

2025EDR0053

NOV 24, 2025 01:48 PM


Cindy Mason, Clerk
Columbia County, Georgia

**IN THE SUPERIOR COURT OF COLUMBIA COUNTY
STATE OF GEORGIA**

WAYLAND BRAXTON WILLIS,
Petitioner,

v.

HALEY CROWE,
Respondent.

Civil Action File No.: 2025EDR0053

EMERGENCY MOTION TO ENFORCE TEMPORARY ORDER,
VACATE VERBAL SUSPENSION OF VISITATION,
AND REQUEST FOR EXPEDITED HEARING

COMES NOW Petitioner, **Wayland Braxton Willis**, pro se, and files this **Emergency Motion to Enforce the Temporary Order, Vacate the Verbal Suspension of Visitation, and Request an Expedited Hearing**, and shows the Court as follows:

1. Existing Court Order

1. On **September 17, 2025**, this Court entered a **Temporary Order** establishing the terms of supervised visitation between Petitioner and the minor child.
 2. To date, the September 17 Temporary Order remains **the only written, signed visitation order** provided to Petitioner.
-

2. Father Has Fully Complied With All Testing Requirements

3. Petitioner has complied with **every drug test requested**, including the October retest and all subsequent tests.
 4. All tests have returned **negative**, and the corrected October results were **MRO-verified** and provided to Respondent's counsel, the Guardian ad Litem ("GAL"), and Petitioner's counsel.
 5. There are **no outstanding conditions** preventing visitation under the September 17 Temporary Order.
-

3. Visitation Has Been Wrongfully Withheld for Two Consecutive Weekends

6. Despite Petitioner's full compliance, supervised visitation has been **denied for two consecutive weekends**.
 7. The minor child was thereby prevented from attending both a **family wedding** and Petitioner's **grandfather's funeral**, resulting in significant and irreparable harm to the parent-child relationship.
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4. The GAL Has Acted Outside Her Authority

8. In written communication to the Court, the GAL stated that she “**suspended visitation**” twice **before any court order**.
 9. The GAL has **no legal authority** to suspend visitation, impose new conditions, or modify the Court’s Temporary Order.
 10. The GAL’s statements mischaracterize the corrected October test results and omit the **MRO-verified negative retest** and subsequent negative results.
-

5. A Verbal Suspension Was Issued Without Due Process

11. Based on incomplete information provided by the GAL, a **verbal suspension of visitation** was communicated to the parties.
 12. This verbal suspension was issued:
 - a. **without a written order**,
 - b. **without consideration** of the corrected MRO results,
 - c. **without notice** to Petitioner, and
 - d. **without allowing Petitioner an opportunity to be heard**,all of which violate basic principles of due process.
-

6. Respondent’s Non-Compliance Continues Without Legal Justification

13. Respondent has refused to make the minor child available for visitation **without any written court order modifying the September 17 Temporary Order**.
 14. Respondent’s refusal to comply with the Temporary Order is **willful** and continues to cause substantial harm.
-

7. Petitioner Requested Action From Counsel but Received No Response

15. On **November 21, 2025**, at approximately 6:14 PM, Petitioner sent written notice to his attorney requesting that objections and motions be filed immediately to address the

wrongful suspension and Respondent's non-compliance.

16. Petitioner stated in writing that if counsel did not intend to file these motions, he needed to be notified so Petitioner could file pro se without further delay.
17. As of the filing of this Motion, **Petitioner has received no response**, necessitating this emergency filing to prevent further harm.

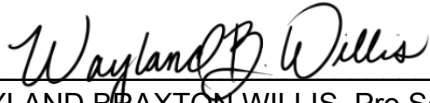
8. Immediate Court Intervention Is Required

18. There is **no valid, written, signed court order** suspending visitation or modifying the September 17 Temporary Order.
19. All parties remain bound by the September 17 Temporary Order unless and until the Court modifies it in writing.
20. Only the Court—not the GAL—has authority to suspend, modify, or condition visitation.
21. Immediate judicial action is required to prevent further violations and protect the rights of Petitioner and the best interests of the minor child.

WHEREFORE, Petitioner respectfully requests that this Court:

- A. **Enforce the September 17, 2025 Temporary Order** and order that supervised visitation resume immediately;
- B. **Vacate any verbal or informal suspension** of visitation issued without a written order;
- C. Order Respondent to **comply with the Court-ordered visitation schedule** unless and until modified by written order of this Court;
- D. Set this matter for an **expedited hearing or immediate judicial review**;
- E. Permit Petitioner to present evidence including all drug test results, communication timelines, and exhibits;
- F. Award **make-up visitation** for the weeks wrongfully denied; and
- G. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted this 21 day of November, 2025.

A handwritten signature in black ink that reads "Wayland B. Willis". The signature is written in a cursive style with a horizontal line underneath it.

