

**DF-24-18010**

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

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

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**RESPONDENT'S EMERGENCY OBJECTION TO PROPOSED FINAL DECREE, NOTICE OF PENDING RECUSAL MATTERS, REQUEST TO WITHHOLD SIGNATURE AND ENTRY, AND NOTICE OF MANDAMUS**

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**TO THE HONORABLE COURT:**

Respondent Jason McKemie files this Emergency Notice of Under-Review Filings, Objection to Petitioner’s Proposed Final Decree, Request for Recusal Delivery and Referral, Request to Withhold Signature and Entry, Request to Stay Enforcement, and Notice of Mandamus.

This filing is made on an emergency basis because Petitioner’s counsel transmitted a proposed Final Decree of Divorce to the Court on June 11, 2026 at 4:28 p.m., described it as a “proposed judgment in conformance with this afternoon’s court appearance,” and requested “receipt and entry.”

Respondent objects to signing, entry, rendition effect, enforcement, implementation, property transfer, debt allocation, healthcare/benefits effects, injunctions, fees, costs, sanctions, and all effects of Petitioner’s proposed Final Decree of Divorce.

Respondent further gives notice that multiple core emergency filings submitted by Respondent before or during the June 11, 2026 trial window remain reflected in eFileTexas as Under Review or Submitted. Those filings include Respondent’s Verified Emergency Motion to Abate, Stay, or Continue Trial; Respondent’s Verified Motion to Recuse; Respondent’s Proposed Order; Respondent’s Notice of Non-Waiver; and Respondent’s Supplemental Verified Notice of Current Medical Emergency.

Respondent requests that the Court withhold signature and entry of any decree, judgment, order, enforcement action, turnover, property transfer, debt allocation, healthcare/benefits effect, injunction, fee award, cost award, sanction, or final-order effect until the Court addresses the filings, objections, recusal issues, medical-incapacity issues, no-bridge issues,

healthcare/QLE/HSA/FSA issues, stolen-evidence issues, source-record issues, de novo/trial-readiness issues, and non-waiver issues identified below.

Respondent will supplement exhibits and supporting records as soon as available. Respondent requests that emergency relief not be denied or delayed solely because exhibits are being supplemented on an emergency rolling basis due to Respondent's medical collapse, financial collapse, lack of phone service, lack of funds, stolen trial materials, stolen hard drives, stolen evidence repositories, and lack of meaningful access to litigation infrastructure.

## **I. UNDER-REVIEW AND SUBMITTED FILINGS**

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Respondent gives emergency notice that the following filings were submitted in eFileTexas on June 11, 2026:

1. Verified Emergency Motion to Abate, Stay, or Continue Trial, submitted June 11, 2026 at 1:17:47 p.m., Envelope No. 116028476, reflected as Under Review.
2. Verified Motion to Recuse, submitted June 11, 2026 at 1:21:45 p.m., Envelope No. 116028734, reflected as Under Review.
3. Proposed Order on Emergency Motion to Abate, Stay, or Continue Trial, submitted June 11, 2026 at 1:24:07 p.m., Envelope No. 116028891, reflected as Under Review.
4. Notice of Non-Waiver of Sanctions, Civil Claims, Attorney Misconduct Claims, and Objection to Treating Engineered Collapse as Waiver, submitted June 11, 2026 at 1:26:44 p.m., Envelope No. 116029052, reflected as Submitted.
5. Supplemental Verified Notice of Current Medical Emergency, Inability to Safely Appear After Trial Setting, Request to Halt Proceedings, Request for Remote Appearance, and Non-Waiver of All Objections, submitted June 11, 2026 at 1:46:24 p.m., Envelope No. 116030521, reflected as Submitted.

Respondent objects to any attempt to treat these filings as nonexistent, withdrawn, abandoned, waived, untimely, or ineffective merely because they remain under review or pending processing in eFileTexas.

Respondent requests that the Clerk, Court Administrator, Court Coordinator, and Court immediately bring these filings to the Court's attention before any decree, judgment, order, enforcement action, turnover, property transfer, debt allocation, injunction, fee award, sanction, or final-order effect is signed, entered, enforced, or implemented.

## **II. REQUEST FOR RECUSAL DELIVERY, REFERRAL, AND RULE 18a COMPLIANCE**

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Respondent's Verified Motion to Recuse was submitted before any evidence was offered by Respondent, before any witness was called by Respondent, before any exhibit was offered by Respondent, before any testimony was taken from Respondent, and before Respondent consented to any trial evidence, prove-up, rendition, decree, or final order in his absence.

