

IN THE CHANCERY COURT FOR PUTNAM COUNTY, TENNESSEE

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

No. 2000-269

FILED 8-23-2000
TIME 11:55 Am.
LINDA F. REEDER, CLERK & MASTER
BY Linda F. Reeder
DEPUTY CLERK & MASTER

INTERROGATORIES PROPOUNDED TO THE DEFENDANT

Pursuant to Rule 33 of the Tennessee Rules of Civil Procedure, Plaintiff requests the Defendant to answer under oath the following interrogatories and serve his responses thereto upon Plaintiff's attorney, Robert H. Green, Kennerly, Montgomery & Finley, P.C., P. O. Box 442, Knoxville, Tennessee 37901 within forty-five (45) days after service of said Interrogatories.

1. Please set forth separately each and every asset, real or personal, owned by you or in which you had an interest with any other person, firm, or corporation as of July 2, 1960. For each such asset identified, state your estimate of its value and any indebtedness owing thereon as of July 2, 1960.

ANSWER:

2. Please itemize and identify each liability owed by you in whole or in part on July 2, 1960 not set forth in response to Interrogatory No. 1.

ANSWER:

3. Please set forth separately each and every asset, real or personal, currently owned by you or in which you have an interest with any other person, firm, or corporation. For each such asset identified, state your estimate of its value and any indebtedness owing thereon.

ANSWER:

4. Please itemize and identify each liability currently owed by you in whole or in part not set forth in response to Interrogatory No. 3.

ANSWER:

5. Please state each source of your income and the respective amount received therefrom for the period from January 1, 2000 through the date that you answer these interrogatories.

ANSWER:

6. As of July 2, 1960, state the name and location of any bank in which there was an account upon which you were authorized to draw funds. For each account, please give the account number and balance in that account as of July 2, 1960.

ANSWER:

7. State the name and location of any bank in which there is an account upon which you are currently authorized to draw funds. For each account, please give the account number and balance in that account.

ANSWER:

8. Please list each item of real or personal property giving a complete description and your opinion as to market value which you maintain is inherited property and should not be included in the marital estate.

ANSWER:

9. Please list each item of real or personal property giving a complete description and your opinion as to market value which you claim were gifts to you and, therefore, should not be included in the marital estate.

ANSWER:

10. State what items of real estate and/or personal property you currently own an interest in which you maintain were separate property owned by you and brought into your marriage to the Plaintiff on July 2, 1960. For each item of separate property so listed, give your opinion as to that item's fair market value as of July 2, 1960.

ANSWER:

11. Please state the name, location, and number of any safe deposit box in your name or in the name of others to which you have or have had access during your marriage to the Plaintiff. Also, provide an inventory of each item of property located in each safe deposit box.

ANSWER:

12. Please state the policy number, beneficiary name, insured's name, and face amount of any policies of life insurance, insuring your life or the life of your wife, or your children owned by you or any corporation in which you have an interest or to which you are the beneficiary.

ANSWER:

13. Please state what health, accident, and hospitalization insurance policies, if any, that you now have in full force and effect under which you or your wife are insureds.

ANSWER:

14. Within the past five (5) years, have you filed or furnished to any individual or corporate entity a personal financial statement? If so, give the date and recipient of each such statement and file a copy thereof as an exhibit to the answer to this interrogatory.

ANSWER:

15. State the name, address, and telephone number of any accountant or persons in possession of books and records kept in the usual course of business for your profession or any business entities in which you have any interest, are employed, or both.

ANSWER:

16. Please detail each and every investment, pension, and/or retirement plan in which you participate and/or have an interest setting forth for each (a) the beginning date of your investment or participation; (b) the amount of your monthly or other periodic contribution thereto; (c) the total amount of your investment therein; (d) the current assets of each such plan; and (e) the approximate present value thereof.

ANSWER:

17. For each interest you may own directly or indirectly in any partnership or corporation, please state the following:

- a. the name of the entity;
- b. the name of the partners or shareholders;
- c. your percentage interest in the business; and
- d. the business purpose of the partnership or corporation.

ANSWER:

18. Please identify each gift made to your wife by you during your marriage.

ANSWER:

19. Please list all witnesses that you intend to call to trial of this matter giving their names, addresses, phone numbers, and a short statement of what you expect their testimony to be.

ANSWER:

20. Please list all persons (other than your wife) that you have had sexual relations with for the past twenty years.

ANSWER:

21. Have you contracted any sexually transmitted diseases in the last several years? If so, please list the approximate date when the disease was contracted and a description of the disease.

ANSWER:

22. Please state the general condition of your health and any physical or mental handicaps that you may have.

ANSWER:

23. Please identify each person that you expect to call as an expert witness at trial and state the subject matter on which said expert is expected to testify.

ANSWER:

24. Please state the substance of the facts and opinions to which each expert is expected to testify and a summary of the grounds for each opinion.

ANSWER:

25. Please list your monthly income and expenses.

ANSWER:

26. Please state the name and address of any psychologist, psychiatrist, social worker, counselor, and/or any other mental health professional you have consulted with or seen as a patient in the last three (3) years.

ANSWER:

Respectfully submitted.

KENNERLY, MONTGOMERY & FINLEY, P. C.

By



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