WAYLAND BRAXTON WILLIS, Pro Se
806 Whispering Willow Ct.
Grovetown, GA 30813
706-631-0526
bhbwillis@gmail.com

EXHIBIT A – September 17 Temporary Order

IN THE SUPERIOR COURT OF COLUMBIA COUNTY
STATE OF GEORGIA

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

TEMPORARY ORDER

A Temporary Hearing was scheduled in this matter for August 11, 2025 before the Honorable Sheryl B. Jolly. The Plaintiff was present, represented by counsel Adam Land. The Defendant was present, represented by counsel Holly G. Chapman. Also present was the appointed *Guardian ad Litem*, Renee Bell. Prior to the need for a full evidentiary hearing, the parties came to an agreement, which has been approved and adopted by the Court as follows:

1.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED on a temporary basis that Plaintiff shall continue to have primary physical custody of the minor child at issue in this matter; to wit: Wayland Brooks Willis, born in 2018.

2.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED on a temporary basis that Defendant's visitation shall be increased in steps, with the first step being overnight visitation supervised by Defendant's parents. The first overnight visitation shall be Saturday, August 23, 2025 beginning at 10AM and ending Sunday, August 24, 2025 at 6pm.

3.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED on a temporary basis that the *Guardian ad Litem* shall have the authority to increase visitation to unsupervised overnight visitations and full weekend visitations as she sees fit without further order of this Court.

4.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED on a temporary basis that the *Guardian ad Litem* shall require the Defendant to submit to a 17 panel hair follicle or

nail bed drug test as well as a blood Peth test and shall receive and review those results prior to authorizing unsupervised visitation.

5.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED on a temporary basis that either party may call or Facetime the child when the child is with the other parent. Calls should be reasonable in duration and frequency.

6.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED on a temporary basis that the minor child shall have no contact with Sara Berry.

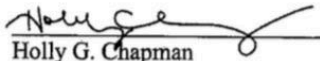
7.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that all other issues shall be held in abeyance until this matter comes before the Court for further hearing.

SO ORDERED this ____ day of _____, 2025.

Honorable Sheryl B. Jolly
Judge, Superior Court
Columbia Judicial Circuit

Presented by:


Holly G. Chapman
Attorney for the Defendant
Davis, Chapman, and Wilder, LLC
1143 Laney Walker Blvd., Suite 201
Augusta, GA 30901
(706) 200-1578 | (706) 229-7051 (f)
GA Bar No.: 512067
hchapman@dcwattorneys.com

Consented to:


Adam Land
Attorney for the Plaintiff
Tisdale Middleton & Land Law Firm
207 North Belair Road
Evans, GA 30809
(706) 869-1348 | (706) 869-9464 (f)
GA Bar No.: 775211
adam@tisdalelawfirm.com

EXHIBIT B – GAL Email Stating She ‘Suspended Visitation’

----- Forwarded Message -----

From: Renee Bell <kidsgal@aol.com>

To: Jo Lynn Harris <jharris@columbiacountyga.gov>; Adam D. Land <adam@tisdalelawfirm.com>; Holly Chapman <hchapman@dcwattorneys.com>

Cc: Tonnia DeBord <tonnia@tisdalelawfirm.com>

Sent: Thursday, November 20, 2025 at 11:23:39 AM EST

Subject: Order suspending visitation and need a status conference - 2025EDR0053 Crowe v Willis

Good morning,

I suspended visitation due to the failed hair follicle drug screen dated October 16th when we received the results on October 29th. I tried to reinstate visitation upon the negative drug screens results received on November 11th, but there were concerns regarding Mr. Willis' sobriety over the weekend. I suspended the visitation again to gather all the facts and get the clinical evaluation results prior to proceeding with visitation.

I am requesting an order suspending visitation and a status conference.

Thank you,

Renee

Renee Bell

Exhibit C — MRO-Verified Negative Test Results



Requesting Agency:
 Analyze America Labs, Inc.
 1840 Wrightsboro Road
 Augusta, GA 30904
 Telephone: 706-738-3145

LAN: 05212102
 Specimen ID: 6792647
 Reason For Test: Random
 Date Collected: 11/04/2025
 Date Received: 11/07/2025
 Date Reported: 11/07/2025

Donor Name: Willis, Wayland

SSN/ID: 057-63-1540

Test(s) Requested: Hair 17 Drug Panel

The Hair 17 Drug Panel Test includes the testing of the following:
 Amphetamine, Methamphetamine, MDMA, MDA, Cocaine/Metabolites, Codeine, Morphine, Heroin Metabolite, Hydrocodone, Hydromorphone, Oxycodone, Oxymorphone, Phencyclidine, THC Metabolite, Alprazolam, Clonazepam, Diazepam, Nordiazepam, Lorazepam, Oxazepam, Temazepam, Meperidine, Normeperidine, Methadone, EDDP, Fentanyl, Norfentanyl, Tramadol, Zolpidem, Buprenorphine, Norbuprenorphine, Propoxyphene, Amobarbital, Butalbital, Pentobarbital, Phenobarbital, Secobarbital, Ketamine, Norketamine.

