

IN THE CHANCERY COURT FOR PUTNAM COUNTY, TENNESSEE

PATRICIA MARLENE HALL COOMER,)
)
 Plaintiff,)
)
 VS.)
)
 LEWIS FAY COOMER,)
)
 Defendant.)

NO. 2000-269

FILED 10-25- 20 00
TIME 3:26PM
LINDA F. REEDER, CLERK & MASTER
BY [Signature]
DEPUTY CLERK & MASTER

**FIRST SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS**

The Defendant, Lewis Fay Coomer, by and through counsel, requests that the Plaintiff, Patricia Marlene Hall Coomer, answer the following interrogatories and request for production of documents in writing and under oath within thirty (30) days of service in accordance with Rules 33 and 34 of the *Tennessee Rules of Civil Procedure*. Where facts set forth in the answers or portions thereof are supplied on information and belief, rather than upon the Plaintiff's knowledge, she should so state, and specifically identify and describe the sources of such information and belief. Should the Plaintiff be unable to answer any interrogatory or portion thereof by either actual knowledge or upon information and belief, the Plaintiff should so state in detail her efforts to obtain such knowledge as would enable her to answer said interrogatories or portions thereof.

The following interrogatories and request for production of documents shall be deemed to be continuing, and any information, including any conclusions, opinions, or contentions that are different from those set forth in answers relating in any way to these interrogatories, which the Plaintiff acquires subsequent to the date of answering these interrogatories and up to and including the date of trial, shall be furnished to the Defendant promptly after such information is acquired.

I. INTERROGATORIES

1. Please state the name and address of your employer (or if self-employed, the name of your company or firm), your job title and description of the duties you perform, the name of your immediate supervisor, and the date you became employed:

ANSWER:

2. Regarding the compensation you received from your employer or self-

employment, please state how your income is determined (salary, commission, draw), your base rate of pay, gross and net earnings for each paycheck received by you since January 1, 1995, and type and amount of each deduction made from your paycheck since January 1, 1995.

ANSWER:

3. For each and every bonus received by you from your employer or self-employment since January 1, 1995, please state the date paid, gross and net amounts and type and amount of each deduction.

ANSWER:

4. Please describe with specificity that manner in which the dates of payment and amounts of your bonuses are determined, including names and job titles of any persons who make such determination.

ANSWER:

5. Please list and describe all other fringe benefits to which you are entitled as a result of your employment, including but not limited to, medical, dental, life and disability insurance, company car or auto allowance, travel and expense allowance, pension or profit-sharing plans, and employee stock option plans.

ANSWER:

6. For each parcel of real property owned by you or in which you have an interest, please state the address, date acquired and purchase price, amount and source of down payment, name in which it is titled, name and address of note and/or mortgage holder, outstanding principal balance of indebtedness secured by a lien on the parcel, amount of monthly or other periodic payment fair market value of each parcel.

ANSWER:

7. For all stocks, bonds and other securities owned by you or in which you have an interest, or have had an interest in the past year, please state for each the name

that has been canceled in the past year, please state the name and address of the insurance company, policy number, name of owner of policy, face amount, present cash surrender value of policy, name(s) of beneficiary(ies), amount of premium and interval at which premiums are paid, name and address of person or entity which pays premium and, if applicable, disposition of proceeds received from the policy at time of cancellation.

ANSWER:

12. For each and every motor vehicle owned by you or in which you have an interest, including but not limited to automobiles, trucks, and boats, (including motors and trailers), please state the type, year, make and model, date acquired, name(s) in which titled, total amount of any outstanding debt, name and address of creditor, amount of monthly payment, and fair market value of vehicle.

ANSWER:

13. For each and every individual retirement account maintained by you for yourself or for your husband, please state the name and address of the financial institution where maintained, date opened, account number, date and amount of each contribution made by you, and present balance.

ANSWER:

14. For each and every pension, profit-sharing, and/or company retirement plan in which you participate, or have ever participate, please state the name of the plan, your account number (if applicable), date and amount of each contribution made by you or on your behalf, name of all persons you have designated as beneficiary(ies) under the plan, and a description and valuation of your current total accrued benefits.

ANSWER:

15. Please list all property, which you will claim as separate property and give the value of that property.

ANSWER:

16. Please list all property, which you will claim is marital property and give the value of that property.

ANSWER:

17. Please list all household furniture and furnishings and state your opinion of the fair market value of these items.

ANSWER:

18. For each and every asset owned by you or in which you have an interest not previously listed in your Answers to these Interrogatories, including but not limited to, debts owed to you, stock options, jewelry, furs, cash, coins or other collectible items, guns, horse, hunting dogs, kennels, gold, silver, antiques, and office furnishings, state the name or description of asset, date acquired, purchase price, amount and source of down payment or purchase price, total amount of debt outstanding against the asset, and its present fair market value.

