

IN THE CHANCERY COURT FOR PUTNAM COUNTY, TENNESSEE

PATRICIA MARENE HALL COOMER, )  
 )  
Plaintiff, )  
 )  
VS. ) No. 2000-260  
 )  
LEWIS FAY COOMER, )  
 )  
Defendant. )

FILED 2-5 2001  
TIME 3:10 p.m.  
LINDA F. REEDER, CLERK & MASTER  
BY Cynthia Jones  
DEPUTY CLERK & MASTER

**DEFENDANT'S RESPONSE TO INTERROGATORIES  
PROPOUNDED TO THE DEFENDANT**

Comes the Defendant, Lewis Fay Coomer, and would answer the First Set of Interrogatories and Request for Production of Documents propounded to him by the Plaintiff, Patricia Marene Hall Coomer, as follows:

1. 1956 Oldsmobile worth \$1,800.00, no debt owed  
Clothing  
\$1,000.00 in Bank
2. None
3. 249 South Elm Street, Cookeville, Tennessee, value \$200,000.00, no debt owed  
Apartment 17th Street, Cookeville, Tennessee, value \$400,000.00, there is a debt owed but Plaintiff has the accurate information but it is estimated that there is approximately \$100,000.00 owed to First Tennessee Bank  
Apartment 3rd Street, Cookeville, Tennessee, value \$375,000.00, no debt owed  
Farm, value \$175,000.00, no debt owed  
Personal property  
Farming Equipment consisting of John Deere tractor model 2155 owned by Father at his death and now owned by my Mother. I have use of this tractor.  
Disk - value \$250.00  
Bushhog - value \$150.00  
Rake - value \$800.00  
16' Trailer - value \$1,200.00  
30' goose neck trailer - value \$5,500.00  
Miscellaneous farming tools and equipment -  
Chevrolet dump truck - value \$6,000.00, no debt  
John Deere Bulldozer 55G track loader - value \$25,000.00, no debt  
1965 Chevrolet - value \$8,000.00  
Honda Gold Wing 1000cc motorcycle and equipment - value \$2,000.00, no debt.  
2001 Nissan Maxima - value unknown and indebtedness unknown, This was purchased since separation.  
Household goods and furnishings in possession of Plaintiff - value \$5,000.00, no debt.  
Approximately 35 cows and 3 bulls - value \$30,000.00, note to First Tennessee Bank  
Personal clothing, jewelry, tools - value undetermined, no debt.
4. None other than those listed in interrogatory 3 above except an unsecured \$35,000.00 note at First Tennessee Bank for cattle purchase.

5. Putnam County Circuit Court Clerk, \$53,000.00 per year  
Farming is a loss. I will supply a copy of my tax return as soon as it is completed. I do not know what the profit or loss is on the farming at this time.
6. First National Bank #000308137
7. First Tennessee #000308137, approximately \$1,000.00
8. 2155 John Deere tractor does not belong to me, it was paid for by my Father and my parents have allowed me to use the tractor as if it were mine. It has never been titled to me and I hope to inherit it some day but it does not belong to me today. It has an approximate value of \$8,000.00.  
I maintain that one-half of the farm located in Oak Park is separate property even though it was not inherited. I paid for one-half of that farm out of a personal injury settlement received by me in 1982 or 1983 and was used to pay one-half of the payment for the farm. The farm is presently worth approximately \$175,000.00
9. I have personal tools and property that have been gifts to me over the years for Christmas and birthdays, which should not be included in my marital estate. The total value of same is probably \$2,000.00 to \$4,000.00. The Plaintiff is well aware of these and they are still at the marital residence. A fair percentage of my personal clothing has been gifts from my family. The 1956 Chevrolet has been merged into other property. The \$1,000.00 I brought into the marriage is the only other separate property I am claiming.
10. None
11. None
12. \$10,000.00 life insurance policy through Putnam County, Plaintiff is beneficiary. If I ever had a copy of the policy it is at the marital residence at 249 South Elm Street, Cookeville, Tennessee. I am not sure if any of the indebtedness borrowed on the realty at the bank ever had a life policy with that but the beneficiary would be the creditor.
13. Self insurance policy with Putnam County, Tennessee. The Plaintiff and I are insured.
14. None that I am aware of. I take my records to Dale Bohannon each year but receive those back and they are all at the residence located at 249 South Elm Street, Cookeville, Tennessee.
15. None
16. Tennessee Consolidated Retirement  
I do not know that this started until some time later in my work with the county. I will get this information and furnish it although that information is public record and can be obtained by anyone.
17. None
18. I cannot itemize the jewelry, clothing and flowers I have given her over the years.
19. Not determined at this time, will be supplemented later.
20. None
21. None

