

IN THE SUPERIOR COURT OF COLUMBIA COUNTY  
STATE OF GEORGIA

HALEY CROWE

Plaintiff,

vs.

CASE NUMBER: 2025EDR0053

WAYLAND WILLIS,

Defendant.

**DEFENDANT'S MOTION TO CLARIFY THE RECORD, ADDRESS  
UNADJUDICATED ALLEGATIONS, AND REQUEST TEMPORARY RELIEF**

**I. LIMITED PURPOSE OF THIS MOTION**

1. This Motion is not filed to relitigate factual allegations, challenge credibility determinations, or seek reconsideration of any prior ruling.
2. Defendant respectfully seeks clarification regarding:
  - o which allegations, if any, presently carry legal effect;
  - o the scope and duration of existing temporary restrictions;
  - o and the parameters of parent-child communication pending final adjudication.
3. Defendant further seeks to ensure that temporary procedural measures are not afforded de facto permanence absent findings of fact or conclusions of law.

**II. PROCEDURAL POSTURE**

4. This matter is pending before the Court as a modification action. To date, no evidentiary hearing on the merits of Plaintiff's allegations has occurred.
5. The Court has entered a series of temporary and consent orders addressing visitation, testing, and evaluative

conditions at various stages of the case. These orders were entered for interim management purposes and expressly reserve ultimate determinations for future adjudication.

6. None of the existing temporary or consent orders contain findings of fact or conclusions of law adjudicating the allegations asserted in Plaintiff's pleadings.
7. Several Defendant-filed motions remain pending without ruling, including motions addressing indigency, clarification, supplementation of the record, and temporary relief, contributing to uncertainty regarding Defendant's rights and obligations.

### **III. STATUS OF ALLEGATIONS REFERENCED IN PLAINTIFF'S FILINGS**

8. Plaintiff's Complaint and emergency filings contain allegations that have not been tested at hearing, subjected to evidentiary review, or reduced to findings of fact or conclusions of law.
9. Defendant files this Motion solely to clarify whether any such allegations presently carry legal effect beyond their status as unproven pleadings.
10. Prior allegations involving law enforcement or child protective authorities resulted in no substantiated findings or adjudicative determinations, and any related Temporary Protective Orders were dismissed or expired without findings of misconduct.

### **IV. DISCOVERY CONFIRMATION**

11. Plaintiff's written discovery responses confirm that no evidentiary findings, agency determinations, or documentary substantiation have been produced to support the allegations referenced in prior pleadings.
12. This absence of substantiation underscores the need for record clarification to prevent interim measures from being misconstrued as adjudicated conclusions.

### **V. STATUS QUO PRIOR TO JANUARY 2025**

13. In the months immediately preceding January 2025, the parties operated under a shared custodial arrangement in which the minor child spent substantial, routine, and

recurring time in Defendant's care as part of the child's ordinary life.

14. Pursuant to the parties' divorce decree and established practice, Defendant exercised multiple days of parenting time each week, including overnight periods, vacations, and active involvement in the child's daily care.
15. During this period, Defendant consistently performed day-to-day parental responsibilities, including transportation, caregiving, school coordination, extracurricular logistics, and schedule flexibility. Plaintiff routinely relied upon Defendant's involvement to support the child's needs.
16. In the weeks immediately preceding Plaintiff's January 2025 allegations, the parties continued cooperative co-parenting, including shared planning for holidays, family events, and routine activities, reflecting continuity and normalcy.
17. The abrupt shift from cooperative co-parenting to emergency assertions occurred without any corresponding adjudicated change in Defendant's parenting conduct or involvement.

#### **VI. PARENT-CHILD COMMUNICATION CLARIFICATION**

18. The parties' divorce decree and parenting plan expressly contemplate regular and ongoing parent-child communication.
19. No order entered in this matter expressly suspends, modifies, or limits the parent-child communication provisions of the divorce decree or parenting plan.
20. Nevertheless, Defendant's reasonable efforts to maintain consistent parent-child communication have frequently been delayed or denied in practice due to uncertainty regarding interpretation and authority pending final adjudication.
21. Defendant respectfully seeks clarification sufficient to ensure that parent-child communication occurs in a predictable, neutral, and child-focused manner consistent with the existing decree unless and until the Court

expressly orders otherwise.

**VII. GUARDIAN AD LITEM CLARIFICATION**

22. Defendant respectfully requests clarification regarding the scope of the Guardian ad Litem's authority, communication expectations, and any reporting or investigative obligations relevant to the current temporary posture, to ensure transparency and consistent application of Court directives.

**VIII. GOOD-FAITH COMPLIANCE**

23. Defendant has complied in good faith with all Court-ordered evaluations and testing directives to the extent financially and practically possible.

24. All completed screenings have returned negative results.

25. Defendant does not seek to litigate testing details in this Motion and reserves any evidentiary presentation for future proceedings.

**IX. PRESERVATION OF DUE PROCESS**

26. Defendant submits this Motion to preserve due process and to ensure that temporary procedural measures are not afforded de facto permanence absent findings of fact or conclusions of law.

**WHEREFORE**, Defendant respectfully prays that this Court:

- A. Clarify the procedural status and legal effect of unadjudicated allegations;
- B. Clarify the scope of existing temporary restrictions;
- C. Clarify and confirm parent-child communication consistent with the divorce decree;
- D. Clarify the scope and obligations of the Guardian ad Litem;
- E. Address pending motions or schedule a status conference; and

Respectfully submitted this 1st day of January, 2026.

*Wayland B Willis*

Wayland Braxton Willis

Defendant, Pro Se

806 Whispering Willow Ct.

Grovetown, Georgia 30813

c: (706) 631-0526

e: bhbwillis@gmail.com

## **EXHIBIT INDEX**

Submitted in Support of Defendant's Motion to Clarify the Record, Address Unadjudicated Allegations, and Request Temporary Relief

### **Exhibit A**

#### **Pre-Allegation Status Quo & Normal Co-Parenting**

##### **Description:**

Text message communications from September 2024 through December 2024 reflecting routine, cooperative co-parenting practices prior to the allegations at issue, including shared planning, schedule flexibility, holiday coordination, and Plaintiff's reliance on Defendant for regular parenting responsibilities.

##### **Purpose:**

To provide contextual evidence of the parties' functional parenting status quo immediately preceding the allegations currently influencing the temporary posture of this case.

### **Exhibit B**

#### **Intervening Communications Context**

##### **Description:**

Records and documentation reflecting the procedural disposition of prior allegations referenced in this matter, including the absence of substantiated findings, dismissed or expired protective actions, and completed screening processes as reflected in the record.

##### **Purpose:**

To distinguish allegations from adjudicated findings and to clarify the procedural posture underlying the current temporary restrictions.

### **Exhibit C**

#### **Communication Ambiguity Under Existing Parenting Plan**

##### **Description:**

Selected communications from the relevant period reflecting uncertainty and inconsistency in the implementation of parent-child contact and communication under the parties' existing parenting plan.

**Purpose :**

To demonstrate the practical impact of the absence of written clarification regarding communication and visitation parameters, supporting Defendant's request for clarification and limited temporary relief.

**EXHIBIT CONTEXT**

**Exhibit A - Pre-Allegation Status Quo & Normal Co-Parenting**

Exhibits A-1 through A-8 are submitted to provide context regarding the parties' routine co-parenting practices and parent-child communication patterns prior to the allegations at issue. These materials reflect ordinary coordination and communication consistent with the existing parenting plan and practices familiar to the child.

**Exhibit B - Intervening Communications Context**

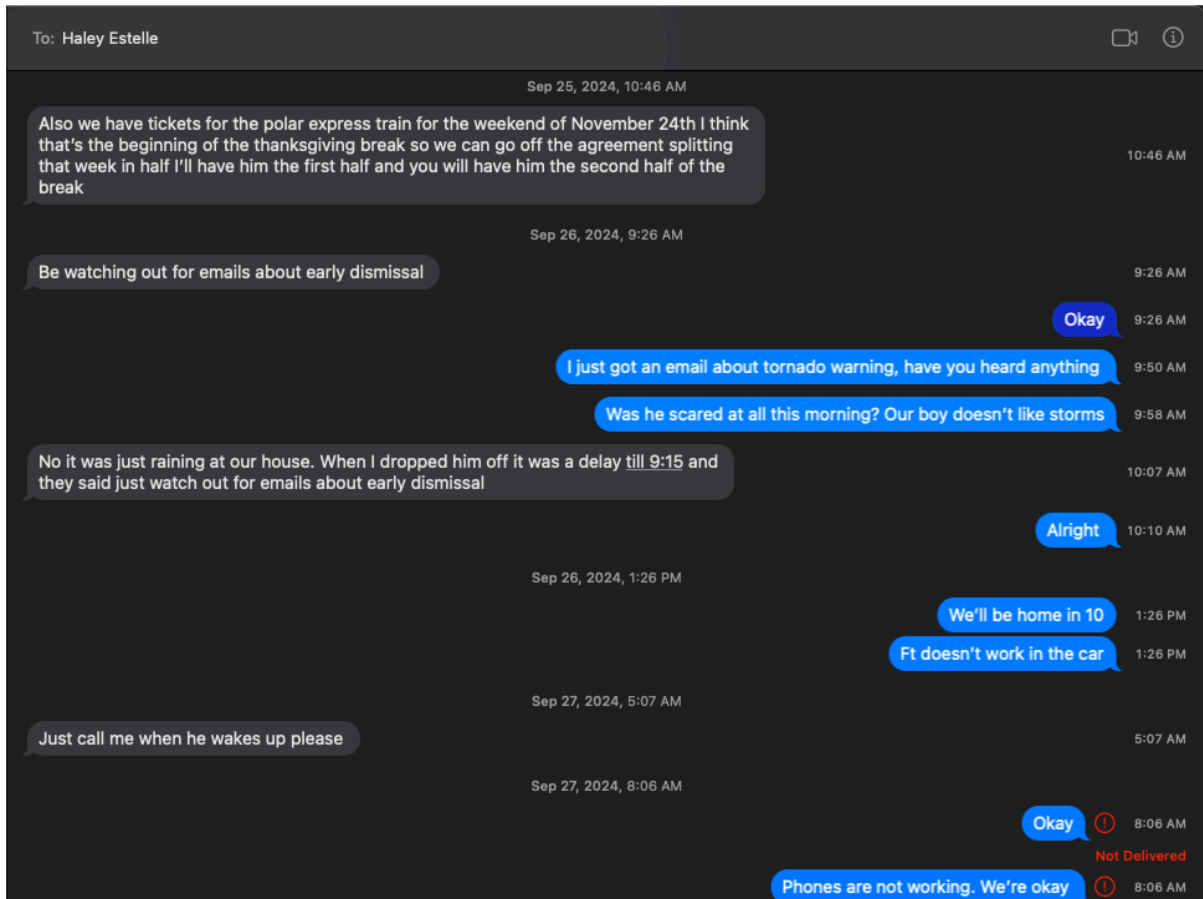
Exhibits B-1.1 through B-4 are submitted to illustrate deviations from previously exercised communication practices, including retractions of informal agreements and uncertainty regarding implementation. These materials are offered solely for contextual clarity and not to assign intent or fault.

