

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. DF-24-18010

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

COVER PAGE: OBJECTION INVENTORY PROCEDURAL NOTIFICFATION

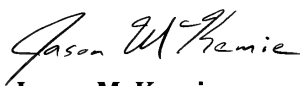
TO THE HONORABLE JUDGE WHELAN:

Respondent Jason McKemie respectfully submits this combined procedural and evidentiary notice containing:

- (1) A formal objection to Petitioner's unilaterally submitted inventory and property claims, and
- (2) A judicial notice outlining a repeated procedural pattern by Petitioner involving discovery misconduct and litigation abuse.

These filings are submitted together for the Court's immediate review and are necessary to preserve Respondent's rights, request judicial oversight, and ensure all future property and evidentiary rulings are based on fully examined and fairly contested records.

Respectfully submitted,



Jason McKemie

5609 La Foy Blvd
Dallas, TX 75209
jmckemie@mckemie.net

Dated: **July 30, 2025**

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&	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

JUDICIAL NOTICE OF OBJECTION TO FURTHER PROCEEDINGS UNDER RULE 18a(g)

TO THE HONORABLE COURT:

Respondent respectfully files this notice to formally object to any further hearings, rulings, trial activity, or procedural advancement in this matter until the pending Rule 18a Motion to Recuse is resolved.

Pursuant to Texas Rule of Civil Procedure 18a(g), the Court is prohibited from taking any further action on the merits of the case while a motion to recuse is pending. This includes setting or proceeding with trial, issuing final orders, or ruling on dispositive motions.

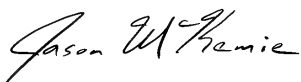
This objection is submitted to preserve Respondent’s procedural rights under the Texas Rules of Civil Procedure. Respondent respectfully requests acknowledgment from the Court that all substantive proceedings in this matter are presently stayed.

This objection does not preclude the Court from considering temporary emergency relief that does not affect the merits of the case, such as medical stabilization or interim financial support. To that end, Respondent will be submitting two supplemental documents:

1. A formal evidentiary supplement concerning the January 7, 2025 hearing and supporting the Rule 18a motion; and
2. A targeted request for temporary emergency relief to address medical, housing, and basic survival needs during the pendency of the Rule 18a determination.

These filings are being finalized and will be delivered to the Court promptly. Respondent files this notice in the meantime to preserve jurisdictional clarity and ensure that no prejudicial action is taken while recusal remains unresolved.

Respectfully submitted,



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

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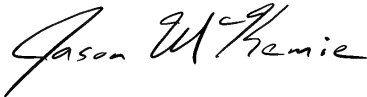
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&	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

RESPONDENT’S FORMAL OBJECTION TO PETITIONER’S UNILATERAL INVENTORY AND PROPERTY CLAIMS SUBMITTED PRIOR TO TRIAL

- Respondent Jason McKemie respectfully files this objection to Petitioner’s sworn asset inventory, property classifications, and financial account listings submitted via Dropbox prior to the July 23, 2025 bench trial. These documents were not exchanged through formal discovery, were not reviewed in advance by Respondent, and were presented without meeting, negotiation, or acknowledgment.
- Petitioner’s legal team unilaterally submitted their asset designations and household property claims in a bulk Dropbox folder which included numerous misclassifications of community property as Petitioner’s separate property. No evidentiary meeting was held. No response or opportunity to confer was extended. Respondent was medically impaired, pro se, and financially severed at the time of this submission and therefore had no ability to review or contest these claims.
- Respondent objects in full to the asset classifications, household property claims, and account designations made therein, and reserves the right to seek:
 - Judicial reclassification of disputed property.
 - Reopening of property-related discovery under Tex. R. Civ. P. 270.
 - Exclusion of misclassified items as untimely or improperly disclosed.
 - Sanctions for abuse of the discovery process under Tex. R. Civ. P. 215.

- This objection is necessary to preserve Respondent's rights and prevent the use of false or unexamined asset claims as the basis for future rulings. Respondent respectfully requests that the Court disregard any uncontested assumptions of ownership presented solely through Petitioner's pre-trial Dropbox submission and set a hearing if necessary to resolve disputed items.

Respectfully submitted,

A handwritten signature in black ink that reads "Jason McKemie". The signature is written in a cursive, flowing style.

Jason McKemie, Pro Se
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Filing Code Description: Objections - Misc

Filing Description: COVER PAGE OBJECTION INVENTORY
PROCEDURAL NOTIFICATION 18010)

Status as of 7/30/2025 9:42 AM CST

Case Contacts

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