Respondent requests immediate compliance with Texas Rule of Civil Procedure 18a, including delivery, referral, written ruling, and written or on-the-record good-cause findings to the extent the Court contends it may proceed notwithstanding the pending verified recusal motion.

Respondent specifically requests that the Clerk immediately deliver Respondent's Verified Motion to Recuse to the respondent judge and to the regional presiding judge or assigned judge as required by Rule 18a procedure.

Respondent objects to any trial evidence, witness testimony, exhibit admission, prove-up, rendition, proposed decree, signing, entry, enforcement, implementation, property transfer, debt allocation, healthcare/benefits effect, injunction, fee award, cost award, sanction, or decree effect occurring after Respondent submitted a verified pre-evidence recusal motion and before Rule 18a compliance.

Respondent further objects to any proposed decree that omits the pending verified recusal motion, omits any Rule 18a ruling, omits any referral, omits any good-cause finding, and instead converts Respondent's medical incapacity and no-bridge absence into post-answer default.

## **III. OBJECTION TO PETITIONER'S PROPOSED FINAL DECREE**

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Petitioner's proposed Final Decree of Divorce is objected to in full.

Respondent does not agree to the proposed decree in form or substance. Respondent objects to all recitals, findings, property awards, debt allocations, account awards, healthcare/HSA/benefits provisions, injunctions, domain-name provisions, social-media provisions, separate-property findings, community-estate findings, default findings, enforcement provisions, divestiture provisions, and global denial provisions contained in Petitioner's proposed decree.

Respondent specifically objects that Petitioner's proposed decree recites that Respondent "failed to appear," that the Court proceeded by "post-answer default," that testimony was received, and that exhibits were admitted. Respondent's physical absence was medical incapacity, not waiver, abandonment, failure to prosecute, delay, consent to trial, consent to evidence, consent to prove-up, consent to rendition, consent to decree, or consent to final orders.

Respondent requested remote bridge information because his phone service was disconnected and he could not place outbound calls. Respondent had no usable bridge information sufficient to appear. Respondent was medically and financially unable to travel safely. Respondent was in or near Bryan, Texas seeking emergency medical evaluation for congestive-heart-failure symptoms after attempting to travel and being forced to divert because of medical collapse, no gas resources, unsafe vehicle condition, disconnected phone service, and worsening symptoms.

Respondent objects that Petitioner's proposed decree omits Respondent's emergency filings, including:

1. Respondent's Verified Emergency Motion to Abate, Stay, or Continue Trial;
2. Respondent's Verified Motion to Recuse;
3. Respondent's Proposed Order;
4. Respondent's Notice of Non-Waiver;
5. Respondent's Supplemental Verified Notice of Current Medical Emergency;
6. Respondent's de novo/trial-readiness issues;
7. Respondent's healthcare/QLE/HSA/FSA issues;
8. Respondent's stolen-evidence issues;

9. Respondent's source-record issues;
10. Respondent's Rule 204 issues;
11. Respondent's financial-stabilization and access-to-counsel issues;
12. Respondent's sanctions, contempt, civil-claim, attorney-misconduct, criminal-referral, and non-waiver issues.

Respondent objects to any decree that uses a global catchall denial to dispose of Respondent's recusal objection, medical-incapacity objection, no-bridge objection, de novo request, healthcare/QLE/HSA/FSA issues, source-record issues, stolen-evidence issues, Rule 204 request, financial-relief requests, sanctions requests, civil-claim preservation, attorney-misconduct issues, criminal-referral issues, or any other pending threshold matter without identifying those matters and making written rulings.

Respondent requests that the Court decline to sign Petitioner's proposed decree, withhold entry, set aside any oral rendition made in Respondent's absence, reopen evidence, stay enforcement, and make written rulings on Respondent's pending recusal, emergency medical, no-bridge, healthcare, stolen-evidence, source-record, de novo, Rule 204, sanctions, financial-relief, and non-waiver issues before any decree is signed.

#### **IV. THE PROPOSED DECREE WOULD REWARD STOLEN EVIDENCE, FALSE REPORTING, HEALTHCARE OBSTRUCTION, AND SOURCE-RECORD CONCEALMENT**

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This was not a neutral default event. Petitioner's proposed decree attempts to convert Petitioner's manufactured collapse into final relief.