**Exhibit C - Communication Ambiguity Under Current Parenting Plan**

Exhibits C-1 through C-8 are submitted to demonstrate how parent-child communication has been implemented in practice during the relevant period, including the absence of consistent parameters or defined availability. These exhibits provide context regarding departures from routine communication practices familiar to the child, without asserting motive or seeking enforcement.

**A-1**

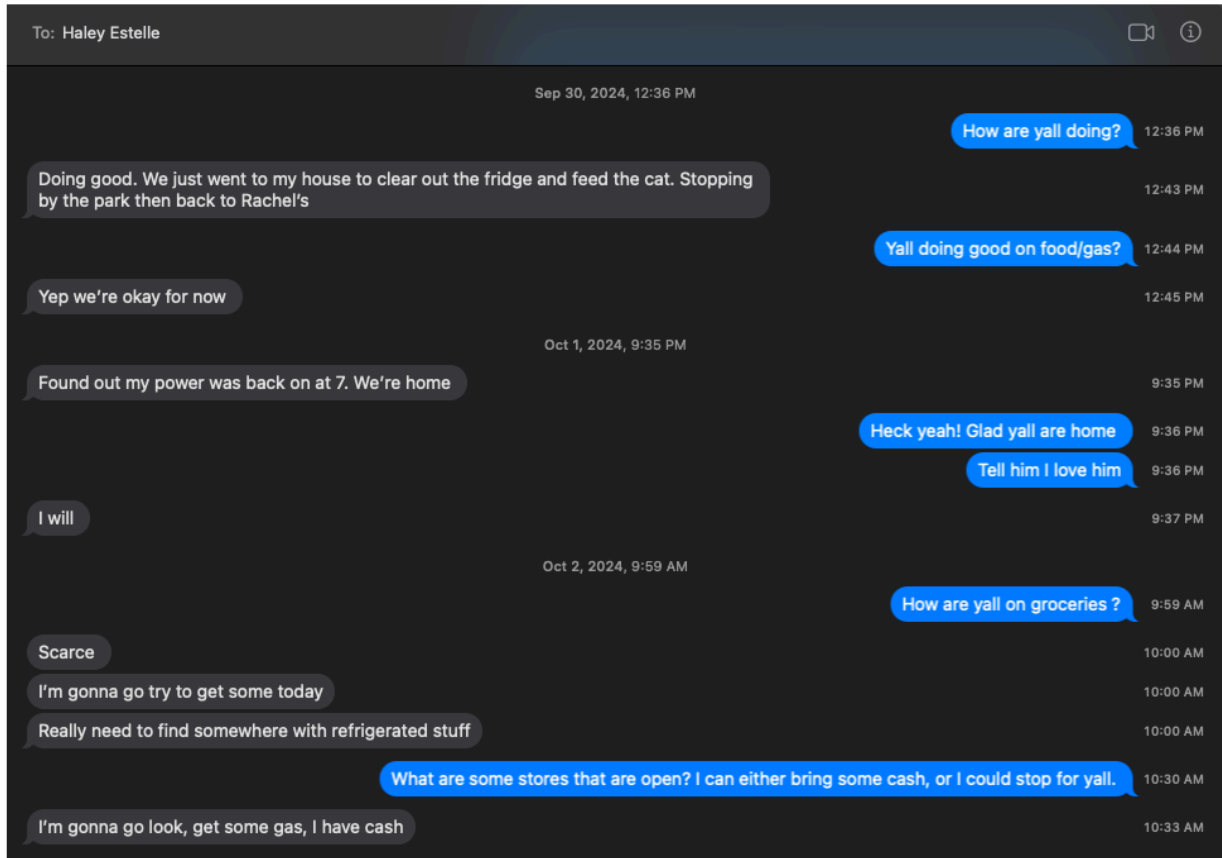
**EXHIBIT A - Pre-Allegation Status Quo & Normal Co-Parenting**  
Text messages dated 9/25/2024 reflecting normal co-parenting prior to January 9th allegations.



**A-2**

**EXHIBIT A - Pre-Allegation Status Quo & Normal Co-Parenting**

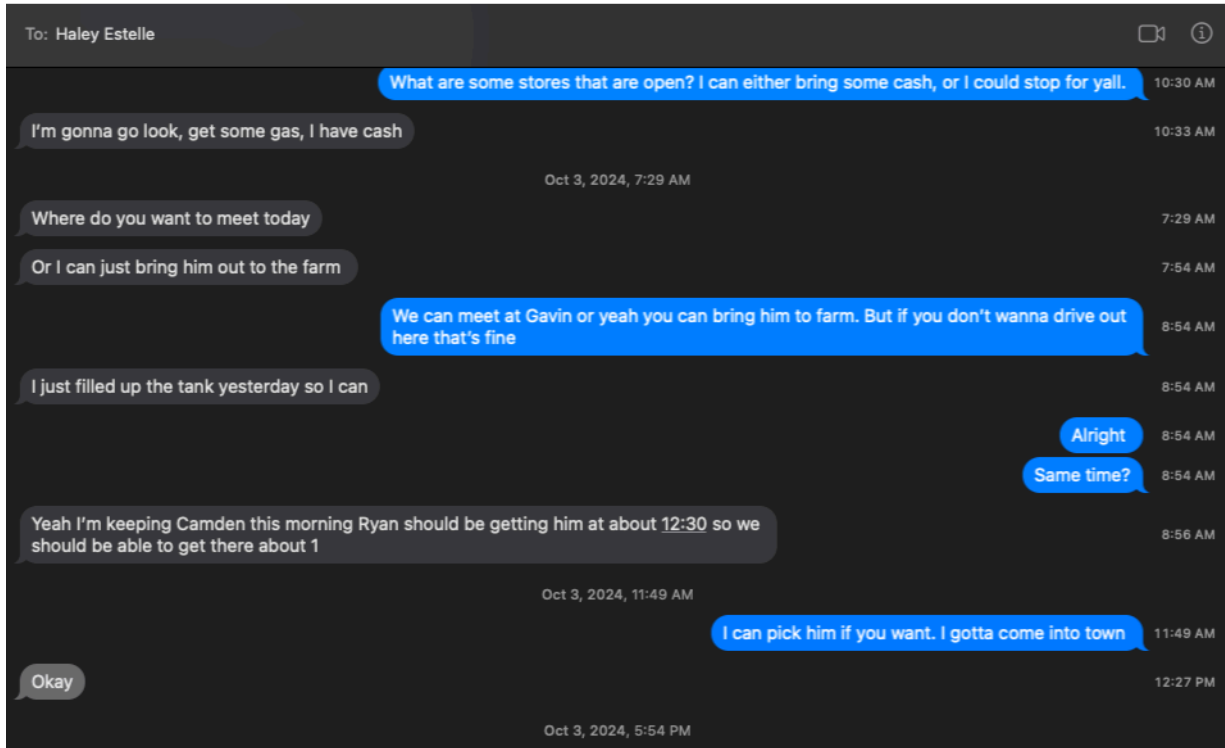
Text messages dated 9/30/2024 reflecting routine co-parenting communications prior to any allegations.



**A-3**

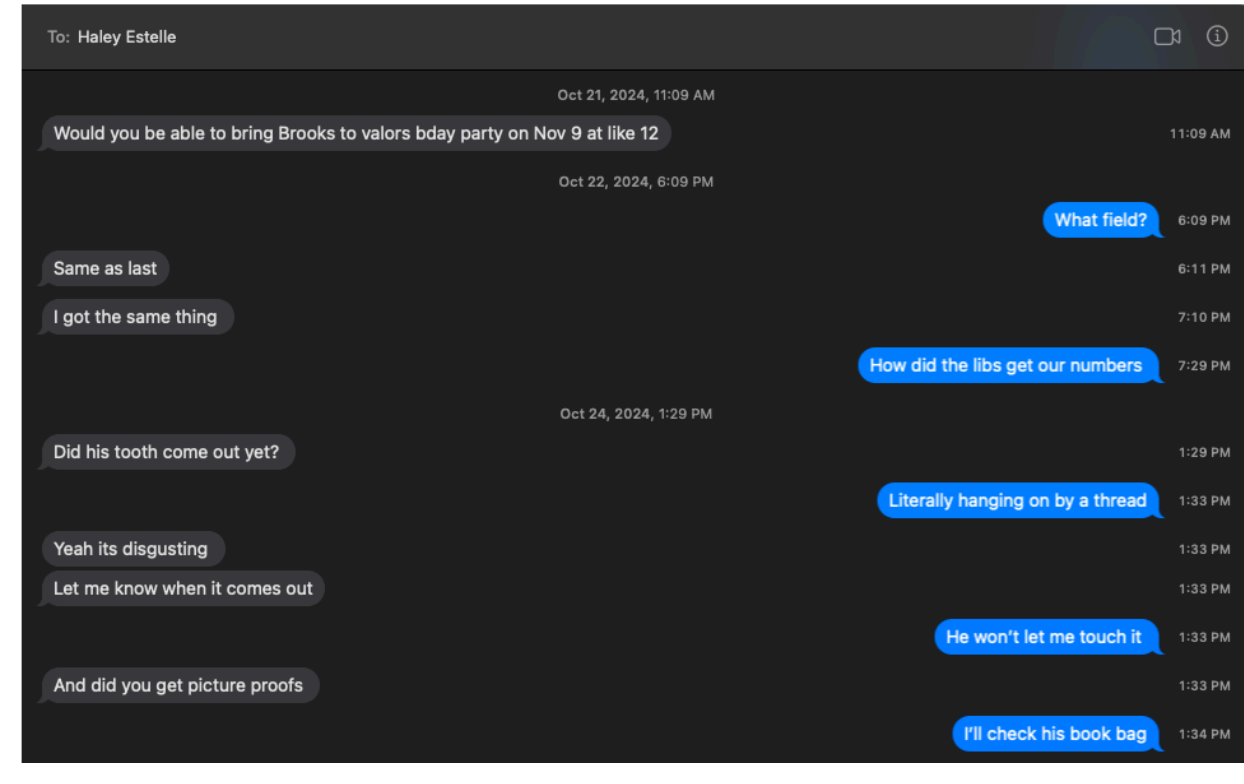
**EXHIBIT A - Pre-Allegation Status Quo & Normal Co-Parenting**

Text messages dated 10/03/2024 demonstrating normal parenting coordination and scheduling.



