

NO. DF-24-18010

IN THE MATTER OF
THE MARRIAGE OF

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GWENDOLYN ULIJASZ-MCKEMIE
&
JASON MCKEMIE

IN THE DISTRICT COURT

301ST JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

**RESPONDENT’S EMERGENCY RULE 18a STATUS NOTICE
REGARDING PENDING VERIFIED RECUSAL,
REQUEST FOR WRITTEN RULING OR REFERRAL,
AND OBJECTION TO DECREE ACTION**

TO THE HONORABLE COURT:

Jason McKemie, *Respondent*, files this **Emergency Rule 18a Status Notice** regarding his pending **Verified Motion to Recuse** filed **June 11, 2026**, before any evidence was offered at trial and before any final decree action.

This filing is not a new motion to recuse. It is a status notice, preservation filing, and objection to decree action while the Rule 18a status of the pending verified recusal remains unresolved on the docket available to Jason.

I. PURPOSE OF THIS NOTICE

Jason files this notice because the Court may be considering whether to render, sign, enter, transmit, enforce, or approve Petitioner’s proposed final decree.

Jason has not located any written order of recusal, written denial, written referral order, or written/on-record good-cause basis for further decree action on eFile, re:SearchTX, or the docket available to him.

Because decree signature would materially affect property division, debt allocation, healthcare access, benefits, enforcement, sanctions, fees, and appellate/mandamus rights, Jason requests that the Court clarify the Rule 18a status before any decree action.

II. PENDING VERIFIED RECUSAL FILED JUNE 11, 2026

On June 11, 2026, Jason filed his Verified Motion to Recuse and Request for Referral under Texas Rule of Civil Procedure 18a.

The motion states on its face that it was filed before any evidence was offered, before any witness was called, before any exhibit was offered, before any testimony was taken, and before any trial evidence was received.

Jason also requested that the recusal be addressed before evidence and objected to any witness being called, exhibit being offered, testimony being taken, or trial evidence being received before the motion was decided or referred.

The e-service record reflects that the Motion to Recuse and Request for Referral was served on June 11, 2026 at 1:21:45 p.m.

III. RULE 18a STATUS NEEDS TO BE CLARIFIED BEFORE DECREE ACTION

Texas Rule of Civil Procedure 18a requires clerk delivery of a recusal motion to the respondent judge and the regional presiding judge. Rule 18a also requires the respondent judge, within three business days after the motion is filed, to either sign and file an order of recusal/disqualification or sign and file an order referring the motion to the regional presiding judge.

Rule 18a further provides that where a recusal motion is filed before evidence is offered at trial, the respondent judge must take no further action in the case until the motion is decided, except for good cause stated in writing or on the record.

Jason recognizes that Petitioner and counsel may argue this is a tertiary recusal. Jason does not waive any objection to that characterization or to any fee/cost request arising from it. If the Court contends it may proceed based on tertiary-recusal law, Rule 18a, Texas Civil Practice and Remedies Code section 30.016, or any other authority, Jason requests that the Court identify that legal basis in writing or on the record before any decree action.

Jason is not asking the Court to relitigate the recusal by this notice. Jason is asking the Court to confirm whether the pending verified recusal has been ruled on, referred, denied, or otherwise addressed in a manner sufficient to preserve mandamus and appellate review before any decree is signed.

IV. OBJECTION TO DECREE ACTION BEFORE RULE 18a STATUS IS CLARIFIED

Jason objects to any rendition, signature, entry, transmission, enforcement, implementation, property transfer, debt allocation, healthcare/benefits effect, injunction, fee award, cost award, sanction, or final-decree effect before:

1. the pending verified recusal is decided;
2. the pending verified recusal is referred;
3. the Court states a written or on-record good-cause basis for proceeding despite the pending verified recusal; or
4. the Court identifies the legal basis for proceeding despite the pending verified recusal and Jason's pending objections.

Jason further objects to any proposed decree that omits the pending verified recusal, omits any Rule 18a ruling, omits any referral order, omits any good-cause finding, or converts Jason's medical incapacity, lack of remote bridge access, stolen evidence, and inability to safely appear into post-answer default.

V. REQUEST FOR IMMEDIATE CLERK DELIVERY AND WRITTEN STATUS

Jason respectfully requests that the Clerk immediately deliver this notice, the June 11, 2026, verified recusal motion, the emergency supplement, and the supplemental exhibit map to:

1. the respondent judge;
2. the regional presiding judge or assigned judge; and
3. any court personnel responsible for proposed decree review.

Jason further requests written confirmation, ruling, referral, or docket entry reflecting the status of the pending verified recusal before any final decree action.

VI. NOTICE OF POSSIBLE REGIONAL PRESIDING JUDGE NOTICE

If no written ruling, referral order, or written/on-record legal basis appears, Jason gives notice that he may notify the regional presiding judge under Texas Rule of Civil Procedure 18a(f)(3).

This notice is made to preserve the record, prevent waiver, and avoid any false record that Jason acquiesced in decree action while the pending verified recusal remained unresolved or unclear.

VII. REQUESTED RELIEF

Jason respectfully requests that the Court:

1. confirm whether the pending verified recusal filed June 11, 2026 has been ruled on, denied, granted, or referred;
2. direct the Clerk to deliver the pending verified recusal, this notice, the emergency supplement, and the supplemental exhibit map to the respondent judge and regional presiding judge;
3. withhold rendition, signature, entry, transmission, enforcement, or approval of any final decree until Rule 18a status is clarified;
4. if the Court contends it may proceed under tertiary-recusal law or any other authority, state the legal basis in writing or on the record before decree action;
5. preserve Jason's recusal, mandamus, due-process, medical-incapacity, no-bridge, healthcare, stolen-evidence, source-record, trial-readiness, sanctions, fee/cost, and appellate objections; and
6. grant all further relief necessary to preserve the record and prevent decree action before Rule 18a status is clarified.

Respectfully Submitted,

A handwritten signature in black ink that reads "Jason McKemie". The signature is written in a cursive, flowing style with a long horizontal line extending from the end of the name.

Jason McKemie

539 W. Commerce St., Ste. 2010

Dallas, Texas 75208

214-868-4901

jmckemie@mckemie.net

UNSWORN DECLARATION OF JASON MCKEMIE

My name is **Jason McKemie**. My date of birth is **April 8, 1976**. My address is **539 W. Commerce St., Ste. 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 Rule 18a Status Notice are true and correct based on my personal knowledge, my filings, eFileTexas records, re:SearchTX records, docket records available to me, emails received by me, records reviewed by me, and documents in my possession or accessible to me.

As of the filing of this notice, I have not located any written order of recusal, written denial, written referral order, or written/on-record good-cause basis for further decree action on eFile, re:SearchTX, or the docket available to me.

Executed in **Brazos County, Texas** on **June 16, 2026**.



Jason McKemie

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this filing was served on all counsel of record and parties entitled to notice by e-service and/or email on **June 16, 2026**.



Jason McKemie

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 116200430

Filing Code Description: Motion - Miscellaneous

Filing Description: RESPONDENT'S EMERGENCY RULE 18A STATUS NOTICE REGARDING PENDING VERIFIED RECUSAL, REQUEST FOR WRITTEN RULING OR REFERRAL , AND OBJECTION TO DECREE ACTION

Status as of 6/16/2026 12:47 PM CST

Case Contacts

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