

KING COUNTY  
THE HONORABLE BETH M. ANDRUS  
SUPERIOR COURT CLERK  
TRIAL DATE: JANUARY 27, 2013  
FILED

CASE NUMBER: 12-2-21829-3 SEA

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR KING COUNTY

GEOFF TATE, and SUSAN TATE, a married couple,

Plaintiffs,

v.

EDDIE JACKSON and TERESA GOLDEN-JACKSON, a married couple; SCOTT ROCKENFIELD and MISTY ROCKENFIELD, a married couple; MICHAEL WILTON and KERRIE LYNN WILTON, a married couple; TRI-RYCHE CORPORATION, a Washington corporation; QUEENSRYCHE MERCHANDISING, INC., a Washington corporation; and, MELODISC LTD., a Washington corporation,

Defendants.

NO. 12-2-21829-3

PLAINTIFFS' ER 904 DISCLOSURE

TO: Defendants Eddie Jackson, Teresa Golden-Jackson, Scott Rockenfield, Misty Rockenfield, Michael, Wilton, and Kerrie Lynn Wilton (collectively, "Defendants")

AND TO: Thomas Osinski, Attorney for Defendants

Plaintiffs, by and through their undersigned attorney of record, hereby designate the following documents to be used as exhibits at trial. These documents are offered under Evidence Rule 904 and shall be deemed authentic and admissible without testimony or further

1 identification, unless objection is served within 14 days of the date of the notice, pursuant to ER  
 2 904(c). Plaintiffs reserve the right to add or withdraw exhibits.

Doc. #	Bates # range	Description, Author/Maker (if applicable)
1.	NS000638-639	6.5.2012 Board of Directors Corporate Resolution
2.	NS000650	Tri-Ryche Corporation (“Tri-Ryche”) consent to appoint officers 8.9.2011  Author: Neil Sussman
3.	NS000655	Tri-Ryche consent to appoint directors 8.9.2011  Author: Neil Sussman
4.	NS000574	Queensryche Merchandising, Inc. (“Queensryche Merchandising”) consent to appoint officers 10.4.2011  Author: Neil Sussman
5.	NS000575	Queensryche Merchandising consent to appoint board of directors 10.4.2011  Author: Neil Sussman
6.	NS000506	Melodisc, Ltd. (“Melodisc”) consent to appoint board of directors 8.9.2011  Author: Neil Sussman
7.	NS000495	Melodisc consent to appoint officers 8.9.2011  Author: Neil Sussman
8.	NS000628-637	Tri-Ryche shareholders agreement 6.6.1994  Author: Neil Sussman
9.	<sup>1</sup>	Email exchange between Michael Wilton, Eddie Jackson, Scott Rockenfield re writing of songs 12.29.2011-1.4.2012
10.		Email exchange between Scott Rockenfield, Eddie Jackson and Michael Wilton re update on bus

25 <sup>1</sup> Defendants did not Bates stamp the documents they produced in response to Plaintiffs’ discovery requests. Documents without Bates stamps were produced by Defendants.

Doc. #	Bates # range	Description, Author/Maker (if applicable)
		10.16.2011
11.		Email exchange between Eddie Jackson, Scott Rockenfield, Michael Wilton, Geoff Tate, Susan Tate re expense trimming for November tour 10.5.2011
12.		Text messages between Kerrie Lynn Wilton and Brian Heaton 11.26.2011-4.14.2012
13.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Geoff Tate re meeting about QR stuff 2.5.2012-2.7.2012
14.		Text messages between Kerrie Lynn Wilton and Scott Rockenfield 3.3.2012-2.18.2013
15.		Email exchange between Kerrie Lynn Wilton, Scott Rockenfield, Eddie Jackson re shareholder agreement 3.3.2012
16.		Email exchange between Michael Wilton, Scott Rockenfield re advice 3.9.2012
17.		Email exchange between Todd LaTorre, Michael Wilton, Scott Rockenfield re Intuition 3.19.2012
18.		Email exchange between Michael Wilton, Scott Rockenfield, Eddie Jackson re Squid News 3.22.2012 with attachment
19.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Geoff Tate re official request for directors/shareholders meeting 3.29.2012-4.3.2012
20.		Email exchange between Scott Rockenfield, Eddie Jackson re board of directors papers 4.16.2012 with attachment
21.		Email exchange between Eddie Jackson, Michael Wilton, Scott Rockenfield re updates 4.24.2012
22.		Text messages between Brian Heaton and Kerrie Lynn Wilton 4.17.2012-4.29.2012
23.		Text message between Kerrie Lynn Wilton and Brian Heaton 6.25.2012-6.26.2012
24.		Email exchange between Todd LaTorre, Michael Wilton re your song 2.11.2012
25.		Email exchange between Scott Rockenfield, Lars Sorensen, Eddie Jackson, Michael Wilton re Scott Rock here 3.31.2012
26.		Email exchange between Scott Rockenfield, Michael Wilton, Eddie Jackson re update 5.21.2012-