22. I am in good health and I have no handicaps that I am aware of.
23. Not determined at this time. I expect that it would probably be prudent for us to agree on a joint appraiser to appraise the real property.
24. See answer to #23 above.
25. My monthly income is \$2,100.00 take home and my expenses are approximately \$1,200.00. See attached itemization.
26. None

**DEFENDANT'S RESPONSE TO DOCUMENTS REQUESTED**

1. The Plaintiff has these documents in her possession at 249 South Elm Street, Cookeville, Tennessee.
2. We were not required to file a state tax return and if we were they would also be at 249 South Elm Street, Cookeville, Tennessee.
3. None
4. None
5. None that I am aware of.
6. None
7. All of my warranty deeds, quit claim deeds and/or trust deeds are at 249 South Elm Street, Cookeville, Tennessee and not in my possession.
8. I have not had a report lately. The previous reports are at 249 South Elm Street, Cookeville, Tennessee in the Plaintiff's possession. These are matters of public record.
9. The only business entity other than my work for the county is my farming operation and the only statements would be in the tax returns. The year 2000 has not been prepared. All other returns prior to 2000 are located at 249 South Elm Street, Cookeville, Tennessee.
10. I do not have any documents from 1960 that I am aware of.
11. 1982 or 1983 settlement is of record in the Circuit Court Clerk's office for Putnam County, Tennessee.
12. Enclosed is a copy of the last monthly statement from First Tennessee checking account, which is a joint checking account, and from a savings account at Fleetguard Federal Credit Union.
13. See answer #12 above.
14. None that I am aware of.
15. None
16. Any life insurance policy with Putnam County referred to in the interrogatories would either be with the County Executive's office or at 249 South Elm Street, Cookeville, Tennessee in the possession of the Plaintiff.
17. A copy of the policy with the County would be at 249 South Elm Street, Cookeville, Tennessee in the possession of the Plaintiff.

18. I do not have any documents reflecting two debts to First Tennessee Bank. They are located at 249 South Elm Street, Cookeville, Tennessee in the possession of the Plaintiff.
19. None
20. Any records of that nature if I ever had them are at 249 South Elm Street, Cookeville, Tennessee in the possession of the Plaintiff.

This the 2<sup>nd</sup> day of February, 2001.

Respectfully submitted:

BY: Lewis F Coomer  
LEWIS FAY COOMER

STATE OF TENNESSEE

COUNTY OF PUTNAM

LEWIS FAY COOMER, first being duly sworn, makes oath that the statements contained in his foregoing Answers to Interrogatories are true to the best of his knowledge, information and belief, and are not made out of levity or by collusion with the Defendant but in sincerity and truth for the causes mentioned therein.

Lewis F Coomer  
LEWIS FAY COOMER

SUBSCRIBED AND SWORN to before me, this 2<sup>nd</sup> day of February, 2001.

Audley Norton  
NOTARY PUBLIC

My Commission Expires:

11/18/03

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 2<sup>nd</sup> day of February, 2000, forwarded a true copy of the foregoing instrument to Mr. Robert Green, Post Office Box 442, Knoxville, Tennessee 37901.

**CAMERON AND CHAFFIN**

BY: Bill Cameron  
William A. Cameron

IN THE CHANCERY COURT FOR PUTNAM COUNTY, TENNESSEE

PATRICIA MARENE HALL COOMER,	)	
	)	
Plaintiff,	)	
	)	
VS.	)	NO. 2000-269
	)	
LEWIS FAY COOMER,	)	
	)	
Defendant.	)	

**STATEMENT OF INCOME AND NEED**

The Defendant, Lewis Fay Coomer, submits the following as an estimate of the necessary monthly expenses, as indicated, for support of himself.

