


Cindy Mason, Clerk
Columbia County, Georgia

IN THE SUPERIOR COURT OF COLUMBIA COUNTY
STATE OF GEORGIA
DOMESTIC RELATIONS DIVISION

HALEY CROWE)	
Plaintiff,)	
vs.)	Civil Action File No.:
)	2025EDR0053
WAYLAND WILLIS,)	
Defendant.)	
_____)	

**DEFENDANT’S MOTION FOR PROTECTIVE ORDER REGARDING CONFIDENTIAL
MEDICAL INFORMATION**

COMES NOW the Defendant, pro se, and respectfully moves this Court for the entry of a Protective Order governing the handling, disclosure, and use of confidential medical information in this matter. In support thereof, Defendant shows the Court as follows:

1. This action involves ongoing custody and visitation issues in which references have been made to the Defendant’s medical history and health-related information, without any judicial findings establishing the relevance, scope, or permissible use of such information.
2. The Defendant has not refused lawful disclosure when required by Court order; however, absent clear procedural boundaries, informal or unregulated reliance on medical information presents a substantial risk of prejudice, mischaracterization, and reliance on matters not properly before the Court.
3. Medical records, prescription histories, and related health information are inherently sensitive and protected by law. Their use outside of court-authorized procedures undermines due process and creates ambiguity as to what information may be considered, by whom, and for what purpose.

4. The Defendant therefore seeks the entry of a Protective Order to ensure that any consideration of medical information occurs only through formal judicial authorization and under conditions that preserve privacy, accuracy, and fairness.
5. Entry of a Protective Order at this stage is necessary to:
 - a. Clarify the procedural requirements governing any medical information;
 - b. Prevent informal or extrajudicial reliance on such information;
 - c. Preserve the integrity of the record; and
 - d. Ensure that no party, guardian ad litem, or other participant relies on medical information absent proper evidentiary foundation and Court approval.
6. This motion does not ask the Court to make findings regarding the substance, relevance, or admissibility of any medical information. Rather, it seeks to establish clear procedural safeguards governing *if and how* such information may be considered, should the Court determine it is necessary.

WHEREFORE, Defendant respectfully requests that this Court enter an Order providing as follows:

- A. That any medical records, prescription histories, or health-related information pertaining to the Defendant shall not be publicly filed in the record absent further Order of this Court;
- B. That any such information, if deemed necessary for review, shall be submitted under seal and/or reviewed in camera, as determined by the Court;
- C. That no party, guardian ad litem, or other participant may rely upon, characterize, reference, or draw adverse inferences from confidential medical information unless such information

has been properly submitted, authorized, and accepted for consideration by the Court;

D. That the scope of any permitted disclosure or review shall be narrowly tailored to the specific purpose expressly identified by the Court and shall not extend beyond that purpose;

E. That this Protective Order is entered without prejudice to any party's rights and without findings as to the relevance, admissibility, or weight of any medical information.

Respectfully submitted, this **16th** day of **January, 2026**.



Wayland Braxton Willis

Defendant, Pro Se

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing DEFENDANT'S MOTION FOR PROTECTIVE ORDER 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 **16th** day of **January, 2026**.



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