Doc. #	Bates # range	Description, Author/Maker (if applicable)
		5.22.2012
27.	NS000374-375	5.31.2012 letter from Thomas Osinski to Josh Brower re Queensryche and its members
28.	NS000385-387	6.5.2012 letter from Josh Brower to Thomas Osinski re Queensryche shareholder oppression/dissolution
29.	NS000376-377	6.6.2012 letter from Thomas Osinski to Josh Brower re Queensryche and its members
30.	NS000563	6.8.2012 letter from Thomas Osinski to Josh Brower re Queensryche and its members
31.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Patrick McLoughlin, Rayanne Lepieszko re message from Scott Rockenfield 12.13.2011-1.13.2012 with attachment
32.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Patrick McLoughlin re Showtech follow-up 2.23.2012
33.		Email exchange between Michael Wilton, Eddie Jackson, Scott Rockenfield, Geoff Tate, Susan Tate, Neil Sussman re accounting 3.12.2012-3.16.2012
34.		Email exchange between Eddie Jackson, Neil Sussman, Geoff Tate, Susan Tate, Scott Rockenfield, Michael Wilton re secret vote 3.1.2012
35.		Email exchange between Michael Wilton, Scott Rockenfield, Eddie Jackson re Scott dinner charge Rising West 7.3.2012
36.		Email exchange between Geoff Tate, Michael Wilton, Scott Rockenfield, Eddie Jackson, Susan Tate, Neil Sussman 6.1.2010
37.		Email exchange between Geoff Tate, Scott Rockenfield, Michael Wilton, Eddie Jackson, Jason Slater, Mike Stone re OMC II writing credits 3.7.2006-3.8.2006
38.		Email exchange between Eddie Jackson, Scott Rockenfield, Todd LaTorre, Michael Wilton, Parker Lundgren re live mixing 10.29.2012
39.		Email exchange between Scott Rockenfield, Glen Parrish, Sullivan Bigg re new QR Ad Mat 11.8.2012
40.	NS000803-820	Fax from Susan Tate to Neil Sussman re publishing credits 8.2.1999
41.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton re OMC suspension notice 3.7.2012 with attachment

	<b>Doc. #</b>	<b>Bates # range</b>	<b>Description, Author/Maker (if applicable)</b>
1	42.	PLTF000457-459	Email exchange between Michael Kadrie, Scott Rockenfield, Geoff Tate, Chris DeGarmo, Michael Wilton, Eddie Jackson re Mindcrime deadline 5.17.2013-5.23.2013
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4	43.	PLFT000498-500	Email exchange between Susan Tate, Michael Kadrie, Thomas Osinski re Operation Mindcrime movie 12.4.2012-12.5.2012
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8	44.	PLTF000455-456	Email exchange between Michael Kadrie, Scott Rockenfield, Geoff Tate, Chris DeGarmo, Michael Wilton, Eddie Jackson re Mindcrime deadline 5.17.2013-6.1.2013
9			
10	45.		Email exchange between Eddie Jackson, Sullivan Bigg, Paul Geary, Scott Rockenfield, Thomas Osinski, Eddie Jackson, Glen Parish, Kevin Daly re Queensryche Operation Mindcrime 2012 anniversary 11.28.2012-11.29.2012
11			
12			
13	46.	PLTF003193	Email exchange between Susan Tate and Miranda Tate re online stuff 4.25.2013
14	47.		Email exchange between Michael Wilton, Scott Rockenfield, Geoff Tate, Susan Tate, Neil Sussman re Facebook postings 12.6.2010
15			
16	48.		Email exchange Michael Wilton, Scott Rockenfield, Eddie Jackson, Geoff Tate, Susan Tate re EJ Facebook post 5.1.2011-5.2.2011
17			
18	49.		Email exchange between Gino Bishop, Scott Rockenfield, Michael Wilton, Eddie Jackson re Sussman 8.31.2012 with attachment
19	50.	NS002160-2161	Email exchange between Neil Sussman, Eddie Jackson, Scott Rockenfield, Michael Wilton, Geoff Tate re accounting for upcoming Queensryche shows 9.28.2012
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22	51.	NS002155	Email exchange between Neil Sussman, Eddie Jackson, Scott Rockenfield, Michael Wilton, Geoff Tate re delinquent QR Merchandising state return 12.3.2013
23			
24	52.	NS0021256-2159	Email exchange between Neil Sussman, Eddie Jackson, Scott Rockenfield, Michael Wilton, Geoff Tate, Susan Tate re IRS penalty notice for Melodisc 8.22.2013 with attachment
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	<b>Doc. #</b>	<b>Bates # range</b>	<b>Description, Author/Maker (if applicable)</b>
1	53.	NS002151-2154	Email exchange between Neil Sussman, Eddie Jackson, Scott Rockenfield, Michael Wilton, Geoff Tate re various tax and business matters 12.2.2013 with attachment
2			
3			
4	54.		Email exchange between Eddie Jackson, Scott Rockenfield, Michael Wilton, Joe O'Brien, Glen Parish, Paul Geary re "read this" 6.18.2012
5			
6	55.		Email exchange between Fozzy O'Hare, Glen Parish, Eddie Jackson, Sullivan Bigg, Scott Rockenfield, Michael Wilton, Paul Geary re IEBA Nashville 10.5.2012
7			
8	56.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Glen Parish, Todd LaTorre, Parker Lundgren, Hunter Motto re 5.1.2013-5.4.2013
9			
10	57.		Email exchange between Glen Parish, Eddie Jackson, Sullivan Bigg, Scott Rockenfield, Michael Wilton, Steven Joh, Don Robertson, Sharon Richardson, John Vyner, Parker Lundgren, Todd LaTorre re Queensryche UK Europe tour dates 3.19.2013
11			
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14	58.	PLTF000070-74	Email exchange between Neil Sussman, Thomas Osinski, Eddie Jackson, Scott Rockenfield, Geoff Tate, Michael Wilton, Lori Mulderink re Monterey claim for commission 7.30.2012-9.5.2012
15			
16	59.	PLTF000106-108	Email exchange between Neil Sussman, Thomas Osinski, Eddie Jackson, Scott Rockenfield, Geoff Tate, Michael Wilton re contact information 8.20.2012-8.31.2012
17			
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19	60.	PLTF000095-98	Email exchange between Neil Sussman, Thomas Osinski, Eddie Jackson, Scott Rockenfield, Geoff Tate, Michael Wilton re attachments-4-report of the executive committee 8.15.2012 with attachment
20			
21	61.	PLTF000089-94	Email exchange between Neil Sussman, Thomas Osinski, Eddie Jackson, Scott Rockenfield, Geoff Tate, Michael Wilton re attachments-3-halfway jam performance ledger 8.15.2012-8.20.2012 with attachment
22			
23			
24	62.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Bruce Melick re we agreement 6.18.2012-6.22.2012
25			
	63.		Email exchange between Bruce Melick, Eddie Jackson, Geoff Tate, Scott Rockenfield, Michael

