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KING COUNTY
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THE HONORABLE CAROL SCHAPIRA

CASE NUMBER: 12-2-21829-3 SEA

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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 ALEX RAFAEL

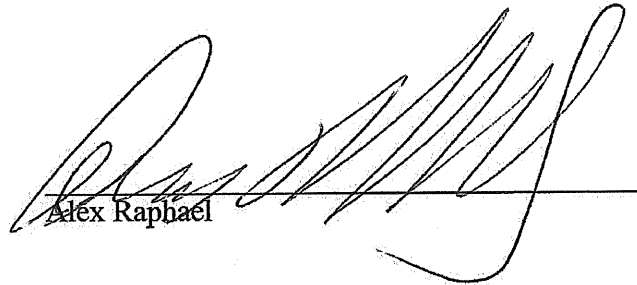
I, Alex Raphael, declare as follows:

1. I was the Stage Right Guitar Technician for the 1988-89 Queensryche/Def Leppard tour in the United States and the Stage Right Guitar Technician/Monitor Engineer for the 1988/89 Queensryche/Metallica tour in Europe and America.

2. I recall one night after a Queensryche/Metallica show I was in the tour bus when Mike Beyer, (Queensryche Sound Engineer) was escorting Eddie Jackson (Queensryche Bass Player) into the bus. Eddie was ranting about finding someone to fight and started to

1 direct his rants and random actions towards Geoff Tate (Singer for Queensryche). He said that
2 "Geoff will fight me because he has balls" and proceeded to kick Geoff in the face. I and other
3 crew members subdued Eddie to the couch, but, when we would think he was ok and relaxed
4 he would get back up and start up at Geoff again. I finally had to sit on Eddie for a good
5 portion of the night until he came back to reality and finally went to his bunk and went to
6 sleep.

7 I declare under penalty of perjury of the laws of the State of Washington this 3rd day
8 of October 2012 that the foregoing is true and correct.

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