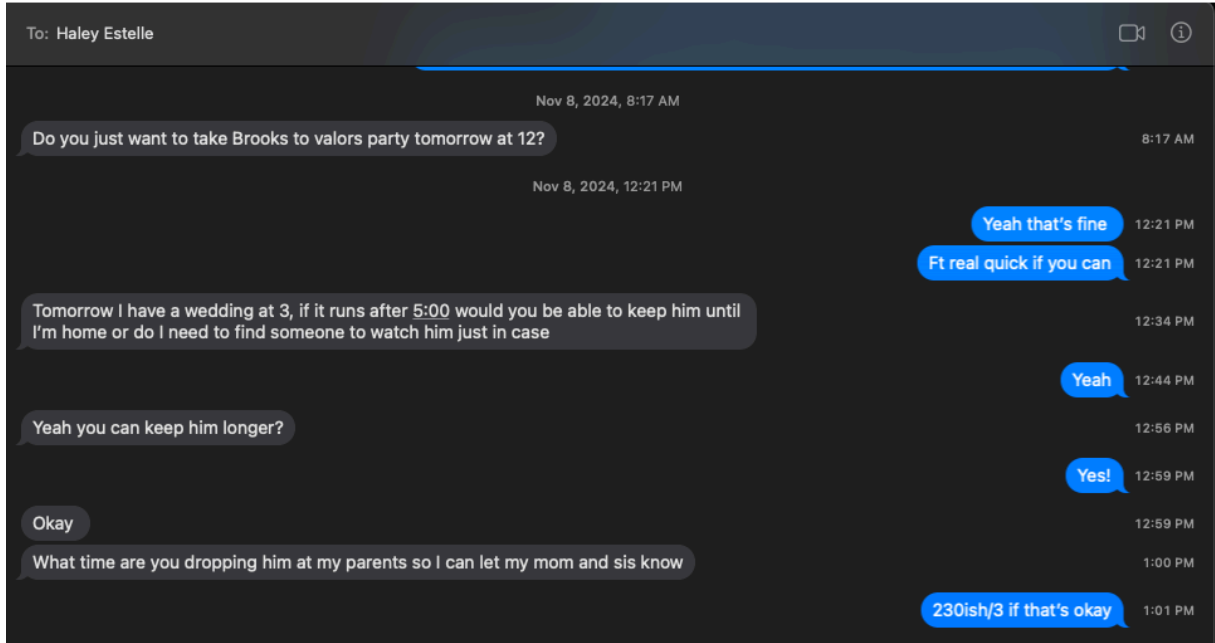
**A-4**

**EXHIBIT A - Pre-Allegation Status Quo & Normal Co-Parenting**  
Text messages dated 10/21/2024 reflecting pre-allegation parenting communications and cooperation.



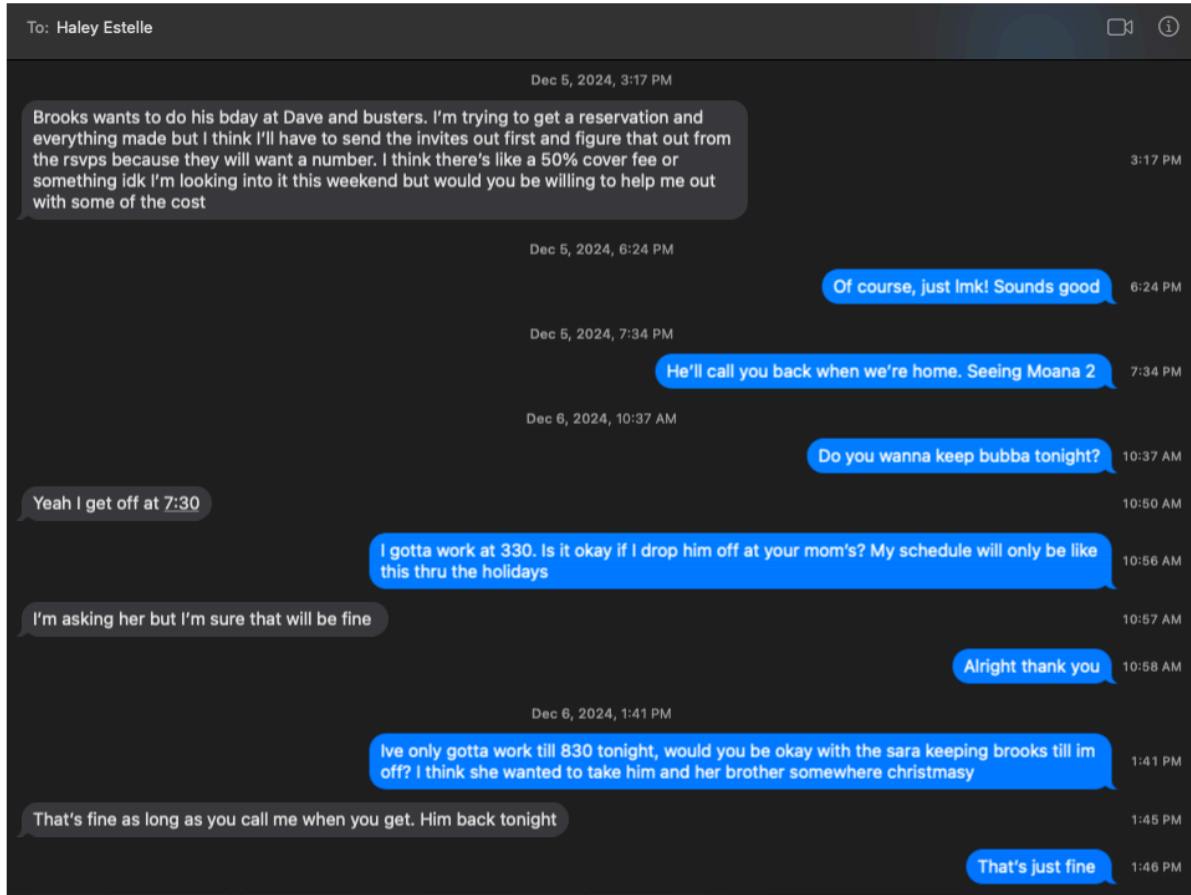
**A-5**

**EXHIBIT A - Pre-Allegation Status Quo & Normal Co-Parenting**  
Text messages dated 11/08/2024 demonstrating continuation of established status-quo parenting practices.



**A-6**

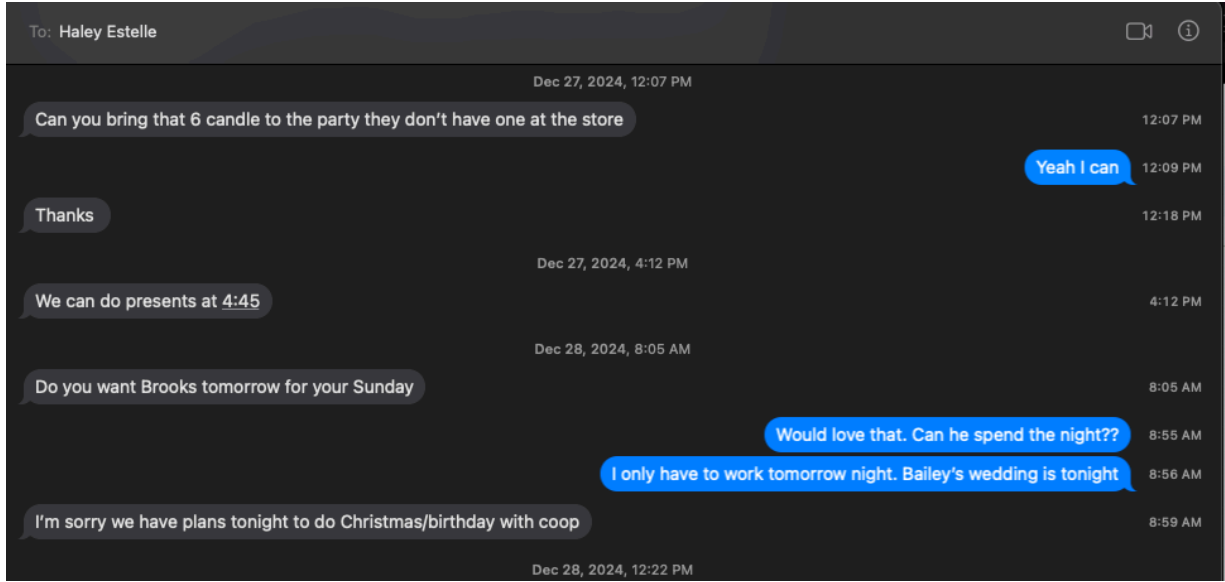
**EXHIBIT A - Pre-Allegation Status Quo & Normal Co-Parenting**  
Text messages dated 12/05/2024 reflecting cooperative planning related to the child's upcoming birthday.