Respondent has repeatedly placed before the Court that Petitioner unlawfully entered the residence, stole hard drives, stole evidence repositories, stole legal work product, stole binders, stole paper files, stole printer equipment, stole printer ink, stole trial materials, stole financial records, stole medical records, stole medications, stole device evidence, stole Apple TV/device evidence, and was recorded saying she had to "get more evidence."

This was theft. No softer label applies.

Respondent objects to any decree that rewards Petitioner's theft, evidence theft, hard-drive theft, stolen legal work product, stolen trial materials, stolen healthcare records, stolen financial records, stolen device evidence, and manufactured law-enforcement narratives.

Respondent further objects to any decree that permits Gwendolyn Laura Ulijasz, her counsel, experts, vendors, investigators, agents, contractors, or anyone acting with or for her to access, inspect, image, copy, test, review, rely on, use, disclose, control, receive, use derivatively, use at trial, or benefit from Respondent's stolen hard drives, stolen evidence repositories, stolen legal work product, stolen trial materials, stolen financial records, stolen medical records, stolen device evidence, stolen Apple TV/device evidence, stolen SAPD-related property, or derivative materials.

Respondent requests categorical non-access, non-use, non-reliance, non-disclosure, non-benefit, preservation away from Petitioner and her agents, external chain-of-custody preservation, and return of Respondent's stolen evidence and stolen property.

Respondent also objects because newly received San Antonio Police Department records show that Petitioner is not merely making false reports. Petitioner is manufacturing the source material for false reports. Petitioner manufactured the eviction/writ aftermath, unlawfully entered the residence, stole property and device evidence, controlled or relocated that property, then used stolen or controlled items to manufacture new police narratives involving alleged mailed property, alleged abandoned property, tracker devices, alleged medical letters, alleged narcotics, HSA-call fraud, and other false criminal narratives.

Respondent denies ever driving to Petitioner's San Antonio residence, placing items at her residence, mailing items to her, stalking her, surveilling her, or using trackers to contact her. Respondent has location evidence from his phone, vehicle, keys, AirTags, Apple/Find My, and other location sources because Respondent has been forced to preserve location evidence throughout Petitioner's false-reporting campaign.

Respondent requests that no decree be signed, entered, enforced, or implemented while these stolen-evidence, false-reporting, device-evidence, Apple/Find My, SAPD property-chain, healthcare, source-record, and trial-readiness issues remain unresolved.

## **V. HEALTHCARE, FALSE QLE, HSA/FSA, AND MEDICAL-ACCESS OBJECTION**

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Respondent objects to any decree awarding Petitioner the Accenture HSA, divesting Respondent of HSA/benefit interests, or treating healthcare access as resolved while

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healthcare obstruction, false QLE processing, HSA/FSA obstruction, and functional-access noncompliance remain unresolved.

Respondent has filed an EBSA/DOL complaint regarding the false divorce-based QLE, functional benefit denial, refusal to produce the administrative record, HSA/FSA obstruction, and medical harm. Respondent has repeatedly advised this Court that healthcare is not collateral. It is life-safety.

A signed healthcare order exists. Petitioner has represented compliance while functional access remained obstructed. Respondent has evidence that Petitioner produced false or nonfunctional HSA compliance, retained control over functional access, and then weaponized Respondent's attempt to obtain court-ordered healthcare access by reporting him to SAPD for alleged fraud. SAPD records materially undercut that fraud narrative.

Respondent objects to any decree that rewards healthcare obstruction, false QLE conduct, HSA/FSA obstruction, false healthcare-compliance representations, medical-access sabotage, benefit-access sabotage, or law-enforcement weaponization arising from Respondent's attempt to obtain the healthcare access the Court had already ordered restored.

## **VI. SOURCE RECORDS, ESTATE RECONSTRUCTION, AND FINANCIAL COLLAPSE**

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Respondent objects to any decree dividing the marital estate, confirming separate property, awarding Accenture RSUs, awarding VEIP/ESPP assets, awarding Chase accounts, awarding HSA assets, assigning debt, imposing indemnity, cutting off informal-marriage claims, or denying Respondent's reimbursement, reconstitution, disproportionate-division, or sanctions claims before complete third-party source records are produced and reviewed.

Respondent has repeatedly requested third-party source records, institution-origin financial records, Accenture compensation records, VEIP/equity records, RSU records, bonus records, payroll records, HSA/FSA records, healthcare/QLE records, lease-buyout records, loan-source records, credit-card records, bank records, payment-source records, and records needed to reconstruct the marital estate.

Petitioner should not be permitted to conceal source records, force financial collapse, obstruct healthcare, steal trial materials, and then obtain a decree that divides property and assigns debt through post-answer default in Respondent's medical absence.

