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12 JUL 09 AM 9:00

THE HONORABLE CAROL A. SCHAPIRA  
KING COUNTY

HEARING DATE: July 10, 2012 at 3:30 P.M.  
E-FILED

CASE NUMBER: 12-2-21829-3 SEA

**SUPERIOR COURT 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 SEA

**DECLARATION OF PARKER  
LUNDGREN**

Under penalty of perjury under the laws of the State of Washington, I, Parker  
Lundgren, declare:

I am a live performance guitarist with the band, Queensryche. I have been  
performing with the band since 2009.

**BRAZIL INCIDENT**

DECLARATION OF PARKER LUNDGREN - 1

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Telephone (253) 383-4433 Fax (253) 572-2223

1 On April 14, 2012, in Sao Paulo, Brazil, at approximately 11:00 p.m., I was  
2 chatting with Scott Rockenfield while awaiting for our show to start. Geoff Tate came up  
3 to Scott Rockenfield from the other side of the drum riser and shoved Scott  
4 Rockenfield's drumset over in Scott Rockenfield's direction. Geoff Tate then said "you  
5 f\*\*king pussy" and spat at him. Our techs immediately ran to the drum raiser to fix the  
6 drums, drum mice and laptop that had been knocked over. Meanwhile Geoff Tate  
7 walked over to Michael Wilton and hit him open-handed in the face, spit on him and said  
8 more obscenities. Michael Wilton tried to walk away as Geoff Tate followed him and  
9 continued to spit on him and call him names. Scott Rockenfield ran over to break them  
10 up when Geoff Tate then hit Scott Rockenfield twice in the head. Security ran in to  
11 separate Geoff Tate from the rest of the band. Geoff Tate walked by Eddie Jackson and  
12 said to him "you're next."

13 Orlando Scott "Fozzy" O'Hare, our tour manager, was able to calm Geoff Tate  
14 down enough for us to play the show. We were advised to stay in one place during the  
15 show and to avoid going near Geoff Tate. We were also advised to not go near the  
16 edge of the stage for fear that Geoff Tate would push someone off stage. During the  
17 rest of the show Geoff Tate repeatedly spit on Michael Wilton, Scott Rockenfield, and  
18 Eddie Jackson and continued to call them names. After the show, we were told to head  
19 straight to the hotel.

20 After we got to the hotel, our tech, Anthony Bender, and I headed out to a bar for  
21 drinks, and we were later accompanied by Geoff Tate and Kelly Gray. During a  
22 conversation between Geoff Tate and I at the bar, Geoff Tate said "I wish that I would  
23 have hit Michael harder," and "I wish I could get my hands on Scott because I would kill  
24 him."

1 It is very apparent that Scott Rockenfield, Michael Wilton and Eddie Jackson's  
2 musical direction in Queensryche has stayed true throughout their 31 years of being a  
3 band. Their musical contributions, both in writing and playing live, best resembles the  
4 music that they have come to be known for. They listen to what their fans want and  
5 continue to be the driving force behind the band.

6 While Geoff Tate is the primary lyricist in the band, he has never written the  
7 music for a song in Queensryche. All of the music has been written by Michael Wilton,  
8 Eddie Jackson, Scott Rockenfield and Chris DeGarmo, and recently some outside  
9 writers that Geoff Tate worked with.

10 It is evident that Geoff Tate's musical tastes have changed over the years which  
11 is understandable. He has even stated in recent interviews that he doesn't like metal.  
12 Queensryche is a brand and fans expect the brand Queensryche, which is a metal  
13 band, to maintain their sound, style, and trademark characteristics. Much of the music  
14 that Geoff Tate chose to write lyrics to on *Dedicated to Chaos* sounds like music from  
15 his solo project album. There is nothing wrong with the musical direction that Geoff Tate  
16 has shifted towards except that it does not fit with Queensryche. It belongs in a different  
17 project such as the Geoff Tate solo project.

18 Aside from Geoff Tate's recent assault in Brazil, he has also made threats to the  
19 band at the M3 and Rocklahoma festivals that if anyone in the band comes near him, he  
20 is going to hit them. He has also tarnished the band's name by telling the audience that  
21 they sucked during the Rocklahoma festival which was streamed live on television.

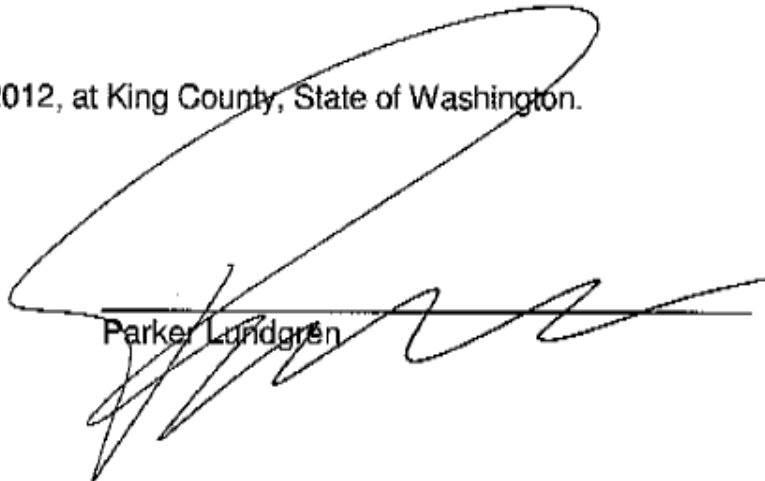
22 When Scott Rockenfield, Michael Wilton, Eddie Jackson and I performed  
23 Queensryche material with Todd LaTorre, it was the most positive and enthusiastic  
24 response that I have seen in my entire run with the band, both from the crowd and  
25 amidst the band. We played the older, heavier material that the fans always ask for and

1 that we are never able to play. The shows sold out both nights and the merchandise  
2 sold out immediately. We had nothing but positive reviews and the fans loved it. We had  
3 fans fly to Seattle for the shows from all around the world, some even as far as Japan.

4       What was even more uplifting than the crowd's reaction was the band's reaction.  
5 I have never seen bigger smiles on the guys' faces while we played the shows. The  
6 positivity continued long after the shows as we started hanging out, going to dinners,  
7 going to shows, and most importantly writing music together as a band, which I never  
8 experienced while Geoff Tate was in the band. Everyone, including the new singer Todd  
9 La Torre, is on the same page. We want to play the same kind of music, and stay true to  
10 the Queensryche legacy.

11       Signed this 6<sup>th</sup> day of July 2012, at King County, State of Washington.

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Parker Lundgren