**A-7**

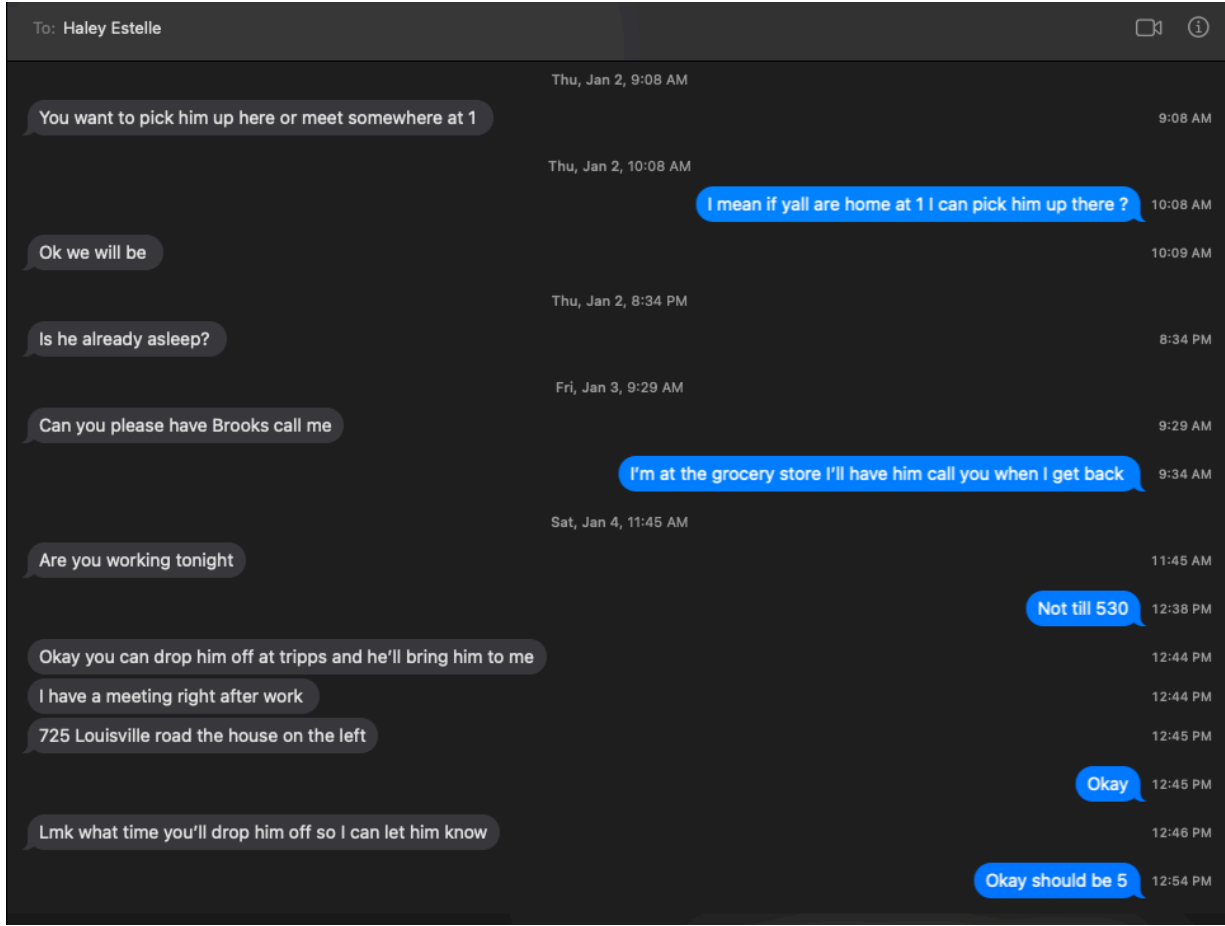
**EXHIBIT A - Pre-Allegation Status Quo & Normal Co-Parenting**

Text messages dated 12/27-12/28/2024 showing cooperative birthday party coordination and reliance, then later withdrawal of agreed parenting time.



**A-8**

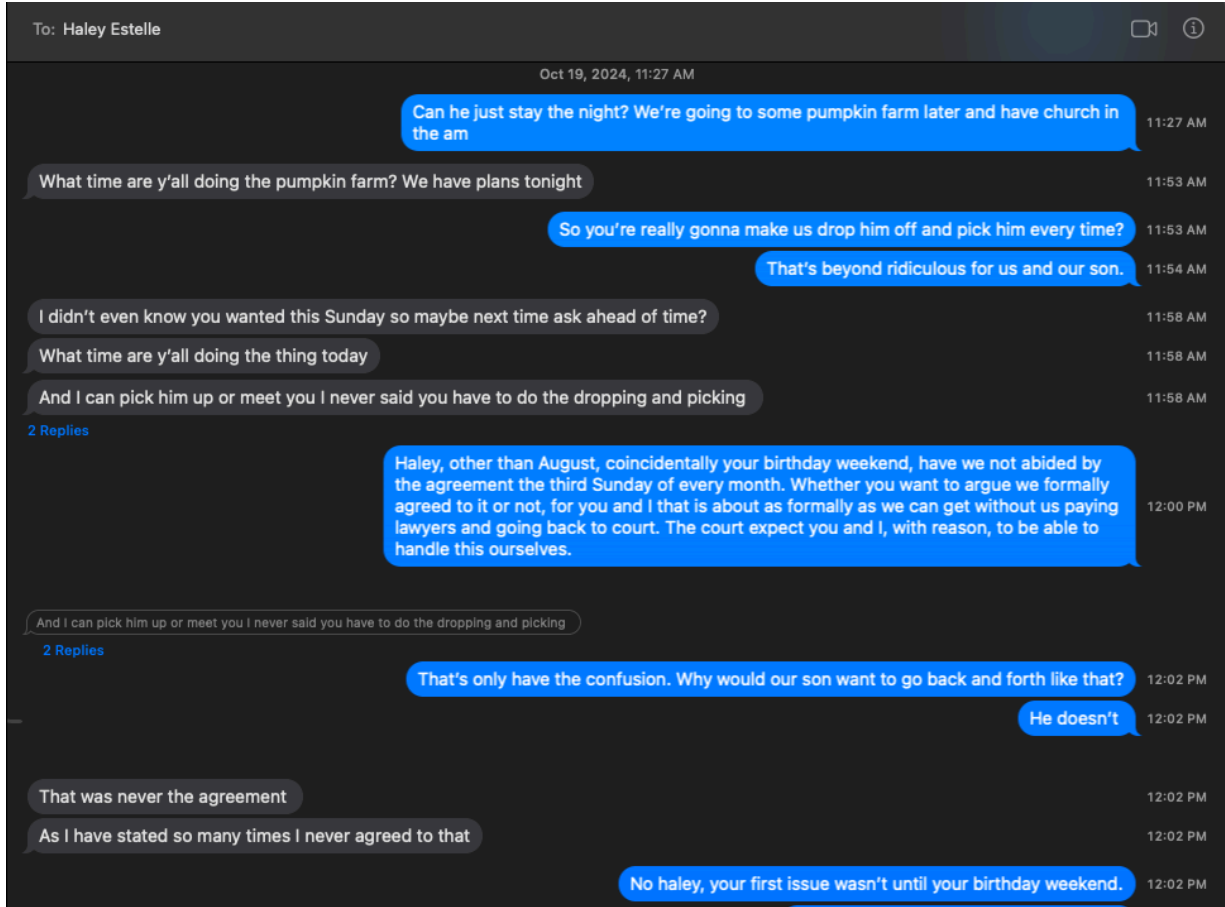
**EXHIBIT A - Pre-Allegation Status Quo & Normal Co-Parenting**  
Text message screenshots dated January 4, 2025 reflecting ordinary co-parenting communication and coordination in the days immediately preceding the allegations later raised.



**B-1.1**

**EXHIBIT B - Intervening Communications Context**

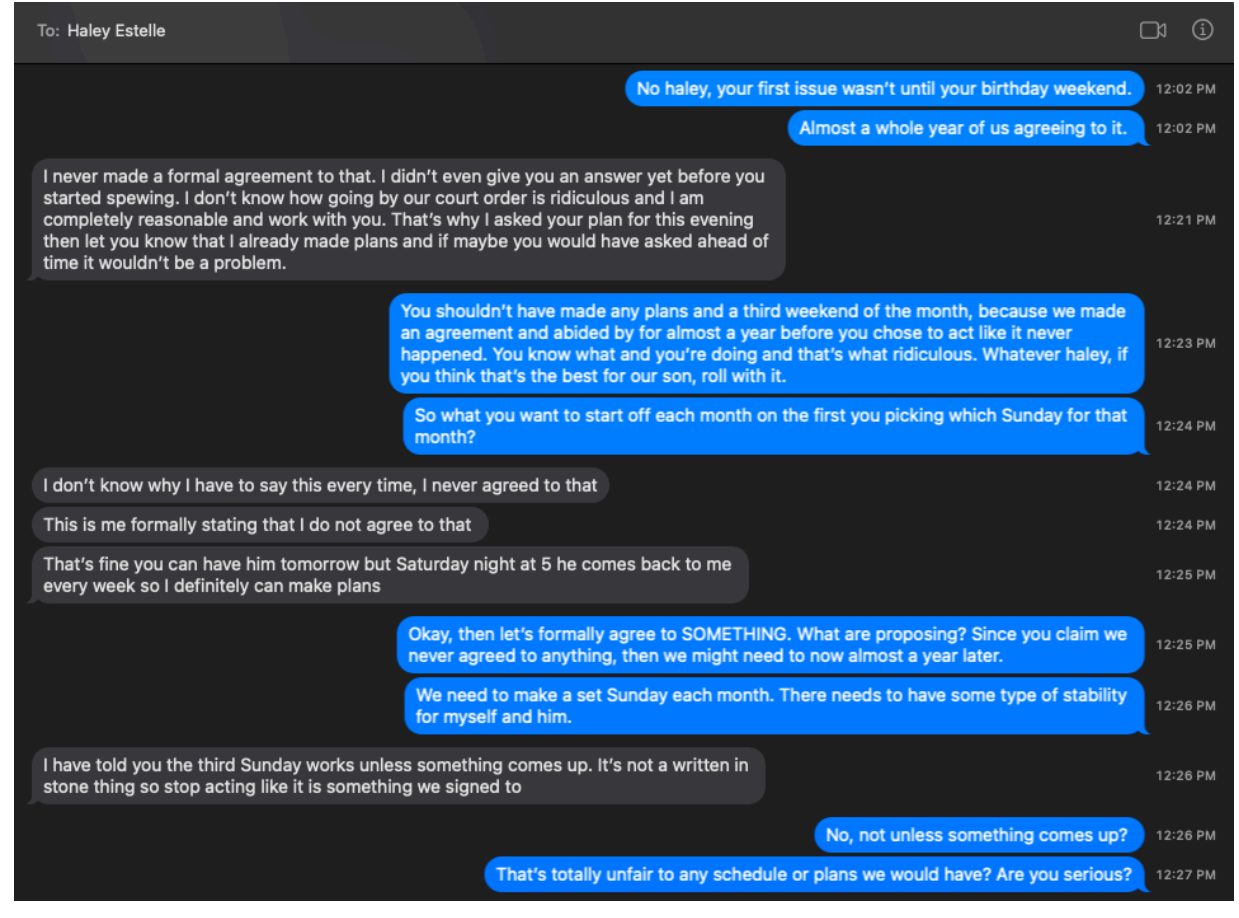
Text message screenshots dated October 19, 2024 reflecting retraction of a previously mutual parenting agreement based on the absence of formal court documentation.