<u>ITEM</u>	<u>AMOUNT</u>
Rent-house payment	\$
Utilities	\$ 150.00
Telephone	\$ 50.00
Cable Television-Satellite	\$ 50.00
Groceries	\$1,000.00
School Lunches (children)	\$
School Supplies (children)	\$
Automobile Payments	\$
Automobile Maintenance	\$
Gas	\$ 250.00
Clothing Replacement (self)	\$ 300.00
Clothing Replacement (children)	\$
Laundry and Dry Cleaning	\$ 50.00
Child care while working	\$
Haircuts, beauty shop, make-up	\$ 10.00
Insurance (car, health, life, etc.)	\$ 100.00
Medical and Dental Expenses	\$ 100.00
Drugs and Medicines	\$ 50.00
Furniture Payments	\$ 200.00
Miscellaneous	\$ 200.00
<b>TOTAL</b>	<b>\$2,510.00</b>

Plaintiff is employed and earns \$2,500.00 gross per month.

Defendant is employed and earns \$4,416.67 gross per month.

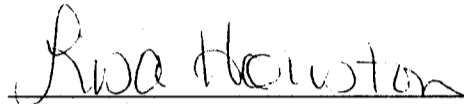
STATE OF TENNESSEE

COUNTY OF PUTNAM

LEWIS FAY COOMER, first being duly sworn, makes oath that the statements contained in his foregoing Statement of Income and Need are true to the best of his knowledge, information and belief.

  
LEWIS FAY COOMER

SUBSCRIBED AND SWORN to before me this the 2<sup>nd</sup> day of February, 2001.

  
NOTARY PUBLIC

My Commission Expires:

11-18-03

BOX 569  
COOKEVILLE TN 38503

PRIORITY CHOICES CHECKING ACCOUNT

MR LEWIS F COOMER OR  
MRS LEWIS F COOMER  
C/O JUSTICE CENTER  
421 E SPRING ST  
COOKEVILLE TN 38501-3368

18 ACCOUNT NUMBER 000308137  
02 52 N

DATE 01/04/01

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	BALANCE OF YOUR FUNDS
PREVIOUS BALANCE ----- 12/06/00	\$1,904.89
4 DEPOSITS TOTALING	\$3,929.00
29 WITHDRAWALS TOTALING	\$5,166.47
NEW BALANCE ----- 01/04/01	\$667.42

PRIORITY CHOICES ACCOUNT TRANSACTIONS

FOR THE PERIOD FROM 12/07/00 THROUGH 01/04/01

DATE	AMOUNT	DESCRIPTION		
12/07	34.27	WITHDRAWAL -KC LIFE - SBL		
			SBL PREM	P015492486
12/12	29.00	REFUND NSF/OD CHARGE		
12/18	900.00	DEPOSIT		
12/18	58.00	OVERDRAFT CHARGE		
12/19	29.00	OVERDRAFT CHARGE		
12/20	29.00	OVERDRAFT CHARGE		
12/21	49.51	WITHDRAWAL -SAFECO INSURANCE		
			INS PREM	72141485888
12/21	87.00	OVERDRAFT CHARGE		
12/22	2,000.00	DEPOSIT		
12/28	29.00	OVERDRAFT CHARGE		
12/29	1,000.00	DEPOSIT		

DATE	CHECK #	AMOUNT	DATE	CHECK #	AMOUNT	DATE	CHECK #	AMOUNT
12/18	4566	23.04	12/14	4580	80.16	12/14	4589	241.50
12/12	4573*	88.00	12/21	4581	25.11	12/15	4590	350.00
12/12	4574	40.00	12/18	4582	106.31	12/21	4592*	157.58
12/14	4575	51.41	12/18	4583	441.26	01/04	4593	101.13
12/18	4576	478.54	12/15	4584	14.29	12/28	4594	94.00
12/19	4577	100.00	12/18	4586*	1,000.00	12/29	4595	130.05
12/18	4578	460.00	12/12	4587	689.85			
12/18	4579	57.46	12/20	4588	121.00			

PRIORITY CHOICES DAILY BALANCE SUMMARY

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
12/07	1,870.62	12/12	1,081.77	12/14	708.70	12/15	344.41
12/18	-1,380.20	12/19	-1,509.20	12/20	-1,659.20	12/21	-1,978.40
12/22	21.60	12/28	-101.40	12/29	768.55	01/04	667.42

\*\* PREVIOUS CHECK NUMBER(S) MISSING  
MEMBER FDIC

\*NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION

**FLEETGUARD  
PO BOX 3238  
COOKEVILLE**

**FEDERAL CREDIT UNION  
TN 38502-3238**

**931-528-9400  
4715500-00995**

Each loan marked \* is an open-end loan. The balance used to compute the finance charge on open-end loans is the unpaid principal balance at the time of the transaction. On the date an advance is taken, the amount of the advance is added to the unpaid principal balance. On the date a payment is made, the finance charge and any late charges due are deducted from the payment amount and the remainder, if any, is subtracted from the unpaid principal balance.

