

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

NOTICE REGARDING LOSS OF HEALTH COVERAGE, QUALIFYING LIFE EVENT, AND REQUEST FOR LEAVE TO ISSUE SUBPOENA TO EMPLOYER HR

TO THE HONORABLE COURT:

Jason McKemie (Respondent) files this Notice in response to *Petitioner’s Emergency Motion to Stay and Clarify Temporary Orders, Notice of Impossibility of Compliance, and Request for Appearance by Videoconference*.

I. Loss of Health Coverage and Qualifying Life Event (QLE)

I submit this Notice to advise the Court that my employer-sponsored dependent health coverage has been terminated. Petitioner has asserted that the termination was based on the occurrence of a **Qualifying Life Event (QLE)**.

I dispute both the factual basis and the timing of any qualifying event and have not been provided documentation sufficient to determine whether any reported QLE was valid, properly reported, or consistent with applicable plan rules and governing law. As a result of the termination, I am currently without active health coverage and have suffered immediate medical and financial harm.

The records necessary to verify the existence, nature, and accuracy of the asserted QLE—including employer communications, benefit change submissions, and plan administrator records—are maintained by Petitioner’s employer, **Accenture**, and are not within my possession or control.

Accordingly, I provide notice that, absent voluntary production of complete and accurate information, I will seek leave of Court to issue a **narrowly tailored subpoena** to Accenture Human Resources and/or the applicable plan administrator to obtain records necessary to determine whether the loss of coverage was properly effectuated and whether Petitioner’s claimed inability to comply with existing orders is supported by objective evidence.

I.A. Healthcare Coverage – Petitioner’s Claim of Impossibility

In her filing, Petitioner asserts that it is “impossible” for her to comply with the Court’s healthcare order because my coverage was terminated through her employer’s ERISA-governed plan and that eligibility determinations were made by the plan administrator outside her control.

For purposes of this Notice, I do not dispute Petitioner’s assertion that reinstatement authority rests with the employer or plan administrator. However, Petitioner’s position places the alleged qualifying life event, its timing, and the representations made to the employer and plan administrator directly at issue.

I therefore provide notice that a **narrowly tailored Motion for Leave to Serve Third-Party Subpoenas** will be filed promptly to obtain records necessary to determine:

1. Whether a qualifying life event was reported;
2. Who reported it;
3. When it was reported;
4. What documentation was submitted in support of it; and
5. Whether the information provided was accurate.

This relief is sought solely to resolve the factual basis underlying Petitioner’s claim of impossibility and to permit the Court to evaluate compliance and enforcement based on verified records rather than competing assertions.

II. Lease Buyout and Eviction Proceedings

Petitioner’s filing also references the former marital residence at **5609 La Foy Blvd** and ongoing eviction proceedings. As previously placed on the record, Petitioner represented that a lease buyout was executed approximately six months in advance, yet eviction actions have continued to be pursued against me.

The existence, timing, amount, and funding source of any such lease buyout remain unresolved and are the subject of pending and forthcoming discovery requests. I note this issue solely to preserve the record and do not seek adjudication of those facts through this Notice.

III. Purpose of This Notice

I submit this Notice for the limited purpose of:

- Acknowledging Petitioner's stated basis for noncompliance;
 - Advising the Court that Petitioner's assertions necessitate limited third-party discovery; and
 - Providing advance notice of an imminent motion seeking subpoena authority to obtain objective records relevant to the issues Petitioner has raised.
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IV. Request for Relief

WHEREFORE, PREMISES CONSIDERED, I respectfully request that the Court:

1. Accept this Notice for purposes of clarifying the factual issues raised by Petitioner's asserted impossibility of compliance with the Court's healthcare order;
 2. Take notice that Petitioner's assertions regarding loss of health coverage place the existence, timing, and reporting of any alleged Qualifying Life Event directly at issue;
 3. Grant me leave, upon filing, to seek narrowly tailored third-party subpoena relief directed to Petitioner's employer, Accenture, and/or the applicable plan administrator, for the limited purpose of obtaining records necessary to verify the factual basis of Petitioner's claims and to allow the Court to evaluate compliance and enforcement based on objective evidence; and
 4. Grant such other and further relief, at law or in equity, to which I may be justly entitled.
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Respectfully submitted,



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