

IN THE CHANCERY COURT FOR PUTNAM COUNTY, TENNESSEE

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

FILED 6-25 2001  
TIME 3:30 P.M.  
LINDA A. REEDER, CLERK & MASTER  
BY Lynthia Jones  
DEPUTY CLERK & MASTER

**DEFENDANT'S RESPONSE TO PIAINTIFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

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

1. I do not have a current Tennessee Consolidated Retirement System mail out. My lawyer is requesting that from the State of Tennessee and we are asking for it at this time. We will supply it upon receipt of same.
2. See attached.
3. See attached.
4. See attached.
5. See attached.
6. We have asked Inez Coomer for those records and she has refused to give those to me. I will keep trying and I believe that eventually she will locate those and give them to me.
7. See attached.
8. This is impossible to answer without gaining access to the marital home. I would like to make arrangements to go into the home and look. I have been gone too long to remember what is there.
9. To the best of my knowledge, all of those items requested have been supplied. There were produced at my expense and to my knowledge there are no other cancelled checks other than those obtained from the bank.

This the 21 day of June, 2001.

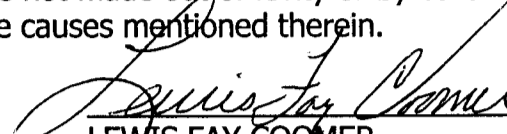
Respectfully submitted:

BY: Lewis Fay Coomer  
LEWIS FAY COOMER

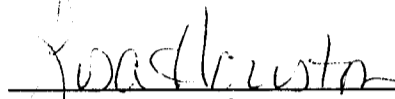
STATE OF TENNESSEE

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 FAY COOMER

SUBSCRIBED AND SWORN to before me, this 21<sup>st</sup> day of June, 2001.

  
NOTARY PUBLIC


My Commission Expires:

11-18-03

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 22<sup>nd</sup> day of June, 2001, forwarded a true copy of the foregoing instrument to Mr. Robert Green, Post Office Box 442, Knoxville, Tennessee 37901.

**CAMERON AND CHAFFIN**

BY:   
William A. Cameron

186 13

MEMBER ACCOUNT STATUS INQUIRY

06/06/01 11:20:32

MBR NAME: LEWIS COOMER

JOINT NAME: PUTNAM CO COURT HOUSE

MEMBER NUMBER: 110060

DISPLAY MSG: Y

DISPLAY PMT DATE: Y

ACCOUNT	TYPE	BALANCE	AVAIL AMT\ PAYMENT	WDC\ FRQ	DIV YTD\ PAYMENT DT	LAST TXN
S	01	108.32	103.32	1	2.69	060601
S	C 20	0.00	1000.00-	0	15.82	042701

NFIN: 043001 BY 14 PRD 640.00 530 BRANCH: 00 OLD-BR:

SSN: 412645804 BIRTH: 040539 JOINED: 040589

STMT MSG:

MESSAGE:

I-INQUIRY REQUEST COMPLETE

4715500 \*MSG\*

F1=SCR F2=FLD F3=RET F4=MNU F9=INT F10=OFF

186 13

MEMBER ACCOUNT STATUS INQUIRY

06/06/01 11:22:01

MBR NAME: ANDREW SPARKS

JOINT NAME: LEWIS COOMER

MEMBER NUMBER: 110061

DISPLAY MSG: Y

DISPLAY PMT DATE: Y

ACCOUNT	TYPE	BALANCE	AVAIL AMT\ PAYMENT	WDC\ FRQ	DIV YTD\ PAYMENT DT	LAST TXN
S	01	506.50	501.50	0	2.39	053101
S	20	1149.24	149.24	0	16.51	103197

NFIN: 122700 BY 15 PRD

0.00

BRANCH: 00 OLD-BR:

SSN: 409679712

BIRTH: 042390

JOINED: 103190

STMT MSG:

