

**2025EDR0053**

FEB 21, 2026 10:11 PM

  
Cindy Mason, Clerk  
Columbia County, Georgia

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

HALEY CROWE )  
Plaintiff, )  
vs. )  
WAYLAND WILLIS, )  
Defendant. )  
\_\_\_\_\_ )

Civil Action File No.:  
2025EDR0053

EXHIBITS IN SUPPORT OF DEFENDANT'S MOTION  
FOR PROTECTIVE FINDINGS REGARDING REPEATED FALSE ALLEGATIONS  
AND ABUSIVE LITIGATION CONDUCT

Filed contemporaneously with Defendant's Motion for Protective  
Findings Regarding Repeated False Allegations and Abusive  
Litigation Conduct

Exhibits A - E



4.

That Plaintiff is entitled to a divorce a vinculo matrimonii, that is to say a total divorce from Defendant upon the following grounds:

- A. That the marriage between the parties is irretrievably broken as contemplated by O.C.G.A. §19-5-3 (13), and there are no reasonable prospects for reconciliation;
- B. That Defendant is guilty of habitual intoxication as contemplated by O.C.G.A. § 19-5-3 (9).
- C. That Defendant is guilty of adultery as contemplated by O.C.G.A. § 19-5-3 (6).
- D. That the Defendant is guilty of cruel treatment as contemplated by O.C.G.A § 19-5-3 (10).

5.

There is one minor child born as the issue of the marriage of the parties, to-wit: Wayland Brooks Willis, born in the year 2018.

6.

That since the birth of the children, the minor children have resided with Plaintiff and Defendant. No other action has ever been initiated concerning the custody of the children and Plaintiff knows of no individual other than the parties to this action who has any claim of custody or visitation rights concerning said children.

7.

That Plaintiff is a fit and proper person to have sole legal and sole physical custody of the parties' minor child, subject to the Defendant's supervised visitation rights.

8.

That Plaintiff is entitled to child support in accordance with the laws of the State of Georgia.

2

9.

Plaintiff is entitled for Defendant to pay a portion of the uncovered medical expenses for the minor child not covered under the current medical/health insurance plan.

10.

That as a result of the marriage between the parties, the Plaintiff and the Defendant have acquired significant marital assets and liabilities to which she is entitled to an equitable division thereof.

11.

Plaintiff shows the Court that she is fearful of Defendant's reaction upon the service of these papers. Defendant has been stalking Plaintiff. Plaintiff believes Defendant has placed cameras in and around her home. He will send her texts questioning whose vehicles are in her driveway when he is no where near the home. Furthermore, he has broken into her home and vandalized it while she was at work. Defendant calls Plaintiff's places of employment and even comes to her place of employment harassing her. Defendant has done these things even when their minor child is with him.

Finally, Defendant has a significant drug and alcohol abuse problem.

12.

Plaintiff is entitled to reasonable attorney fees and expenses of litigation related to this action.

**WHEREFORE**, the Plaintiff prays:

(A) That process issues requiring the Defendant to be and appear within the time provided by law to answer this Complaint.

3

(B) That Plaintiff be granted ex parte relief awarding her sole legal and physical custody of the parties' minor child until such time as the Defendant can have a psychological evaluation and a drug and alcohol assessment.

(C) That the marriage between the parties is irretrievably broken as contemplated by O.C.G.A. §19-5-3 (13), and there are no reasonable prospects for reconciliation; and that Defendant is guilty of cruel treatment as contemplated by O.C.G.A § 19-5-3 (10).

(D) That Plaintiff be awarded temporary and permanent sole legal and sole physical custody of the parties' minor child subject to Defendant's supervised visitation rights.

(E) That Defendant pay child support in accordance with the laws of the State of Georgia.

(F) That marital assets and debts acquired between the parties be equitably divided.

(G) That Plaintiff be awarded reasonable attorney fees for having to bring this action.

(H) That the Plaintiff have such other additional relief as the Court deems equitable and proper.

This, the 29<sup>th</sup> day of June, 2022.



BARBARA BARNETT CLARIDGE  
GA Bar No. 126396  
Attorney for Plaintiff

Claridge Law Firm  
206 Pleasant Home Rd.  
Augusta, Georgia 30907  
(706) 860-4500  
[bclaridge@claridgelawfirm.com](mailto:bclaridge@claridgelawfirm.com)

**EXHIBIT A-2**

**Section A: 2022 Initial Allegation & Ex Parte Relief**

Automatic Domestic Standing Order and Notice of Temporary Hearing entered in Civil Action No. 2022EDR0589, scheduling hearing for June 30, 2022.

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

Civil Action File No.: 2022EDR0589

HALEY CROWE,	)	
Plaintiff,	)	
	)	
v.	)	JUDGE: <u>J. Wade Padgett</u>
	)	
WAYLAND B WILLIS,	)	
Defendant.	)	
_____	)	

**AUTOMATIC DOMESTIC STANDING ORDER  
AND NOTICE OF CONFERENCE OR HEARING**

**TO THE PARTIES TO THIS ACTION:**

*If you are a party to this legal action, this order is binding upon you. This is an important court order that affects your rights. Please read ALL OF this order carefully. If you do not understand this order, contact an attorney for legal advice.*

All parties and their counsel are required to attend the following:

- Initial Conference     Temporary Hearing     Final Hearing (Contempt only)
- Columbia County Justice Center**    Courtroom: 2    Date: June 30, 2022  
640 Ronald Reagan Drive    Time: 11:00 a.m.  
Evans, Georgia 30809
- UNCONTESTED-(No Hearing Needed)**
- No hearing set** – to be noticed on a later date

---

Party/Attorney filing action: <u>BARBARA CLARIDGE</u>	Phone: <u>(706)860-4500</u>
E-mail: <u>BCLARIDGE@CLARIDGELAWFIRM.COM</u>	Fax:

---

*To Parties Without Attorneys: If you have filed this action without an attorney, or if you plan to defend this action without an attorney, you have full responsibility for complying with all procedural and substantive requirements of the law. The court will not act as your attorney, nor will the court help you prove or defend your case. This action involves important legal rights and you are strongly urged by the court to hire an attorney.*

**EXHIBIT A-3**

**Section A: 2022 Initial Allegation & Ex Parte Relief**

Text message communications between the parties dated June 27-29, 2022, occurring within the filing window and immediately preceding the scheduled June 30, 2022 hearing.

To: Haley Estelle

Jun 27, 2022, 3:53 PM

Brooks isn't allowed to see the new buzz light year btw 3:53 PM

It has boys kissing 3:54 PM

Oh I know. I've already told Him we wouldn't be watching I saw that article 3:59 PM

I told him too 3:59 PM

Scary how I was gonna take him to see that in the movies 3:59 PM

I'm not ready to have that convo w him bc he's not gonna understand yet so we need to try to shield him as much as we can until we can warn him and explain to him 4:00 PM

Jun 27, 2022, 6:30 PM

Lol I just spanked brooks and he ran away crying and said "I'm going to my room and calling my daddy" 6:30 PM

Oh my lordddd. Haley, you spank him when you feel like it's necessary. Im sorry he's being a butt 6:33 PM

I honestly thought it was cute 6:33 PM

He was like trying to make me feel bad haha 6:33 PM

The guilt trip 🙄 6:34 PM

To: Haley Estelle

Jun 28, 2022, 7:08 PM

Im off tomorrow, you wanna meet in the am? 7:08 PM

To exchange brooks? 7:09 PM

Yeah? 7:09 PM

And I can bring rainbow too 7:09 PM

That's fine 7:10 PM

Or am I really not supposed to till 3? 7:11 PM

Yeah I mean that's when your time is supposed to start 7:11 PM

Okay 7:12 PM

But if you want to get him a little earlier that's fine with me 7:12 PM

Are you working thurs and Friday? 7:12 PM

No 7:12 PM

Well, I'm not sure about Friday. But not tomorrow or Thursday 7:12 PM

Okay 7:13 PM

To: Haley Estelle

Jun 29, 2022, 11:15 AM

You're sure I can get brooks at whatever time we agreed today? 11:15 AM

What time did we agree? 11:16 AM

Still 3? 11:16 AM

That's fine weren't you asking to get him earlier though 11:17 AM

If you're okay with that 11:17 AM

I would be okay with that but can we just do like 2 bc you'll have him tomorrow since you're not working right? 11:19 AM

2 is fine. Can we meet at artsy? 11:22 AM

That's fine 11:22 AM

Jun 29, 2022, 1:36 PM

If y'all haven't passed we can meet at spot 1:36 PM

Moms not at artsy 1:37 PM

We'll be at spot at 2 1:37 PM

Okay 1:38 PM

**EXHIBIT B-1**

**Section B: 2023 Second Allegation Cycle**

Final Judgment and Decree of Divorce entered July 2023, concluding the divorce action by agreement and establishing the governing parenting-time framework.