Doc. #	Bates # range	Description, Author/Maker (if applicable)
		Wilton, Neil Sussman re Queensryche web store 6.12.2012-6.14.2012
64.	PLTF000135	Email exchange between Neil Sussman, Eddie Jackson, Scott Rockenfield, Geoff Tate, Michael Wilton re ongoing QR Merchandising expenses 8.10.2012
65.	PLTF007837-7844	Employment Agreement between Tri-Ryche and Geoff Tate 6.6.1994
66.	PLTF007845-7849	Songwriters Agreement between Tri-Ryche and Geoff Tate 6.6.1994
67.	NS002162-2173	Billboard.com Q&A: <u>Queensryche Talks Lawsuit</u> by Christa Titus 8.14.2012
68.		Email exchange between Todd LaTorre, Scott Rockenfield re Dusk til Dawn 9.24.2012
69.	NS000646-647	Billboard.com exclusive <u>Queensryche Parts Ways with Geoff Tate</u> by Christa Titus 6.20.2012
70.	NS002191-2199	Bylaws of Queensryche Merchandising 11.1996
71.	NS002200-2205	Certificate of Incorporation and Articles of Incorporation of Queensryche Merchandising 10.28.1996
72.	NS002174-2179	Articles of Incorporation of Melodisc 6.3.1991
73.	NS002180-2190	Bylaws of Melodisc 6.3.1991
74.	NS000679-690	Bylaws of Tri-Ryche 9.27.1989
75.	NS002206-2210	Certificate of Incorporation and Articles of Incorporation of Tri-Ryche 8.30.1989
76.		Email exchange between Eddie Jackson, Michael Wilton, Scott Rockenfield, Geoff Tate, Susan Tate, Neil Sussman re pet door 4.14.2011-4.16.2011
77.		Email exchange between Michael Wilton, Neil Sussman, Scott Rockenfield, Eddie Jackson, Geoff Tate re Sao Paulo, Brazil 4.25.2012
78.		Email exchange between Bruce Melick, Meline McWhirter, Eddie Jackson, Scott Rockenfield, Geoff Tate, Michael Wilton, Frank Moriarty re existing merch from Duvall 2.8.2013 with attachment
79.		Email exchange between Bruce Melick, Meline McWhirter, Eddie Jackson, Scott Rockenfield, Michael Wilton, Frank Moriarty re QR summary 5.10.2013 with attachments
80.		Email exchange between Bruce Melick, Meline McWhirter, Eddie Jackson, Scott Rockenfield, Geoff Tate, Michael Wilton, Frank Moriarty re revised

Doc. #	Bates # range	Description, Author/Maker (if applicable)
		web statement for Duvall merch 2.8.2013
81.		Email exchange between Michael Wilton, Scott Rockenfield, Eddie Jackson re 3B 3.12.2012
82.		Email exchange between Eddie Jackson, Scott Rockenfield, Michael Wilton, Glen Parish, Paul Geary, Kevin Chiamonte re Billboard follow-up questions 8.13.2012
83.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Patrick McLoughlin re QR and Showtech deal memo 2.8.2012-2.29.2012 with attachments
84.		Email exchange between Neil Sussman, Eddie Jackson, Scott Rockenfield, Michael Wilton, Geoff Tate, Susan Tate re Showtech proposal 3.2.2012
85.		Draft email from Michael Wilton to Neil Sussman, Eddie Jackson, Scott Rockenfield, Michael Wilton, Geoff Tate, Susan Tate
86.		Questions for merchandising proposal Author: Michael Wilton
87.		Draft Email from Michael Wilton to Geoff Tate
88.		Email exchange between Bruce Melick, Scott Rockenfield, Eddie Jackson, Michael Wilton re web proposal from Tinman 4.17.2012-4.18.2012
89.		Email exchange between Eddie Jackson, Scott Rockenfield, Michael Wilton, Geoff Tate, Neil Sussman, Thomas Osinski, Josh Brower re directors meeting 5.5.2012-5.10.2012
90.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Geoff Tate re official request for directors/shareholders meeting 3.29.2012
91.		Email exchange between Glen Parish, Eddie Jackson, Kevin Chiamonte, Scott Rockenfield, Michael Wilton re tour name 2.15.2013
92.		Text messages between Kerrie Lynn Wilton and Eddie Jackson 4.17.2012-1.2.2013
93.		Directors meeting via teleconference minutes 6.5.2012
94.		Email exchange between Scott Rockenfield, Geoff Tate, Eddie Jackson, Michael Wilton, Parker Lundgren, Susan Tate, Kelly Gray, Jeff Albright re please read and all reply 4.5.2011
95.	NS002011-2015	Email exchange between Neil Sussman, Geoff Tate,