Hair 17 Drug Panel Test Result: Negative

A negative result indicates that none of the drugs listed were detected at a concentration equal to or greater than their listed cutoff levels.

| Drugs Tested For | Result | Screening Cut off | Screening Method |
|-----------------------------|----------|-------------------|------------------|
| Amphetamine | Negative | 300 pg/mg | ELISA |
| Methamphetamines | Negative | 500 pg/mg | ELISA |
| Cocaine/Metabolites | Negative | 500 pg/mg | ELISA |
| Opiates | Negative | 200 pg/mg | ELISA |
| Extended Opiates | Negative | 200 pg/mg | ELISA |
| Phencyclidine | Negative | 300 pg/mg | ELISA |
| Marijuana (THC/Carboxy THC) | Negative | 50 pg/mg | ELISA |
| Benzodiazepines | Negative | 100 pg/mg | ELISA |
| Meperidine/Metabolites | Negative | 40 pg/mg | ELISA |
| Methadone/Metabolites | Negative | 200 pg/mg | ELISA |
| Fentanyl/Metabolites | Negative | 40 pg/mg | ELISA |
| Tramadol | Negative | 40 pg/mg | ELISA |
| Zolpidem | Negative | 40 pg/mg | ELISA |
| Buprenorphine/Metabolites | Negative | 40 pg/mg | ELISA |
| Propoxyphene | Negative | 8 pg/mg | ELISA |
| Barbiturates | Negative | 200 pg/mg | ELISA |
| Ketamine/Metabolite | Negative | 500 pg/mg | ELISA |

REPORT NOTATIONS

1.5 inches (3.81 cm) - Head Hair

Certified By: John Masimore
 Result Report Version: US.11.2018

Test Version: 5680878.2
 - Page 1 of 1 -

Shaza Deeb
 Laboratory Director

Wayland Willis results Inbox x



kia@analyzeamerica.com

to me, Attorney ▾

Tue, Nov 11, 1:03 PM (9 days ago)



Dear Mr. Willis

Please find attached the drug screens we were processing for you. If you have any questions, please feel free to contact the lab.

Thank you for choosing Analyze America Labs, Inc.

Kind regards

Ms. Reikya Smiley

Client Services

AA Labs, Inc

706-738-3145



Laboratory Final Report

ph. 706-738-3145
fax 706-738-3218

Report To: Reikya Smiley
Analyze America Labs Inc
1840 Wrightsboro Rd
Augusta, GA 30904

Client ID: F052505GA
Client: Analyze America Labs_No MRO
Location:
Collector: REIKYA SMILEY

Sample Information

| | |
|-------------------------------|--------------------------------------|
| Specimen ID: 8033023 | Test Reason: Random |
| Donor ID: 057631540 | Type: Blood |
| Lab Sample ID: 4499786 | Collected: 11/04/2025 14:01 |
| Donor: WAYLAND WILLIS | Received: 11/05/2025 12:54 |
| | Report Date: 11/06/2025 19:23 |

Tests Requested

| | | | |
|------------|------------------|----------------|----------|
| 20PETBLDSP | BloodSpot PETH20 | Sample Result: | negative |
|------------|------------------|----------------|----------|

Results

| Test | Results | Quantitation | Screen Limit | Confirm Limit |
|-------------------------------|----------|--------------|--------------|---------------|
| PHOSPHATIDYL ETHANOL (LCMSMS) | negative | | 20 ng/mL | |

Additional Sample Information

Comments

All screen methods are immunoassay unless otherwise noted.

Test developed and characteristics determined by United States Drug Testing Laboratories. See Compliance Statement on our website http://www.usdtl.com/compliance_statement.

Certification

Data approved by Keon Choi on 11/06/2025

UNITED STATES DRUG TESTING
1700 S. MOUNT PROSPECT ROAD
DES PLAINES, ILLINOIS 60018-1804
Phone 847-375-0770
Fax 847-375-0775



EXHIBIT D
Email from Petitioner to Counsel Dated November 21, 2025

URGENT FILINGS REQUEST



Wayland Braxton Willis <bhbwillis@gmail.com>
to Holly ▾

6:14 PM (2 hours ago) ☆ 😊 ↩ ⋮

Holly,

I received the forwarded message from the Court's assistant. I need to express, in the strongest and clearest possible terms, that the Guardian ad Litem's statements to the Court contain significant inaccuracies and omissions that materially misrepresent the facts and my compliance with the Court's directives.