CLERK OF SUPERIOR COURT  
COLUMBIA COUNTY GEORGIA  
**2022EDR0589**  
AUG 10, 2023 11:31 AM

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

HALEY CROWE , )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 WAYLAND BRAXTON WILLIS, )  
 )  
 Defendant. )

*Cindy Mason*  
Cindy Mason, Clerk  
Columbia County, Georgia

CIVIL ACTION FILE NO.:  
*2023*  
~~2022~~EDR0589

**MEMORANDUM OF UNDERSTANDING**

1. Custody / Visitation: The parties shall have joint legal custody of the minor child, Wayland Brooks Willis, born in the year 2018, with Plaintiff being designated as the primary physical custodian.
  - a. Defendant's visitation shall be pursuant to a modified Parenting Plan A, a copy of which is attached hereto.
2. Defendant shall pay to Plaintiff the sum of \$200.00 a month, beginning on August 15, 2023, and continuing each month thereafter until further Order of the Court.
3. The parties have previously divided their personal property and shall retain as their individual property the personal property currently in their individual possession. Defendant shall have exclusive use and possession of the Rainbow vacuum system and shall be solely responsible for payment of the same and shall hold Plaintiff harmless therefrom.
4. Plaintiff shall have exclusive use and possession of the former marital home, 615 Mickleson Way, Evans, Georgia 30809, the lease to which is exclusively held in her name.
5. The parties have no joint debts and shall be responsible for any and all debt held in their individual names.
6. Plaintiff and Defendant shall each be entitled to any banking, savings, and retirement accounts held in their individual names as their separate property.
7. Plaintiff shall have exclusive use and possession of the 2010 Toyota Rav 4, which is titled exclusively in her name.
8. Defendant shall have exclusive use and possession of the 2014 Nissan Sentra, which is titled exclusively in his name.

**SIGNATURES ON NEXT PAGE**

SUPERIOR COURT OF COLUMBIA COUNTY, GEORGIA

AUG 10, 2023 11:31 AM

Civil Action File No. 2022EDR0589

*Cindy Mason*  
Cindy Mason, Clerk  
Columbia County, Georgia

HALEY CROWE, )  
Plaintiff, )

v. )

WAYLAND BRAXTON WILLIS, )  
Defendant. )

PARENTING PLAN A

Instructions: This Parenting Plan is approved for use in the Columbia Judicial Circuit. This local form is substantially similar to the form set forth in Uniform Superior Court Rule 24.10. If there are substantive changes to the basic form, **bold and underline** the changes, and check here  X .

Date of this plan:  July 27, 2023

- ( X ) The parties agree to the terms of this plan and affirm the accuracy of the information provided, as shown by their signatures at the end of this plan.
- ( ) This plan has been prepared or ordered by the judge.

This plan: ( X ) is a new plan.  
 ( ) modifies an existing Order: Court: \_\_\_\_\_  
 Case No.: \_\_\_\_\_ Date: \_\_\_\_\_

This plan applies to the following minor child(ren) of the parties:

Child's Name	Year of Birth
WAYLAND BROOKS WILLIS	2018

I. CUSTODY AND DECISION MAKING

- A. Legal Custody shall be: [Check one]
- (X) joint.
  - ( ) with the Mother, not joint.
  - ( ) with the Father, not joint.

**B. Primary Physical Custodian**

For the child(ren) named below, the primary physical custodian shall be:

WAYLAND BROOKS WILLIS	<input checked="" type="checkbox"/> Mother	<input type="checkbox"/> Father	<input type="checkbox"/> Joint
	<input type="checkbox"/> Mother	<input type="checkbox"/> Father	<input type="checkbox"/> Joint
	<input type="checkbox"/> Mother	<input type="checkbox"/> Father	<input type="checkbox"/> Joint
	<input type="checkbox"/> Mother	<input type="checkbox"/> Father	<input type="checkbox"/> Joint
	<input type="checkbox"/> Mother	<input type="checkbox"/> Father	<input type="checkbox"/> Joint

For the purposes of this Parenting Plan, ( X ) Mother, ( ) Father is designated as the "Custodial Parent". The other parent is the "Non-Custodial Parent".

**C. Day-To-Day Decisions**

A parent shall make decisions regarding the day-to-day care of the child(ren) while the child(ren) is/are residing with that parent, including any emergency decisions affecting the health or safety of the child(ren).

**D. Major Decisions**

Major decisions regarding each child shall be made as follows:

Educational decisions	<input type="checkbox"/> Custodial Parent	<input type="checkbox"/> Non-Custodial Parent	<input checked="" type="checkbox"/> joint
Non-emergency health care	<input type="checkbox"/> Custodial Parent	<input type="checkbox"/> Non-Custodial Parent	<input checked="" type="checkbox"/> joint
Religious upbringing	<input type="checkbox"/> Custodial Parent	<input type="checkbox"/> Non-Custodial Parent	<input checked="" type="checkbox"/> joint
Extracurricular activities	<input type="checkbox"/> Custodial Parent	<input type="checkbox"/> Non-Custodial Parent	<input checked="" type="checkbox"/> joint

**E. Disagreements**

If the parents have been ordered to have joint decision making in Section I(D) above, and should the parties be unable to agree after serious and meaningful consideration of each other's views:

(X) the Custodial Parent shall have final decision making authority **non-emergency health care, extracurricular activities, and religious upbringing.**

(X) the Non-Custodial Parent shall have final decision making authority **in regards to education decisions. Should the Non-Custodial Parent decide to put the minor child in private school, he shall be responsible for payment for the tuition.**

The party with final decision making authority does not have the authority to modify any of the visitation provisions specifically set forth herein. The number of extracurricular activities in which the child(ren) are enrolled must be reasonable.

**II. PARENTING TIME/VISITATION SCHEDULES**

*The following schedule should not be construed as precluding other visitation or alternative arrangements. The best visitation plan is one the parties have agreed to, rather than one imposed by the Court. However, the Court will only enforce the strict terms of this Parenting Plan in the event of any future disagreements concerning visitation.*

**Other Additional Provisions:**

**XII. INCORPORATION INTO JUDGMENT**

It is contemplated that this Parenting Plan will be incorporated into a temporary or final judgment in this case. If there is any conflict between any such judgment and this Parenting Plan or any written agreement between the parties, the judgment shall control. If there is any conflict between this Parenting Plan and any written agreement between the parties, this Parenting Plan shall control.

**XIII. AGREEMENT OF THE PARTIES *[if applicable]***

The parties hereby knowingly and voluntarily agree to the terms of this Parenting Plan. If signed by a party, the party affirms that the information he/she has provided in connection with the preparation of this Parenting Plan is true and correct.

*[If applicable, this paragraph must be marked.]* The parties hereby agree that if a disagreement arises with regard to the terms of this Parenting Plan, prior to seeking a modification, the parties shall attempt to resolve said disagreement through the Columbia Judicial Circuit's alternative dispute resolution program or any other mediation acceptable to the parties and the Court.

