

**NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA**

**DF-24-18010**

**NO.** \_\_\_\_\_

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**IN THE MATTER OF  
THE MARRIAGE OF**

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§

**GWENDOLYN ULIJASZ-MCKEMIE**

**JASON MCKEMIE**

**IN THE DISTRICT COURT**

**254<sup>th</sup> JUDICIAL DISTRICT &**

**DALLAS COUNTY, TEXAS**

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**FILE UNDER SEAL**

**EMERGENCY MOTION FOR IMMEDIATE FINANCIAL  
RELIEF, OBJECTION TO TRIAL SETTING FOLLOWING  
RULE 18a RECUSAL, AND REQUEST FOR WRIT-ELIGIBLE  
COURT ACKNOWLEDGMENT**

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**FILED UNDER SEAL**

**Pursuant to Texas Rules of Civil Procedure**

This document is submitted under seal in accordance with the Texas Rules of Civil Procedure and is not to be disclosed or made publicly accessible without further order of the Court.

Respondent expressly reserves the right to move for this document to be unsealed, in whole or in part, should it become necessary to introduce the contents into the public record for purposes of evidentiary proceedings, judicial review, or to rebut perjury, misrepresentation, or litigation misconduct.

Nothing herein shall be construed as a waiver of Respondent's right to make the contents public if required to protect due process, expose fraud, or preserve the integrity of the record.

Respectfully submitted,

Jason McKemie  
Pro Se Respondent  
539 W Commerce St, Ste 2010  
Dallas, TX 75208  
(214) 868-4901  
[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

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| <b>IN THE MATTER OF</b>          | <b>§</b> | <b>IN THE DISTRICT</b>                           |
| <b>COURT THE MARRIAGE OF</b>     | <b>§</b> |  |
|                                  | <b>§</b> |  |
| <b>GWENDOLYN ULIJASZ-MCKEMIE</b> | <b>§</b> | <b><u>254<sup>th</sup></u> JUDICIAL DISTRICT</b> |
| <b>&amp;</b>                     | <b>§</b> |  |
| <b>JASON MCKEMIE</b>             | <b>§</b> | <b>DALLAS COUNTY, TEXAS</b>                      |

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**THIS RECUSAL WAS INITIATED BY RESPONDENT.**

**PURSUANT TO TEXAS RULE OF CIVIL PROCEDURE 18a. AS THE MOVING PARTY,  
RESPONDENT HAS A LEGAL RIGHT TO BE HEARD ON THE PROCEDURAL AND  
EVIDENTIARY ISSUES THAT NECESSITATED THE RECUSAL PRIOR TO ANY TRIAL  
SETTING OR FURTHER MERITS HEARING. TO PROCEED OTHERWISE WOULD  
CONSTITUTE A DENIAL OF DUE PROCESS.**

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**TO THE HONORABLE JUDGE OF THE 302ND DISTRICT COURT:**

Comes now, **Jason McKemie**, Respondent pro se in the above-referenced matter, and submits this formal objection to any attempt to set this matter for trial. This objection is submitted pursuant to **Texas Rule of Civil Procedure 18a**, which governs judicial recusals and the due process rights of the moving party. The recusal in this matter was filed by Respondent, was not contested by opposing counsel, and was granted.

Under Rule 18a(i)(3), the moving party **has a right to be heard on the issues giving rise** to the recusal before the matter may proceed to trial or be ruled on by the newly assigned judge.

This document presents a **non-exhaustive summary** of the procedural violations and evidentiary concerns that support the recusal and require judicial review. A full record is being compiled and will be submitted separately.

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## **I. THIS RECUSAL WAS INITIATED BY RESPONDENT**

This recusal was not mutual, incidental, or administrative. It was filed by **Respondent**, and it arose out of a documented pattern of procedural suppression, unequal treatment, and deprivation of fundamental rights. Respondent hereby asserts his legal right to be heard prior to any trial setting or merits hearing. To proceed without addressing the basis for the recusal would constitute a violation of due process under both state and federal law.

Respondent appeared before **Judge Kimberly Brown** and requested two things:

**Emergency financial relief to prevent eviction**, and enforcement of his rights under **Texas Rule of Civil Procedure 18a** following a motion to recuse.

Judge Brown informed Respondent that he **could not have both**, and explicitly asked him to choose:

**“Do you want relief, or do you want the recusal?”**

In that moment, Respondent was being forced to decide between **basic survival and constitutional due process** – between **a place to sleep** and **a fair trial**.

Respondent firmly believes that the Constitution guarantees **both**, and that no litigant should ever be required to sacrifice one to access the other.

