

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

HALEY CROWE,

Plaintiff,

v.

WAYLAND BRAXTON WILLIS,

Defendant.

Civil Action File No.: 2025EDR0053

**DEFENDANT'S MOTION FOR TEMPORARY ADJUSTMENT OF SUPPORT
OBLIGATION AND PROTECTIVE RELIEF PENDING ADJUDICATION**

COMES NOW Defendant Wayland Braxton Willis, appearing pro se, and respectfully moves this Court for narrowly tailored, temporary relief regarding his current child support obligation pending adjudication of the underlying matters in this case. In support, Defendant shows the Court as follows:

I. RELIEF SOUGHT

Defendant seeks temporary adjustment of his child support obligation based on present conditions and the absence of adjudication affecting the structure and enforceability of current obligations. Defendant specifically requests:

- (a) temporary suspension or reduction of the existing support obligation;
- (b) alternatively, authorization to remit payments into escrow through the Clerk of Court;
and
- (c) entry of a protective order prohibiting contempt enforcement related to support during the pendency of this motion and related proceedings.

This request is temporary in nature and does not seek permanent modification of support.

II. FACTUAL AND LEGAL BASIS

Pursuant to O.C.G.A. § 19-6-19, this Court has authority to modify a support obligation upon a showing of a material change in circumstances. Defendant's present financial condition, as reflected in the unrled Affidavit of Indigence filed December 9, 2025, constitutes such a change.

Additionally, O.C.G.A. § 19-6-15 governs the structure of child support obligations and contemplates adjustment when financial capacity is materially altered.

1. On December 9, 2025, Defendant filed an Affidavit of Indigence reflecting inability to satisfy court-imposed financial obligations under the conditions then imposed. No ruling has been entered on that affidavit in 113 days.
2. Defendant is presently without sufficient income or available resources to satisfy ongoing financial obligations as currently structured. Defendant's last employment ended December 10, 2025, and current monthly income is \$0.00.
3. Defendant has made good-faith efforts to comply with financial obligations where feasible but cannot continue payments under the present structure without incurring additional debt or compromising basic subsistence.
4. Twenty-six substantive motions affecting Defendant's rights and obligations remain pending without adjudication. Among those motions are multiple requests directly related to the financial compliance conditions currently imposed.
5. In the absence of a ruling on indigence or clarification of enforceable conditions, Defendant is subject to ongoing financial obligations without a defined and achievable compliance framework, creating the risk of contempt exposure for circumstances entirely beyond Defendant's control.
6. The testing and evaluation conditions currently imposed upon Defendant as conditions precedent to restoration of parenting time were entered under a same-day compliance deadline on December 9, 2025. The designated testing facility has confirmed in writing its inability to perform the required tests. The order has never been modified. The Affidavit of Indigence filed that same evening — addressing Defendant's inability to fund compliance — has never been ruled upon.
7. A federal civil rights complaint arising in part from the procedural conditions described above was filed and docketed on March 24, 2026 as *Willis v. Jolly & Bell*, Case No. CV126-056

(S.D. Ga.). That proceeding is pending before the United States District Court for the Southern District of Georgia.

III. CLARIFICATION OF POSITION

Defendant does not seek to condition support on parenting time or to relitigate any underlying custody or communication issues through this Motion. Defendant's present circumstances are raised solely for purposes of support structure and compliance feasibility and are not asserted as a basis for any determination regarding parental fitness.

Defendant remains ready and willing to comply with any obligation the Court defines within Defendant's demonstrable financial capacity.

IV. RELIEF REQUESTED

WHEREFORE, Defendant respectfully requests that this Court:

1. Temporarily suspend or reduce Defendant's child support obligation pending adjudication of the financial conditions currently before the Court;
2. Alternatively, authorize Defendant to remit support payments into escrow through the Clerk of Court pending resolution of the indigence determination;
3. Enter a protective order prohibiting contempt enforcement related to support obligations during the pendency of this motion and related proceedings;
4. Rule on Defendant's Affidavit of Indigence, filed December 9, 2025, as the threshold financial determination governing the feasibility of all current financial obligations imposed upon Defendant; and
5. Grant such other and further relief as this Court deems just and proper in light of the documented financial circumstances of the Defendant.

Respectfully submitted this 2nd day of April, 2026.



Wayland Braxton Willis, Defendant Pro Se

806 Whispering Willow Ct., Grovetown, Georgia 30813

legal@thebreakingproject.org | (762) 354-0014

CERTIFICATE OF SERVICE

I hereby certify that on the **2nd** day of **April, 2026**, I served a true and correct copy of the foregoing **Motion For Temporary Adjustment Of Support Obligation And Protective Relief Pending Adjudication** upon Adam D. Land, Esq., Tisdale Middleton & Land, 207 N. Belair Road, Evans, Georgia 30809, by electronic service through PeachCourt.



Wayland Braxton Willis, Defendant Pro Se

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