

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

HALEY CROWE,
Plaintiff,

vs.

WAYLAND BRAXTON WILLIS,
Defendant.

Civil Action File No.: 2025EDR0053

**DEFENDANT'S NOTICE OF COMPLETION OF DISCOVERY,
REQUEST FOR FINAL EVIDENTIARY HEARING,
AND MOTION FOR TEMPORARY RELIEF PENDING FINAL TRIAL**

Defendant Wayland Braxton Willis, proceeding pro se, respectfully files this Notice of Completion of Discovery, Request for Final Evidentiary Hearing, and Motion for Temporary Relief Pending Final Trial, and shows the Court the following:

I. Procedural Posture

This domestic relations action has been pending before the Court since 2025. Discovery in this matter has been completed. Written discovery, including interrogatories, was completed in May 2025, and depositions of the parties were completed in September 2025. The parties have therefore had ample and reasonable opportunity to conduct discovery in this matter.

Accordingly, the evidentiary record is complete and the matter is now procedurally ready for final adjudication.

II. Notice of Completion of Discovery

Pursuant to O.C.G.A. § 9-11-40, civil actions become triable after the last day upon which defensive pleadings were required to be filed and after the parties have had reasonable time for discovery.

Because discovery has been completed and sufficient time has elapsed, this matter is now procedurally ready to be placed on the Court's trial calendar.

Defendant therefore files this Notice to inform the Court that discovery has concluded and that the case is ready to be scheduled for a final evidentiary hearing on the merits.

III. Request for Final Evidentiary Hearing

Defendant respectfully requests that the Court place this matter on the next available trial calendar and set the case for a final evidentiary hearing so that all issues before the Court may be resolved based upon evidence presented in open court.

Defendant further requests that the Court issue a Rule Nisi scheduling the parties to appear for the final hearing.

Defendant files this motion to ensure that the Court has a clear opportunity to exercise its jurisdiction and bring the pending matters before the Court to resolution through a final evidentiary hearing.

IV. Motion for Temporary Relief Pending Final Trial

As of the date of this filing, one hundred thirty-one (131) days have elapsed since Defendant's parenting time was suspended without a contemporaneous written order. Defendant last had any contact with the minor child on January 14, 2026. No written findings of fact have been entered by the Court identifying a basis for the continuation of restrictions. No evidentiary hearing has been conducted at which Defendant was afforded an opportunity to present evidence or cross-examine witnesses.

During this period, Defendant has filed over thirteen substantive motions seeking clarification, written findings, modification, and enforcement. As of this filing, no written rulings have been entered disposing of any of those motions. The December 9, 2025 testing order imposed a specific laboratory testing condition, the designated facility has been confirmed unable to perform the required testing, and no amended order has been entered defining a compliance pathway.

The cumulative effect of suspension without adjudication, testing requirements that cannot be satisfied as written, and the absence of any written findings constitutes circumstances in which

appropriate temporary relief is necessary to preserve the integrity of the parent-child relationship pending final adjudication.

Defendant respectfully requests that the Court enter such temporary relief as it deems just, equitable, and consistent with the best interests of the minor child pending the final evidentiary hearing, including any relief necessary to ensure that the final hearing is conducted upon a record that accurately reflects the current circumstances and the evidence available.

PRAYER FOR RELIEF

WHEREFORE, Defendant respectfully requests that this Court:

1. Acknowledge the completion of discovery in this matter;
2. Place this case on the Court's trial calendar and set the matter for a final evidentiary hearing;
3. Issue a Rule Nisi scheduling the hearing;
4. Enter such temporary relief as the Court deems just, equitable, and in the best interests of the minor child pending final adjudication; and
5. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted, this **9th** day of **March, 2026**.



Wayland Braxton Willis

Defendant, Pro Se

806 Whispering Willow Ct.

Grovetown, Georgia 30813

C: (706) 631-0526

E: bhbwillis@gmail.com

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing **Notice of Completion of Discovery, Request for Final Evidentiary Hearing, and Motion for Temporary Relief Pending Final Trial** upon the following counsel of record and parties by electronic service through PeachCourt eService:

Adam B. Land, Esq.
Tisdale Middleton & Land Law Firm
207 N. Belair Road, Evans, Georgia 30809
adam@tisdalelawfirm.com

Renee Bell, Guardian ad Litem
kidsgal@aol.com

This 9th day of March, 2026.



Wayland Braxton Willis
Defendant, Pro Se
806 Whispering Willow Ct.
Grovetown, Georgia 30813
C: (706) 631-0526
E: bhbwillis@gmail.com