But when faced with another night without food, and the potential of a fair trial, **he choose to not eat**.

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## **I. INTRODUCTION AND PROCEDURAL POSTURE**

Comes now Jason McKemie, Respondent pro se in the above-referenced matter, and submits this formal objection to any attempt to set this matter for trial. This objection is

submitted pursuant to **Texas Rule of Civil Procedure 18a**, which governs judicial recusals and the due process rights of the moving party.

The recusal in this matter was filed by Respondent, was not contested by opposing counsel, and was granted. Under Rule 18a(i)(3), the moving party has a right to be heard on the issues giving rise to the recusal before the matter may proceed to trial or be ruled on by the newly assigned judge.

This declaration presents a non-exhaustive summary of the procedural violations and evidentiary concerns requiring urgent judicial review. A full evidentiary timeline will be filed by **10:00 AM on Friday, July 25, 2025**.

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## **II. URGENCY AND IMMINENT HARM**

Respondent is facing **imminent eviction and homelessness**, with a final court-acknowledged deadline of **Monday, July 28, 2025**. He has not eaten in several days, is relying on food pantries, and is actively fighting a **life-threatening staph infection** without access to medication.

An **eviction hearing is scheduled for Friday, July 25th at 10:00 AM CST**. Respondent urgently requests a signed document confirming this case is not trial-ready due to the pending recusal and unresolved due process claims.

This crisis is the direct result of an extended pattern of obstruction by **Petitioner and her counsel, Sullivan & Cook LLP**, who have strategically cut off Respondent from all financial, medical, and legal resources.

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## **III. EIGHT MONTHS OF FINANCIAL STRANGULATION**

Since **December 18, 2024**, Petitioner has completely severed Respondent from access to marital assets, including **HSA cards required for life-saving prescriptions**.

- Petitioner is the **sole financial guarantor** of the marital residence.
- Despite this, Respondent was unilaterally assigned **100% of the \$25,000/month financial obligation**, while two days post-op from spinal surgery.
- Respondent has no income, no legal representation, and no access to basic necessities, including medication.

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#### **IV. FINANCIAL HISTORY AND PATTERN OF DECEPTION**

When Respondent moved into the marital residence in **August 2023**, Petitioner's income was stable at approximately **\$350,000/year**. Within 12 months, it had increased by **440% to \$1.5 million/year**.

This gain was not unilateral. Respondent provided strategic, operational, and technical support, working alongside Petitioner in a collaborative business model. Petitioner explicitly credited Respondent's involvement with this growth.

In **November 2024**, Respondent was offered a **\$250,000/year W-2 job**, which Petitioner **forbade him to accept**, citing that continued collaboration would produce more value. Unknown to Respondent, Petitioner had already begun:

- Concealing assets
- Opening undisclosed accounts
- Diverting marital funds for personal use

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#### **V. MEDICAL NEGLECT AND HSA SABOTAGE**

After spinal surgery in **December 2024**, Petitioner reported Respondent's rehabilitation equipment and legal retainer as "fraud," cutting off access to both medical and legal recovery.

In **July 2025**, while hospitalized with cellulitis, Respondent received HSA access temporarily and filled a \$41 prescription. Petitioner revoked the card the following day, blocking access to critical medications, including those for congestive heart failure. Sullivan & Cook was notified but took no corrective action.

Respondent has been off vital medication for over three months.

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#### **VI. SYSTEMIC JUDICIAL OBSTRUCTION**

## SYSTEMIC DUE PROCESS VIOLATIONS

Respondent has been repeatedly and systematically obstructed from obtaining any judicial relief, including emergency support, enforcement of standing orders, and financial access. Specific examples include:

### Coordinated Procedural Obstruction and Judicial Lockout

Respondent has encountered repeated and compounding procedural barriers that have effectively denied him access to judicial relief. The following patterns have emerged:

- **Judicial Lockout via Conditional Access** - On multiple occasions, when Respondent attempted to appear before District Judge Bedard to seek emergency or procedural relief, he was told that **the Court could not proceed unless opposing counsel was present.**
- **Strategic Absence by Opposing Counsel** - When Respondent notified opposing counsel (Sullivan & Cook) in advance of his intent to appear and seek relief, **they failed to appear.**
- **Stonewalling of Scheduling Attempts** - When Respondent formally requested opposing counsel's availability for a hearing or emergency review, **no response was provided.**
- **Rejection of Good-Faith Appearances** - When Respondent appeared in good faith, having given notice and prepared materials, **he was told the Court could not act in their absence.**
- **Escalation to Removal** - When Respondent requested to proceed anyway – in light of opposing counsel's repeated non-engagement – **he was physically removed from the courthouse.**

This is a textbook procedural catch-22: Respondent is blocked from relief unless opposing counsel attends, and opposing counsel simply refuses to attend. This is a tactical abuse of courtroom protocol designed to obstruct one party entirely from access to justice.

