

**IN THE SUPERIOR COURT OF COLUMBIA COUNTY  
STATE OF GEORGIA  
DOMESTIC RELATIONS DIVISION**

**HALEY CROWE,**  
Plaintiff,

v.

**WAYLAND BRAXTON WILLIS,**  
Defendant.

Civil Action File No.: 2025EDR0053

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**AFFIDAVIT OF WAYLAND BRAXTON WILLIS  
IN SUPPORT OF DEFENDANT'S MOTION TO RECUSE AND REASSIGN  
PURSUANT TO UNIFORM SUPERIOR COURT RULE 25.1**

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I, Wayland Braxton Willis, being duly sworn and under penalty of perjury, do hereby depose and state as follows:

1. I am the Defendant in Case No. 2025EDR0053, a domestic relations modification proceeding pending in the Superior Court of Columbia County, State of Georgia, before the Honorable Sheryl B. Jolly, Chief Judge.
2. On March 24, 2026, I filed a civil rights complaint in the United States District Court for the Southern District of Georgia, Augusta Division, captioned Willis v. Jolly & Bell, Civil Action No. CV126-056, naming the Honorable Sheryl B. Jolly as a Defendant in her official capacity under 42 U.S.C. § 1983. That complaint was stamped and docketed by the federal court on March 25, 2026.
3. On March 11, 2026, I filed a Petition for Writ of Mandamus in the Superior Court of Columbia County, Case No. 2026ECV0357, naming the Honorable Sheryl B. Jolly as the sole Respondent. That petition is currently pending.

4. On April 4, 2026, I submitted a formal sworn complaint to the Georgia Judicial Qualifications Commission (JQC) against the Honorable Sheryl B. Jolly, alleging violations of Georgia Code of Judicial Conduct Canons 1, 2, and 3, arising from her conduct in Case No. 2025EDR0053 and Case No. 2026ECV0357. That complaint was submitted on April 4, 2026 and constitutes a newly ripened, independent basis for recusal that did not previously exist in formally submitted sworn form.

5. By reason of the foregoing, I am the adverse party to the Honorable Sheryl B. Jolly in an active federal civil rights lawsuit, an active state mandamus proceeding, and a pending JQC ethics complaint. I submit that a reasonable person, knowing these facts, would question whether Judge Jolly can preside impartially over Case No. 2025EDR0053.

I, Wayland Braxton Willis, swear under penalty of perjury that the facts stated herein are true and correct, and that this motion is made in good faith and not for the purpose of delay.

*Wayland B. Willis*

**Wayland Braxton Willis, Affiant**

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legal@thebreakingproject.org | (762) 354-0014

Sworn to and subscribed before me this **6th** day of **April, 2026**

*Gracie Williams*

Notary Public, State of Georgia

My Commission Expires: 05/16/2028