MESSAGE: CHILDS ACCT.-LEWIS COOMER TRANSACTIONS ONLY! 12-22-00 RSN

I-INQUIRY REQUEST COMPLETE

4715500 \*MSG\*

F1=SCR F2=FLD F3=RET F4=MNU F9=INT F10=OFF

186 13

MEMBER ACCOUNT STATUS INQUIRY

06/06/01 11:22:27

MBR NAME: JAKE SPARKS

JOINT NAME: LEWIS COOMER

MEMBER NUMBER:

8428000

DISPLAY MSG: Y

DISPLAY PMT DATE: Y

ACCOUNT	TYPE	BALANCE	AVAIL AMT\ PAYMENT	WDC\ FRQ	DIV YTD\ PAYMENT DT	LAST TXN
S	01	51.52	46.52	0	0.28	012400
S	10	851.12	851.12	0	5.71	053101

NFIN: 122200 BY 20 PRD

0.00

BRANCH: 00 OLD-BR:

SSN: 412751710

BIRTH: 020294

JOINED: 110497

STMT MSG:

MESSAGE: CHILDS ACCT.-LEWIS COOMER TRANSACTIONS ONLY! 12-22-00 RSN

I-INQUIRY REQUEST COMPLETE

4715500 \*MSG\*

F1=SCR F2=FLD F3=RET F4=MNU F9=INT F10=OFF

186 13

MEMBER ACCOUNT STATUS INQUIRY

06/06/01 11:22:54

MBR NAME: CARLEY SPARKS

JOINT NAME: LEWIS COOMER

MEMBER NUMBER:

9580000

DISPLAY MSG: Y

DISPLAY PMT DATE: Y

ACCOUNT	TYPE	BALANCE	AVAIL AMT\ PAYMENT	WDC\ FRQ	DIV YTD\ PAYMENT DT	LAST TXN
S	01	105.17	100.17	0	0.17	053101

NFIN: 122200 BY BO PRD

0.00

BRANCH: 00 OLD-BR:

SSN: 408897026 BIRTH: 032100

JOINED: 122200

STMT MSG:

MESSAGE: CHILD ACCT.- LEWIS COOMER TRANSACTIONS ONLY! RSN 12-22-00

I-INQUIRY REQUEST COMPLETE

4715500 \*MSG\*

F1=SCR F2=FLD F3=RET F4=MNU F9=INT F10=OFF

186 13

MEMBER ACCOUNT STATUS INQUIRY

06/06/01 11:23:21

MBR NAME: BRADEN GALBREATH

JOINT NAME: LEWIS COOMER

MEMBER NUMBER: 9581000

DISPLAY MSG: Y

DISPLAY PMT DATE: Y

ACCOUNT	TYPE	BALANCE	AVAIL AMT\ PAYMENT	WDC\ FRQ	DIV YTD\ PAYMENT DT	LAST TXN
S	01	150.45	145.45	0	0.42	053101

NFIN: 122200 BY BO PRD

0.00

BRANCH: 00 OLD-BR:

SSN: 409874837 BIRTH: 060999

JOINED: 122200

STMT MSG:

MESSAGE: CHILD ACCT.-LEWIS COOMER TRANSACTIONS ONLY! RSN12-22-00

I-INQUIRY REQUEST COMPLETE

4715500 \*MSG\*

F1=SCR F2=FLD F3=RET F4=MNU F9=INT F10=OFF

This Instrument Prepared by Ledbetter & Buck, Attorneys  
P. O. Box 715, Cookeville, TN 38503

**WARRANTY DEED**

**OWNER:**

**LEWIS COOMER**

**SEND TAX BILLS TO:**

**Name** \_\_\_\_\_

**Address** \_\_\_\_\_

**FOR AND IN CONSIDERATION** of the sum of TEN DOLLARS (\$10.00) cash in hand paid and other good and valuable consideration, the receipt of which is hereby acknowledged, **ROBERT E. TURNER and AMANDA G. TURNER, Husband and Wife**, have this day bargained and sold, and do hereby transfer and convey unto **LEWIS COOMER**, his heirs and assigns, hereinafter referred to as "grantee," certain real estate located in the Seventh Civil District of Putnam County, State of Tennessee, as follows:

Being Lot No. 3 of the Grademere Subdivision, a plat of which is of record in Plat Cabinet C, Slide 10, in the Register's Office of Putnam County, Tennessee, which plat reference is herein referred to for a more complete description.