Doc. #	Bates # range	Description, Author/Maker (if applicable)
		Eddie Jackson, Scott Rockenfield, Michael Wilton, Susan Tate, Josh Brower, Ben Stone, Denver Gant, Thomas Osinski re Queensryche Gross Revenues and Payments 8.28.2012 with attachment
96.		Email exchange between Scott Rockenfield, Meline McWhirter, Eddie Jackson, Michael Wilton re liability insurance 1.11.2013-1.12.2013
97.		Email exchange between Kevin Chiaramonte, Scott Rockenfield, Eddie Jackson, Michael Wilton, Paul Geary, Glen Parish re QR Bio first draft 8.30.2012 with attachment
98.		Email exchange between Scott Rockenfield, Kevin Chiaramonte, Paul Geary, Eddie Jackson, Glen Parish, Michael Wilton, Thomas Osinski re new QR press bio 6.16.201-6.19.2012
99.		Text message between Brian Heaton and Kerrie Lynn Wilton 9.2.2012-10.9.2012
100.		Text message between Brian Heaton and Kerrie Lynn Wilton 7.5.2012-7.6.2012
101.		Text message between Brian Heaton and Kerrie Lynn Wilton 4.30.2012-5.3.2013
102.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton re office move 4.25.2012
103.		Email exchange between Brian Heaton, Glen Parish, Todd LaTorre, Eddie Jackson, Scott Rockenfield, Parker Lundgren, Michael Wilton, Kevin Chiaramonte re ontourlive issues 1.10.2013
104.		Email exchange between Scott Rockenfield, Todd LaTorre, Sullivan Bigg, Glen Parish, Michael Wilton, Eddie Jackson, Parker Lundgren, Erin Hobbs re Queensryche 5.6.2013
105.		Email exchange between Michael Wilton, Sullivan Bigg, Scott Rockenfield, Paul Geary, Eddie Jackson, Glen Parish re new offer July 12 4.24.2013
106.		Email exchange between Brian Heaton, Kerrie Lynn Wilton re restaurant recommendations 4.4.2013-4.5.2013
107.		Email exchange between Harald Kohl, Meline McWhirter, Scott Rockenfield, Michael Wilton, Eddie Jackson, Thomas Osinski re next steps 12.12.2012-12.14.2012
108.		Email exchange between Scott Rockenfield, Glen

Doc. #	Bates # range	Description, Author/Maker (if applicable)
		Parish, Michael Wilton, Parker Lundgren, Eddie Jackson, Kevin Chiaramonte, Brian Heaton, Todd LaTorre re EP rumor 2.5.2013
109.		Email exchange between Kevin Chiaramonte, Scott Rockenfield, Glen Parish, Paul Geary re Burn! magazine 6.9.2012
110.		Email exchange between Eddie Jackson, Kevin Chiaramonte, Thomas Osinski, Scott Rockenfield, Glen Parish, Paul Geary, Michael Wilton, Sullivan Big re GT stuff 8.20.2012-8.21.2012
111.		Email exchange between Eddie Jackson, Scott Rockenfield, Geoff Tate, Susan Tate, Michael Wilton, Parker Lundgren, Miranda Tate re dates not available 1.25.2011-4.12.2011
112.		Email exchange between Scott Rockenfield, Todd LaTorre, Eddie Jackson, Michael Wilton, Parker Lundgren re schedules and updates 12.19.2012-12.22.2012
113.		Email exchange between Scott Rockenfield, Todd LaTorre, Eddie Jackson, Michael Wilton, Parker Lundgren, Glen Parish, Kevin Chiaramonte re FU single out on Youtube 4.3.2013
114.		Email exchange between Todd LaTorre, Scott Rockenfield re rising west 3.28.2012
115.		Email exchange between Scott Rockenfield, Michael Wilton, Todd LaTorre re hi guys 5.16.2012
116.		Email exchange between Joe O'Brien, Michael Wilton, Scott Rockenfield, Eddie Jackson, Parker Lundgren, Glen Parish, Todd LaTorre, Kevin Chiaramonte re Ryche stuff 8.7.2012
117.		Email exchange between Michael Wilton, Glen Parish, Thomas Osinski Scott Rockenfield, Paul Geary, Eddie Jackson, Kevin Chiaramonte re GT solo record/website 7.21.2012
118.		Email exchange between Meline McWhirter, Scott Rockenfield, Eddie Jackson, Michael Wilton, Sarah Bally EMS Music, LLC 6.13.2013
119.		Email exchange between Parker Lundgren, Scott Rockenfield, Todd LaTorre, Eddie Jackson, Michael Wilton re song credits/splits 3.21.2013-3.23.2013
120.		Draft press release 5.2012 re Queensryche parts ways with Susan Tate

	<b>Doc. #</b>	<b>Bates # range</b>	<b>Description, Author/Maker (if applicable)</b>
1	121.		Email exchange between Geoff Tate addressed to everyone re Showtech deal
2			
3	122.		Email exchange between Todd LaTorre, Scott Rockenfield re Scott Rockenfield Queensryche 3.10.2012-3.11.2012
4			
5	123.		Email exchange between Eddie Jackson, Michael Wilton, Scott Rockenfield re new backdrop 8.6.2012
6	124.		Employment Agreement between Tri-Ryche and Michael Wilton 6.6.1994
7	125.		Email exchange between Glen Parish, Sullivan Bigg, Scott Rockenfield, Eddie Jackson, Michael Wilton, Meline McWhirter re MEX \$\$ 2.26.2013
8			
9	126.		Email exchange between Michael Wilton, Scott Rockenfield, Eddie Jackson, Todd LaTorre, Parker Lundgren re 48 channels of rehearsal vibe 5.6.2013
10			
11	127.		Email exchange between Todd LaTorre, Scott Rockenfield, Michael Wilton, Parker Lundgren, Eddie Jackson, Glen Parish, Kevin Chiaramonte re quick note 1.8.2013-1.9.2013
12			
13	128.		Email exchange between Michael Wilton, Eddie Jackson re P&L you asked for 3.16.2011 with attachment
14			
15	129.		Email exchange between Scott Rockenfield, Meline McWhirter, Eddie Jackson, Michael Wilton re payment 3.14.2013
16			
17	130.		Email exchange between Scott Rockenfield, Meline McWhirter, Eddie Jackson, Michael Wilton re distributions and payroll 4.19.2013
18			
19	131.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Todd LaTorre, Parker Lundgren re July 28 expenses 6.26.2012
20			
21	132.		Email exchange between Scott Rockenfield, Meline McWhirter, Eddie Jackson, Michael Wilton re Cash flow band payroll 1.28.2013 with attachment
22			
23	133.		Email exchange between Michael Wilton, Scott Rockenfield, Eddie Jackson re monies and what to do 12.27.2012 with attachment
24			
25	134.		Email exchange between Todd LaTorre, Scott Rockenfield, Michael Wilton, Parker Lundgren, Eddie Jackson, Glen Parish re recording and stuff 1.4.2013-1.5.2013
	135.		Email exchange between Todd LaTorre, Scott