### Respondent has made repeated efforts to appear before:

- **District Judge Debard**
- Associate judges

At least **eleven documented emergency hearing attempts** were made in a 14-day span. Every attempt was blocked:

- If Respondent notified Sullivan & Cook, they refused to appear
- If he asked them for availability, they gave no response
- If he appeared anyway, the Court refused to proceed
- If he insisted, bailiffs removed him from the courthouse

This created a **closed-loop of procedural denial**, fully exploited by Sullivan & Cook, to prevent:

- Emergency relief
  - Discovery enforcement
  - Financial access
  - Judicial review of certified financial misconduct
- 

## **VII. DISCOVERY FAILURE AND CERTIFIED FRAUD**

Respondent served discovery in good faith. Petitioner refused to respond.

- **Sullivan & Cook LLP withdrew**, only to re-enter 15 minutes before the deadline to object to all requests.
- Respondent received no usable financial data – only redacted screenshots lacking balances or metadata.
- Numerous known accounts remain concealed.

Respondent has filed:

- A **Motion to Preserve Metadata**
- A sworn declaration disavowing a black binder falsely attributed to him
- Multiple notices flagging that Sullivan & Cook certified **incomplete and materially false financials**

They continue to declare the case trial-ready to avoid exposing those records to judicial review.

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## **VIII. PATTERN OF ABUSE AND LITIGATION STRATEGY**

This case centers on a litigant who has repeatedly weaponized the civil and criminal justice system for gain. Petitioner has used legal proceedings to:

- Wrongfully evict former partners
- Silence third-party witnesses
- Intimidate landlords and employers
- Block direct and indirect communication

Petitioner is believed to spend over **\$100,000/year on litigation** and has received confidential cash settlements from at least **three former employers**.

Her sister, Pamela Woodman, submitted **perjured testimony** contradicted by video and used to justify a protective order.

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## **IX. PRAYER FOR RELIEF**

Respondent respectfully requests that the Court:

1. Decline to set trial until this full record is reviewed;
  2. Issue documentation that Respondent may present at his **July 25 eviction hearing** confirming that the case is stayed and relief is pending;
  3. Grant immediate financial relief, including access to marital funds, to prevent irreparable harm (DETAILS FORTHCOMING);
  4. Schedule a hearing on due process violations, evidentiary suppression, and financial access;
  5. Reopen discovery and enforce full disclosure of concealed accounts;
  6. Rule on all pending motions, including:
    - Spousal support
    - Legal fee equalization
    - Subpoena requests
    - Emergency access to healthcare
  7. Formally acknowledge Respondent's rights under Rule 18a;
  8. Order the release of funds or direct Petitioner to provide immediate access to HSA benefits and marital accounts.
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**Respectfully submitted,**

A handwritten signature in black ink that reads "Jason McKemie". The signature is written in a cursive style with a large, stylized initial 'J' and 'M'.

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

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**WRIT OF POSSESSION**

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**[PROPOSED] ORDER GRANTING EMERGENCY WRIT OF POSSESSION TO STAY EVICTION**

On this day, the Court considered **Respondent** Jason McKemie’s Emergency Motion for Immediate Relief and Request for Writ of Possession to Stay Eviction Proceedings related to the property located at:

**5609 La Foy Boulevard, Dallas, Texas 75209**

Having considered the motion and the circumstances presented therein, the Court finds that immediate relief is necessary to prevent irreparable harm, including eviction, homelessness, and disruption of pending judicial proceedings.

**IT IS THEREFORE ORDERED that:**

1. A **writ of possession** is hereby issued in favor of **Respondent Jason McKemie** for the above-referenced property, to remain in effect pending further orders of this Court;
2. This Order shall be presented by Respondent at the scheduled eviction hearing on **Friday, July 25, 2025 at 10:00 AM**, to serve as official notice of the Court’s intervention and the stay of eviction enforcement;
3. All eviction proceedings related to 5609 La Foy Boulevard, Dallas, Texas 75209 are **hereby stayed** until further review and determination by this Court.

SIGNED on this the \_\_\_\_ day of July, 2025.

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**JUDGE PRESIDING**  
302nd District Court  
Dallas County, Texas