of remaining property, loss of evidence, loss of medications, loss of utility access, loss of phone access, loss of storage property, loss of vehicle access, and medical endangerment.
7. Applicant has congestive heart failure and serious medical vulnerability.
8. Applicant has presented evidence of medical-resource obstruction, medication loss, and physical harm.
9. Applicant has presented evidence that on April 16, 2026, defective service forced him away from the residence, after which security personnel entered, cameras were disabled, Petitioner arrived with outdated identification, and property/evidence/medications were removed, destroyed, discarded, or made inaccessible.
10. Applicant has presented evidence that Petitioner described the April 16 activity as needing to "grab more of this evidence."
11. Applicant has presented evidence that April 16 was not a normal move, but a destructive teardown involving electronics near trash, cameras ripped from walls, hard drives/evidence repositories missing or inaccessible, and property destruction.
12. Applicant has presented evidence of current emergency conditions, including no safe alternate housing, no funds to move remaining property, no food funds, no usable medication access, phone/utility/storage risk, and active writ risk.
13. If relief is not entered today, the family-court status quo will be destroyed before the Court can hear the matter.
14. A temporary restraining order is necessary to preserve property, protect the parties, preserve evidence, prevent medical endangerment, and prevent another writ / lockout / cleanout / removal event pending hearing.

IT IS THEREFORE ORDERED that Gwendolyn Laura Ulijasz, Petitioner, and all persons acting in active concert or participation with her who receive actual notice of this Order, including agents, representatives, security personnel, movers, contractors, vendors, landlord-side actors, storage actors, investigators, and any other person acting at her direction or for her benefit, are

TEMPORARILY RESTRAINED as follows:

1. WRIT / LOCKOUT / CLEANOUT / REMOVAL RESTRAINT

Petitioner shall not directly or indirectly cause, request, finance, coordinate, assist, encourage, facilitate, participate in, or complete any writ execution, lockout, re-key, residence cleanout, property removal, property transfer, property disposal, storage transfer, storage sale, utility interruption, access event, third-party entry, or removal/disposal event affecting Applicant, Applicant's residence, Applicant's remaining property, Applicant's medications, Applicant's evidence, Applicant's electronic data, or Applicant's ability to remain safely housed pending hearing.

2. STATUS QUO PRESERVATION

Petitioner shall preserve the status quo existing as of the date and time this Order is signed, including Applicant's access to shelter, remaining property, medications, evidence, communication tools, utilities, storage, vehicle access, and medical-access resources pending hearing.

3. RESIDENCE ACCESS RESTRAINT

Petitioner shall not go to, enter, access, approach, coordinate access to, or cause any person to access 5609 La Foy Blvd., Dallas, Texas 75209, or any area where Applicant's remaining property, records, evidence, medications, devices, or personal effects are located, except by further written order of this Court.

4. NO PROXY CONDUCT

Petitioner shall not use any third party, including security personnel, movers, contractors, vendors, landlord-side actors, investigators, attorneys acting outside legitimate litigation functions, friends, family members, agents, or representatives to do anything Petitioner is restrained from doing directly.

5. PROPERTY AND EVIDENCE PRESERVATION

Petitioner shall not access, review, copy, image, alter, delete, transfer, conceal, publish, disclose, rely on, use, destroy, discard, move, sell, transfer, or interfere with Applicant's security footage, hard drives, legal work product, drafts, case records, medical records, financial records, cloud data, creative work, professional files, devices, medications, or evidence repositories.

6. RECORD PRESERVATION

Petitioner shall preserve all April 16, writ, eviction, landlord, lease-buyout, All My Sons, Merritt McClayton Rahilly, security, Jetty Partners, Decisive Resources, vendor, payment, encrypted-message, benefits/QLE, HSA/FSA, Accenture, Public Storage, firearm, AirTag, Apple, SAPD, DPD, constable bodycam, CAD, dispatch, incident-note, property-handling, storage, utility, vehicle, and communications records.

