


Cindy Mason, Clerk
Columbia County, Georgia

IN THE SUPERIOR COURT OF COLUMBIA COUNTY
STATE OF GEORGIA

HALEY CROWE, :
PLAINTIFF, : CIVIL ACTION FILE
v. : NO. 2025EDR0053
WAYLAND BRAXTON WILLIS, :
DEFENDANT. :

ANSWER TO PLAINTIFF’S PETITION FOR CHANGE OF CUSTODY

NOW COMES DEFENDANT, Wayland Braxton Willis, and files this, his Answer to Plaintiff’s Petition for Change of Custody, and shows the Court the following:

1.

Defendant admits as true the allegations of Paragraph 1.

2.

Defendant admits as true the allegations of Paragraph 2.

3.

Defendant admits as true the allegations of Paragraph 3.

4.

Defendant admits as true the allegations of Paragraph 4.

5.

Defendant admits as true the allegations of Paragraph 5.

6.

Defendant admits as true the allegations of Paragraph 6.

7.

Defendant admits in part and denies in part the allegations of Paragraph 7. Defendant denies that there has been a material change in condition and circumstances to justify a modification and/or suspension of the Defendant's visitation rights. Defendant further denies that he is actively using and abusing illegal narcotics. Defendant admits that he was recently arrested as a codefendant to the possession of marijuana gummies from May of 2024 but denies guilt of the same. Defendant also denies that he has been taking the minor child to Southbound Smokehouse, drinking there, and then driving the minor child home, and he would demand strict proof of the same. Defendant admits that he has previously had a substance abuse problem, but notes that that predates the date of the final decree and thus is not a change in circumstance. Defendant strongly denies the allegation that his lifestyle choices are subjecting the child to an unnecessary risk of long term emotional and physical harm and notes that Plaintiff has a long history of making unsubstantiated allegations toward him.

8.

Defendant objects to a suspension of his visitation rights with the minor child but does not object to both parties submitting to a drug screen.

9.

Defendant denies that there is a basis to modify the terms of the parties' parenting plan.

10.

Defendant does not have enough information to admit or deny the allegations of Paragraph 10 at this time but does not object to setting child support based on the Georgia Child Support guidelines, taking into account his parenting time and the cost of work related childcare expenses.

11.

Defendant denies that there is a basis to suspend Defendant's visitation rights and further denies that the child's safety and well being is in danger in his care.

12.

Defendant denies the allegations of Paragraph 12

13.


Defendant shows that due to the actions of Plaintiff he has been forced to retrain the services of an attorney and is entitled to an award of attorney fees and expenses of litigation under O.C.G.A. §19-9-3(g), O.C.G.A. §19-6-15(k)(5), O.C.G.A. §9-15-14, and all other applicable provisions.

WHEREFORE, Defendant prays:

- (a) That Plaintiff's petition be denied;
- (b) That Defendant's parenting time be restored to him;
- (c) That the Defendant be awarded attorney fees and costs of litigation under O.C.G.A. §19-9-3 (g), § 19-6-15(k)(5), and §9-15-14 if deemed appropriate; and
- (d) That Defendant have such additional relief as the Court may consider equitable and appropriate.

This 13th day of March, 2025.

Respectfully submitted,



Holly G. Chapman
Attorney for the Defendant

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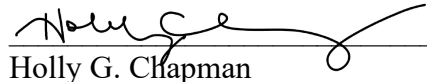
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DEFENDANT.	:	

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the following pleading upon counsel for the Plaintiff electronically through PeachCourt.

Submitted this 13th day of March, 2025.



Holly G. Chapman
Counsel for the Defendant

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