

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

**HALEY CROWE,**  
Plaintiff,

vs.

Civil Action File No.: **2025EDR0053**

**WAYLAND BRAXTON WILLIS,**  
Defendant.

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**DEFENDANT'S MOTION FOR CONTEMPT AND  
ENFORCEMENT OF COURT-ORDERED COMMUNICATION**

COMES NOW Defendant Wayland Braxton Willis, appearing pro se, and respectfully moves this Court to find Plaintiff in civil contempt for willful violation of the Final Judgment and Decree of Divorce and incorporated Parenting Plan, specifically the court-ordered daily telecommunication rights between Defendant and the minor child, Wayland Brooks Willis. In support thereof, Defendant states:

**I. JURISDICTION AND AUTHORITY**

This Court has continuing jurisdiction over this matter pursuant to O.C.G.A. § 19-9-3 and its inherent authority to enforce its own orders through contempt proceedings. The Final Judgment and Decree of Divorce entered in this matter, and its incorporated Parenting Plan, constitute enforceable orders of this Court. This Court retains authority to compel compliance with those orders and to impose sanctions for willful noncompliance.

**II. EXISTENCE OF A VALID COURT ORDER**

Section V of the Parenting Plan ('Contacting the Child'), incorporated into the Final Judgment and Decree of Divorce, provides that when the child is in the physical custody of one parent, the other parent shall have the right to communicate with the child by telephone

at any reasonable time. Section IX of the Parenting Plan provides that its terms may be modified only by written order of this Court. Section X addresses conduct of the parties in relation to the Parenting Plan's terms.

No subsequent written order has modified, suspended, or removed the court-ordered right to telecommunication contact contained in the Final Judgment. The Order Immediately Suspending Visitation entered November 24, 2025 suspends **visitation only**. It does not mention, reference, restrict, or suspend telephonic or FaceTime communication. The court-ordered right to telecommunication contact therefore remains in full force and effect.

### **III. KNOWLEDGE OF THE ORDER**

Plaintiff was a party to the Final Judgment and has continuous knowledge of its provisions. Both parties participated in the drafting and entry of the Parenting Plan. Plaintiff has repeatedly referenced Parenting Plan provisions in text communications with Defendant, demonstrating active awareness of its terms. No appeal of the Final Judgment was taken, and no motion to modify the communication provisions has ever been filed.

### **IV. WILLFUL NONCOMPLIANCE**

#### **A. Origin of the Unauthorized Communication Suspension**

The communication interference did not originate with any court order. On November 5, 2025, Defendant directly asked Guardian Ad Litem Renee Bell in writing whether a phone call with Brooks required drug screen results before it could occur. Bell responded:

**Renee Bell, GAL (November 5, 2025, 6:28 PM):** *"Yes sir, when visitation is stopped it includes all visitation."*

No court order issued on or before November 5, 2025 suspended communication. The November 24, 2025 written order — entered nineteen days later — suspends visitation only and contains no reference to communication. Bell's November 5 statement had no operative court order to support it on the date it was made or at any time thereafter.

## **B. Plaintiff's Reliance on Bell's Unauthorized Instruction**

On December 26, 2025, when Defendant objected to Plaintiff's continued interference with court-ordered communication and noted that the November 24 Order suspends visitation only, Plaintiff responded:

**Haley Crowe (December 26, 2025, 7:59 AM):** *"Renee said the suspension of visitation includes calls. I'm just being nice."*

Plaintiff's own words confirm that her basis for withholding communication was not a court order — it was a verbal instruction from the Guardian Ad Litem. No such instruction appears in any operative court order. Plaintiff's acknowledgment that she was being 'nice' by permitting any contact is itself an admission that she understood herself to be in control of whether contact occurred, not constrained by any written mandate to permit it.

## **C. Documented Pattern of Communication Interference**

The following is a chronological summary of documented interference with court-ordered communication from December 2025 through January 2026, established by text message records and contemporaneously logged observations signed by Defendant:

**December 23, 2025:** During a FaceTime call at 2:58 PM, Brooks spontaneously asked: "I can't wait to see you — what's Santa bringing me for Christmas?" The child's statements and questions indicated he believed Father would be present during the Christmas holiday. Defendant had not been informed that the child held this expectation, nor that the child had not been prepared for Father's absence. Logged contemporaneously. Plaintiff was present during the call.