*Haley E. Crane*  
Mother

*Wayland B. W.*  
Father

7/27/2023  
Date Signed

7-27-2023  
Date Signed

**EXHIBIT B-2**

**Section B: 2023 Second Allegation Cycle**

Petition for Stalking Temporary Protective Order filed December 11, 2023, containing sworn allegations and request for ex parte protective relief, coinciding with a contemporaneous DFCS report.

CLERK OF SUPERIOR &  
JUVENILE COURTS  
FILED FOR RECORD

THE SUPERIOR COURT FOR THE COUNTY OF Columbia

2023 DEC 11 AM 10:44

STATE OF GEORGIA

CINDY MASON CLERK  
COLUMBIA COUNTY GEORGIA

Halcy Crowe,  
Petitioner,

:  
: Civil Action File  
:

v.

:  
: No. 2023110345  
:

Wayland "Braxton" Willis,  
Respondent.

**PETITION FOR STALKING TEMPORARY PROTECTIVE ORDER**

The Petitioner, pursuant to O.C.G.A. § 16-5-94, hereby files this Petition for a Stalking Temporary Protective Order and in support shows the Court the following:

1. The Petitioner is a resident of Columbia County, Georgia and is over the age of 18 years of age or is an emancipated minor. Petitioner's year of birth is 1999, sex F, and race white.

2. The Respondent is a resident of Evans Col. County, Georgia, and may be served at 309 Evans Lake Way Columbia County, Georgia.

OR

2.1 Respondent is a resident of the State of Georgia. Under O.C.G.A. §§19-13-2(b) and 16-5-94(b) jurisdiction and venue are proper with this Court because the stalking occurred in the State of Georgia in Columbia County and/or Petitioner lives in Columbia County. Respondent is subject to the jurisdiction of this Court and may be served at 309 Evans Lake Way Evans GA 30809.

3. On or about Jan-Jun, 2022, the Respondent has knowingly and willfully committed the following acts of stalking under O.C.G.A. §§ 16-5-90 et seq. tracker on my car, cameras on/in my home, waiting in back yard in late hours of the night for me to get home, recording devices in home & car and similar events may occur in the future. These acts had no legitimate purposes, happened at places other than the residence of the Respondent, were without the consent of the Petitioner, and placed Petitioner in reasonable fear for her/his own safety and/or the safety of her/his immediate family.

4. In the past on or about Jan - June, 2022, the Respondent committed the following acts of stalking under O.C.G.A § 16-5-90 et seq. unknown trackers and recording devices on car, cameras in and around my home,

W. WADE PADGETT

RECORDED & SCANNED IN  
MINUTES 16:11:13

Respondant has a history of stalking, harassing, intimidating and threatening me, Petitioner, Haley Crowe. During the course of our separation I endured this with multiple calls to law enforcement while saving up to get a divorce lawyer. I did receive a TPO after my lawyer had filed. We recently have settled this divorce and custody case. ~~Respondant~~

There is an ongoing DECS investigation on Respondant because of sexual abuse my (our) son had disclosed with me on Wednesday of last week (12/06/2023) I also filed a report through Columbia County Sheriff's department. During the forensic interview of my son, Wayland Brooks Wills, (4y/o) he did not disclose the information he shared with me. I fear that Respondant will return to the same stalking, harassing, intimidating nature that he has shown in the past once he is brought to light on the nature of this situation and I fear for my son's safety in his care.

Haley & Crowe 12/11/2023

~~physically waiting and watching me  
through windows of my home, entering  
my home~~

THEREFORE, Petitioner requests:

- (a) That the Court set a hearing within thirty (30) days of the signing of the Order and to direct Respondent to appear before this Court and to show any reasons why the demands of the Petitioner should not be granted;
- (b) That the Respondent be served a copy of this Petition and Ex Parte Protective Order as required by law;
- (c) That this Court direct law enforcement to enforce this Order;
- (d) That this Court direct Respondent to stop abusing, harassing and intimidating Petitioner's child/ren;
- (e) That this Court restrain and enjoin Respondent from having any direct or indirect contact with the petitioner and/or Petitioner's child/ren;
- (f) That this Court order that Respondent be enjoined from approaching within \_\_\_ yards of Petitioner;
- (g) That this Court make findings of fact and conclusions of law concerning the issues in this case;
- (h) That Petitioner have such other and further relief as the Court may deem just and proper;
- (i) That this Court issue a Stalking Act Ex Parte and Twelve Month Protection Order; and
- (j) That this Court grant such other relief as it determines just and equitable.

Respectfully submitted,

Daley E. Cronin  
Petitioner

Address

419 Mickelson Way  
Evans GA 30809

Telephone: 706 909 8287

(Do not give current address if confidential;  
give alternative address)

CLERK OF SUPERIOR &  
JUVENILE COURTS  
FILED FOR RECORD

2023 DEC 11 AM 10:44

CINDY MASCH CLERK  
COLUMBIA COUNTY GEORGIA

THE SUPERIOR COURT FOR THE COUNTY OF COLUMBIA

STATE OF GEORGIA

Haley Crowe,  
Petitioner,

Civil Action File

v.

No. 202310345

Wayland B Willis  
Respondent.

VERIFICATION

Personally appeared HALEY E. CROWE, who being duly sworn states that she/he is the Petitioner in the above styled case and that the facts set forth in the foregoing Petition for Stalking Temporary Protective Order are true and correct.

Haley E Crowe  
Petitioner

Sworn and subscribed before  
me this 11<sup>th</sup> day of December, 2023.

[Signature]  
NOTARY PUBLIC  
My commission expires: MARCH 22, 2026

MARCH 22, 2026

**EXHIBIT B-3**

**SECTION B: 2023 Second Allegation Cycle**

Ex Parte Temporary Protective Order entered December 12, 2023 imposing immediate restrictions pending hearing.

CLERK OF SUPERIOR COURT  
JUDICIAL BRANCH  
COLUMBIA COUNTY GEORGIA

ORI Number 2023 DEC 12 PM 2:05

COURT SC-17 CLERK  
COLUMBIA COUNTY GEORGIA

THE SUPERIOR COURT FOR THE COUNTY OF Columbia

STATE OF GEORGIA

<u>Haley Crowe</u>	:	
Petitioner,	:	Civil Action File
v.	:	
<u>Wayland "Braxton" Willis,</u>	:	No. <u>2023D0345</u>
Respondent.	:	

**STALKING EX PARTE TEMPORARY PROTECTIVE ORDER**

Upon proceedings before me, the Petitioner having demanded pursuant to O.C.G.A. § 16-5-94 that a Protective Order be issued; and alleged that Respondent has knowingly and willfully committed or attempted to commit acts in violation of O.C.G.A. § 16-5-90 et seq. and such acts were not at the home of the Respondent, had no legitimate purpose and that Petitioner is in reasonable fear of her/his safety and/or the safety of her/his immediate family; and it appearing to the Court that probable cause exists to believe that similar events will occur in the future, IT IS HEREBY ORDERED AND ADJUDGED:

1. That Respondent is enjoined and restrained from any acts directly or indirectly [pco01,02] which harass and/or intimidate the Petitioner or her/his immediate family.
2. That Respondent is enjoined from approaching within 500 yards of Petitioner. [pco01,04]
3. That Respondent have no contact of any type, direct or indirect, or through another person with Petitioner, or her/his immediate family, including but not limited to telephone, fax, or any other means of communication.
4. 

That the Respondent appear before this Court, on the <u>10th</u> day of <u>January</u> , 2024 at <u>1:00 p.m.</u> in room <u>1690</u> of the <u>Columbia</u> County Courthouse at <u>640 Ronald Reagan Dr., Evans, Ga 30809</u> to show cause why the requests of the Petitioner should not be granted.
---
5. That a copy of this Order be given to local law enforcement and the Respondent be served with a copy of this Order and Petition for Stalking Temporary Protective Order instanter.