The GAL's own email states that she "suspended visitation" twice prior to any court order. As you know, the GAL has **no legal authority** to suspend visitation, impose new conditions, or modify the standing September 17 Temporary Order. Her unilateral actions—combined with her mischaracterization of the October 16 test and omission of the MRO-verified negative retest—have now resulted in a verbal suspension issued **without my evidence, without my documentation, and without due process**.

My supervised visitation has now been denied for two consecutive weekends with **no signed order in place**, preventing my son from attending both a family wedding and my grandfather's funeral. These are immediate and irreparable harms.

Because of this, I need you to take urgent action to protect my rights:

1. **File an objection and/or motion to vacate** the verbal suspension based on due process and the GAL acting outside her authority;
2. **Request an expedited hearing or immediate judicial review**, so the Court can see the verified negative tests and the full communication timeline; and
3. **File a Motion for Contempt** for Respondent's willful refusal to comply with the Court-ordered supervised visitation on two consecutive weekends prior to any judicial ruling.

I want to be completely transparent: I have every email, text message, test result, screenshot, and timeline fully organized and formatted for court. I am prepared to file immediately if needed. Nothing that has been claimed will go unanswered, and every discrepancy is documented.

Out of respect for the urgency of this situation, **please respond no later than this evening** confirming whether you will be filing these motions on my behalf. If you do not intend to file, please let me know right away so I can proceed myself without losing any further time with my son.

Thank you,
Wayland Braxton Willis

EXHIBIT E

Timeline of Visitation Denials and Resulting Harm

November 2025

• November 9–10 Weekend

Petitioner appeared ready for supervised visitation in accordance with the September 17, 2025 Temporary Order.

Respondent did **not** make the minor child available.

No written order existed modifying visitation.

• November 16–17 Weekend

Petitioner again appeared ready for supervised visitation.

Respondent again refused to make the minor child available.

As a result, the minor child was unable to attend a **family wedding** with Petitioner's side of the family.

No written order existed modifying visitation.

• November 23 Weekend (Upcoming / Immediate)

Petitioner is again prepared for supervised visitation.

Respondent has indicated or continues to act in a manner suggesting visitation will not occur due to an alleged verbal suspension.

The minor child is scheduled to miss **Petitioner's grandfather's funeral**, an irreplaceable family event, if visitation does not proceed.

No written order exists modifying visitation.

Summary:

Since the September 17 Temporary Order remains the only signed order of the Court, Respondent's refusal to produce the child for supervised visitation on multiple weekends represents **ongoing willful non-compliance**, resulting in significant and irreparable harm to the parent-child relationship and extended family involvement.

EXHIBIT F

Summary of Respondent's Non-Compliance With Court-Ordered Visitation

The following summary reflects Respondent's actions and inactions that prevented Court-ordered supervised visitation from taking place, despite Petitioner's full readiness and compliance:

1. Failure to Produce the Child for Court-Ordered Visitation

- On each scheduled visitation weekend since **November 9–10, 2025**, Respondent did **not** make the minor child available for supervised visitation under the September 17 Temporary Order.
 - Respondent provided **no written explanation**, no written notice, and relied solely on alleged verbal communication from the Guardian ad Litem.
-

2. Respondent Required Petitioner to Wait on GAL Approval

- Respondent repeatedly communicated (directly or indirectly) that she would not comply with visitation until the GAL "approved" visitation or "released" the suspension.
 - No such authority exists under Georgia law, and no written order was issued by the Court.
-

3. Respondent Declined or Ignored Petitioner's Attempts to Coordinate Visitation

- Petitioner initiated communication to confirm pickup times/locations in good faith.
- Respondent did not respond, delayed responding, or gave non-committal statements indicating visitation would not occur.

- Respondent did not propose alternative times or show willingness to comply with the standing order.
-

4. Respondent Failed to Provide Child for Significant Family Events

- Respondent's refusal to comply with visitation directly resulted in the minor child missing:
 - a **family wedding** (November 16–17 weekend), and
 - **Petitioner's grandfather's funeral** (scheduled during November 23 weekend).
-

5. Respondent Has Relied Entirely on a Non-Judge, Non-Order "Suspension"

- Respondent took the position that visitation was "suspended," despite:
 - no written order signed by the Court,
 - the GAL having no authority to suspend visitation,
 - Petitioner providing **MRO-verified negative test results**, and
 - the September 17 Temporary Order being fully active and enforceable.
-

Summary:

Respondent's actions show a **pattern of willful non-compliance** with the Court-ordered visitation schedule. Petitioner made every effort to fulfill his responsibilities, coordinate visitation, and comply with all testing requirements. Respondent's refusal to follow the Court's order has resulted in repeated denial of supervised visitation and irreparable harm to the parent-child relationship.