**B-1.2**

**EXHIBIT B - Intervening Communications Context**

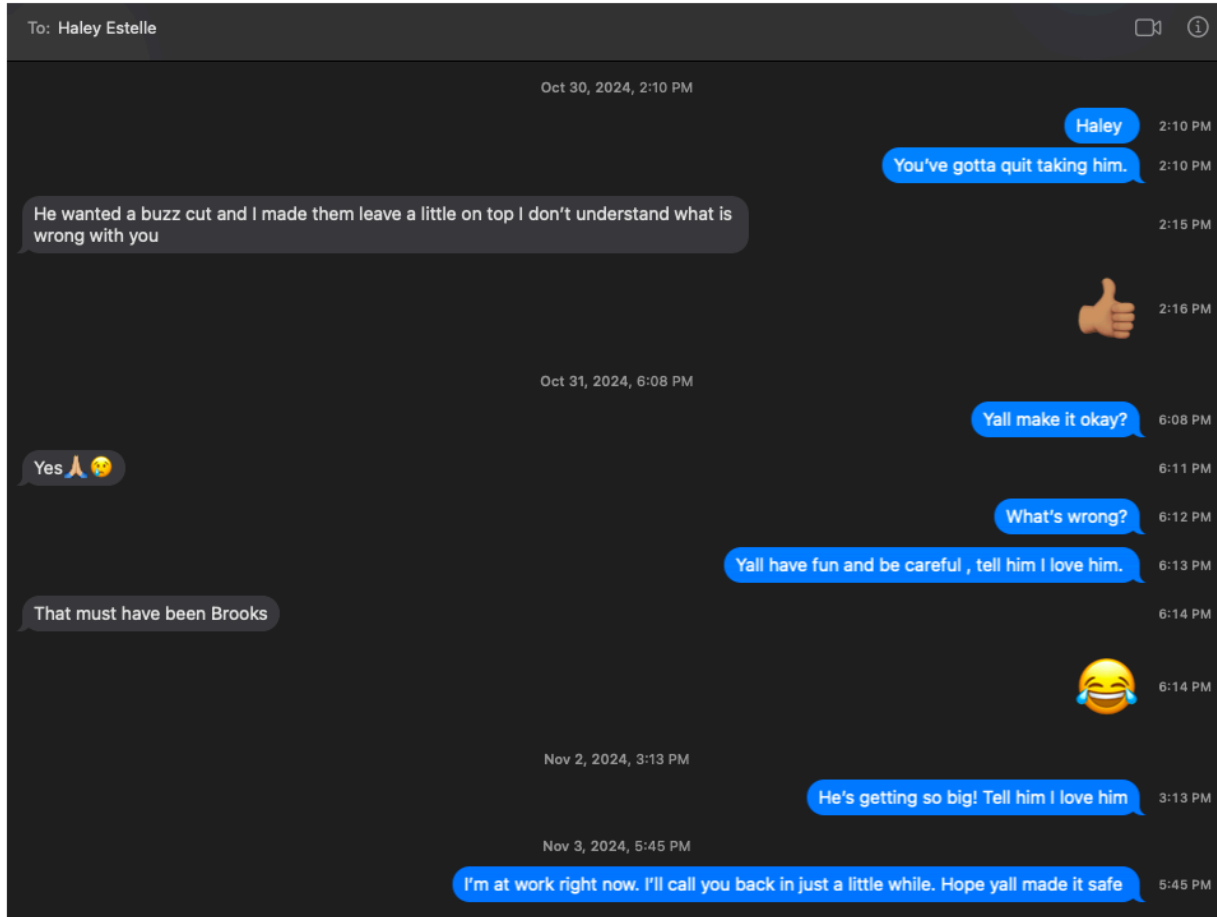
Text message screenshots dated October 19, 2024 reflecting retraction of a previously mutual parenting agreement based on the absence of formal court documentation.



**B-2**

**EXHIBIT B - Intervening Communications Context**

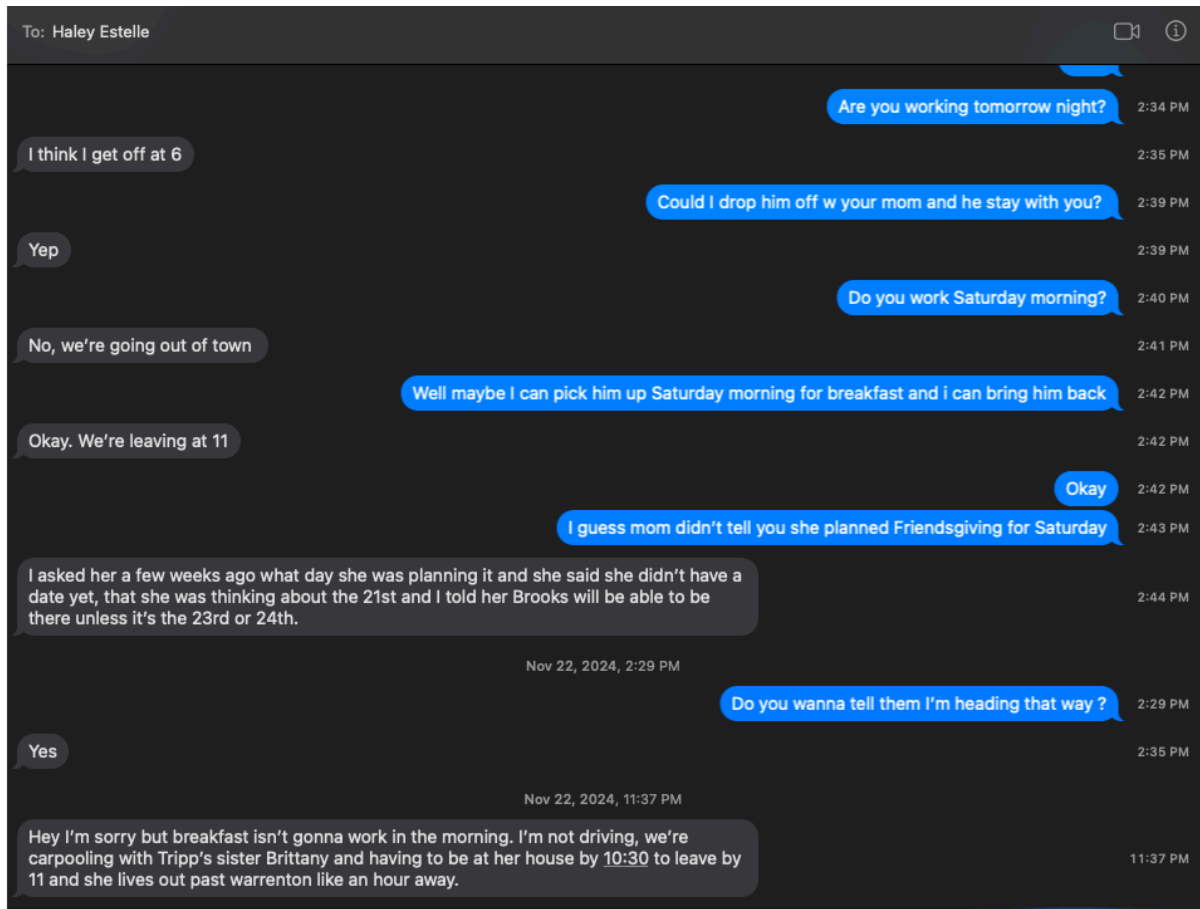
Text message screenshots dated October 31, 2024 reflecting reliance on established parenting communication and coordination practices between the parties.



**B-3**

**EXHIBIT B - Intervening Communications Context**

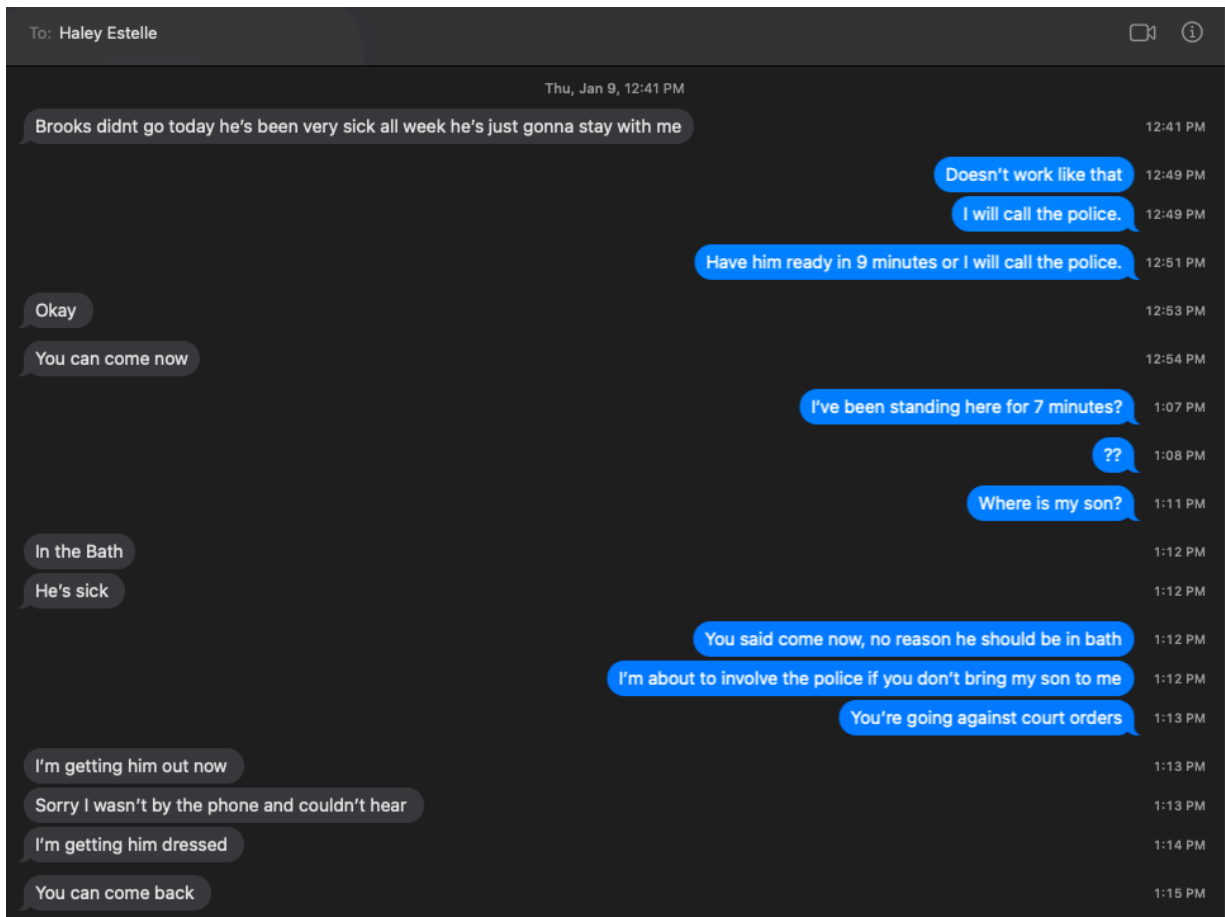
Text message screenshots dated November 21, 2024 reflecting retraction of a previously discussed discretionary parenting arrangement affecting Defendant's scheduled parenting time.



