

DEC 10, 2025 10:42 AM


Cindy Mason, Clerk
Columbia County, Georgia

IN THE SUPERIOR COURT OF COLUMBIA COUNTY
STATE OF GEORGIA

HALEY CROWE,

Plaintiff,

v.

WAYLAND WILLIS,

Defendant.

Civil Action No. 2025EDR0053

DEFENDANT'S MOTION FOR RELIEF AND/OR MODIFICATION OF TESTING ORDER

COMES NOW the Defendant, **Wayland Willis**, and respectfully moves this Court for limited relief and/or modification of the Court's December 9, 2025 Order requiring the Defendant to submit to a **17-panel hair follicle drug test and PEth test before 4:30 PM on December 9, 2025**. In support of this Motion, the Defendant shows the Court the following:

1. Defendant's Willingness to Comply

The Defendant does not dispute the testing requirement and expresses full willingness to complete all Court-ordered testing as directed.

2. Immediate Financial Inability to Comply Same-Day

The Defendant was served with the testing directive at the conclusion of the December 9 hearing. At this time, the Defendant has **no available financial resources** to pay for both the 17-panel follicle test and the PEth test, which must be paid for upfront at the laboratory.

The Defendant cannot obtain funds, loans, or third-party assistance prior to the 4:30 PM deadline imposed by the Court.

3. Impossibility of Same-Day Compliance

Because laboratory testing requires full pre-payment, and because the Defendant lacks the ability to pay the required amount on the same day, compliance is impossible without relief from the Court. The Defendant is not refusing the Order; the impossibility arises solely from financial indigency. The combined cost of the required **17-panel follicle test and PETH test is exceptionally high**, and the Court did not inquire into or consider the Defendant's financial circumstances before issuing a same-day directive requiring immediate payment. The Defendant's financial resources have already been exhausted by substantial litigation-related expenses, including attorney withdrawal fees, repeated filing fees, document production costs, program-related fees, and the ongoing purchase of supplies and equipment necessary to prepare evidence and maintain the Court-ordered case binder. These cumulative expenses were unavoidable and left the Defendant with no remaining funds to satisfy the sudden and unusually costly same-day testing requirement. The financial obligation imposed by the Order was not foreseeable, and the Defendant had no reasonable opportunity to prepare for or secure funds to meet this unexpected demand.

4. Good-Faith Efforts to Comply

Immediately after receiving the Court's directive, the Defendant attempted to contact **Analyze America Labs** to:

- determine the total cost of both tests;
- inquire about payment arrangements or deferred billing;
- request an immediate appointment.

Call logs and additional documentation can be provided as Exhibit A.

5. Relief Requested

The Defendant respectfully requests that the Court grant one or more of the following:

- a. A brief extension of the testing deadline to allow time for the Defendant to obtain the necessary funds;**
 - b. Permission to file an Affidavit of Indigence and for the Court to determine whether reduced-cost testing, cost-sharing, or use of a county indigent provider is appropriate;**
 - c. Modification of the December 9 testing deadline to allow reasonable compliance;**
 - d. Any other relief the Court deems fair and just to ensure that the Defendant is not penalized for financial circumstances outside his control.**
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6. Good-Faith Purpose of This Motion

This Motion is submitted solely to prevent any misunderstanding or appearance of defiance. The Defendant seeks only to comply with the Court's directive in a realistic manner consistent with his financial circumstances.

WHEREFORE, the Defendant respectfully prays that this Court grant the relief requested herein and issue an Order modifying or extending the testing deadline and/or addressing indigency limitations, along with any further relief the Court finds proper.

Respectfully submitted this **9** day of **December, 2025**.

Wayland Willis
Defendant, Pro Se
806 Whispering Willow Ct.
Grovetown, GA 30813

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day served a copy of the foregoing **Defendant's Motion for Relief and/or Modification of Testing Order** upon all parties of record by filing same through PeachCourt, which provides electronic service to the following:

Adam Land
Attorney for Plaintiff

Renee Bell
Guardian ad Litem

This 9th day of December, 2025.

Wayland Willis
Defendant, Pro Se

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AFFIDAVIT OF INDIGENCE

Personally appeared before the Court the Defendant, **Wayland Willis**, who, after being duly sworn, states the following:

1. The Defendant currently lacks the financial ability to pay for the Court-ordered **17-panel follicle drug test and PEth test** required on December 9, 2025.
2. The Defendant has no available funds, savings, credit, or third-party financial support to cover the cost of the testing before the same-day deadline of 4:30 PM.
3. The inability to pay is not due to refusal, avoidance, or unwillingness to comply, but solely due to indigency.
4. The Defendant is prepared to complete the ordered testing immediately upon obtaining financial relief, an extension, or modification granted by the Court.
5. The statements contained herein are true and correct to the best of the Defendant's knowledge and belief.

Wayland Willis

Defendant, Pro Se

Sworn to and subscribed before me
This 9 day of December, 2025.

Notary Public

My Commission Expires: _____

EXHIBIT A – DEFENDANT’S GOOD-FAITH ATTEMPT TO CONTACT LABORATORY

The attached call log reflects the Defendant’s immediate attempt to contact Analyze America Labs following the issuance of the Court’s Order, for the purpose of complying with the testing directive. The Defendant was unable to proceed due to financial impossibility.