**December 25, 2025 — Christmas Day:** Defendant called twice and texted twice. Plaintiff acknowledged contact. Brooks did not call. At 9:17 PM Defendant wrote: "Haley, I've been trying to speak to our son for days." No call occurred.

**December 26, 2025:** Plaintiff invoked Bell's instruction as justification for withholding communication. See Section IV.B above.

**December 27, 2025 — Brooks' Seventh Birthday:** On the minor child's birthday, Defendant was permitted a single phone call of approximately sixty seconds at 8:45 AM.

During that call, Brooks asked Defendant whether Father would be attending his birthday party that day. The child continued to believe, up to the day of his birthday, that Father would be present. Defendant had not been informed the child had not been told otherwise, and had no opportunity to help prepare the child emotionally in advance. That evening, Defendant was permitted a second brief call of approximately one minute at 6:59 PM, which ended abruptly when another activity began. Both contacts were logged contemporaneously.

**December 30, 2025:** Brooks was reported to be at a movie and dinner. Defendant asked for a callback time. Plaintiff responded: "You can call in the morning." No callback occurred the following morning.

**January 1-2, 2026:** Defendant requested callback on New Year's Day. On January 2, Plaintiff stated Brooks was spending the night at her mother's. When Defendant asked for the grandmother's updated phone number, no number was provided and no response followed.

**January 4, 2026:** Defendant placed a FaceTime call at 4:53 PM and texted at 5:11 PM to confirm. Plaintiff did not see either until later that evening and promised a callback after Brooks' bath. Records reflect contact occurred that evening after persistent follow-up.

**January 5, 2026:** During a FaceTime call at approximately 7:00 PM, Brooks answered but appeared hesitant and repeatedly looked off-camera. The child stated he was about to watch a movie and indicated he needed to end the call. When Brooks began to state that he was not permitted to speak further, Plaintiff interjected audibly from off-screen: "All I was doing, all I said was that he could say it in a nice way." Defendant responded calmly and encouraged future communication. The child did not initiate a follow-up call later that evening. Logged contemporaneously. Observation noted: the child had not previously expressed reluctance to speak with Defendant absent third-party involvement during the call.

**January 7, 2026 — Adult Interjection During Call:** During a FaceTime call at 7:31 PM, Brooks answered and immediately said: "Daddy, sorry, I'm watching a movie." Before the child could continue, Plaintiff interjected audibly from off-screen: "No, this is before bed, this is his call." A third adult male voice then stated: "I can pause it," to which Plaintiff responded: "No, this is his call. You can try again tomorrow." Brooks became visibly upset. Defendant calmly reassured the child, encouraged him to finish his movie, reminded him he was loved, and voluntarily ended the call to reduce the

child's distress. The minor child appeared emotionally distressed and was observed looking side to side while multiple adults spoke over or about him. Logged contemporaneously the same evening.

**January 13, 2026:** Defendant requested a callback. No response.

**January 14, 2026 — Last contact with Brooks:** Defendant's last confirmed contact with his son. At 10:35 AM Defendant sent: "I love you so much son... I'll call you as soon as you get out of school." No return call to the attempted after school call occurred that afternoon or thereafter.

**January 17, 2026:** Defendant texted: "Hey, never heard back yesterday after I called. What time this evening work for yall?" No response for two days.

**January 19, 2026 — Final exchange:** Defendant texted at 3:24 PM: "Haley, you have been ignoring my texts and facetimes for days. Please have Brooks FaceTime me sometime today or tonight and let me know what time. At least let me know that he's okay or some type of update." Plaintiff responded at 4:04 PM and 4:05 PM disputing the characterization. At 4:13 PM Plaintiff wrote: "I will not continue to have this same conversation over text. I am not going to respond anymore explaining the same thing over and over. Call your kid or don't I really don't care."