6. That this Order applies in every county throughout the state and it shall be the duty of every court and every law enforcement official to enforce and carry out the provisions of this Order pursuant to O.C.G.A. §§ 16-5-94 (e) and 19-13-4 (d). Law enforcement may use their arrest powers pursuant to O.C.G.A. §§ 16-5-91 and 17-4-20 to enforce the terms of this Order.
7. That these proceedings be filed in the office of the Clerk of this Court.
8. That this Court determined that it had jurisdiction over the parties and the subject matter under the laws of the State of Georgia and the Court ordered that the Respondent be given reasonable notice and opportunity to be heard sufficient to protect the Respondent's due process rights and this Order shall be presumed valid and pursuant to 18 U.S.C. § 2265(a) shall be accorded **full faith and credit** by any other state or local jurisdiction and shall be enforced as ordered as if an Order of the enforcing state or jurisdiction.

SO ORDERED this 12th day of December, 2023.


  
\_\_\_\_\_  
JUDGE, SUPERIOR COURT

Columbia County

Jill Morris

Print or stamp Judge's name

Violation of the above Order may be punishable by arrest.

\* visitation with child to be orchestrated by 3rd party 

**EXHIBIT B-4**

**Section B: 2023 Second Allegation Cycle**

Order of dismissal entered January 10, 2024, granting Petitioner's motion to dismiss the December 11, 2023 Stalking Temporary Protective Order petition; related DFCS involvement concluded during the same period.

**FILED IN OFFICE**  
CLERK OF SUPERIOR COURT  
COLUMBIA COUNTY, GEORGIA  
**2023D0345**

ORI Number                      **JAN 10, 2024 02:33 PM**

  
Cindy Mason, Clerk  
Columbia County, Georgia

THE SUPERIOR COURT FOR THE COUNTY OF   Columbia  

STATE OF GEORGIA

<u>Haley Crowe</u>	:	
Petitioner,	:	Civil Action File
v.	:	
	:	
<u>Wayland Braxton Willis</u>	:	No. <u>2023D0345</u>
Respondent.	:	

**DISMISSAL OF TEMPORARY PROTECTIVE ORDER**

IT IS HEREBY ORDERED, ADJUDGED, and DECREED that the (Petition)(~~Counter-Petition~~)(~~Both Petition and Counter-Petition~~) [strike through appropriate] for Temporary Protective Order filed on the 11th day of December, 2023 is hereby dismissed without prejudice:

- on (Petitioner's)(~~Respondent's~~)(~~Both Petitioner's and Respondent's~~) motion to dismiss.
- on (Petitioner's)(Respondent's)(Both Petitioner's and Respondent's) failure to appear and proceed.
- on (Petitioner's)(Respondent's)(Both Petitioner's and Respondent's) failure to prove by a preponderance of the evidence the allegations contained in the (Petition)(Counter-Petition)(Both Petition and Counter-Petition) for Temporary Protective Order.
- due to lack of service on (Petitioner)(Respondent)(Both Petitioner and Respondent).
- OTHER: \_\_\_\_\_

This 10th day of January, 2024.

  
\_\_\_\_\_  
JUDGE, SUPERIOR COURT  
Columbia County

Jill Morris  
Print or stamp Judge's name

Transmitted to Georgia Protective Order Registry      Date \_\_\_\_\_ Clerk \_\_\_\_\_

**EXHIBIT B-5**

**Section B: 2023 Second Allegation Cycle**

Text message communications dated December 4-10, 2023, occurring during the same period as the December 11, 2023 TPO filing and related agency involvement.

To: Haley Estelle

Dec 4, 2023, 4:26 PM

The farm is booked up the weekend of Brooks birthday, so our second option is trampoline park. I'm gonna look into how much it is gonna cost. I'm thinking just the cousins. Your parents will be out of town that weekend but will be here on his birthday. So I was thinking we could do a family dinner/celebration on his birthday with immediate family and then have the kids party that Saturday.

Dec 5, 2023, 9:20 PM

is he still awake?

Dec 7, 2023, 7:28 AM

You dont have to come get Brooks this morning. I'm taking him to the doctor. He has a fever. Ill touch base with you later

Dec 7, 2023, 9:17 AM

How's it going ?

I'm about to run to grocery store... do you want me to text you when I'm done?

I'll talk to you around 1!!!

What do you mean talk to you?

Why do you need him till 1?

To: Haley Estelle

Dec 7, 2023, 12:01 PM

Still no update on my son's health or what the doctor said ?

I won't be done with dentist appt till around 130.. I can either pick him up or I'll lyk when I'm home

We're both super sick. He has a viral infection. I'm sorry but he's just going to stay with me

I'm sorry to hear that. But no I will be picking him up at 130 and I taking care of my sick son is my job as well and I will give him beyond adequate attention. There's an agreement for a reason. That's no longer your decision to make

See you soon.

We're at your house. Where you said you and our very sick son are resting?

I'm not sure you understand the legalities of this.

Dec 8, 2023, 12:17 PM

Haley I hope I don't even have to say it.

Dec 10, 2023, 3:40 PM

Haley let me speak w my son.

**EXHIBIT C-1**

**Section C: 2024 Third Allegation Cycle**

Sworn deposition testimony of Plaintiff confirming that, despite contacting DFCS in 2024 regarding alleged concerns, no case was opened, no investigation initiated, no safety plan implemented, and no restrictions imposed.

---

## Exhibit C-1

*(2024 Third Allegation Cycle – No Case Initiated)*

---

### Statement Confirmed Under Oath

*Sworn Deposition Testimony – September 12, 2025*

*Crowe v. Willis – File No. 2025EDR0553*

---

During sworn, deposition testimony, Plaintiff:

- Plaintiff testified that she called DFCS.
- Plaintiff further testified that DFCS declined to open a case and did not initiate an investigation.

Plaintiff acknowledged:

- No case was opened by DFCS.
- No safety plan was implemented.
- No findings were made by DFCS.
- No restrictions were imposed by DFCS.

Defendant was never contacted by DFCS regarding any new allegation in 2024.

---

*Source: Sworn deposition testimony of Plaintiff.*

**EXHIBIT D-1**

Section D: 2025 Fourth Allegation Cycle

Petition for Stalking Temporary Protective Order filed January 9, 2025, alleging stalking and fear of future harm.

CLERK OF SUPERIOR &  
JUVENILE COURTS  
FILED FOR RECORD

2025 JAN -9 PM 2:45

THE SUPERIOR COURT FOR THE COUNTY OF \_\_\_\_\_

CINDY THASCH CLERK  
COLUMBIA COUNTY GEORGIA

STATE OF GEORGIA

Haley E Crowe  
Petitioner,

Civil Action File

v.

Wayland Willis  
Respondent. (Braxton)

No. 2025D0007

**PETITION FOR STALKING TEMPORARY PROTECTIVE ORDER**

The Petitioner, pursuant to O.C.G.A. § 16-5-94, hereby files this Petition for a Stalking Temporary Protective Order and in support shows the Court the following:

1. The Petitioner is a resident of Columbia County, Georgia and is over the age of 18 years of age or is an emancipated minor. Petitioner's year of birth is 1999, sex F, and race W.
  2. The Respondent is a resident of Col. County, Georgia, and may be served at 1124 GAVIN RD, Columbia County, Georgia.
- OR
- 2.1 Respondent is a resident of the State of Columbia county Jail. Under O.C.G.A. §§19-13-2(b) and 16-5-94(b) jurisdiction and venue are proper with this Court because the stalking occurred in the State of Georgia in \_\_\_\_\_ County and/or Petitioner lives in \_\_\_\_\_ County. Respondent is subject to the jurisdiction of this Court and may be served at \_\_\_\_\_.
3. On or about Nov<sup>21</sup> - Jun, 2022 + Jan 2025 the Respondent has knowingly and willfully committed the following acts of stalking under O.C.G.A. §§ 16-5-90 et seq. Tracking, stalking, ~~was~~ recording, Harassing through phone, workplace, and Home. Threatening taking my child and other violence. ~~and other acts of stalking~~ intimidating and similar events may occur in the future. These acts had no legitimate purposes, happened at places other than the residence of the Respondent, were without the consent of the Petitioner, and placed Petitioner in reasonable fear for her/his own safety and/or the safety of her/his immediate family.

