

IN THE CHANCERY COURT FOR PUTNAM COUNTY, TENNESSEE

PATRICIA MARENE HALL COOMER,)
)
 Plaintiff/Counter Defendant,)
)
 vs.)
)
 LEWIS FAY COOMER,)
)
 Defendant/Counter Plaintiff.)

No. 2000-269

FILED 11-13 2000
TIME 2:11 P.M.
LINDA F. REEDER, CLERK & MASTER
BY [Signature]
DEPUTY CLERK & MASTER

ANSWER TO COUNTER COMPLAINT

Now comes the Counter Defendant, by and through counsel, and, for answer to the Counter Complaint filed herein by the Counter Plaintiff, would show to the Court as follows:

1. The allegations of paragraph 1 of the Counter Complaint are admitted.
2. The allegations of paragraph 2 of the Counter Complaint are admitted.
3. The allegations of paragraph 3 of the Counter Complaint are denied.
4. The allegations of paragraph 4 of the Counter Complaint are admitted.
5. The allegations of paragraph 5 of the Counter Complaint are admitted insofar as the same alleges the parties have accumulated a marital estate and that the same should be divided between the parties in an equitable manner. The allegations of paragraph 5 of the Counter Complaint not herein admitted are hereby denied.
6. The allegations of paragraph 6 of the Counter Complaint are admitted.
7. The allegations of paragraph 7 of the Counter Complaint are denied.

Now having fully answered the Counter Complaint filed against her in this cause, Counter Defendants prays the same be dismissed with the costs taxed to the Counter Plaintiff.

KENNERLY, MONTGOMERY & FINLEY, P. C.

By [Signature]
Robert H. Green, BPR# 1428
Attorney for Plaintiff/Counter Defendant
P. O. Box 442
Knoxville, TN 37901
865-546-7311

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been served on William A. Cameron, Esq., Cameron & Chaffin, 100 South Jefferson Avenue, Cookeville, Tennessee 38501 by depositing the same in the U. S. Mail with sufficient postage thereon to carry the same to its destination or by hand delivery this the 9 day of November, 2000.

KENNERLY, MONTGOMERY & FINLEY, P. C.

By


Robert H. Green