

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

**RESPONDENT’S SUPPLEMENT TO MOTION TO RECUSE,
NOTICE OF RULE 18a(f)(3) NONCOMPLIANCE AND
REQUEST FOR IMMEDIATE MINISTERIAL ACTION**

TO THE HONORABLE RAYMOND G. WHELESS, PRESIDING JUDGE OF THE FIRST ADMINISTRATIVE JUDICIAL REGION, TO THE COURT, AND TO THE DALLAS COUNTY DISTRICT CLERK:

Respondent Jason McKemie files this narrow procedural supplement and notice under Texas Rule of Civil Procedure 18a(f)(3). This filing is not a merits brief. It is a ministerial notice that the Rule 18a process has not been completed and a request that it be completed immediately.

- I. PRIOR RULE 18a RECUSAL IN DISTRICT 254
 - 1. This case arrived in the 302nd Judicial District Court after a prior Rule 18a recusal in the 254th Judicial District Court.
 - 2. On July 23, 2025, Respondent filed a verified motion to recuse Judge Kimberly Brown.
 - 3. The July 23, 2025 motion to recuse Judge Brown alleged an appearance of impropriety, bias, and systemic prejudice based on the following core grounds:
 - a) over 25 motions remained unheard despite repeated requests for emergency relief;
 - b) Respondent faced spinal surgery, hospitalization, and life-threatening infection without court intervention or temporary support despite ongoing notices and filings;
 - c) Petitioner was permitted to withhold discovery, modify financial filings after deadline, and submit false affidavits and redacted account statements without sanction;
 - d) Respondent was denied access to marital health benefits, legal counsel, and financial resources during active emergency conditions; and
 - e) opposing counsel was permitted to withdraw during discovery and then reappear minutes before the deadline to file blanket objections to nearly every discovery request.
 - 4. The recusal process in District 254 then moved as follows:

- a) July 23, 2025 – Verified Motion to Recuse filed;
 - b) July 23, 2025 – Order of Recusal signed;
 - c) July 24, 2025 – affidavit/declaration filing entered;
 - d) July 29, 2025 – Rule 18a supplemental certificate of service filed;
 - e) July 29, 2025 – e-served copy of transfer order filed;
 - f) September 8, 2025 – pretrial setting in District 302.
5. The point is not that the docket was idle after the Brown recusal. It was not. The point is that no substantive structural cure was entered. Between transfer and the September 8 pretrial setting, no written order cured the discovery collapse, no emergency protective relief was imposed, and no active case-management structure was entered to address the previously raised concerns.
- II. PRESENT RULE 18a NONCOMPLIANCE IN DISTRICT 302
- 6. On February 24, 2026, Respondent filed a verified motion to recuse the Honorable Sandra Jackson at 8:54 a.m.
 - 7. Trial had been set for 9:00 a.m. on February 24, 2026.
 - 8. The parties were not brought into the courtroom until approximately 9:40 a.m., and the recusal issue was addressed only after 10:00 a.m., before any evidence was offered.
 - 9. Because the motion was filed before evidence was offered at trial, Rule 18a(f)(2)(A) applies.
 - 10. Under Rule 18a(e)(1), when a motion to recuse is filed, the clerk must immediately deliver a copy to the respondent judge and to the regional presiding judge.
 - 11. Under Rule 18a(f)(1), regardless of whether the motion complies with every requirement of Rule 18a, the respondent judge, within three business days after the motion is filed, must either:
 - a) sign and file an order of recusal; or
 - b) sign and file an order referring the motion to the regional presiding judge.
 - 12. Under Rule 18a(f)(2)(A), because the motion was filed before evidence was offered at trial, the respondent judge must take no further action in the case until the motion has been decided, except for good cause stated in writing or on the record.
 - 13. Under Rule 18a(f)(3), if the respondent judge fails to comply with a duty imposed by Rule 18a, the movant may notify the regional presiding judge.
 - 14. Under Rule 18a(g)(1), (4), and (6), the regional presiding judge must rule on the referred motion or assign a judge to rule, may issue interim or ancillary orders as justice may require, and the motion must be heard as soon as practicable.
 - 15. The three-business-day deadline expired on February 27, 2026.
 - 16. As of March [10/11], 2026, no written order of recusal or referral appears on the docket. If the docket remains unchanged at the time of filing, the noncompliance is continuing.
 - 17. This is not discretionary delay. Rule 18a uses mandatory language. The clerk must immediately deliver. The respondent judge must recuse or refer within three business days. When the motion is filed before evidence, the respondent judge must take no further action absent good cause stated in writing or on the record.