BARRY A. FLEMING

RECORDED & SCANNED IN  
MINUTES 1-9-25 TC

THE SUPERIOR COURT FOR THE COUNTY OF \_\_\_\_\_

CLERK OF SUPERIOR &  
JUVENILE COURTS  
FILED FOR RECORD

STATE OF GEORGIA

2025 JAN -9 PM 2:46

Halley Crowe  
Petitioner

Civil Action File

CINDY MASGA CLERK  
COLUMBIA COUNTY GEORGIA

v.

No. 2025D0007

Wayland Braxton Willis  
Respondent.

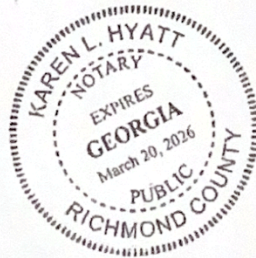
**VERIFICATION**

Personally appeared \_\_\_\_\_, who being duly sworn states that she/he is the Petitioner in the above styled case and that the facts set forth in the foregoing Petition for Stalking Temporary Protective Order are true and correct.

Halley Crowe  
Petitioner

Sworn and subscribed before  
me this 9 day of January, 2025.

Karen L. Hyatt  
NOTARY PUBLIC  
My commission expires:



**EXHIBIT D-2**

**Section D: 2025 Fourth Allegation Cycle**

Ex Parte Temporary Protective Order entered January 15, 2025, imposing immediate restrictions without any evidentiary hearing or presentation of evidence.

CLERK OF SUPERIOR &  
JUVENILE COURTS  
FILED FOR RECORD CW

ORI Number 2025 JAN 15 PM 1:31  
SC-17

THE SUPERIOR COURT FOR THE COUNTY OF Columbia  
COLUMBIA COUNTY GEORGIA

STATE OF GEORGIA

Haley Crowe, :  
Petitioner, : Civil Action File  
v. :  
Wayland Willis, : No. 2025D0007  
Respondent. :

**STALKING EX PARTE TEMPORARY PROTECTIVE ORDER**

Upon proceedings before me, the Petitioner having demanded pursuant to O.C.G.A. § 16-5-94 that a Protective Order be issued; and alleged that Respondent has knowingly and willfully committed or attempted to commit acts in violation of O.C.G.A. § 16-5-90 et seq., and such acts were not at the home of the Respondent, had no legitimate purpose and that Petitioner is in reasonable fear of her/his safety and/or the safety of her/his immediate family; and it appearing to the Court that probable cause exists to believe that similar events will occur in the future, IT IS HEREBY ORDERED AND ADJUDGED:

1. That Respondent is enjoined and restrained from any acts directly or indirectly [pco01,02] which harass and/or intimidate the Petitioner or her/his immediate family.
2. That Respondent is enjoined from approaching within 500 yards of Petitioner. *or minor child.* [pco01,04]
3. That Respondent have no contact of any type, direct or indirect, or through another person with Petitioner, or her/his immediate family, including but not limited to telephone, fax, or any other means of communication.
4. 

<p><b>That the Respondent appear before this Court, on the <u>5th</u> day of <u>February</u>, 20<u>25</u> at <u>1:00</u> p.m. in room <u>1090</u> of the <u>Columbia</u> County Courthouse at <u>640 Ronald Reagan Dr., Evans, Ga 30809</u> to show cause why the requests of the Petitioner should not be granted.</b></p>
---
5. That a copy of this Order be given to local law enforcement and the Respondent be served with a copy of this Order and Petition for Stalking Temporary Protective Order instanter.

RECORDED & SCANNED IN  
MINUTES 1:15-25:10

6. That this Order applies in every county throughout the state and it shall be the duty of every court and every law enforcement official to enforce and carry out the provisions of this Order pursuant to O.C.G.A. §§ 16-5-94 (e) and 19-13-4 (d). Law enforcement may use their arrest powers pursuant to O.C.G.A. §§ 16-5-91 and 17-4-20 to enforce the terms of this Order.
7. That these proceedings be filed in the office of the Clerk of this Court.
8. That this Court determined that it had jurisdiction over the parties and the subject matter under the laws of the State of Georgia and the Court ordered that the Respondent be given reasonable notice and opportunity to be heard sufficient to protect the Respondent's due process rights and this Order shall be presumed valid and pursuant to 18 U.S.C. § 2265(a) shall be accorded **full faith and credit** by any other state or local jurisdiction and shall be enforced as ordered as if an Order of the enforcing state or jurisdiction.

SO ORDERED this 15th day of January 2025.

  
\_\_\_\_\_  
JUDGE, SUPERIOR COURT

Columbia County

Jill Morris

Print or stamp Judge's name

**Violation of the above Order may be punishable by arrest.**

**EXHIBIT D-3**

**Section D: 2025 Fourth Allegation Cycle**

Order Dismissing January 9, 2025 Temporary Protective Order Without Prejudice, entered April 3, 2025.

FILED IN OFFICE  
CLERK OF SUPERIOR COURT  
COLUMBIA COUNTY, GEORGIA

ORI Number \_\_\_\_\_

**2025D0007**

IN THE SUPERIOR COURT OF COLUMBIA COUNTY  
STATE OF GEORGIA

APR 03, 2025 03:28 PM

*Cindy Mason*  
Cindy Mason, Clerk  
Columbia County, Georgia

HALEY CROWE  
Petitioner

Civil Action No. 2025EDR0007

v.

WAYLAND BRAXTON WILLIS  
Respondent

**DISMISSAL OF TEMPORARY PROTECTIVE ORDER**

IT IS HEREBY ORDERED that the (Petition) (~~Counter-Petition~~) (~~both Petition and Counter-Petition~~) [strike through as appropriate] for Temporary Protective Order filed on the 09<sup>th</sup> day of January, 2025, is hereby dismissed without prejudice:

- on (Petitioner's) (~~Respondent's~~) (~~both Petitioner's and Respondent's~~) motion to dismiss.
- on (Petitioner's) (Respondent's) (both Petitioner's and Respondent's) failure to appear and proceed.
- on (Petitioner's) (Respondent's) (both Petitioner's and Respondent's) failure to prove the allegations contained in the (Petition) (Counter-Petition) (both Petition and Counter-Petition) for a Temporary Protective Order by preponderance of the evidence.
- due to lack of service on (Petitioner) (Respondent) (both Petitioner and Respondent).
- OTHER: \_\_\_\_\_.

So ordered this 3rd day of April, 2025.

Jill Morris  
Judge Superior Court  
COLUMBIA County, Georgia  
JILL MORRIS  
Print or stamp Judge's name

- Transmitted to Georgia Protective Order Registry  
Date \_\_\_\_\_  
Clerk/Deputy Clerk \_\_\_\_\_

**EXHIBIT D-4**

**Section D: 2025 Fourth Allegation Cycle**

Order Immediately Suspending Visitation entered November 24, 2025, memorializing prior verbal suspension of parenting time on October 29, 2025.

FILED IN OFFICE  
CLERK OF SUPERIOR COURT  
COLUMBIA COUNTY, GEORGIA  
**2025EDR0053**

NOV 24, 2025 04:35 PM

  
Cindy Mason, Clerk  
Columbia County, Georgia

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

**HALEY CROWE,  
PETITIONER,**

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

**CASE NO.: 2025EDR0053**


v.