Doc. #	Bates # range	Description, Author/Maker (if applicable)
		Rockenfield, Michael Wilton, Parker Lundgren, Eddie Jackson re crew list 12.10.2012
136.		Email exchange between Bruce Melick, Scott Rockenfield Eddie Jackson, Michael Wilton re rising west final accounting 6.22.2012 with attachment
137.		Email exchange between Sullivan Bigg, Glen Parish, Scott Rockenfield, Eddie Jackson, Michael Wilton, Fozzy O'Hare, Paul Geary re Queensryche April 20 1.9.2013 with attachment
138.		Email exchange between Sullivan Bigg, Glen Parish, Scott Rockenfield, Eddie Jackson, Michael Wilton, Paul Geary re Queensryche offer Friday May 3.15.2013 with attachment
139.		Email exchange between Bruce Melick, Scott Rockenfield Eddie Jackson, Michael Wilton, Meline McWhirter, Frank Moriarty re Fourth quarter web/VIP sales 2.8.2013 with attachment
140.		Email exchange between Sullivan Bigg, Glen Parish, Scott Rockenfield, Eddie Jackson, Michael Wilton, Paul Geary, Fozzy O'Hare re new offer 10.30.2012 with attachment
141.		Email exchange between Sullivan Bigg, Glen Parish, Scott Rockenfield, Eddie Jackson, Michael Wilton, Paul Geary, Fozzy O'Hare re new offer 10.16.2012 with attachment
142.		Email exchange between Sullivan Bigg, Glen Parish, Scott Rockenfield, Eddie Jackson, Michael Wilton, Paul Geary, Fozzy O'Hare re offer Queensryche 1/12/13 11.14.2012 with attachments
143.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton re rising west final P&L 6.17.2012 with attachment
144.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Bruce Melick re invoice 10.6.2012-10.7.2012 with attachments
145.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Meline McWhirter re El Paso management 1.28.2013 with attachment
146.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Meline McWhirter re one more thing 1.10.2013 with attachment

	<b>Doc. #</b>	<b>Bates # range</b>	<b>Description, Author/Maker (if applicable)</b>
1	147.		Email exchange between Steve Joh, Glen Parish, Scott Rockenfield, Eddie Jackson, Michael Wilton re Japanese sales 4.18.2013-4.19.2013
2			
3	148.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton re expenses 12.10.2012 with attachment
4			
5	149.		Email exchange between Michael Wilton, Eddie Jackson re budget Europe 4.5.2010 with attachment
6			
7	150.		Email exchange between Joe O'Brien, Paul Geary, Eddie Jackson, Michael Wilton, Scott Rockenfield, Glen Parish re Queensryche invoice 10.2.2012 with attachment
8			
9	151.		Email exchange between Joe O'Brien, Paul Geary, Eddie Jackson, Michael Wilton, Scott Rockenfield, Glen Parish re QR invoice June, July, August 9.5.2012 with attachment
10			
11	152.		Email exchange between Joe O'Brien, Paul Geary, Eddie Jackson, Michael Wilton, Scott Rockenfield re invoice through September 10.16.2012 with attachment
12			
13	153.		Email exchange between Joe O'Brien, Paul Geary, Eddie Jackson, Michael Wilton, Scott Rockenfield re anti 360 deal outline 10.28.2012 with attachments
14			
15	154.		Email exchange between Eddie Jackson, Michael Wilton, Scott Rockenfield, Glen Parish, Larry Morand re test 6.14.2012-6.15.2012 with attachment
16			
17	155.		Email exchange between Sullivan Bigg, Glen Parish, Scott Rockenfield, Eddie Jackson, Michael Wilton, Paul Geary, Kell Houston re Queensryche 10/19 & 10/20 6.26.2012 with attachments
18			
19	156.		Email exchange between Sullivan Bigg, Glen Parish, Scott Rockenfield, Eddie Jackson, Michael Wilton, Paul Geary re 10/27/12 Snoqualmie Casino 7.24.2012 with attachment
20			
21	157.		Email exchange between Sullivan Bigg, Glen Parish, Scott Rockenfield, Eddie Jackson, Michael Wilton, Paul Geary re HOB offer 7.19.2012 with attachment
22			
23	158.		Email exchange between Sullivan Bigg, Glen Parish, Scott Rockenfield, Eddie Jackson, Michael Wilton, Paul Geary, Fozzy O'Hare re offer for Queensryche Hildalgo 7.30.2012 with attachment
24			
25	159.		Email exchange between Sullivan Bigg, Glen Parish, Scott Rockenfield, Eddie Jackson, Michael Wilton,