III. THIS CANNOT BE HANDLED AS A ROUTINE HANDOFF

18. This case has already once passed through recusal and transfer without substantive structural protection.
19. For that reason, the present Rule 18a failure cannot be treated as a routine transfer issue or a harmless clerical delay. Immediate ministerial correction and an immediate written handoff are required.

IV. REQUESTED MINISTERIAL RELIEF

20. Respondent respectfully requests that the Regional Presiding Judge:
 - a) confirm receipt of the February 24, 2026 Motion to Recuse;
 - b) if necessary, direct the Dallas County District Clerk to immediately deliver file-stamped copies of the Motion to Recuse to the respondent judge and to the Regional Presiding Judge;
 - c) immediately rule on the Motion to Recuse or assign a judge to rule;
 - d) direct the District Clerk to file a short Certificate of Delivery stating the date and time the Motion to Recuse and any order of recusal or referral were delivered;
 - e) confirm that no further action may be taken by the respondent judge absent Rule 18a(f)(2)(A) good cause stated in writing or on the record; and
 - f) set a limited status conference so this case is not re-parked again without active structure.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Respondent respectfully requests immediate Rule 18a compliance, immediate ministerial correction of the expired recusal-or-referral deadline, immediate ruling or assignment, a clerk's certificate of delivery, confirmation of the Rule 18a stay, a limited status conference, and all further relief to which Respondent may be justly entitled.

Respectfully Submitted,



Jason McKemie | Pro Se

539 W. Commerce St., Suite 2010
Dallas, TX 75208
214-868-4901
jmckemie@mckemie.net

CERTIFICATE OF SERVICE

I certify that on March __, 2026, a true and correct copy of the foregoing was served on all parties and counsel of record through the eFileTexas electronic service system in accordance with Tex. R. Civ. P. 21a.



Jason McKemie

EXHIBIT LIST:

- Exhibit A — File-stamped Verified Motion to Recuse (filed gam on Feb. 24, 2026).
- Exhibit B — Screen shot of docket at time of filling this ministerial action request, showing filing time and the absence of a referral/recusal order as of Mar. 12, 2026.
- Exhibit C — Signed Order on Emergency Reinstatement of Healthcare (Dec. 17, 2025).
- Exhibit D — Proposed Unified Order Regarding Material Developments / Third-Party Verification / HSA-FSA Functionality.
- Exhibit E — Associate Judge’s Report (Jan. 12, 2026) and compliance timeline (Jan. 6, Jan. 9, Jan. 20, Feb. 5, 2026).
- Exhibit F — Employer/benefits/COBRA/HSA-FSA vendor correspondence re: QLE termination and incomplete restoration (if available).

Respectfully submitted,

Jason McKemie

539 W Commerce St, Ste 2010
Dallas, TX 75208
214-868-4901
jmckemie@mckemie.net

UNSWORN DECLARATION (Tex. Civ. Prac. & Rem. Code § 132.001)

My name is Jason McKemie. My date of birth is 04/08/1976. My address is 539 W Commerce St, Ste 2010, Dallas, Texas 75208. I declare under penalty of perjury that the factual statements in this Motion are true and correct.

Executed in Dallas County, Texas on _____, 2026.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this Motion was served on all counsel of record and/or parties entitled to notice in accordance with the Texas Rules of Civil Procedure and applicable e-service rules on the date of filing.

Jason McKemie
539 W Commerce St, Ste 2010
Dallas, TX 75208

214-868-4901
jmckemie@mckemie.net

UNSWORN DECLARATION

My name is Jason McKemie. My date of birth is 04/08/1976. My address is 539 W Commerce St, Ste 2010, Dallas, Texas 75208. I declare under penalty of perjury that the factual statements in this Motion are true and correct.

Executed in Dallas County, Texas on _____, 2026.

Jason McKemie

Respectfully submitted,

Jason McKemie
539 W Commerce St, Ste 2010
Dallas, TX 75208
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(214) 519-8958



CERTIFICATE OF SERVICE

RULE 18A(F)(3) NOTICE OF NONCOMPLIANCE; REQUEST FOR IMMEDIATE REFERRAL OR ASSIGNMENT; AND EMERGENCY MOTION FOR INTERIM ANCILLARY ORDER

DF-24-18010

I hereby certify that a true and correct copy of the foregoing document has been served upon all counsel of record via Texas e-File service in accordance with the Texas Rules of Civil Procedure on this **March 2nd, 2026.**



Jason McKemie