

**NOTICE: THIS  
DOCUMENT CONTAINS  
SENSITIVE DATA**

CAUSE NO: DF-24-18010

Gwendolyn Ulijasz-McKemie § IN THE 254TH JUDICIAL DISTRICT COURT  
 APPLICANT §  
 VS. §  
 §  
 §  
 Jason McKemie § OF Dallas COUNTY, TEXAS  
 RESPONDENT §

## Application for Amended Temporary Ex Parte Protective Order

### 1. Parties:

Gwendolyn Ulijasz-McKemie

**Applicant**

Dallas

**County of Residence**

Mark this box if you are completing and filing this application on behalf of the Applicant.

Donna R. Tomlinson

**Name of Person Filing the Application**

Attorney for Applicant

**Title of Person Filing the Application**

Jason McKemie

**Respondent**

Respondent's address for service: 5609 La Foy Blvd., Dallas, Texas 75209

### 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)

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Current or former spouses                           | <input type="checkbox"/> Parent or child of the Respondent   |
| <input type="checkbox"/> Current or former dating partners                              | <input type="checkbox"/> Foster child or foster parent of the Respondent   |
| <input checked="" type="checkbox"/> Are or were members of the same family or household | <input type="checkbox"/> Applicant is dating or married to Respondent's current or former spouse or dating partner |
| <input type="checkbox"/> Parents of the same child(ren)                                 | <input type="checkbox"/> No relationship   |
| <input type="checkbox"/> Relatives  |  |

**4. Children Under Age 18 Who Need Protection:**

Name	Is Respondent the parent or guardian	
a. _____	<input type="checkbox"/> Yes	<input type="checkbox"/> No
b. _____	<input type="checkbox"/> Yes	<input type="checkbox"/> No
c. _____	<input type="checkbox"/> Yes	<input type="checkbox"/> No
d. _____	<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. \_\_\_\_\_

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?

\_\_\_\_\_

- (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:

Donna R. Tomlinson

Please explain why the court should prohibit direct communication from the Respondent:  
 Communication is abusive and constant. Respondent attempts communications at all hours and Respondent becomes angry with Petitioner attempts to conclude conversations.  
 (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, Texas 75209 during the time period of December 21 at 9am to December 27 at 9am

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)  
Dog - Katie  
\_\_\_\_\_
- 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.  
Vacate the residence located at 5609 La Foy Blvd., Dallas, Texas 75209 during the time period of December 21 at 9am to December 27 at 9am.  
\_\_\_\_\_  
\_\_\_\_\_

\*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, Texas 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. 5609 La Foy Blvd., Dallas, Texas 75209 during the time period of December 21 at 9am to December 27 at 9am

Order a law enforcement officer: to go with the Applicant to the residence; to tell the Respondent that the Court has ordered the Respondent to vacate the residence; to provide protection to the Applicant while the Applicant takes possession of the residence or while the Respondent takes possession of the Respondent's personal property; and to arrest the Respondent if the Respondent refuses to leave in violation of the Order.

Applicant requests exclusive use of the following property that the Applicant and Respondent jointly own or lease:

5609 La Foy Blvd., Dallas, Texas 75209 during the time period of December 21 at 9am to December 27 at 9am

Order the Respondent not to damage, transfer, encumber, or otherwise dispose of any property jointly owned or leased by the parties, including removing or disabling any vehicle owned or possessed by the Applicant or jointly owned or possessed by the parties.

10.  **Spousal Support Order** (Mark the box if the Applicant is married to the Respondent and would like spousal support)

**Applicant is married to the Respondent and requests the Court to order the Respondent to pay spousal support.**

11.  **Rights to Mobile Phone Numbers, Associated Devices, and Accounts** (Mark the box if asking to separate or transfer the wireless telephone account)

The Applicant asks the Court to order that the wireless telephone numbers that are used primarily by the Applicant or a person listed in this application as a person in need of protection be separated from the Respondent's wireless telephone service account. The Applicant asks for sole use, possession, and control of the following wireless telephone numbers and associated mobile devices, including sole billing responsibility and sole ownership of the mobile devices and wireless telephone service account associated with the wireless telephone numbers.

The Applicant further asks the Court to order the Respondent to pay the costs associated with transferring the wireless service account to the Applicant and the outstanding balance on the account.

The following wireless telephone numbers and associated mobile devices are used by the Applicant or the children listed in this Application.

(917) 471-1979

my phone number       child's phone number

my phone number       child's phone number

my phone number       child's phone number

(Sheet may be attached for additional numbers)

The Applicant asks the Court to prohibit Respondent from closing, limiting access to, or otherwise tampering with the wireless telephone service account associated with aforementioned mobile phone numbers and associated mobile devices until this Court determines who is the primary user of the mobile phone numbers and devices. Applicant also asks the Court to order the Respondent's wireless telephone service provider not to disclosure the Applicant's or other persons in need of protection contact information to the Respondent, including any new telephone numbers assigned to the Applicant or other person in need of protection.