Respondent further objects because he is in total financial collapse. There is no gas, no food money, no medication money, no working phone service, no available credit, no loans, no stable housing, no litigation funding, no printer, no trial materials, no access to stolen evidence repositories, and no ability to meaningfully participate unless emergency financial and litigation-access relief is entered.

Respondent's financial collapse is not waiver. It is the result of Petitioner's financial strangulation, healthcare obstruction, source-record concealment, evidence theft, hard-drive theft, legal-work-product theft, trial-material theft, manufactured eviction, false reporting, and procedural abuse.

## **VII. REQUEST TO WITHHOLD SIGNATURE, ENTRY, ENFORCEMENT, AND DECREE EFFECTS**

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Respondent requests that the Court immediately:

1. withhold signature and entry of Petitioner's proposed Final Decree of Divorce;
2. decline to sign Petitioner's proposed decree;
3. set aside any oral rendition made in Respondent's medical absence;
4. reopen evidence;
5. stay enforcement;
6. stay implementation, turnover, property transfer, debt allocation, healthcare/benefits effects, injunctions, domain-name transfers, account transfers, fee awards, cost awards, sanctions, and all decree effects;
7. rule on Respondent's verified pre-evidence recusal motion before any decree is signed;
8. ensure Rule 18a delivery, referral, and compliance;
9. rule on Respondent's emergency abatement/stay/continuance request;
10. rule on Respondent's medical-incapacity and remote-appearance objections;

11. rule on Respondent's no-bridge objection;
12. rule on Respondent's de novo/trial-readiness objections;
13. rule on Respondent's healthcare/QLE/HSA/FSA objections;
14. rule on Respondent's stolen-evidence, stolen hard-drive, stolen legal-work-product, stolen trial-material, and stolen device-evidence objections;
15. rule on Respondent's source-record, forensic-accounting, estate-reconstruction, reimbursement, reconstitution, and disproportionate-division objections;
16. rule on Respondent's Rule 204 request and related threshold-discovery objections;
17. rule on Respondent's financial-stabilization, survival-level temporary relief, access-to-counsel, interim attorney-fee, litigation-expense, and parity relief requests;
18. rule on Respondent's sanctions, contempt, fee-shifting, civil-claim, attorney-misconduct, and criminal-referral preservation issues;
19. deny in full any request by Petitioner, counsel, experts, vendors, agents, or anyone acting with or for her for fees, costs, sanctions, expert expenses, vendor expenses, protective expenses, discovery expenses, or cost shifting against Respondent based on the collapse Petitioner manufactured;
20. enter written rulings sufficient to preserve mandamus and appellate review.

## **VIII. NOTICE OF MANDAMUS AND REQUEST TO SUPPLEMENT EXHIBITS**

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Respondent is filing emergency mandamus relief in the Fifth Court of Appeals seeking immediate temporary relief staying signing, entry, enforcement, implementation, property transfer, debt allocation, healthcare/benefits effects, injunctions, fees, costs, sanctions, and all effects of Petitioner's proposed Final Decree of Divorce.

Respondent further gives notice that he will supplement the trial-court record and mandamus record as soon as available with:

1. signed/unsigned decree status;
2. docket entry and re:SearchTX status;
3. admitted exhibit list;
4. court reporter transcript;
5. no-bridge emails;
6. bodycam/video records;
7. Apple/Find My records;
8. SAPD property-chain records;
9. SAPD reports and bodycam;
10. Dallas police/constable records;
11. healthcare/HSA/FSA records;
12. EBSA/DOL records;
13. source financial records;
14. Accenture/Businessolver/Aetna/HSA/FSA records;
15. lease-buyout, writ, eviction, mover, U-Haul, payment, vendor, and chain-of-custody records;
16. declarations, exhibits, screenshots, location records, and related proof as available.

Respondent requests that emergency protection not be denied merely because exhibits are being supplemented on a rolling basis. Respondent is medically collapsed, financially collapsed, without working phone service, without gas, without food, without medication money, without stable housing, without stolen trial materials, without stolen hard drives,

without stolen evidence repositories, and without meaningful litigation infrastructure because of the manufactured collapse described in Respondent's filings.