**WAYLAND BRAXTON WILLIS,  
RESPONDENT.**

**ORDER IMMEDIATELY SUSPENDING VISITATION**

On November 20, 2025, this Court received an email from the Guardian, Renee Bell, requesting the Court to immediately suspend the Respondent's visitation. The Respondent submitted to a hair follicle drug screen test on October 16, 2025, and the report was not completed and distributed to the Attorneys or Guardian until October 29, 2025. After receiving the test results, the Guardian suspended visitation. The Respondent submitted to another drug test on November 11, 2025 which he passed. Upon receipt of the November 11 testing report, the Guardian tried to reinstate supervised visitation on her own. However, the weekend of November 15<sup>th</sup>, the Guardian had concerns that the Respondent was not sober. The Court hereby finds that it is in the best interest of the child for visitation to be suspended entirely until further order by this Court.

This 24<sup>th</sup> day of November, 2025.

  
SHERYL B. JOLLY  
Chief Judge, Superior Court  
Columbia Judicial Circuit

**EXHIBIT D-4**

**Section D: 2025 Fourth Allegation Cycle**

Order Immediately Suspending Visitation entered November 24, 2025, memorializing prior verbal suspension of parenting time on October 29, 2025.

**CERTIFICATE OF SERVICE**


This is to certify that I, Sarah Elizabeth Strickland, on this day have served a copy of the foregoing **ORDER** upon the following by way of  hand delivery,  electronic mail,  statutory electronic service by using PeachCourt's electronic service system pursuant to O.C.G.A. § 9-11-5(f) and via email to the following; or  United States Mail in a properly addressed envelope with adequate postage affixed for safe and proper delivery to the following:

TISDALE, MIDDLETON, LAND  
Adam Land  
207 North Belair Road  
Evans, GA 30809  
[adam@tisdalelawfirm.com](mailto:adam@tisdalelawfirm.com)  
[tonnia@tisdalelawfirm.com](mailto:tonnia@tisdalelawfirm.com)

DAVIS, CHAPMAN, AND WILDER, LLC  
Holly G. Chapman  
1143 Laney Walker Blvd., Suite 201  
Augusta, GA 30901  
[hchapman@dcwattorneys.com](mailto:hchapman@dcwattorneys.com)

Renee Bell  
[kidsgal@aol.com](mailto:kidsgal@aol.com)

This 24 of November, 2025.

  
\_\_\_\_\_  
/s/SE Strickland  
Sarah Elizabeth Strickland  
Staff Attorney to Chief Judge  
Sheryl B. Jolly

Office of Judge Sheryl B. Jolly  
Columbia Judicial Circuit  
640 Ronald Reagan Drive  
Evans, Georgia 30809  
T: 706-447-6733

**EXHIBIT D-5**

**Section D: 2025 Fourth Allegation Cycle**

Sworn deposition testimony of Plaintiff regarding the video allegation referenced in the January 9, 2025 Temporary Protective Order petition, including her description of the video and confirmation that it was produced during deposition.

---

**Exhibit D-5**

---

(2025 Fourth Allegation Cycle – Video Allegation)

---

**Statement Confirmed Under Oath**

---

Sworn Deposition Testimony – September 12, 2025  
Crowe v. Willis – File No. 2025EDR0053

---

During sworn deposition testimony, Plaintiff:

- Testified that her child told her Defendant showed him a video she described as involving nudity.
- Confirmed that the allegation referenced the same video sent to her via text message.
- Testified that she retained the video and could scroll up to access it.
- When asked what the video depicted, testified:  
*“It depicted two young boys reacting to provocative TikToks of a girl dancing provocatively.”*
- Played the video during the deposition in the presence of counsel, the Guardian ad Litem, and the court reporter.
- Confirmed she had already viewed the video.
- Defendant forwarded the same video to the Guardian ad Litem during the deposition.

---

Source: Sworn deposition testimony of Plaintiff.

**EXHIBIT D-6**

**Section D: 2025 Fourth Allegation Cycle**

Excerpt of Plaintiff's sworn deposition testimony taken September 12, 2025, regarding the January 9, 2025 arrest petition and asserted fear of Defendant, including confirmation under oath that Defendant had not violated any prior temporary protective orders.

---

**Exhibit D-6**

---

(2025 Fourth Allegation Cycle – Basis for 2025 TPO)

---

**Statement Confirmed Under Oath**

---

Sworn Deposition Testimony – September 12, 2025  
Crowe v. Willis – File No. 2025EDR0053

---

During sworn deposition testimony, Plaintiff:

- Testified that she filed the 2025 TPO because she was afraid Defendant would react harshly after being released from jail.
- Testified that she did not know what Defendant had been arrested for at the time she sought the TPO.
- Acknowledged that, when signing the ex parte TPO, the judge indicated uncertainty as to whether there would be sufficient evidence to extend the order at the hearing.
- Confirmed that there were no violations of prior TPOs issued in 2022 or 2023.

---

Source: Sworn deposition testimony of Plaintiff.

**EXHIBIT D-7**

**Section D: 2025 Fourth Allegation Cycle**

**Text Message Exchange Between Plaintiff and Defendant Dated December 28, 2024 to January 9, 2025 (Pre-Filing Context)**

He said he can meet you at Publix at 4 he'll just need a car seat 1:16 PM

We'll be at the house if he'd rather just come there 1:39 PM

Okay he said that's fine 1:46 PM

Dec 28, 2024, 9:02 PM

In focus doesn't have service in the morning so I'm sleeping in just call or text when ur otw 9:02 PM

Alright 9:03 PM

Dec 29, 2024, 9:33 AM

Heading that way 9:33 AM

Dec 29, 2024, 2:24 PM

What time are you dropping him back off? 2:24 PM

Well I thought I had to work but I don't so I can drop him off 430ish if that's cool 2:24 PM

Okay sounds good 2:25 PM

Jan 1, 2025, 12:51 PM

He went to the store with Tripp I'll have him call you when he gets back 12:51 PM

Jan 2, 2025, 9:08 AM

You want to pick him up here or meet somewhere at 1 9:08 AM

Jan 2, 2025, 10:08 AM

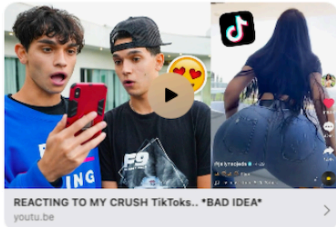
725 Louisville road the house on the left 12:45 PM

Okay 12:45 PM

Lmk what time you'll drop him off so I can let him know 12:46 PM

Okay should be 5 12:54 PM

Jan 4, 2025, 8:45 PM




REACTING TO MY CRUSH TikToks.. \*BAD IDEA\*  
youtu.be

This is what he was caught watching, and we had a very very serious discussion and he displayed an emerge amount of regret. Idk why you reached out to my dad first?? 8:46 PM

It was taken care of and he has lost privileges 8:46 PM

He said he saw two completely naked men sitting next to each other with their penises out 8:58 PM

Why would he have access to any content that is not appropriate for 6 years olds 9:00 PM



REACTING TO MY CRUSH TikToks.. \*BAD IDEA\*  
youtu.be

This is what he was caught watching, and we had a very very serious discussion and he displayed an emerge amount of regret. Idk why you reached out to my dad first?? 8:46 PM

It was taken care of and he has lost privileges 8:46 PM

He said he saw two completely naked men sitting next to each other with their penises out 8:58 PM

Why would he have access to any content that is not appropriate for 6 years olds 9:00 PM

Does that video show that???? 9:06 PM

He put his headphones and I got suspicious and I grabbed it and that's what was playing and we immediately had an intervention 9:07 PM

He only has restricted YouTube there's no other access to web or internet reaching 9:08 PM

How would restricted age limit YouTube kids show that video 9:14 PM

I texted Brad bc he told me that you got on to him and told Brad that he was in trouble when he came in the room when Brooks was freaking out. Brooks should not be in trouble for that at all it is 100% your fault that he has access to content like that and instead of giving him an intervention you should apologize to him that he saw something inappropriate on your watch 9:16 PM