This conveyance is made subject to certain restrictions and covenants which are of record in the Register's Office of Putnam County, Tennessee, in Warranty Deed Book 365, Page 553, which restrictions shall run with the land and be binding upon all future owners of said land.

**SOURCE OF DESCRIPTION:** Previous and last conveyance.

**THE PREVIOUS AND LAST** conveyance being a Deed from Larry Burgess, et ux., to Robert E. Turner, et ux., of record in Warranty Deed Book 386, Page 95, Register's Office for Putnam County, Tennessee.

**TO HAVE AND TO HOLD** said real estate, with appurtenances, estate, title and interest belonging to the said grantee, his heirs and assigns forever.

They covenant that they are lawfully seized and possessed of said real estate in fee simple, have a good right to convey it, and that the same is unencumbered.

They further covenant and bind themselves, their heirs and representatives, to warrant and forever defend the title to said real estate to said grantee, his heirs and assigns, against the lawful claims of all persons.

**WITNESS THEIR HANDS** this 5 day of September 1997.

*Robert E. Turner*  
\_\_\_\_\_  
**ROBERT E. TURNER**

*Amanda G. Turner*  
\_\_\_\_\_  
**AMANDA G. TURNER**

This instrument prepared by:  
**CAMERON AND CHAFFIN ATTORNEYS**  
100 South Jefferson Avenue  
Cookeville, TN 38501

MAP AND PARCEL NUMBER  
**Map 28**  
**Group**  
**Parcel 16.00**

\*\*\*\*\*

**PROPERTY OWNERS:**  
**Inez Coomer**

**SEND TAX BILLS TO:**  
**Property Owner**

\*\*\*\*\*

**WARRANTY DEED**

FOR AND IN CONSIDERATION of Ten (\$10.00) Dollars, cash in hand paid and other good and valuable consideration, the receipt and sufficiency of all of which is hereby acknowledged, I, **Lewis Coomer**, have this day bargained and sold, and do hereby transfer and convey unto **Inez Coomer**, her heirs and assigns, hereinafter referred to as "grantee", whether one or more, certain real estate located in the First (1st) Civil District of Putnam County, Tennessee as follows:

Beginning at an iron pin in the north margin of Hwy #293, being Davis' Southeast corner; thence leaving Hwy #293 with Davis' east line N 12 degrees 24' E 99.54'; thence N 08 degrees 40' E 96.20'; thence N 13 degrees 12' E 81.88'; thence N 36 degrees 26' E 143.52'; thence N 87 degrees 46' W 53.93'; thence continuing with Davis and the center Line of a branch N 00 degrees 44' E 224.66' thence N 00 degrees 79' E 223.55'; thence N 01 degrees 43' E 177.53'; thence N 00 degrees 26' E 569.22'; thence leaving said branch and continuing with Davis N 81 degrees 31' W 376.96' to a wood post at a fence corner; thence N 10 degrees 51' E 231.64' to a wood post in a fence line; thence N 09 degrees 04' E 111.23' to a wood post at a fence corner, being a common corner of Davis and Roberts; thence leaving Davis with Roberts' line and a fence line N 10 degrees 07' E 448.23'; thence N 10 degrees 13' E 486.41' to a wood post; thence N 09 degrees 50' E 556.99' to a 36" White Oak in a fence line; thence S 80 degrees 44' E 875.13' to a wood post at a fence corner, being a common corner of Roberts and Patton; thence leaving Roberts with Patton's line S 81 degrees 05' E 725.19' to a wood post in a fence line; thence S 79 degrees 33' E 335.82' to a wood post at a fence corner; thence S 09 degrees 17' W 568.22' to a wood post in a fence line; thence S 09 degrees 36' W 187.71'; thence leaving Patton and severing Whitson N 82 degrees 20' W 812.69' to an iron pin; thence S 06 degrees 37' W 2552.46' to an iron pin in the north margin of Hwy #293; thence with the north margin of said road S 87 degrees 11' W 128.48'; thence S 84 degrees 08' W 253.30' to a Concrete monument; thence N 73 degrees 56' W 351.90' to the Beginning. Containing 89.28 acres, more or less, as surveyed by Alfred M. Bartlett, R.L.S. #762, on July 28, 1998.