7. SWORN INVENTORY

Petitioner shall preserve all medications, electronic devices, storage media, documents, records, evidence, and personal property of Applicant that are in Petitioner's possession, custody, or control, or in the possession, custody, or control of any person acting at her direction or for her benefit.

Within forty-eight (48) hours after service or actual notice of this Order, Petitioner shall serve Applicant with a sworn inventory, signed under penalty of perjury, identifying any such items presently known to be in her possession, custody, or control, including any items removed, handled, damaged, discarded, or retained during or after the April 16, 2026 residence-entry and property-removal event.

The inventory shall identify each item or category of items by general description, current location, and current condition. This provision is for preservation and chain-of-custody purposes only and does not require public disclosure of passwords, access keys, privileged material, or security-sensitive information absent further order of the Court.

8. VEHICLE STATUS QUO

Petitioner shall not directly or indirectly cause, finance, request, coordinate, assist, encourage, facilitate, or participate in any repossession, surrender, cancellation, disablement, transfer, interference, insurance interruption, registration interference, or possession interference affecting any vehicle currently used by Applicant, including any vehicle required for medical access, court access, housing access, pharmacy access, food access, or evidence preservation.

9. UTILITIES / PHONE / STORAGE / COMMUNICATIONS

Petitioner shall not directly or indirectly cause, finance, request, coordinate, assist, encourage, facilitate, or participate in any interruption, cancellation, disconnection, lockout, deletion, sale, transfer, destruction, or access restriction affecting Applicant's utilities, phone service, internet service, storage units, evidence storage, cloud accounts, communication tools, or remaining property.

10. NO RETALIATION

Petitioner shall not retaliate against Applicant for seeking this Order by making or causing police reports, welfare checks, fraud reports, benefits reports, storage reports, tracking/stalking reports,

employer reports, credit-card reports, financial-institution reports, landlord reports, or third-party accusations unsupported by source records.

11. NOTICE TO THIRD PARTIES

Applicant may present this Order to any constable, sheriff, mover, security vendor, landlord, locksmith, storage facility, utility provider, vehicle lender, benefits administrator, or other person or entity involved in any writ, lockout, cleanout, removal, service disruption, benefits access, vehicle access, storage sale, or property/evidence handling.

Any person acting in active concert or participation with Petitioner who receives actual notice of this Order is restrained to the extent permitted by Texas Rule of Civil Procedure 683.

12. NO COLLATERAL APPEAL FINDING

This Order does not vacate, reverse, or adjudicate the validity of any order issued by another court. This Order restrains Petitioner and persons acting in active concert with her from using, causing, financing, coordinating, facilitating, assisting, or participating in a writ / lockout / cleanout / removal process to destroy the family-court status quo, remove evidence, interfere with medications, or render Applicant homeless before this Court hears the matter.

HEARING

This matter is set for hearing on temporary injunction, protective order, healthcare enforcement, evidence preservation, emergency funds release, and further status-quo relief on:

Date: _____

Time: _____

Location: _____

EXPIRATION

This Temporary Restraining Order expires fourteen days from the date and hour of signing unless extended by written order, agreement, or further order of this Court.

BOND

Because this Order is entered under Texas Family Code §§ 6.501 and 6.503, the Court finds that no affidavit, verified pleading, or bond is required. Alternatively, if bond is required, bond is set at \$_____.

SIGNED on _____, 2026, at _____.m.

JUDGE PRESIDING

**NOTICE: CONTAINS SENSITIVE CONTENT AND REFERENCES
MATERIALS REQUESTED FOR SEALED IN-CAMERA REVIEW**

NO. DF-24-18010

IN THE MATTER OF	§	IN THE DISTRICT COURT
THE MARRIAGE OF	§	
	§	
GWENDOLYN ULIJASZ-MCKEMIE	§	301ST JUDICIAL DISTRICT
&	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

EXHIBIT MAP AND HYPERLINK REFERENCE INDEX

**IN SUPPORT OF APPLICATION FOR TEMPORARY EX PARTE PROTECTIVE ORDER,
UNSWORN DECLARATIONS, AND RELATED EMERGENCY RELIEF**

Applicant separately files an Exhibit Map and Hyperlink Reference Index identifying Exhibits A through X, with direct links and brief descriptions. The Exhibit Map is incorporated by reference into this Application, the supporting declarations, and the proposed orders submitted with this emergency packet.