Jan 5, 2025, 5:44 PM

Brooks January tuition is due tomorrow. 5:44 PM

Jan 9, 2025, 12:41 PM

Brooks didnt go today he's been very sick all week he's just gonna stay with me 12:41 PM

Doesn't work like that 12:49 PM

I will call the police 12:49 PM

**EXHIBIT D-7**

**Section D: 2025 Fourth Allegation Cycle**

**Text Message Exchange Between Plaintiff and Defendant Dated December 28, 2024 to January 9, 2025 (Pre-Filing Context)**

To: Haley Estelle

Jan 5, 2025, 5:44 PM

Brooks January tuition is due tomorrow. 5:44 PM

Jan 9, 2025, 12:41 PM

Brooks didn't go today he's been very sick all week he's just gonna stay with me 12:41 PM

Doesn't work like that 12:49 PM

I will call the police. 12:49 PM

Have him ready in 9 minutes or I will call the police. 12:51 PM

Okay 12:53 PM

You can come now 12:54 PM

I've been standing here for 7 minutes? 1:07 PM

?? 1:08 PM

Where is my son? 1:11 PM

In the Bath 1:12 PM

He's sick 1:12 PM

You said come now, no reason he should be in bath 1:12 PM

I'm about to involve the police if you don't bring my son to me 1:12 PM

You're going against court orders 1:13 PM

I'm getting him out now 1:13 PM

Sorry I wasn't by the phone and couldn't hear 1:13 PM

iMessage

To: Haley Estelle

Okay 12:53 PM

You can come now 12:54 PM

I've been standing here for 7 minutes? 1:07 PM

?? 1:08 PM

Where is my son? 1:11 PM

In the Bath 1:12 PM

He's sick 1:12 PM

You said come now, no reason he should be in bath 1:12 PM

I'm about to involve the police if you don't bring my son to me 1:12 PM

You're going against court orders 1:13 PM

I'm getting him out now 1:13 PM

Sorry I wasn't by the phone and couldn't hear 1:13 PM

I'm getting him dressed 1:14 PM

You can come back 1:15 PM

You and I can meet or you can pick him up from here 1:22 PM

Sun, Aug 24, 12:11 PM

Whatever you were asking about November is fine. 12:11 PM

Sun, Aug 24, 5:56 PM

Okay sounds good. Yall bringing him here or do you want me to pick up? 5:56 PM

iMessage

**EXHIBIT E-1**

**Section E: Custodial Structure & Allegation Pattern**

Calendar exhibits reflecting the established weekly parenting-time structure exercised by the parties prior to and following the July 2023 divorce decree.

**Status Quo Parenting Structure (2022-Jan 9, 2025)**

Blue - Father Parenting Time | Purple - Mother Parenting Time | Split Block - Exchange Day

**Pre-Divorce Parenting Structure (January 2022-July 2023)**

SUN	MON	TUE	WED	THU	FRI	SAT
Purple	Purple	Purple	Blue	Blue	Blue	Blue   Purple
Purple	Purple	Purple	Blue	Blue	Blue	Blue   Purple
Purple	Purple	Purple	Blue	Blue	Blue	Blue   Purple
Purple	Purple	Purple	Blue	Blue	Blue	Blue   Purple

**Post-Divorce Parenting Structure (August 2023-January 9, 2025)**

SUN	MON	TUE	WED	THU	FRI	SAT
Purple	Purple	Purple	Purple	Blue	Blue	Blue   Purple
Purple	Purple	Purple	Purple	Blue	Blue	Blue   Purple
Blue   Purple	Purple	Purple	Purple	Blue	Blue	Blue   Purple
Purple	Purple	Purple	Purple	Blue	Blue	Blue   Purple

**EXHIBIT E-2**

**Section E: Custodial Structure & Allegation Pattern**

Text message record reflecting exchange of the child for Christmas visitation despite a court-ordered suspension and ongoing Temporary Protective Order and DFCS involvement arising from sexual abuse allegations.

To: Haley Estelle

Dec 10, 2023, 3:40 PM

Haley let me speak w my son. 3:40 PM

Dec 25, 2023, 12:24 PM

My dad is on the way to drop brooks off 12:24 PM

Dec 29, 2023, 1:27 PM

Loading... 1:27 PM

Dec 31, 2023, 7:18 PM

What time can I ft him tonight 7:19 PM

Jan 6, 2024, 8:34 AM

My dad is dropping brooks off rn 8:34 AM

Jan 11, 2024, 8:37 AM

Will you have his two new pairs of boots I've bought him recently as well as my correct car seat ready? Either put outside your door or something 8:37 AM

Jan 11, 2024, 10:22 AM

Do you have my car seat? 10:22 AM

I can leave yours outside my door if you want to trade them. 10:24 AM

He's wearing a pair of shoes that you recently got him but I will put the boots out with the car seat 10:25 AM

I put your car seat and the boots outside my door. There's also a Wesley packet for kindergarten if you were interested in that because I'm not sure what your plans are for his school next year 10:36 AM

iMessage

**EXHIBIT E-3**

**Section E: Custodial Structure & Allegation Pattern**

Handwritten Letter from Plaintiff, dated January 10, 2024, delivered following the December 2023 DFCS and protective order allegations and prior to dismissal.

Dear Braxton,

I am writing a letter because there is no reason any of this should be discussed - but it needs to be addressed. I am not going forward with a year long protective order, you might know this by the time you have received this note. That being said we will be seeing each other and communicating again. I will not discuss what my son disclosed with me with you or why or any conversations related to the report that was filed after the disclosure that my son innocently shared with me. I don't want to hear a single defense from you and I have nothing to defend myself. "How could you believe

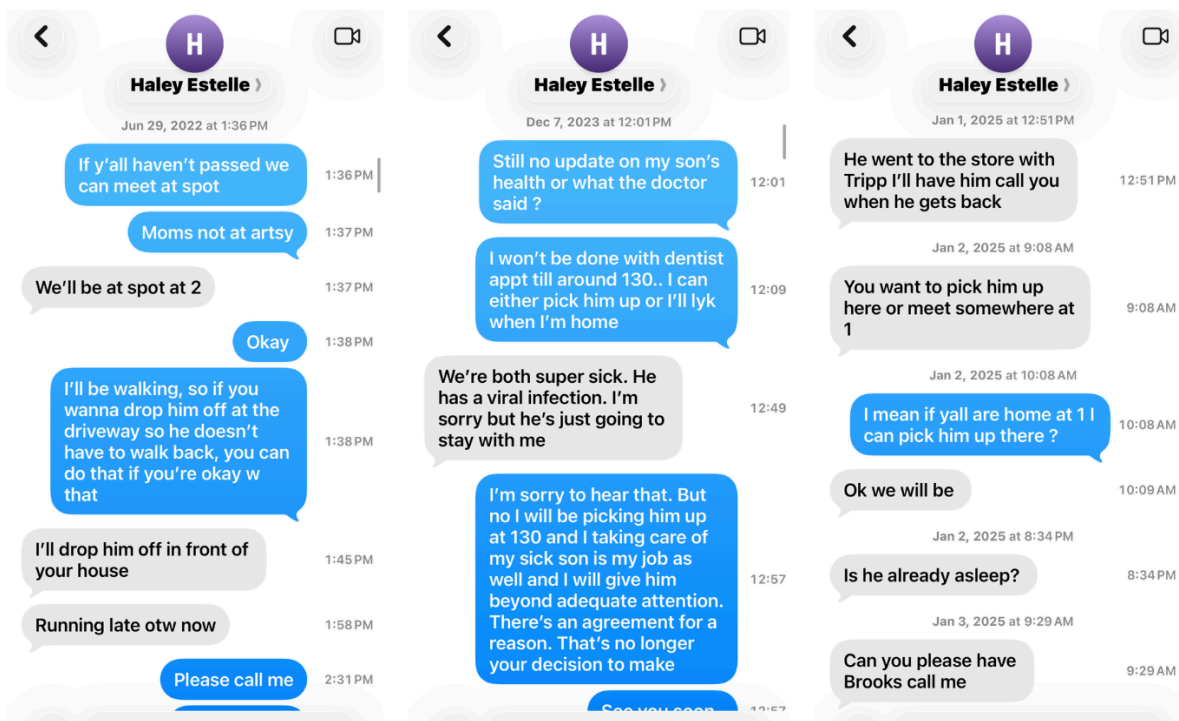
this" or any claims that Brooks didn't say it or made it up. I will never have any conversation with you about this subject. I think you know deep down that I will always do what is best for the sake of Brooks' well being. I also think deep down you already understand why I did what I did, even down to the protection for myself. For now, I believe that we can move forward and make things cordial for the sake of Brooks' normalcy. I will comply with our agreement and am continuing to seek the Lord's guidance, revelations and promises. I don't understand any of this and all I can do is put my trust in God. This will be the only time I will speak on this. Thanks.