Doc. #	Bates # range	Description, Author/Maker (if applicable)
		Paul Geary, Fozzy O'Hare re offer for Queensryche San Antonio 7.30.2012 with attachment
160.		Email exchange between Sullivan Bigg, Glen Parish, Scott Rockenfield, Eddie Jackson, Michael Wilton, Fozzy O'Hare re Queensryche offer 7.30.2012 with attachment
161.		Email exchange between Sullivan Bigg, Glen Parish, Scott Rockenfield, Eddie Jackson, Michael Wilton, Paul Geary, Fozzy O'Hare, Alan Miller re Queensryche offer 8.8.2012 with attachment
162.		Email exchange between Sullivan Bigg, Glen Parish, Scott Rockenfield, Eddie Jackson, Michael Wilton, Paul Geary re Queensryche offer 4.19.2013 with attachment
163.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Meline McWhirter re management commish sheets 1.22.2013 with attachments
164.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Meline McWhirter re Queensryche December invoice 1.4.2013 with attachment
165.		Email exchange between Scott Rockenfield, Meline McWhirter re cash flow 3.7.2013
166.		Email exchange between Scott Rockenfield, Meline McWhirter re hello 5.23.2013
167.		Email exchange between Scott Rockenfield, Meline McWhirter, Steve Joh, Glen Parish re update on Queensryche advance 6.3.2013
168.		Email exchange between Parker Lundgren, Scott Rockenfield, Michael Wilton, Eddie Jackson, Todd LaTorre re Paul updates 11.26.2012-11.28.2012
169.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton re \$\$ suggestion 12.27.2012
170.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Meline McWhirter re \$\$ coming in 1.8.2013
171.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Meline McWhirter, Joe O'Brien re Queensryche invoice 1.4.2013-1.9.2013
172.		Email exchange between Scott Rockenfield, Eddie

Doc. #	Bates # range	Description, Author/Maker (if applicable)
		Jackson, Michael Wilton, Meline McWhirter re cash flow 1.28.2013-1.30.2013
173.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Meline McWhirter, Joe O'Brien re Queensryche January 2013 invoice 1.31.2013-2.5.2013
174.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Meline McWhirter re \$\$ and band payments 1.10.2013-1.12.2013
175.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton, Meline McWhirter, Harald Kohl re ok QR bank accounts 12.27.2012
176.		Email exchange between Scott Rockenfield, Eddie Jackson, Michael Wilton re basic account for 2010-2011 2.22.2012 with attachments
177.		Accounting and payment from Hard Rock Café Seattle to Michael Wilton for Rising West shows on 6.8.2012 and 6.9.2012
178.		Talent Engagement Agreement between W.E.S.T and Hard Rock Café International dated 5.16.2012
179.		Talent Engagement Agreement between W.E.S.T and Hard Rock Café International dated 5.16.2012
180.		W-9 for Michael Wilton for Whip Ale LLC dated 5.16.2012
181.	NS001277-1288	Letter from Neil Sussman to Michael Kadrie re option/purchase agreement with Geoff Tate 3.5.2012
182.	NS001364-1372	Draft option/purchase agreement August 2011 Author: Neil Sussman
183.	NS001404-1406	Email exchange between Neil Sussman, Hagen Starz, Susan Tate, Geoff Tate, Michael Kadrie re copyright 4.30.2011-5.6.2011
184.		Email exchange between Glen Parish, Michael Wilton, Scott Rockenfield, Eddie Jackson, Paul Geary re QR dates on the site 6.14.2012
185.		Email exchange between Sullivan Bigg, Thomas Osinski, Tommy Vee, Jerry Lima, Susan Tate re Geoff Tate of Queensryche 6.18.2012-7.11.2012
186.		Email exchange between Sullivan Bigg, Glen Parish, Scott Rockenfield, Eddie Jackson, Michael Wilton re firm offer 6.18.2012-6.19.2012
187.		Queensryche Halfway Jam contract and addendum June 2012

	<b>Doc. #</b>	<b>Bates # range</b>	<b>Description, Author/Maker (if applicable)</b>
1	188.	NS001249-1250	VooDoo's income and expenses 6.7.2013 Author: Neil Sussman
2			
3	189.	NS001274	Letter from Mark Daly, lead singer of the VooDoos re history with Queensryche
4	190.		Email between Michael Wilton, Neil Sussman re VooDoos Author: Michael Wilton
5			
6	191.	NS000984	Eddie Jackson charge-back expenses 3.29.2012 Author: Neil Sussman
7	192.	NS000985	Eddie Jackson charge-back expenses 11.28.2011 Author Neil Sussman
8	193.	NS000986	Eddie Jackson charge-back expenses 09.22.2009 Author Neil Sussman
9	194.	NS000996	Todd LaTorre charge-back expenses 12.4.2012 Author: Neil Sussman
10			
11	195.	NS000997	Parker Lundgren charge-back expenses 11.16.2010 Author: Neil Sussman
12	196.	NS001008	Misty Rockenfield charge-back expenses 4.16.2012 Author: Neil Sussman
13	197.	NS001009	Misty Rockenfield charge-back expenses 12.19.2011 Author: Neil Sussman
14	198.	NS001010-1012	Misty Rockenfield charge-back expenses 12.13.2010 Author: Neil Sussman
15	199.	NS001013	Scott Rockenfield charge-back expenses 5.29.2012 Author: Neil Sussman
16	200.	NS001014-1015	Scott Rockenfield charge-back expenses 12.19.2011 Author: Neil Sussman
17			
18	201.	NS001016-1017	Scott Rockenfield charge-back expenses 12.29.2010 Author: Neil Sussman
19	202.	NS001018-1020	Email exchange between Neil Sussman, Scott Rockenfield, Jason Ashebury re Nathan Dvorak flight 12.28.2009-12.29.2009 with attachment
20			
21	203.	NS001021-1023	Scott Rockenfield charge-back expenses 12.23.2009 Author: Neil Sussman
22	204.	NS001095	Michael Wilton charge-back expenses 1.13.2012 Author: Neil Sussman
23	205.	NS001096	Michael Wilton charge-back expenses 12.6.2011 Author: Neil Sussman
24	206.	NS001097	Michael Wilton charge-back expenses 9.23.2010 Author: Neil Sussman
25	207.	NS001098-1099	Michael Wilton charge-back expenses 12.22.2009 Author: Neil Sussman