## **IX. NON-WAIVER**

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Respondent does not waive any objection, claim, defense, request, relief, sanctions request, contempt request, mandamus issue, appellate issue, civil claim, criminal-referral issue, attorney-misconduct issue, healthcare-obstruction issue, source-record issue, stolen-evidence issue, financial-sabotage issue, false-reporting issue, digital-intrusion issue, Rule 204 issue, protective-relief issue, reimbursement claim, parent-loan claim, forensic-accounting request, or request for emergency survival-level financial relief, interim attorney's fees, litigation expenses, access-to-counsel relief, fee shifting, sanctions, estate reconstitution, or written findings.

No decree, judgment, order, oral rendition, prove-up, evidence ruling, exhibit admission, property division, debt allocation, injunction, fee award, cost award, sanction, enforcement provision, or global catchall denial should be construed to waive, release, merge, adjudicate, extinguish, deny, or limit those claims, requests, objections, and remedies.

Respondent expressly does not consent to any evidence, testimony, exhibit admission, prove-up, oral rendition, decree, judgment, enforcement, fee award, cost award, sanction, property division, debt allocation, healthcare/benefits effect, injunction, domain-name transfer, account transfer, or adverse ruling entered or proposed in Respondent's medical absence.

## **PRAYER**

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Respondent Jason McKemie requests that the Court:

1. immediately withhold signature and entry of Petitioner's proposed Final Decree of Divorce;
2. decline to sign Petitioner's proposed decree;
3. set aside any oral rendition made in Respondent's medical absence;
4. reopen evidence;
5. stay enforcement and all decree effects;

6. deliver, refer, and address Respondent's verified pre-evidence recusal motion under Rule 18a;
7. rule on Respondent's emergency filings, medical-incapacity objections, no-bridge objections, healthcare objections, stolen-evidence objections, source-record objections, de novo/trial-readiness objections, Rule 204 issues, financial-stabilization requests, access-to-counsel requests, sanctions requests, non-waiver filings, and proposed order;
8. deny in full any request for fees, costs, sanctions, expert expenses, vendor expenses, protective expenses, discovery expenses, or cost shifting against Respondent;
9. preserve all stolen evidence away from Petitioner, counsel, experts, vendors, investigators, agents, contractors, and anyone acting with or for her;
10. prohibit Petitioner, counsel, experts, vendors, investigators, agents, contractors, and anyone acting with or for her from accessing, inspecting, imaging, copying, testing, reviewing, relying on, using, disclosing, controlling, receiving, using derivatively, using at trial, or benefiting from Respondent's stolen hard drives, stolen evidence repositories, stolen legal work product, stolen trial materials, stolen financial records, stolen medical records, stolen device evidence, and derivative materials;
11. allow Respondent to supplement exhibits and supporting records as soon as available;
12. enter written rulings sufficient to preserve mandamus and appellate review; and
13. grant all further relief to which Respondent is entitled.

Respectfully Submitted,



Jason McKemie

539 W. Commerce St., Suite 2010

Dallas, Texas 75208

214-868-4901

[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

Respondent, *Pro Se*

## UNSWORN DECLARATION OF JASON MCKEMIE

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My name is **Jason McKemie**. My date of birth is **April 8, 1976**. My address is **539 W. Commerce St., Suite 2010, Dallas, Texas 75208**.

I am the Respondent in **Cause No. DF-24-18010**.

I declare under penalty of perjury that the factual statements in this Emergency Notice are true and correct based on my personal knowledge, my court filings, eFileTexas records, re:SearchTX records, emails received by me, records reviewed by me, medical records, SAPD records, HSA records, screenshots, videos, audio recordings, location records, and documents in my possession or accessible to me.

I submitted emergency filings on June 11, 2026. eFileTexas reflects that multiple core filings remain under review or submitted.

I did not consent to trial, evidence, prove-up, rendition, decree, judgment, enforcement, fees, costs, sanctions, property division, debt allocation, healthcare/benefits effects, injunctions, or adverse rulings in my absence.

My inability to physically appear was medical incapacity and financial collapse. It was not waiver, abandonment, delay, failure to prosecute, consent to trial, or consent to final orders.

I requested remote access and bridge information because my phone service was disconnected and I could not place outbound calls. I did not receive usable bridge information sufficient to appear.

I am filing emergency mandamus relief and will supplement supporting exhibits and records as soon as available.

Executed in Texas on June 12, 2026.

  
Jason McKemie

## CERTIFICATE OF SERVICE

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I certify that a true and correct copy of this filing was served on all parties and counsel of record by eService and/or email on June 12, 2026.

A handwritten signature in black ink that reads "Jason McKemie". The signature is written in a cursive style with a long horizontal stroke underlining the name.

Jason McKemie