There is a power line across a portion of the above described property. There is also a TVA power line with a 75' power line easement across A portion of the above described property.

**THE PREVIOUS AND LAST** conveyance being a deed of record from Lou Anna Cumby, Jessie (Jesse) Montgomery, A. W. Montgomery, Jr., Dorothy Mayberry, Luther Montgomery and Pauline Parkerson to Lewis Coomer in Warranty Deed Book 399, page 751, Register's Office of Putnam County, Tennessee.

**TO HAVE AND TO HOLD** said real estate, with the appurtenances, estate, title, and interest belonging to the said grantee, her heirs and assigns forever. I do covenant that we are lawfully seized and possessed of said real estate in fee simple, have good right to convey it, and that the same is unencumbered.

We further covenant and bind ourselves, our heirs and representatives, to warrant and forever defend the title to said real estate to said grantee, her heirs and assigns, against the lawful claims of all persons.

**WITNESS** our hands this the 13 day of December, 1999.

  
\_\_\_\_\_  
**LEWIS COOMER**

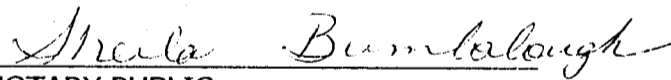
**STATE OF TENNESSEE  
COUNTY OF PUTNAM**

Personally appeared before me, the undersigned authority, a Notary Public in and for said County and State, **Lewis Coomer**, the within named bargainer, with whom I am personally acquainted (or proved to me on the basis of satisfactory evidence), and who acknowledged that he executed the within instrument for the purposes therein contained.

Witness my hand and official seal this the 13 day of December, 1999.

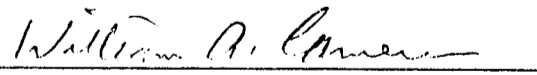
My Commission Expires:

2/26/2000

  
\_\_\_\_\_  
NOTARY PUBLIC

**STATE OF TENNESSEE  
COUNTY OF PUTNAM**

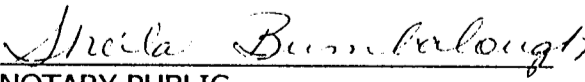
The actual consideration or value whichever is greater, for this transfer is \$ 367,326.58.

  
\_\_\_\_\_  
Affiant

SUBSCRIBED AND SWORN to before me this the 13 day of December, 1999.

My Commission Expires:

2/26/2000

  
\_\_\_\_\_  
NOTARY PUBLIC

Fayetteville, TN 37334  
ADDRESS  
CORRECTION  
REQUESTED

15871 01-01-1998 425 563P  
LEWIS COOMER  
42 SPRING ST  
COOKEVILLE TN 38501-3368  
\*\*C005

U.S. Postage Paid  
Fayetteville, TN  
Permit No. 1

Requested Delivery On Or Before April 4, 2001

# Farmers' Exchange

1-800-247-7318

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APRIL 2001

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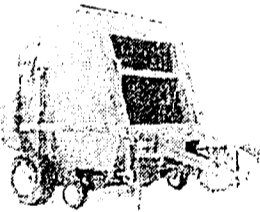
Great Plains 

### JOHN DEERE

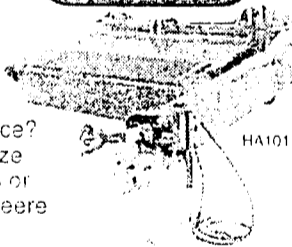
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