**B-4**

**EXHIBIT B - Intervening Communications Context**

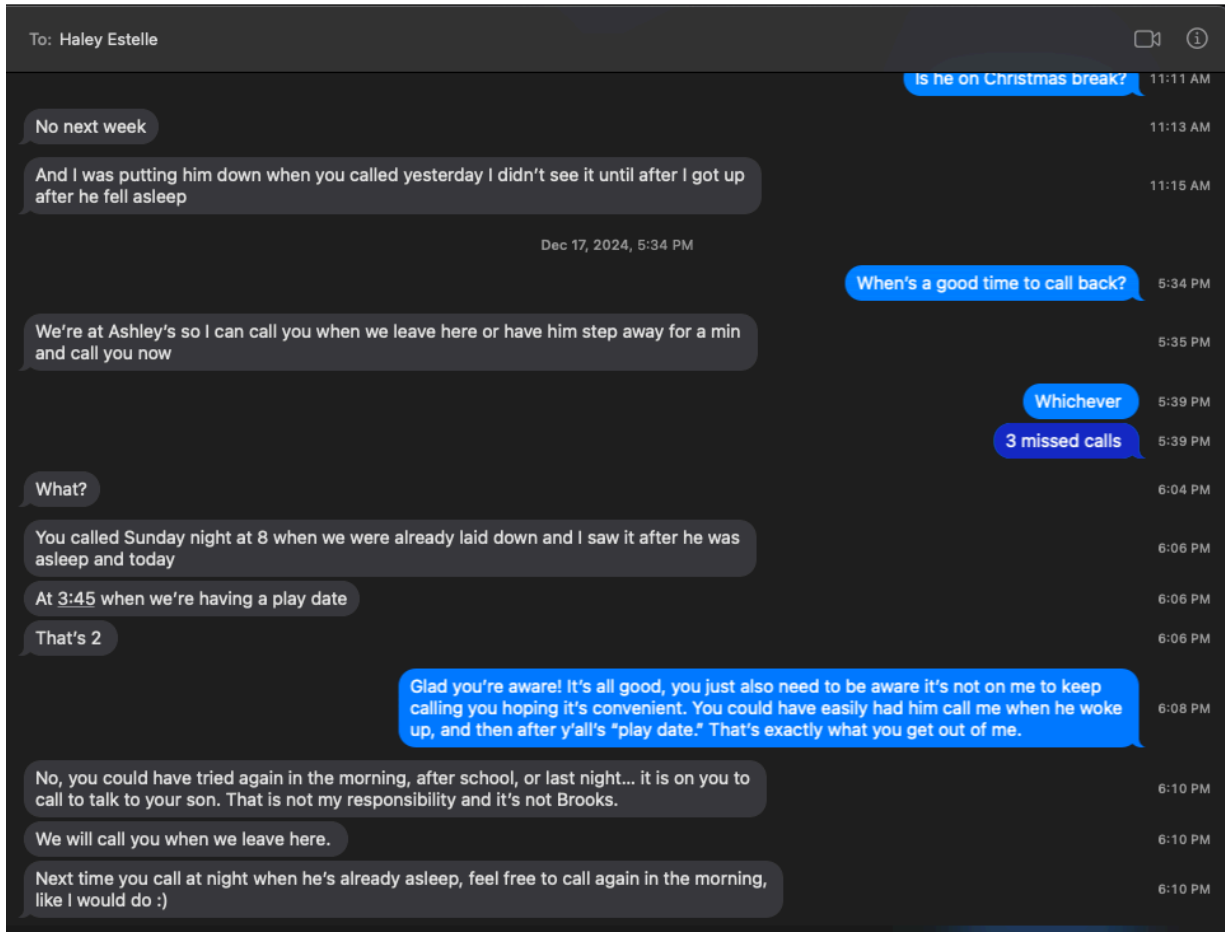
Text message screenshots dated January 9, 2025 reflecting parenting-related communication occurring contemporaneously with the initiation of formal allegations and related procedural actions. Conversation ends upon the arrival of CCSO Deputies answering a 'Domestic Dispute' call.



C-1

**EXHIBIT C - Communication Ambiguity Under Established Decree**

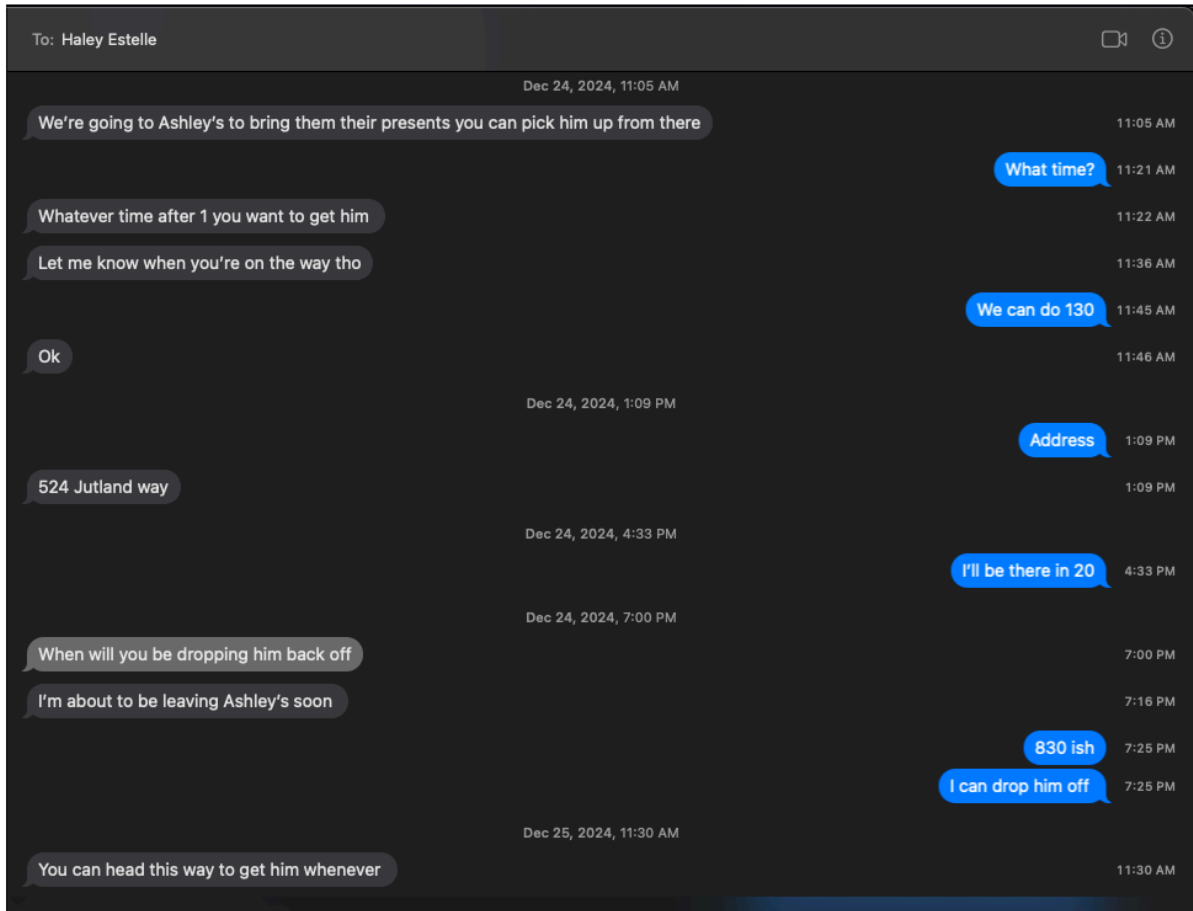
Text message screenshots dated December 17, 2024 reflecting delayed or uncertain coordination of parent-child phone communication under the existing parenting plan.