- Application For Temporary Ex Parte Protective Order
- Unsworn Declarations
- And Related Emergency Relief

PROTECTIVE ORDER EXHIBIT MAP

Each exhibit uses a 3-row block: ID | NAME | LINK 1 / LINK 2 | DESCRIPTION. Add new exhibits by copying any complete 3-row block.

O	EXHIBIT INDEX AND CLICKABLE REFERENCE MAP
	https://tinyurl.com/POExhibitIndex
	Index of Exhibit's with clickable links to supporting documentation. Document includes descriptions of referenced materials for context.
A	DANE PATCHING DECLARATION
	https://tinyurl.com/DestructionDeclaration
	Independent witness evidence regarding April 16 aftermath, destructive handling, electronics and valuables near trash, camera/security damage, and Applicant not being the dangerous actor.
B	APRIL 16 WRIT AFTERMATH / TIMELINE / PHOTOS / VIDEOS
	https://tinyurl.com/WritAftermath
	Shows forced absence, timeline, prescription medication theft including heart medications, theft of approximately 60TB of litigation hard drives, property destruction, trash commingling, security disruption, and valuables in or near trash.
C	HEALTHCARE OBSTRUCTION CONTRADICTIONS MATRIX
	https://tinyurl.com/HealthcareMatrix
	Shows inconsistent compliance claims, HSA/FSA obstruction, nonfunctional healthcare-payment access, and why same-day monetary enforcement is necessary.
D	MEDICAL PHOTOGRAPHS / MEDICAL BENEFITS OBSTRUCTION
	https://tinyurl.com/MedicalHarm
	Shows medical vulnerability, infection recurrence, medication-access danger, edema/fluid-retention harm, and physical harm from medical-resource obstruction.
E	ONCOR MEDICAL CRITICAL CARE / CHRONIC CONDITION WAIVER
	https://tinyurl.com/DallasMedWaiver
	Physician-supported medical-risk anchor showing Applicant's medical vulnerability and need for uninterrupted power, medication access, and healthcare-payment access.
F	ILLEGAL WRIT / BANKRUPTCY EMERGENCY NOTICE
	https://tinyurl.com/WritRevoke
	Shows defective notice, forced absence, writ emergency, Petitioner arrival, missing medications, hard drives, and camera equipment.
G	PUBLIC STORAGE / FIREARM / GUN-REPORT PROOF / OFFICER-BATTERY CONTEXT
	https://tinyurl.com/GunAcquisition
	Supports firearm escalation, gun-related fear narrative, Public Storage allegation, Applicant's denial, and law-enforcement physical-danger context.
G2	BATTERY OF POLICE OFFICER, RESISTING ARREST.
	https://tinyurl.com/BatteryOfficer
	Supports officer-battery / resisting-officer context relevant to firearm and physical-danger analysis.
H	AIRTAG / APPLE / SAPD SOURCE RECORDS
	https://tinyurl.com/AirTagStalk
	Shows tracking/stalking narrative inversion and source records contradicting key portions of Petitioner's tracking allegations.
I	FALSE POLICE REPORT SUMMARY / DPD / SAPD RECORDS
	https://tinyurl.com/FalsePoliceReports
	Shows repeated police reports, investigations, detective contacts, Miranda warnings, and lack of substantiated tracking/stalking findings.
J	SEALED IN-CAMERA SUBMISSION / LIFE INSURANCE DENIALS / MEDICATION AND DANGER CONTEXT
	https://tinyurl.com/SealedSubmission
	Sealed context for death statements, behavioral escalation, medication discontinuation, future-risk factors, life-insurance/psychological-underwriting materials, and related danger evidence if the Court requests sealed review.