The Annual Percentage Rate (APR) is shown in the loan summary below. The phrase "(MAY VARY)" means that this loan has a variable Annual Percentage Rate.

000625 **LEWIS COOMER 38501**  
**PUTNAM CO COURT HOUSE**  
**421 E SPRING ST RM 1C49A**  
**COOKEVILLE TN 38501-3368**

STATEMENT PERIOD	
FROM	TO
10-01-00	12-31-00
MEMBER NUMBER	
110 060	
412-64-5804	1
SOC. SEC. NUMBER	PAGE



DATE MO/DAY/Y	TYPE OF ACCOUNT / TYPE OF TRANSACTION	LOAN PAYMENT AMOUNT	FINANCE CHARGE	FEE OR LATE CHARGES	CHANGE TO BALANCE	BALANCE
10 01 0	REGULAR SHARES (01)			PREVIOUS BALANCE		132624
10 13 0	COUNTY EMPLOYEES PAYROLL				10000	142624
10 31 0	COUNTY EMPLOYEES PAYROLL				10000	152624
11 15 0	COUNTY EMPLOYEES PAYROLL				10000	162624
11 30 0	COUNTY EMPLOYEES PAYROLL				10000	172624
12 15 0	COUNTY EMPLOYEES PAYROLL				10000	182624
12 22 0	SHARE W/D TO CHECKS DISBURSED				100000-	82624
12 29 0	COUNTY EMPLOYEES PAYROLL				10000	92624
12 31 0	DIVIDEND EARNED 10-01-00 THRU 12-31-00				839	93463
12 31 0	2.27 ANNUAL PERCENTAGE YIELD EARNED 10-01-00 THRU 12-31-00					93463
12 31 0				NEW SHARE BALANCE		93463
10 01 0	MONEY MARKET (20)			PREVIOUS BALANCE		499035
10 13 0	P/R TRANSFER				50000	549035
10 19 0	MONEY MARKET W/D TO CASH DISBURSED				400000-	149035
10 31 0	P/R TRANSFER				50000	199035
10 31 0	DIVIDEND EARNED 10-01-00 THRU 10-31-00				1081	200116
	3.56 ANNUAL PERCENTAGE YIELD EARNED 10-01-00 THRU 10-31-00					200116
11 15 0	P/R TRANSFER				50000	250116
11 30 0	P/R TRANSFER				50000	300116
11 30 0	DIVIDEND EARNED 11-01-00 THRU 11-30-00				657	300773
	3.56 ANNUAL PERCENTAGE YIELD EARNED 11-01-00 THRU 11-30-00					300773
12 15 0	P/R TRANSFER				50000	350773
12 22 0	MONEY MARKET W/D TO CHECKS DISBURSED				200000-	150773
12 29 0	P/R TRANSFER				50000	200773
12 31 0	DIVIDEND EARNED 12-01-00 THRU 12-31-00				798	201571
12 31 0	3.56 ANNUAL PERCENTAGE YIELD EARNED 12-01-00 THRU 12-31-00					201571
12 31 0				NEW SHARE BALANCE		201571
----- ***** 2000 YEAR-TO-DATE FINANCIAL SUMMARY ***** -----						
	DIV/INT PAID	DIV/INT WITHHOLDING	MORTGAGE POINTS	MORTGAGE LATE CHG	MORTGAGE FINANCE CHG	OTHER NON-MTG FINANCE CHG
	265.25	0.00	0.00	0.00	0.00	0.00

**THANK YOU FOR YOUR SUPPORT IN 2000 AND HAPPY NEW YEAR!  
IT'S AUDIT TIME! NOTIFY OUR AUDITORS, EDWARDS & ASSO., PA  
CERTIFIED PUBLIC ACCOUNTANTS, PO BOX 140168, NASHVILLE, TN  
37214 IF ANY DISCREPANCIES ON THIS STATEMENT. THANKS AGAIN!**

This statement is a permanent record of your account. Income tax information appears at the end of the statement.

See reverse side for important information