C-2

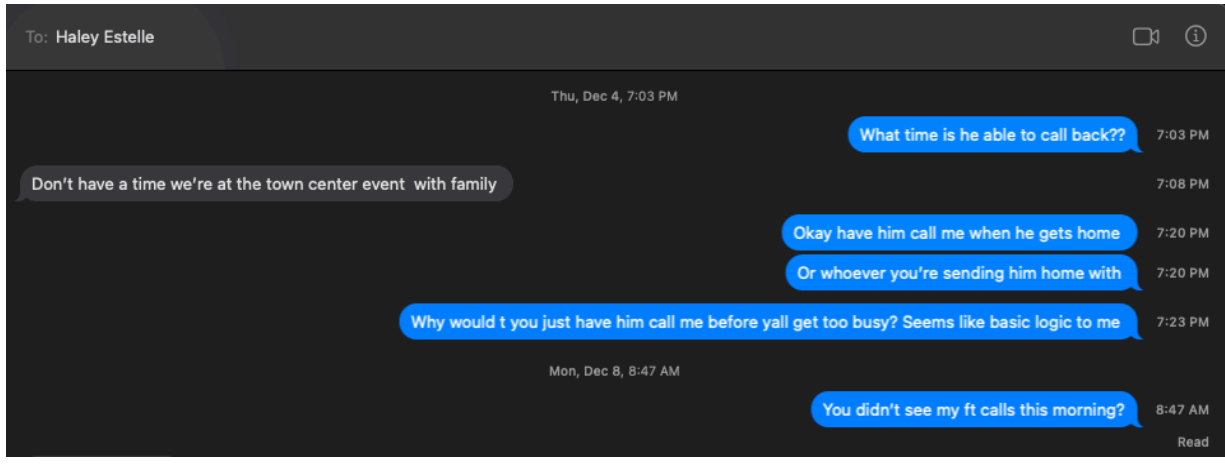
**EXHIBIT C - Communication Ambiguity Under Established Decree**

Text message screenshots dated December 24, 2024 reflecting holiday-related parent-child communication and unilateral transportation expectations under the parties' existing parenting plan, notwithstanding Defendant's continued flexibility and compliance.



C-3

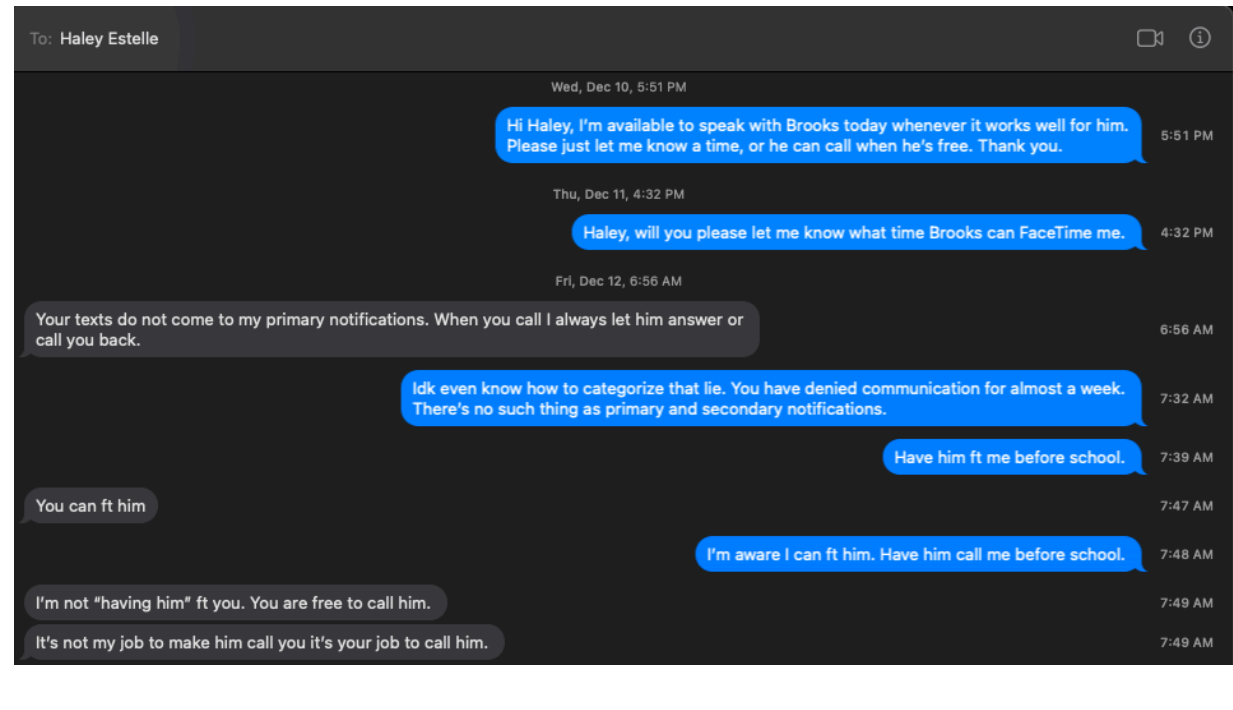
**EXHIBIT C - Communication Ambiguity Under Established Decree**  
Text message screenshots dated December 4-8, 2025 reflecting scheduling uncertainty regarding parent-child communication.



**C-4.1**

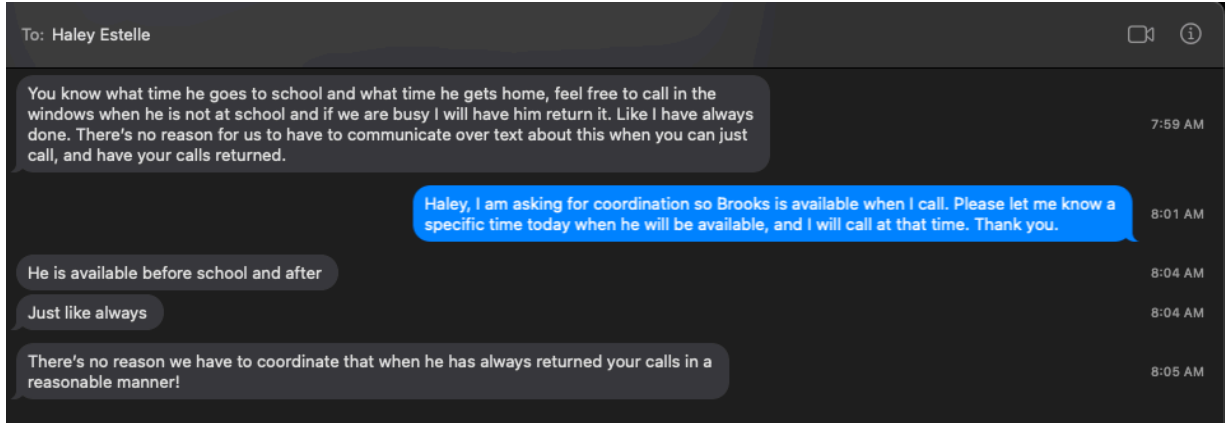
**EXHIBIT C - Communication Ambiguity Under Established Decree**

Text messages dated December 10-12, 2025 reflecting breakdown in shared prioritization of the child's parent-child communication.



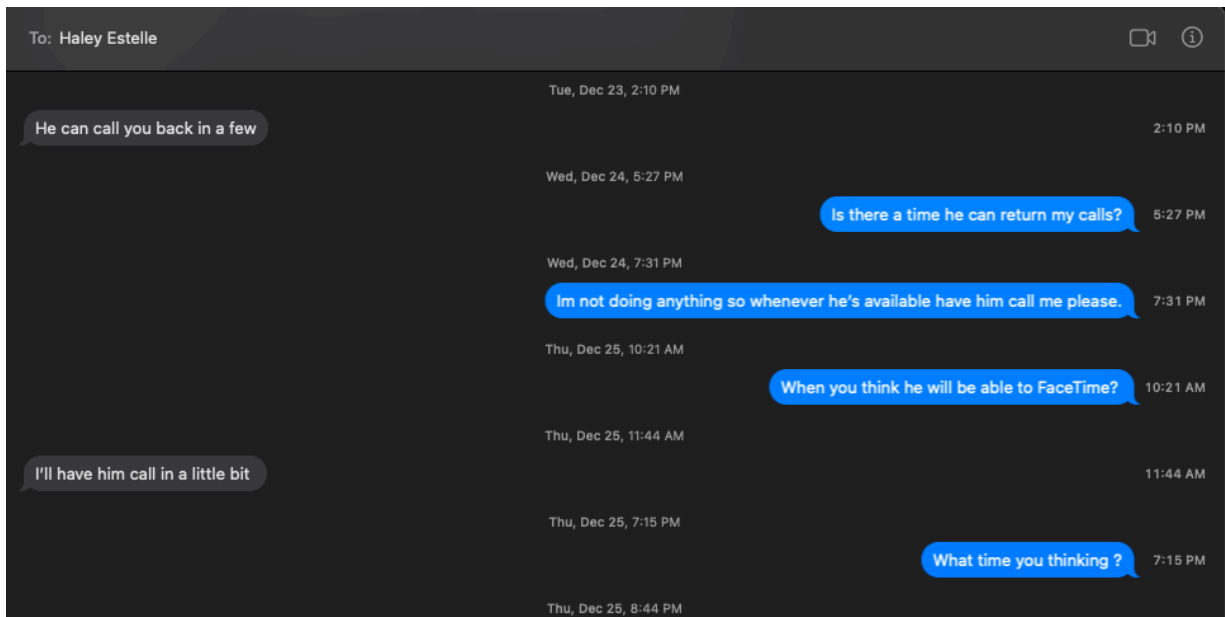
**C-4.2**

**EXHIBIT C - Communication Ambiguity Under Established Decree**  
Text messages dated December 12, 2025 reflecting breakdown in shared prioritization of the child's parent-child communication.