Since January 19, 2026, Plaintiff has not responded to any attempt by Defendant to reach Brooks, has not facilitated a single call or callback, and has not permitted the minor child to contact his father. The record further reflects that prior to the current blackout, Brooks regularly and independently expressed a desire to speak with Defendant — a desire that, given Plaintiff's demonstrated pattern of control over all communication access, required her active facilitation to be fulfilled. What happens when Brooks asks to call his father and Plaintiff declines is not reflected in this record because Defendant has no visibility into those interactions. What is reflected is that no call has come. As of the date of this filing, Defendant has been denied all communication with his son for **fifty-four days**, without any written court order authorizing the suspension of communication — and without any indication that Brooks has been told why his father has not called, or that his father has been trying.

## **V. ABSENCE OF LAWFUL EXCUSE**

Plaintiff cannot point to any court order that authorizes the current communication blackout because no such order exists. The November 24, 2025 Order Immediately Suspending Visitation does not mention communication. No emergency order has been entered. No findings of fact have been made that would support restricting Defendant's court-ordered communication rights. The Guardian Ad Litem has no authority under any operative order to suspend, condition, or terminate communication — that authority belongs exclusively to this Court.

Plaintiff's reliance on an oral instruction from the Guardian Ad Litem does not constitute a lawful excuse for violation of a written court decree. A party's obligation to comply with a court order is not discharged by the instruction of a non-judicial third party. *Parrot v. Parrot*, 281 Ga. 152 (2006) (party bound by terms of court order regardless of third-party instruction to contrary).

## **VI. HARM TO COURT-ORDERED RELATIONSHIP**

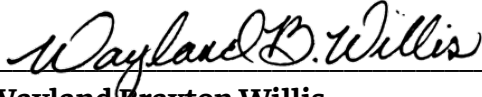
The Parenting Plan's communication provisions reflect this Court's considered judgment that continuous contact between Brooks and his father serves the child's best interest. The record documents not only the quantity of denied contact but its quality and context. Brooks spent his seventh birthday — December 27, 2025 — permitted a single sixty-second call with his father, during which he asked whether Father would be at his party. He had not been told otherwise. On January 7, 2026, he became visibly distressed while two adults spoke over and about him during a call he had answered himself. He was last able to speak with his father on January 14, 2026. Fifty-four days of complete communication blackout — without findings, without an authorizing order, and without any emergency justification — directly contravenes this Court's decree and compounds the harm to Brooks with each passing day.

## **VII. RELIEF REQUESTED**

WHEREFORE, Defendant respectfully requests that this Court:

1. Enter a written finding that Plaintiff is in **civil contempt** of the Final Judgment and Parenting Plan for willful violation of the court-ordered telecommunication rights, beginning no later than December 26, 2025;
2. Order that daily telephonic or FaceTime communication between Defendant and Brooks **resume immediately** pursuant to the Final Judgment, without conditioning communication on any drug screen result, clinical evaluation, or GAL approval not authorized by written court order;
3. Establish a defined communication protocol to eliminate ambiguity and prevent further interference:
  - a. Daily communication shall be permitted during two defined windows: Morning — prior to school drop-off; Evening — 3:30 PM until 8:00 PM;
  - b. Each communication shall be permitted a minimum uninterrupted duration of five to ten minutes;
  - c. If a call is not answered, the receiving parent shall respond by text within thirty minutes acknowledging the missed call and advising when the call will be returned, unless the child is asleep or engaged in a school obligation;
  - d. Telephonic and FaceTime communication shall be private and free from monitoring, interruption, muting, coaching, or conditioning upon competing activities, unless otherwise ordered by this Court or required for documented safety concerns;
4. Award compensatory make-up communication time equal to the full period of denied communication beginning December 26, 2025;
5. Award reasonable attorney's fees and litigation expenses incurred in bringing this Motion pursuant to this Court's inherent contempt authority; and
6. Schedule a hearing on this Motion at the earliest available date and grant such other and further relief as the Court deems just and proper.

Respectfully submitted, this **15th** day of **March, 2026**.



**Wayland Braxton Willis**

Pro Se Defendant

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of March, 2026, I served a true and correct copy of the foregoing motion upon the following parties via PeachCourt eService:

**Adam B. Land, Esq.,**

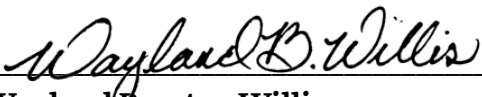
Tisdale Middleton & Land,

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