

FILED

12 JUL 12 AM 11:41

THE HONORABLE CAROL SCHAPIRA  
MOTION NOTED FOR ORAL ARGUMENT ON JULY 13, 2012 AT KING COUNTY  
SUPERIOR COURT CLERK  
E-FILED  
CASE NUMBER: 12-2-21829-3 SEA

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

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.

Case No. 12-2-21829-3 SEA

DECLARATION OF  
CATHERINE REEVES

I, Catherine Reeves, declare as follows:

1. I met Geoff and Susan Tate in October 2007 at a Halloween party at their residence. My husband and I were invited to this event as I had recently met Susan through the private school that our daughters (both in 5th grade at the time) were attending. In the nearly five years since then, we have had been friends with the Tates and have had the wonderful opportunity to share many experiences with them and their family.

1           2.       Many of these experiences included Queensryche concerts and backstage  
2 passes. Not once during these many occasions did I ever witness anything remotely  
3 resembling ambivalence or tension of any sort. My husband and I even went on the tour bus  
4 with Queensryche, from Boston to Rochester, NY, to Washington, DC in August of 2011. We  
5 had a fantastic time with everyone and I was touched by the friendships that I saw between all  
6 of the crew and band members that made every show come together.

7           3.       Our family of four was delighted to make it onboard ShipRocked '09 as well as  
8 ShipRocked '11. In '09, I have fond memories sitting in the cigar bar with the Rockenfields  
9 and the Tates and a few other friends, happy and giggling, just enjoying the moment. On the  
10 '11 cruise, the Rockenfield family and the Wiltons joined the Tates and my family on an all-  
11 day excursion to see the Mayan Ruins. And one evening, Susan and I went to invite Kerri  
12 Lynn Wilton to join us for a drink, and as the three of us laughed and got ready, Kerri Lynn  
13 offered one of her beautiful black dresses to Susan to wear out that night. From my view, this  
14 looked like a group of fun people who all relished being together.

15           4.       We took many trips with the Rockenfields and the Tates: to Walla Walla in  
16 December 2010 (when Scott was the drummer for an acoustic set there); to Pt. Townsend for  
17 Susan's birthday in March of 2010; we rented a house together in Pt. Ludlow for a weekend of  
18 fun in 2010; we shared a house together for a weekend in Friday Harbor with all of our  
19 children in 2011. (I believe this house was owned by Scott's sister). I looked forward to every  
20 one of these trips as they were so enjoyable! When Geoff and Susan's daughter, Miranda, got  
21 married in 2009, every member of the band came to the wedding. It was a beautiful afternoon  
22 in Duvall, and a wonderful reception and dinner, and camaraderie.

23           5.       I invited the Rockenfields and the Tates to my own house for many theme  
24 parties and gatherings. Scott and Geoff always seemed like old friends, laughing and enjoying  
25 the evening with everyone else. I love to throw a party, and only invite those people who add  
26 to the fun. This always included the Tates and the Rockenfields!

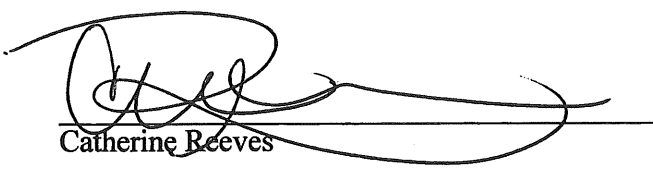
1           6.       Over the last several years, my friendship with Susan Tate has blossomed and I  
2 consider her one of my very closest and dearest friends. When she told me that she was  
3 getting fired, I was shocked, as was she. Neither of us saw this coming. It seemed so “out of  
4 the blue”. If these people had any disagreements among them, I surely never saw them.

5           7.       As for the character of Geoff Tate, he is one of the calmest individuals I have  
6 encountered in my adult life. I have seen him be a pillar of calm while his wife was panicking,  
7 trying to get her car moved out of over a foot of snow (they had a record deadline nearing, and  
8 the car would NOT budge). Once while leaving our driveway, he accidentally backed his car  
9 into a structure that housed mailboxes across the street. He got out of his car, assessed the  
10 damage, swept up the broken glass (the rear window was shattered), and drove home. I  
11 remember thinking how serene he was while accidentally damaging his vehicle. I have  
12 watched him prepare for a show in front of thousands of people, relaxed and collected as  
13 people were going in and out of his dressing room, even chatting with strangers that had access  
14 to a VIP tent, shortly before going on stage. I have watched him parent his children, entertain  
15 a house full of guests, and deal with the day-to-day issues that arise while traveling with a band  
16 and crew, not to mention a few frustrations of daily life, such as run out of gas or no electricity  
17 at his house. I have allowed my children to attend birthday parties and sleepovers at the Tate  
18 house, never once concerned for their safety or wellbeing. I have never seen him angry, let  
19 alone violent in any way.

20           8.       I have also witnessed him pour his heart and soul into his passion: music. I  
21 have never heard him say a negative comment about the band. From my perspective, he  
22 always seems to be looking forward, to new ideas and concepts, and wanting to use his  
23 creative abilities. I believe he is proud of Queensryche and the achievements they have made  
24 over the years. And, I am honored to count both Geoff and Susan as my friends.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

I declare under penalty of perjury of the laws of the State of Washington this 11<sup>th</sup> day of July 2012 that the foregoing is true and correct.



Catherine Reeves

4814-7398-3759, v. 2