

DEC 02, 2025 10:56 PM

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


Cindy Mason, Clerk
Columbia County, Georgia

**HALEY CROWE,
Plaintiff,**

Civil Action File No.: 2025EDR0053

v.

**WAYLAND BRAXTON WILLIS,
Respondent.**

**SUPPLEMENTAL OBJECTION TO COUNSEL'S MOTION TO
WITHDRAW**

Respondent, Wayland Braxton Willis ("Respondent"), files this Supplemental Objection to Counsel's Motion to Withdraw and shows the Court as follows:

1. Lack of Proper Notice

Counsel filed her Motion to Withdraw on December 2, 2025, at approximately 9:19 a.m. Respondent did not receive any PeachCourt notification of this filing. Respondent received only an email from Counsel at approximately 5:01 p.m., hours after the motion was filed. Respondent has consistently received automatic notifications of all filings in this case; the absence of notice for this filing prejudiced his ability to respond promptly.

2. Prejudice Due to Timing Before Hearing

The final hearing is set for December 9, 2025—seven days from the date of Counsel's filing. Withdrawal at this stage significantly prejudices Respondent's ability to prepare and present his case. Respondent has relied on Counsel's representation for ongoing motions, filings, and communications, and must now complete substantial preparation alone.

3. Breakdown Not Attributable to Respondent

Respondent has demonstrated full cooperation and communication with Counsel throughout the case. Any alleged breakdown in communication is not attributable to bad faith, refusal to cooperate, or lack of engagement on Respondent's part. Respondent has complied with every request made of him and has maintained consistent contact.

4. Outstanding Motions and Case Work Requiring Representation

Critical matters remain pending before the Court, including:

- recent filings,
- evidentiary preparation,
- outstanding discovery issues,
- and procedural steps tied to the upcoming hearing.

Withdrawal at this stage would leave Respondent without adequate representation to address these matters.

5. Request for Relief

Respondent respectfully requests that the Court:

- (a) Deny Counsel's Motion to Withdraw until after the December 9 hearing; or, in the alternative,
- (b) Require Counsel to remain on the case through the December 9 hearing, or
- (c) Schedule an expedited hearing on the Motion to Withdraw so Respondent is not left without representation during final preparation.

WHEREFORE, Respondent respectfully prays that the Court grant the relief requested herein and for such other relief as the Court deems just and proper.

Respectfully submitted

Wayland B. Willis

Wayland Braxton Willis

Respondent, Pro Se

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