	<b>Doc. #</b>	<b>Bates # range</b>	<b>Description, Author/Maker (if applicable)</b>
1	208.		Email exchange between Michael Wilton, Meline McWhirter, Scott Rockenfield, Eddie Jackson re flight reimbursements Vegas 1.10.2013
2			
3	209.	PLTF007702	Melodisc 2008 Profit & Loss Statement Author: Meline McWhirter
4			
5	210.	PLTF007703	Melodisc 2009 Profit & Loss Statement Author: Meline McWhirter
6			
7	211.	PLTF007704	Melodisc 2010 Profit & Loss Statement Author: Meline McWhirter
8			
9	212.	PLTF007705	Melodisc 2011 Profit & Loss Statement Author: Meline McWhirter
10			
11	213.	PLTF007706	Melodisc January 1, 2012 – June 5, 2012 Profit & Loss Statement Author: Meline McWhirter
12			
13	214.	PLTF007707	Melodisc June 6, 2012 – December 31, 2012 Profit & Loss Statement Author: Meline McWhirter
14			
15	215.	PLTF007708-7709	Melodisc January – October 2013 Profit & Loss Statement Author: Meline McWhirter
16			
17	216.	PLTF007710	Melodisc 2008 Balance Sheet Author: Meline McWhirter
18			
19	217.	PLTF007711	Melodisc 2009 Balance Sheet Author: Meline McWhirter
20			
21	218.	PLTF007712	Melodisc 2010 Balance Sheet Author: Meline McWhirter
22			
23	219.	PLTF007713	Melodisc 2011 Balance Sheet Author: Meline McWhirter
24			
25	220.	PLTF007714	Melodisc Summary Balance Sheet as of June 5, 2012 Author: Meline McWhirter
	221.	PLTF007715	Melodisc Balance Sheet as of December 31, 2012 Author: Meline McWhirter
	222.	PLTF007716-7717	Melodisc Balance Sheet as of October 31, 2013 Author: Meline McWhirter
	223.	PLTF007718-7720	Melodisc 2008 Income by Customer Detail Author: Meline McWhirter
	224.	PLTF007721-7723	Melodisc 2009 Income by Customer Detail Author: Meline McWhirter

	<b>Doc. #</b>	<b>Bates # range</b>	<b>Description, Author/Maker (if applicable)</b>
1	225.	PLTF007724-7725	Melodisc 2010 Income by Customer Detail Author: Meline McWhirter
2			
3	226.	PLTF007726-7728	Melodisc 2011 Income by Customer Detail Author: Meline McWhirter
4	227.	PLTF007729-7730	Melodisc 2012 Income by Customer Detail Author: Meline McWhirter
5	228.	PLTF007731-7732	Melodisc Income by Customer Detail January – October 2013 Author: Meline McWhirter
6			
7	229.	PLTF007733-7752	Melodisc Expenses by Vendor Detail Jan 1 – June 5, 2012 Author: Meline McWhirter
8			
9	230.	PLTF007753-7772	Melodisc Expenses by Vendor Detail June 6 – Dec 31, 2012 Author: Meline McWhirter
10			
11	231.	PLTF007773-7805	Melodisc Expenses by Vendor Detail Jan – Oct, 2013 Author: Meline McWhirter
12			
13	232.	PLTF007806	Queensryche Merchandising 2008 Profit & Loss Statement Author: Meline McWhirter
14	233.	PLTF007807	Queensryche Merchandising 2009 Profit & Loss Statement Author: Meline McWhirter
15			
16	234.	PLTF007808	Queensryche Merchandising 2010 Profit & Loss Statement Author: Meline McWhirter
17			
18	235.	PLTF007809	Queensryche Merchandising 2011 Profit & Loss Statement Author: Meline McWhirter
19			
20	236.	PLTF007810	Queensryche Merchandising January 1, 2012 – June 5, 2012 Profit & Loss Statement Author: Meline McWhirter
21	237.	PLTF007811	Queensryche Merchandising June 6, 2012 – Dec 31, 2012 Profit & Loss Statement Author: Meline McWhirter
22			
23	238.	PLTF007812	Queensryche Merchandising Jan – Oct, 2013 Profit & Loss Statement Author: Meline McWhirter
24			
25	239.	PLTF007813	Queensryche Merchandising 2008 Balance Sheet Author: Meline McWhirter

	<b>Doc. #</b>	<b>Bates # range</b>	<b>Description, Author/Maker (if applicable)</b>
1	240.	PLTF007814	Queensryche Merchandising 2009 Balance Sheet Author: Meline McWhirter
2			
3	241.	PLTF007815	Queensryche Merchandising 2010 Balance Sheet Author: Meline McWhirter
4	242.	PLTF007816	Queensryche Merchandising 2011 Balance Sheet Author: Meline McWhirter
5			
6	243.	PLTF007817	Queensryche Merchandising 2012 Balance Sheet as of June 5, 2012 Author: Meline McWhirter
7	244.	PLTF007818	Queensryche Merchandising 2012 Balance Sheet as of Dec 31, 2012 Author: Meline McWhirter
8			
9	245.	PLTF007819	Queensryche Merchandising 2012 Balance Sheet as of Oct 31, 2013 Author: Meline McWhirter
10			
11	246.	PLTF007820-7830	Queensryche Merchandising Jan 1 – Jun 5, 2012 Expenses by Vendor Detail Author: Meline McWhirter
12			
13	247.	PLTF007831-7834	Queensryche Merchandising Jun 6 – Dec 31, 2012 Expenses by Vendor Detail Author: Meline McWhirter
14			
15	248.	PLTF007835-7836	Queensryche Merchandising Jan – Oct 2013 Expenses by Vendor Detail Author: Meline McWhirter
16			
17	249.	NS002076	Tri-Ryche 2008 Profit & Loss Statement Author: Neil Sussman
18	250.	NS002077-2082	Tri-Ryche 2008 Transaction Statement Author: Neil Sussman
19	251.	NS002083	Tri-Ryche 2008 Balance Sheet Author: Neil Sussman
20	252.	NS002084-2085	Tri-Ryche 2008 W-2 Wage & Tax Statements for Michael Wilton, Scott Rockenfield, Eddie Jackson, and Geoff Tate Author: Neil Sussman
21			
22	253.	NS002086-2087	Tri-Ryche 2008 Forms 1099-MISC for Michael Wilton, Scott Rockenfield, Eddie Jackson, and Geoff Tate Author: Neil Sussman
23			
24	254.	NS002088	Tri-Ryche 2008 Tri-Ryche payments to band members Author: Neil Sussman
25			