**EXHIBIT E-4**

**Comparative Conduct Surrounding Emergency Filings**  
 (2022-2025)

Summary of documented parent-to-parent communications within each allegation filing window.

Allegation Cycle	Documented Parent Communication Conduct	Presence Of Alleged Danger
June 2022 TPO Filing	Text communications reflect scheduling and exchange coordination between the parents immediately preceding and surrounding the June 2022 TPO filing.	The documented parent communications within the filing window contain no written assertion of immediate risk, fear, or emergency condition.
December 2023 DFCS Report/TPO	Text communications reflect discussion regarding the child's reported illness and related parental communication immediately preceding and surrounding the December 2023 DFCS report and TPO filing.	The documented parent communications within the filing window contain no written assertion of immediate risk, fear, or emergency condition.
January 2025 DFCS Report/ TPO	Text communications reflect scheduling, pickup, and location coordination between the parents immediately preceding and surrounding the January 2025 DFCS report and TPO filing.	The documented parent communications within the filing window contain no written assertion of immediate risk, fear, or emergency condition.



**EXHIBIT E-4.1****Section E: Custodial Structure & Allegation Pattern**

Filing and Disposition Dates for Emergency Allegation Cycles (2022-2025)

	FILING DATE	DISMISSAL/CLOSURE DATE
<b>2022</b> 1st TPO PETITION	June 28, 2022	Temporary ex parte TPO entered; No final hearing conducted; No permanent TPO entered.
<b>2023</b> 2nd TPO PETITION & 1st DFCS INVOLVEMENT	December 11, 2023	January 10, 2024
<b>2025</b> 3rd TPO PETITION & 3rd DFCS INVOLVEMENT	January 9, 2025	April 3, 2025

**EXHIBIT E-5**

**Section E: Custodial Structure & Allegation Pattern**

Text message exchange dated December 24-25, 2022, reflecting coordinated and invited overnight presence in the home following the June 2022 TPO filing, and family photograph taken December 25, 2022 (transmitted December 27, 2022), documenting Christmas Eve through Christmas morning together in the home.

12/24/22 6:37:38 PM EST

Are you not coming to memes?

12/24/22 6:50:00 PM EST

Haley Estelle (+17065048287)

I'm not coming I really didn't know if I was formally invited but I'm still wrapping and trying to get the house together. Also waiting on my parents to bring brooks bed all day and I'm getting sick. Sorry I haven't been in touch

12/24/22 6:51:18 PM EST

No worries

12/24/22 7:20:43 PM EST

Haley Estelle (+17065048287)

Do you want me to pick y'all up from your house or will y'all get dropped here?

12/24/22 7:22:47 PM EST

Yeah that's fine

Yeah that's fine

12/24/22 7:25:10 PM EST

Haley Estelle (+17065048287)

Which one

12/24/22 7:36:58 PM EST

I guess we can get dropped off

12/24/22 7:37:29 PM EST

Haley Estelle (+17065048287)

Up to you do you need stuff from your house? I can get y'all from there

12/24/22 7:37:50 PM EST

Yeah i do. That works

12/24/22 7:47:57 PM EST

12/24/22 7:37:50 PM EST

Yeah i do. That works

12/24/22 7:47:57 PM EST

Haley Estelle (+17065048287)

Well give me a call when you get there I'll head that way

12/24/22 7:48:17 PM EST

Okay. Brooks is opening up gifts now

12/24/22 8:03:47 PM EST

Haley Estelle (+17065048287)

Liked "Okay. Brooks is opening up gifts now "

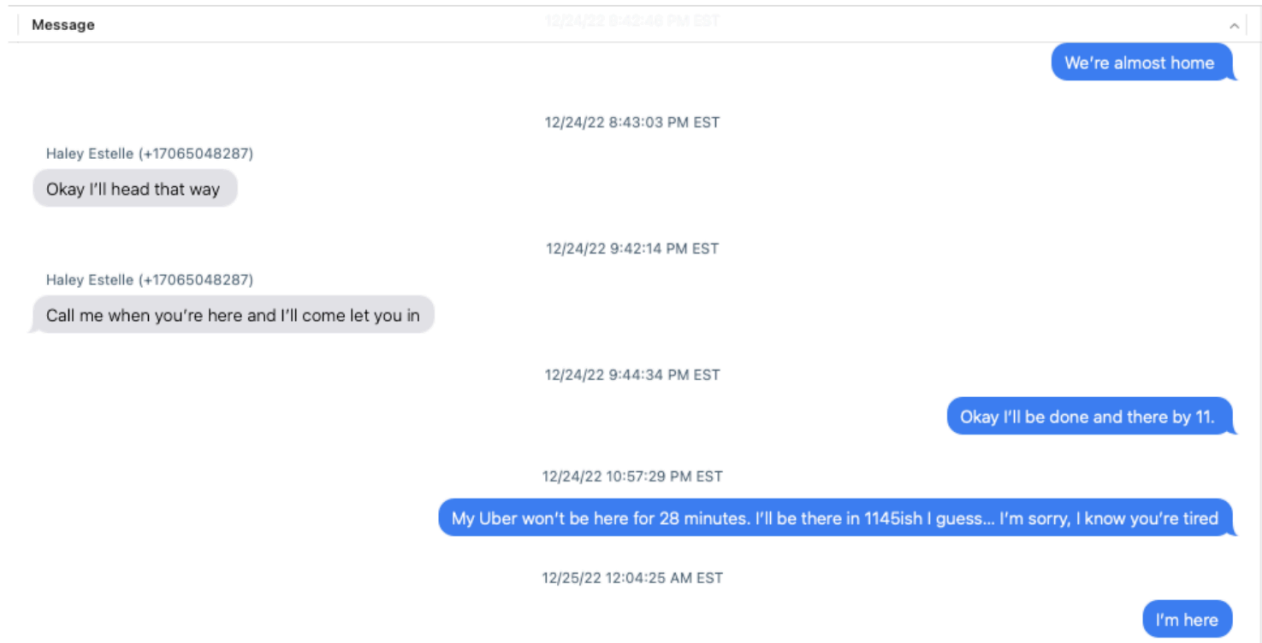
12/24/22 8:42:46 PM EST

We're almost home

**EXHIBIT E-5**

**Section E: Custodial Structure & Allegation Pattern**

Text message exchange dated December 24-25, 2022, reflecting coordinated and invited overnight presence in the home following the June 2022 TPO filing, and family photograph taken December 25, 2022 (transmitted December 27, 2022), documenting Christmas Eve through Christmas morning together in the home.



**EXHIBIT E-6**

**Section E: Custodial Structure & Allegation Pattern**

Chronological timeline summarizing emergency allegation filings and corresponding disruptions to Defendant's parenting time from 2022 through 2026.

**EMERGENCY ALLEGATION CYCLE TIMELINE**