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:

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**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: 5609 La Foy Blvd., Dallas, Texas 75209

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: Donna R. Tomlinson  
 Address: 4201 Spring Valley Road, Suite 1210, Dallas, Texas 75244

**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.

Donna R. Tomlinson

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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*):

4201 Spring Valley Road, Suite 1210, Dallas, Texas 75244

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214.420.0100

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**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 Gwendolyn Ulijasz-McKemie (First Middle Last)

my date of birth is 05/27/1978, and my address is

5609 La Foy Blvd., Dallas, Texas, 75209 United States  
(Street) (City) (State) (Zip Code) (Country)

I declare under penalty of perjury that the foregoing is true and correct.  
Executed in \_\_\_\_\_ County, State of \_\_\_\_\_  
day of \_\_\_\_\_, \_\_\_\_\_ (Month) \_\_\_\_\_ (Year).  
\_\_\_\_\_  
(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:

See Petitioner's Supporting Declaration attached as Exhibit A and incorporated herein for all purposes.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- a. In what county did this happen? Dallas
- b. On what date did this happen? \_\_\_\_\_
- c. Was a weapon involved?  Yes  No If yes, what kind?  
\_\_\_\_\_
- 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?  
\_\_\_\_\_
- g. Were you injured?  Yes  No If yes, describe your injuries:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- 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.

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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:

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e. Did you seek medical care?  Yes  No

4. Has the Respondent ever been convicted of family violence?  Yes  No  
If yes, list when and in which county and state the conviction(s) occurred:

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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:

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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, Texas 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:

See Petitioner's Supporting Declaration attached as Exhibit A and incorporated herein for all purposes.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



See Petitioner's Supporting Declaration attached as Exhibit A and incorporated herein for all purposes.

Applicant signs here

**NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA**

**NO. DF-24-18010**

**IN THE MATTER OF  
THE MARRIAGE OF**

**GWENDOLYN ULIJASZ-MCKEMIE  
AND  
JASON MCKEMIE**

§  
§  
§  
§  
§  
§

**IN THE DISTRICT COURT**

**254TH JUDICIAL DISTRICT  
DALLAS COUNTY, TEXAS**

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**PETITIONER'S SUPPORTING DECLARATION**

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In accordance with Texas Civil Practice & Remedies Code § 132.001, the following unsworn declaration is made:

My name is Gwendolyn Uljasz-McKemie. My date of birth is May 27, 1978, and my address is 5609 La Foy Blvd., Dallas, Texas 75209. I am above the age of eighteen years, and I am fully competent to make this declaration.

I am the Petitioner in this case. The facts stated in this Declaration are within my personal knowledge and are true and correct.

Jason McKemie is Respondent, and we were married on June 22, 2024.

I am in fear of Jason McKemie based on his manic behavior and drug use that have escalated over the past few months. Jason has become more verbally abusive, and his threatening behavior has escalated. As a result, I have left the marital home as I no longer feel safe in the same proximity with him.

Unbeknown to me during our courtship, Jason has been a consistent drug user and also has a neurological diagnosis that he has left untreated. On the morning of our wedding ceremony on June 22, 2024, I found out that Jason McKemie had been participating in daily drug use and had serious addiction issues. Jason admitted to me on the morning of our wedding, that this had been present in this life, had been ongoing, and gotten worse in the weeks prior to our wedding ceremony. Since that time to the present, Jason's behavior has evolved from what I would characterize as "unusual" in March/April of 2024, to "troubling" in the week leading up to the wedding, to "concerning" and then "frightening and aggressive" thereafter. His mania, stalking, and aggression is escalating and has peaked in the last two weeks.

During the time Jason lived in my home at 4223 Travis Street from August 2023 until March 2023, Jason's behavior was balanced, loving, and doting. While he stayed up late some nights, I recall that it was within reason. Jason had assured me that his previous drug use was in the past. This was important to me because I had not had a drink in almost ten years, did not use drugs, and I am still active and sponsored in Alcoholics Anonymous.

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**PETITIONER'S SUPPORTING DECLARATION  
MCKEMIE**

**EXHIBIT**

**A**

**PAGE 1 OF 4**

exhibitster.com

I had no knowledge that Jason was already a daily drug user when our wedding ceremony took place on June 22, 2024. I only saw that his behavior changed in the months leading up to the wedding. I attributed it to a few other significant stressors going on at that time. He had expressed stresses with his job over the 10 months prior to the wedding and he was frustrated. We also had to unexpectedly relocate on short notice (8 weeks notice) before our wedding. This was the result of a broken pipe that flooded that home. He was anxious and irritable, smoking more but I attributed it to the job, unexpected move and wedding planning.

On June 22<sup>nd</sup> we wed. I returned to work for a few days after my wedding but took time off on July 6<sup>th</sup>. During this time, I noticed that Jason's behavior was becoming more alarming, and I was concerned. He was keeping extremely late nights, would leave food all over the floor in the kitchen, would always seem to be losing his balance and was perspiring so much in his sleep that I would have to change the linens frequently. I noticed that Jason was taking about 8 different prescription medications daily. When I questioned him about this, his explanation was that the "meds hit him wrong." As things continued, I was concerned that he might be taking drugs and tried to confront him several times, but it ended in either dismissiveness or prolonged aggressive arguments.