	<b>Doc. #</b>	<b>Bates # range</b>	<b>Description, Author/Maker (if applicable)</b>
1	255.	NS002089	Tri-Ryche 2009 Profit & Loss Statement Author: Neil Sussman
2			
3	256.	NS002090-2095	Tri-Ryche 2009 Transaction Statement Author: Neil Sussman
4	257.	NS002096	Tri-Ryche 2009 Balance Sheet Author: Neil Sussman
5	258.	NS002097-2098	Tri-Ryche 2009 W-2 Wage & Tax Statements for Michael Wilton, Scott Rockenfield, Eddie Jackson, and Geoff Tate Author: Neil Sussman
6			
7			
8	259.	NS002099-2100	Tri-Ryche 2009 Forms 1099-MISC for Michael Wilton, Scott Rockenfield, Eddie Jackson, and Geoff Tate Author: Neil Sussman
9			
10	260.	NS002101	Tri-Ryche 2009 Tri-Ryche payments to band members Author: Neil Sussman
11			
12	261.	NS002102	Tri-Ryche 2010 Profit & Loss Statement Author: Neil Sussman
13	262.	NS002103-2108	Tri-Ryche 2010 Transaction Statement Author: Neil Sussman
14	263.	NS002109	Tri-Ryche 2010 Balance Sheet Author: Neil Sussman
15	264.	NS002110-2111	Tri-Ryche 2010 W-2 Wage & Tax Statements for Michael Wilton, Scott Rockenfield, Eddie Jackson, and Geoff Tate Author: Neil Sussman
16			
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18	265.	NS002112-2113	Tri-Ryche 2010 Forms 1099-MISC for Michael Wilton, Scott Rockenfield, Eddie Jackson, and Geoff Tate Author: Neil Sussman
19			
20	266.	NS002114	Tri-Ryche 2010 Tri-Ryche payments to band members Author: Neil Sussman
21			
22	267.	NS002115	Tri-Ryche 2011 Profit & Loss Statement Author: Neil Sussman
23	268.	NS002116-2122	Tri-Ryche 2011 Transaction Statement Author: Neil Sussman
24	269.	NS002123	Tri-Ryche 2011 Balance Sheet Author: Neil Sussman
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	<b>Doc. #</b>	<b>Bates # range</b>	<b>Description, Author/Maker (if applicable)</b>
1	270.	NS002124-2125	Tri-Ryche 2011 W-2 Wage & Tax Statements for Michael Wilton, Scott Rockenfield, Eddie Jackson, and Geoff Tate Author: Neil Sussman
2			
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4	271.	NS002126-2127	Tri-Ryche 2011 Forms 1099-MISC for Michael Wilton, Scott Rockenfield, Eddie Jackson, and Geoff Tate Author: Neil Sussman
5			
6	272.	NS002128	Tri-Ryche 2011 Tri-Ryche payments to band members Author: Neil Sussman
7			
8	273.	NS002129	Tri-Ryche 1/1/2012 – 6/5/2012 Profit & Loss Statement Author: Neil Sussman
9			
10	274.	NS002130-2133	Tri-Ryche 1/1/2012 – 6/5/2012 Transaction Statement Author: Neil Sussman
11			
12	275.	NS002134	Tri-Ryche 6/6/2012 – 12/31/2012 Profit & Loss Statement Author: Neil Sussman
13			
14	276.	NS002135-2138	Tri-Ryche 6/6/2012 – 12/31/2012 Transaction Statement Author: Neil Sussman
15			
16	277.	NS002139	Tri-Ryche 2012 Balance Sheet Author: Neil Sussman
17			
18	278.	NS002140-2141	Tri-Ryche 2012 W-2 Wage & Tax Statements for Michael Wilton, Scott Rockenfield, Eddie Jackson, and Geoff Tate Author: Neil Sussman
19			
20	279.	NS002142-2143	Tri-Ryche 2012 Forms 1099-MISC for Michael Wilton, Scott Rockenfield, Eddie Jackson, and Geoff Tate Author: Neil Sussman
21			
22	280.	NS002144	Tri-Ryche 2012 Tri-Ryche payments to band members Author: Neil Sussman
23			
24	281.	NS002145	Tri-Ryche 1/1/2013 – 11/1/2013 Profit & Loss Statement Author: Neil Sussman
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	282.	NS002146-2149	Tri-Ryche 1/1/2013 – 11/1/2013 Transaction Statement Author: Neil Sussman

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Doc. #	Bates # range	Description, Author/Maker (if applicable)
283.	NS002150	Tri-Ryche 2013 Balance Sheet Author: Neil Sussman
284.	NS002073-2075	Melodisc Summer 2010 US Tour Revenues Author: Neil Sussman
285.	NS002072	Melodisc Fall 2010 US Tour Revenues Author: Neil Sussman

DATED this 30<sup>th</sup> day of December, 2013.

VERIS LAW GROUP PLLC

By s/ Joshua C. Allen Brower  
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**DECLARATION OF SERVICE**

I declare under penalty of perjury under the laws of the State of Washington that on this date I caused the foregoing document to be served on the following persons via the methods indicated:

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Dated at Seattle, Washington, this 30<sup>th</sup> day of December, 2013.

s/ Alison Sepavich  
Alison Sepavich

4816-3760-6935, v. 2