

IN THE SUPERIOR COURT OF COLUMBIA COUNTY
STATE OF GEORGIA

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

MOTION TO WITHDRAW AS COUNSEL OF RECORD

Comes Now the undersigned counsel and moves to withdraw from the matter above pursuant to Uniform Superior Court Rule 4.3 and shows as follows:

1.

The attorney wishes to withdraw from this action.

2.

The Court retains jurisdiction of the above-styled action.

3.

The client has the burden of keeping the court informed with regard to where notices, pleadings, or other papers may be served and can currently be reached at 6124 Gavin Road, Grovetown, Georgia 30813.

4.

The client has the obligation to prepare for trial or cause his new attorney to prepare for trial.

6.

If the client fails or refuses to meet this burden, the client may suffer adverse consequences.

7.

There is a hearing scheduled on December 9, 2025 for a status conference. Said hearing will not be affected by the withdrawal of counsel, and if the Court deems it necessary for counsel to remain counsel of record for that hearing, counsel respectfully requests to be allowed to withdraw immediately following said hearing.

8.

Service of notice of intent to withdraw was served on the Defendant by electronic mail to bhbwillis@gmail.com on November 18, 2025. A copy of said notice is filed with the Court.

9.

Defendant has filed an objection to undersigned counsel's withdrawal from his representation.

10.

Pursuant to Rule 1.16(b) of the Georgia Rules of Professional Conduct, counsel's withdrawal from representation is permissive under the facts of this case. Specifically, Defendant has breached his contract with undersigned counsel, and there has been a breakdown in the attorney-client relationship. *See Sutherland v. Hammers*, 375 Ga.App. 439 (2025).

11.

Undersigned counsel respectfully requests that this Court, after considering her motion to withdraw and the filed objection of the Defendant, grant this motion, or in the alternative, hear further evidence ex-parte at the hearing scheduled for December 9, 2025.

This the 2nd day of December, 2025

Respectfully submitted,



Holly G. Chapman
Attorney for the Plaintiff

Davis, Chapman, and Wilder, LLC
1143 Laney Walker Blvd., Suite 201
Augusta, GA 30901
(706) 200-1578
(706) 229-7051 (fax)
GA Bar No.: 512067
hchapman@dcwattorneys.com

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CERTIFICATE OF SERVICE

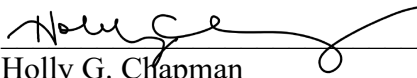
This is to certify that I have this day served a copy of the following pleading upon the following individuals by electronic mail and through PeachCourt to:

Honorable Sheryl B. Jolly
jharris@columbiacountyga.gov

Wayland Braxton Willis
bhbwillis@gmail.com

Adam Land
adam@tisdalelawfirm.com

This the 2nd day of December, 2025.



Holly G. Chapman
Attorney for the Plaintiff

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