

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

PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to Rule 34 of the Tennessee Rules of Civil Procedure, Plaintiff requests the Defendant produce for inspection and copying at the offices of Kennerly, Montgomery & Finley, P.C., Fourth Floor, NationsBank Building, 550 Main Street, Knoxville, Tennessee 37902 at 10:00 a.m. on October 24, 2000, the documents described below.

INSTRUCTIONS AND DEFINITIONS

- A. In providing the documents described below, you are requested to furnish all documents known or available to you, regardless of whether these documents are possessed directly by your or your attorneys, employees, agents, investigators, or other representatives.
- B. If any of these documents cannot be produced in full, produce to the extent possible specifying the reason for your inability to produce the remainder and stating whatever information, knowledge, or belief you have concerning the substance of the contents of such unproduced documents.
- C. This request is intended to be continuing, requiring you to produce whatever documents responsive to this request you subsequently obtain or become aware of.
- D. As used herein, the term "document" means all writings or printed matter of any kind, including the originals and all non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise, including, without limitation, correspondence, memoranda, notes, records, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, prospectuses, interoffice or intraoffice communications, telephone message slips, offers, notations of conversations, bulletins, drawings, plans, computer printouts, computer input or output, teletypes,

telefax, invoices, worksheets, ledger books, books of account, and all drafts, alterations, modifications, changes, and amendments of any of the foregoing. The term "document" or "documents" also includes all graphics or oral records or representations of any kind, including, without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings, motion pictures, and electronic, mechanical, or electrical records or recordings of any kind, including, without limitation, tapes, cassettes, disks, and recordings.

#### **DOCUMENTS REQUESTED**

1. Federal income tax returns of Lewis Fay Coomer and/or Patricia Marene Hall Coomer for the years 1995 through 1999, including W-2s and 1099s.

**RESPONSE:**

2. State of Tennessee tax returns of Lewis Fay Coomer and/or Patricia Marene Hall Coomer for the years 1995 through 1999.

**RESPONSE:**

3. Federal income tax returns for the years 1995 through 1999 of any closely-held, limited liability, and/or S corporation in which Lewis Fay Coomer has/had any ownership interest.

**RESPONSE:**

4. Federal income tax returns (filed for informational purposes) and K-1s for 1995 through 1999 on all limited and/or general partnerships in which Lewis Fay Coomer currently has any interest or in which he has had an interest in the past.

**RESPONSE:**

5. Personal financial statements prepared and/or furnished to any person, firm, or corporate entity by or on behalf of Lewis Fay Coomer and/or Patricia Marene Hall Coomer at any time from January 1, 1995 to date.

**RESPONSE:**

6. Corporate and/or partnership financial statements prepared and/or furnished to any firm, person, partnerships, or corporate entity by or on behalf of any corporation and/or partnership in which Lewis Fay Coomer has or had any interest from January 1, 1995 to date.

**RESPONSE:**

7. Copies of warranty deeds, quit claim deeds, and/or trust deeds evidencing any interest in real property by Lewis Fay Coomer.

**RESPONSE:**

8. Copies of periodic statements, annual reports, and/or plan descriptions for the interest of Lewis Fay Coomer in any retirement or pension plan.

**RESPONSE:**

9. Profit and loss statements, income statements, and balance sheets on any corporation, partnership, or business entity in which you have or had any interest from January 1, 1995 to date.

**RESPONSE:**

10. Documents which reflect any money or property inherited by you or received by you as a gift during the marriage and all documents reflecting the purchase price of property you claim was separately yours prior to the marriage.

**RESPONSE:**

11. All documents which reflect any judgments in your favor or against you in any action by or against you as of the date of your response to these requests for production.

**RESPONSE:**

12. Any documents which reflect the name and location and balance in any account at any bank, savings and loan, or other financial institution in which you have or had any interest or any access to as of July 2, 1960.

**RESPONSE:**

13. Any documents which reflect the name and location and balance in any account at any bank, savings and loan, or other financial institution in which you currently have an interest.

**RESPONSE:**

14. Documents reflecting any interest you might have in any trust, whether you are a beneficiary, contingent beneficiary, trustee, or settlor. For each trust identified, please also provide a copy of the latest financial statement.

**RESPONSE:**

15. Documents which reflect the name, location, and number of any safe deposit box in your name or in the names of others to which you have or have had access during the marriage.

**RESPONSE:**

16. All life insurance policies which are now in effect upon your life.

**RESPONSE:**

17. All health, accident, and hospitalization policies of insurance which are now in full force and effect covering yourself and/or your wife and/or your children.

**RESPONSE:**

18. All documents which reflect any debts which you owe.

**RESPONSE:**

19. All notes payable to you and/or you and others.

**RESPONSE:**

20. Documents, including amortization schedules, reflecting the balances owing, payments made, or other financial information on debts you owe or on notes or debts payable to you or you and others.

**RESPONSE:**

Respectfully submitted.

KENNERLY, MONTGOMERY & FINLEY, P. C.

By 

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