ANSWER:

19. Please list all debts owed by you, individually or jointly with your husband, stating for each debt the name and address of the creditor, date debt incurred, original amount of debt, present outstanding balance, amount of monthly or other periodic payment, name of person or entity which pays or contributes to the payment of the payment of the monthly or other periodic payments; date debt due in full; a listing of property pledged to source the debt, and reason debt was incurred.

ANSWER:

20. Please itemize your monthly living expense by category such as mortgage(s), notes on motor vehicles, electricity, water, telephone, food, clothing laundry, club membership, medical and dental care, insurance, bank notes, etc., stating for each category the amount expended by you monthly in that category.

ANSWER:

21. Please list each and every asset sold, conveyed, transferred, given as a gift, or otherwise disposed of by you for the past 2 years showing for each such asset a description of the asset (including dollars amount of any funds transferred), date transferred, name(s) and address(s) of person(s) to whom transferred, consideration received by you for transfer, and reason for transfer.

ANSWER:

22. State the name, business address and telephone number of your accountant and any other person who has handled any of your financial affairs for the past five years.

ANSWER:

23. Please identify each person, other than your spouse, with whom you have had sexual intercourse from the date of your marriage to your spouse through the date you answer this interrogatory. Please give the name, address and telephone number of each individual and the dates on which you have had sexual intercourse with that person.

ANSWER:

24. Please identify each person of the opposite sex whom you have spent the night with since your marriage to your spouse. Please give the name, address and telephone number of each individual and the dates on which you have spent the night with.

ANSWER:

25. Please identify each person of the opposite sex whom you have gone out with socially since your marriage to your spouse.

ANSWER:

26. Please identify each person living at your current address.

ANSWER:

II. REQUEST FOR PRODUCTION OF DOCUMENTS

1. Please produce all documents including, but not limited to, income tax returns and all documents filed with said returns, W-2 forms, and checks from any employer which receipt your gross income for 1995, 1996, 1997, 1998, 1999 and this year to date.

ANSWER:

2. Please produce copies of all canceled checks, deposit slips, bank statements for all bank and institutional accounts and credit union accounts which you have had any interest in or access to, in any degree, since January 1, 1995.

ANSWER:

3. Please produce copies of any and all financial statements, specifically, any personal financial statements for the last five years and this year to date that have been submitted by you or any business interest in which you are an owner, or have any interest to any degree in, whether it be a corporation, partnership or solo proprietorship, regardless of whether said financial statements were for the purpose of procuring loans or whether said financial statements were for other business reasons.

ANSWER:

4. Please produce evidence of ownership, such as stock certificates, partnership agreements, or any other agreement that evidences any ownership which you have in any business interest whatsoever.

ANSWER:

5. Please produce any documents that reflect the name, location and balance of any bank, savings and loan, liquid asset or other accounts which you have any interest in or access to in any degree, during the past two years and this year to date.

ANSWER:

6. Please produce all stock certificates or other securities that are in your

name, or as a member of an investment group or held in trust by you or on your behalf for securities which you bought or sold during the past seven (7) calendar years and this year to date, including but not limited to, all trading account statements.

ANSWER:

7. Please produce copies of any trusts of which you are beneficiary.

ANSWER:

8. Please produce all documents which reflect the name, location and number of any safe deposit boxes in your name or in the names of others to which you have or have had access to during the past five (5) calendar years and this year to date.

ANSWER:

9. Please produce all documents that evidence any ownership in real estate, including, but not limited to, warranty deeds, quit claim deeds, and deeds of trust, and any transfer of any kind by you either individually or jointly in any degree for the last two (2) calendar years and this year to date.

ANSWER:

10. Please produce all documents that reflect any money or property inherited by you or gifted to you during the marriage and all property you claim that was separately yours prior to the marriage.

ANSWER:

11. Please produce all documents refuting to any interest that you have in any pension plan, profit sharing plan, patent, copyright invention or royalty.

ANSWER:

12. Please produce documentation of any appraisal or other documents that reflect the value of any property owned by you or in which you have an interest.

ANSWER:

This the 25th day of October, 2000.

Respectfully submitted,

CAMERON AND CHAFFIN

BY Bill Cameron
Attorney for Plaintiff

William A. Cameron, #3335
100 South Jefferson Avenue
Cookeville, Tennessee 38501
(931) 526-3366

CERTIFICATE OF SERVICE

I hereby certify that I have this the 25th day of October, 2000, forwarded a true copy of the foregoing instrument to be served to Mr. Robert H. Green, Post Office Box 442, Knoxville, Tennessee 37901.

CAMERON AND CHAFFIN

BY: Bill Cameron
William A. Cameron