In September Jason's verbal abuse became more frequent. He started calling me names regularly. I kept a running list because I knew that something was very wrong and getting worse. I had not seen or heard him behave abusively before. He repeatedly calls me a "bitch," "evil," "selfish," a "punisher," and a "liar," and "Satan." Several times he has call me a "cunt" or a "cuntbag." He walks around the house muttering some of this and also at night. In addition to the verbal abuse, Jason has also started to shop incessantly. He seems to have developed a shopping addiction as a part of his manic episodes.

On September 5, 2024, Jason woke me up at 3am in the bedroom. He was crying and yelling and walking in a small circle between my side of the bed and the dresser. He screamed that he "could not see." He said this over and over and was hysterical. Once I got him in bed, he told me he had bought GHB and had taken too much again. His drug use continues, and his manic episodes are becoming more frequent as a result.

He has fallen into a pattern of non-stop talking about anything that interests him for prolonged periods of time, and then regularly and viciously accusing me of not taking "30 seconds" for him to show me something because he is "not important and [I] hate him." Often it is centered around Elon Musk, technology, or what he has bought or plans to buy on Amazon. If I do not match his enthusiasm or if question the necessity of the purchases, he becomes agitated and will try again to engage me and explain. He will do it over and over and then gets highly agitated. This has become repeat behavior and has escalated to the point where I feel threatened, and I am afraid to physically move, for fear of it becoming physical. I cannot leave the room without having him follow me to continue to reengage and prove his point while he tells me that I am "Satan" and "evil."

I do not feel safe, I cannot exit these conversations without repercussions for not giving

him the attention he demands on his topic of choice when he demands it. This is a constant pattern in the home and escalates constantly. Not even when I try multiple times to excuse myself.

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

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

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

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

Upon careful inspection of my laptop, I found that a keystroke software program had been installed in early December on my Mac. Upon further review, I found that he had deleted the files from my computer that were important. More digging on my Mac showed that he had put an AirTag in my car, which he did early Friday morning when I could not find him in the house, and accidentally surprised him in the garage. It was clear to me that he was fiddling around with something in my car, which he never drives, and we never drive in together. He told me he was looking for "a cable."

Jason continues to intimidate and threaten me and has most recently informed me that

he will continue this behavior. On the evening of December 16, 2024, Jason sent a text that he would not allow me to have time on my own in the house. He stated that any entrance in our home would be monitored by him and his friends.

I am frightened enough that I am living out of a suitcase with nowhere to go. I am afraid and I believe that the escalation in name calling, increasingly aggressive and now threatening talk and stalking behaviors will become violent. I have now realized that Jason has been digitally stalking and tracking me, whether I am in the home or not. I am deeply concerned that despite my best efforts to remove spyware on my Mac and disconnect shared apps on my phone and similar items, he is unrelenting in his efforts to know my whereabouts and keep track of what I am up to.

The constant verbal abuse along with my fear of physical harm has resulted in me getting physically sick from lack of sleep and stress. Jason's constant manic behavior has caused me so much stress and fear that I am unable to function properly at work. I am afraid to go home, and I do not have friends or family to stay with and feel safe.

As of December 18, 2024, Petitioner is now aware that Respondent has removed documents from the computer which are necessary for her continued employment. Petitioner needs access to the home for a substantial amount of time, to regain possession of files and documentation required to respond to her job. Petitioner is asking for at least 72 hours to be able to access and utilize the necessary documentation to gather her possessions, her vehicle and her dog, Katie, so that she can seek temporary residence elsewhere. Petitioner has worked diligently to obtain a civil escort through law enforcement agencies and is unable to either get anyone or get any accompany for more than an hour. She has also been made aware that it will be for only one visit, and she has been made aware that she is unable to utilize law enforcement for multiple visits.

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

Executed on December 20, 2024.

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Gwendolyn Ulijasz-McKemie, Declarant

### Automated Certificate of eService

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Crystal Martinez on behalf of Donna Tomlinson

Bar No. 24046868

crystal@jhfamilylaw.com

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Status as of 12/20/2024 2:10 PM CST

Associated Case Party: GWENDOLYN ULIJASZ MCKEMIE

Name	BarNumber	Email	TimestampSubmitted	Status
Crystal Martinez		crystal@jhfamilylaw.com	12/20/2024 12:19:08 PM	SENT
Donna Tomlinson		donna@jhfamilylaw.com	12/20/2024 12:19:08 PM	SENT

Associated Case Party: JASON MCKEMIE

Name	BarNumber	Email	TimestampSubmitted	Status
Brant M.Webb		firm@webbfamilylaw.com	12/20/2024 12:19:08 PM	SENT
Betty Villarreal		betty@webbfamilylaw.com	12/20/2024 12:19:08 PM	SENT