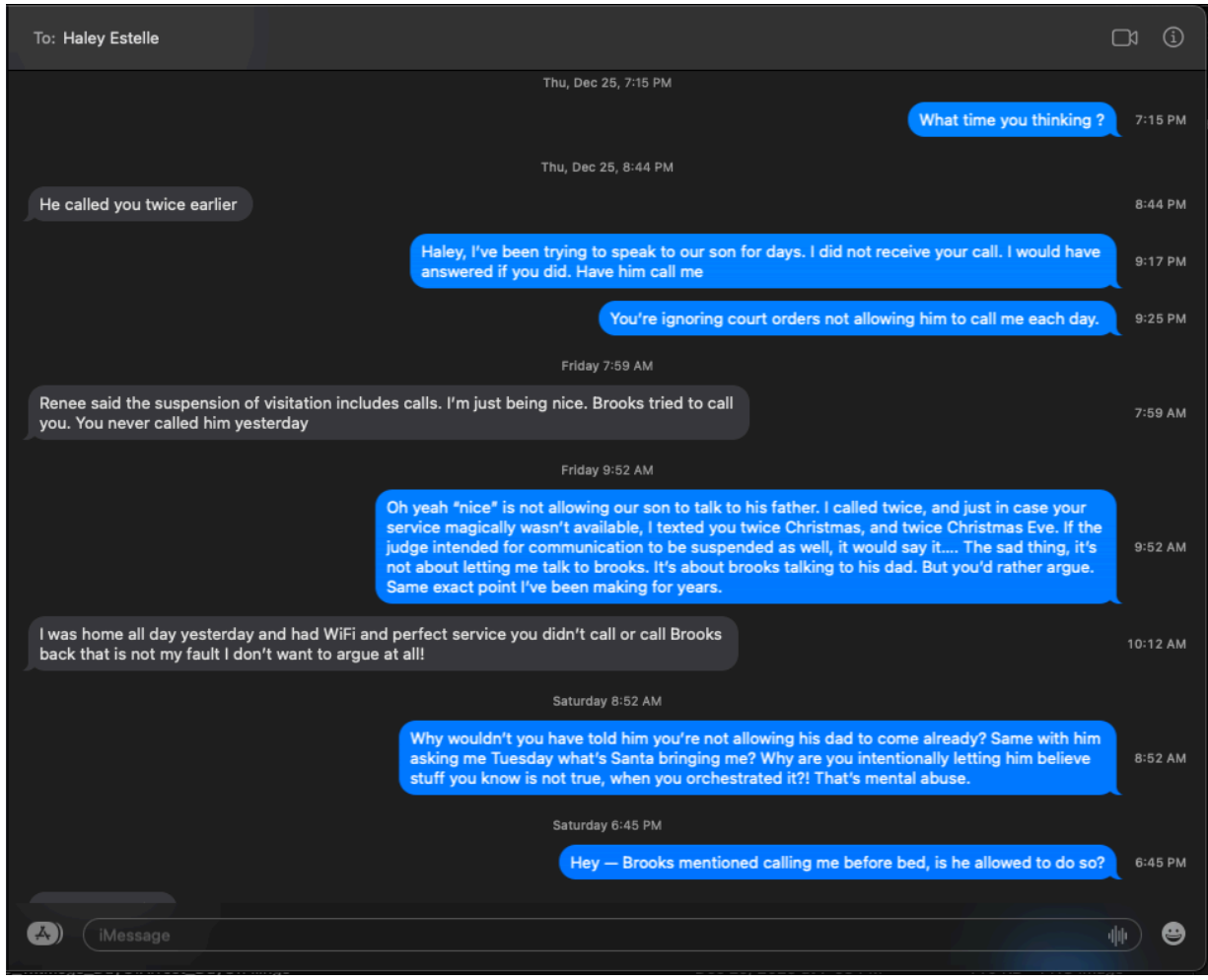
**C-5**

**EXHIBIT C - Communication Ambiguity Under Established Decree**  
Text message screenshots dated December 23-25, 2025 reflecting repeated attempts to coordinate parent-child communication during the Christmas holiday period, without any completed contact.



**C-6.1**

**EXHIBIT C - Communication Ambiguity Under Established Decree**  
Text message screenshots dated December 25-27, 2025 reflecting repeated efforts to arrange parent-child communication on Christmas Day and the child's birthday, with no completed contact on December 25 and a materially limited call on December 27.



**C-6.2**

**EXHIBIT C - Communication Ambiguity Under Established Decree**

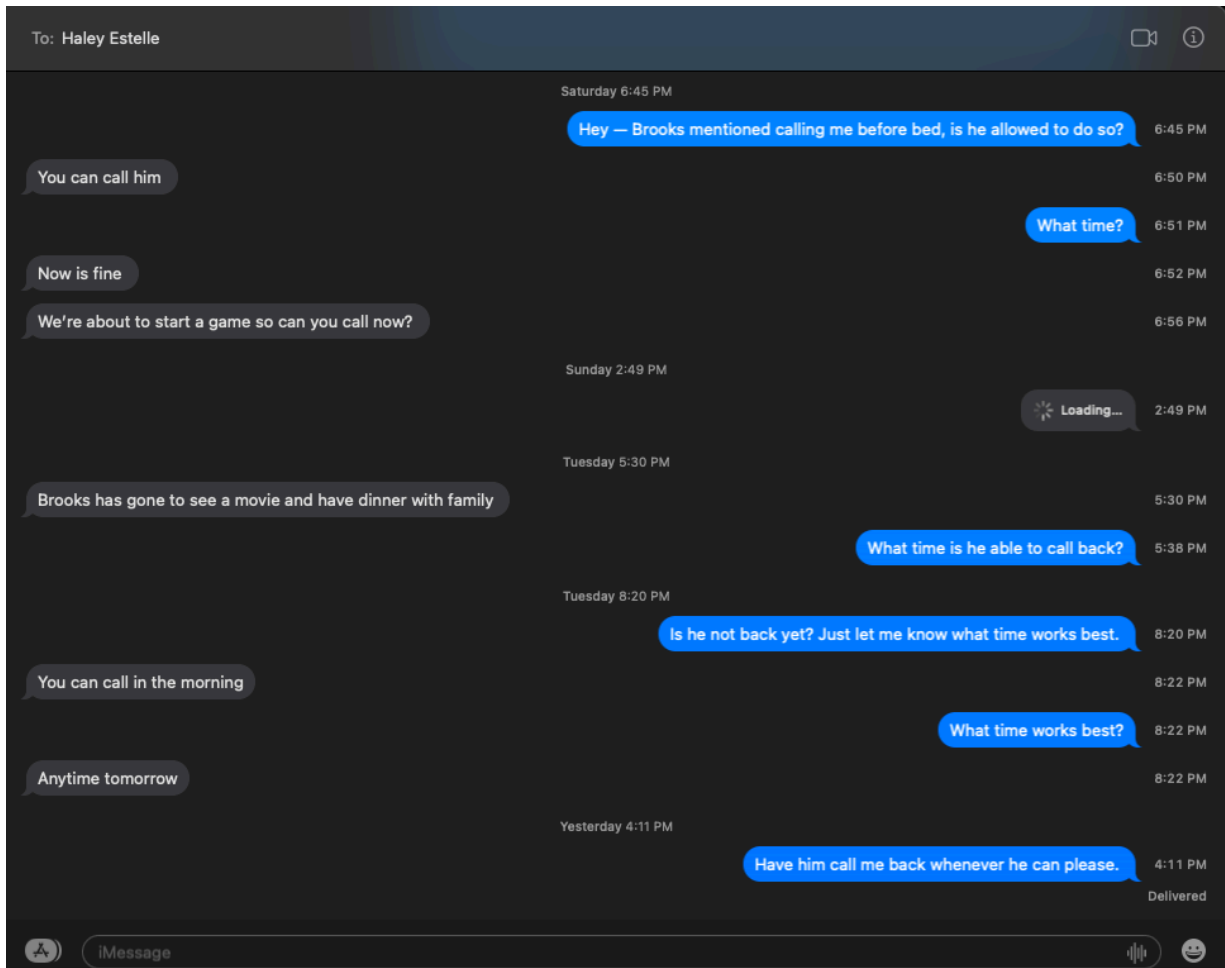
Call log excerpt reflecting attempted and completed parent-child phone communications between December 19, 2025 and December 27, 2025.

Call Type	Date and Time	Duration
Outgoing Call	12/27/25 • 8:45 AM	1 minute
Outgoing Call	12/26/25 • 9:32 AM	Canceled
Outgoing Call	12/25/25 • 7:13 PM	Canceled
Outgoing Call	12/25/25 • 9:18 AM	Canceled
Outgoing Call	12/24/25 • 4:59 PM	Canceled
Outgoing Call	12/24/25 • 10:31 AM	Canceled
Outgoing Call	12/23/25 • 2:58 PM	15 minutes
Outgoing Call	12/23/25 • 2:10 PM	Canceled
Outgoing Call	12/23/25 • 8:13 AM	Canceled
Outgoing Call	12/19/25 • 7:21 PM	

C-7

**EXHIBIT C - Communication Ambiguity Under Established Decree**

Text messages screenshot dated December 27-31, 2025 reflecting lack of timely parent-child communications and continued delays following the child's birthday.



C-8

**EXHIBIT C - Communication Ambiguity Under Established Decree**

Email dated December 12, 2025 from Guardian ad Litem Renee Bell addressing visitation status and communication expectations.

Checking on status Inbox x



Renee Bell

Fri, Dec 12, 9:44 AM ☆ 😊 ↩ ⋮

to me ▾

Good morning,

I saw where you did not take the drug screen and asked for relief due to financial hardship. Did you meet with Mr. Nichols?

I want to make sure you get to see your son. The visitation schedule hinges upon clean drug screen results as well as you having completed the clinical evaluation with Mr. Nichols.

FYI - usually when there is no visitation that means no communication. Haley is not pushing to stop you from talking to him or having FaceTime currently, so I am not bringing up that issue. She forwarded the texts to me which means it could be a potential problem. Just call him when you have a moment to speak to him. I know you want a set time but trust me she is giving you more availability than my other cases where the time is set and that is the only time they can speak to their children. You could say I will call today at .... time.

Thanks,

Renee

Renee Bell  
PO Box 16578  
Augusta, GA 30919  
706-825-8828 Cell  
706-790-0131 Fax

**CLOSING CONTEXT FOR EXHIBIT C**

The foregoing exhibits, including the Guardian ad Litem correspondence, are submitted solely to provide context regarding how parent-child communication has been implemented in practice in the absence of clear, written parameters. Together, these materials illustrate the ambiguity that has governed communication expectations during the relevant period and are offered to assist the Court in evaluating Defendant's pending requests for clarification and limited temporary relief, without asserting fault or seeking enforcement.

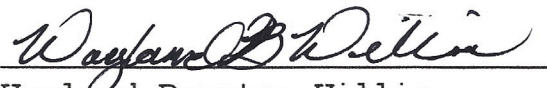
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing *DEFENDANT'S MOTION TO CLARIFY THE RECORD, ADDRESS UNADJUDICATED ALLEGATIONS, AND REQUEST TEMPORARY RELIEF*, together with all exhibits, upon the following parties by electronic service through PeachCourt eService:

**Adam B. Land, Esq.**  
Counsel for Plaintiff  
adam@tisdalelawfirm.com

**Renee Bell**  
Guardian ad Litem  
kidsgal@aol.com

This 1st day of January, 2026.



Wayland Braxton Willis  
Defendant, Pro Se  
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