FILED

12 JUN 29 AM 11:21 THE HONORABLE CAROL SCHAPIRA

MOTION NOTED FOR ORAL ARGUMENT ON JULY 10, 2012 AND 300 PNV

E-FILED

CASE NUMBER: 12-2-21829-3 SEA

SUPERIOR COURT CLERK

Case No. 12-2-21829-3 SEA

DECLARATION OF SUSAN TATE IN

SUPPORT OF THE MOTION FOR

PRELIMINARY INJUNCTION

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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.

Defendants.

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; OUEENSRYCHE MERCHANDISING, INC., a Washington corporation; and MELODISC LTD., a Washington corporation,

Susan Tate declares as follows:

I am a plaintiff in this lawsuit. I am over 18, competent to give testimony, and 1.

base this declaration on personal knowledge.

2. Until April 2012, I was the manager of Queensryche. I was manager for seven

years, and co-manager for four years before that. My responsibilities included working with

Queensryche agent and booking tours for Queensryche.

DECLARATION OF SUSAN TATE IN SUPPORT OF MOTION FOR PRELIMINARY 1 INJUNCTION

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3. Removing Geoff Tate as the lead singer of Queensryche and replacing him with another singer devalues the value of Queensryche name and brand significantly. I have worked with band promoters for many years, and have a lot of experience with them. In my opinion, they will be unwilling to work with Queensryche without Geoff Tate as the lead singer. The only promoter of which I am aware that is still willing to book Queensryche is the promoter of the Halfway Jam, a concert in Minnesota. And on the website he has not disclosed that Geoff Tate will not be performing. Rather, the photograph on the website shows a photograph of Queensryche with Geoff on it. A shot of the website is attached hereto as Exhibit A. Any shows that Queensryche can possibly book without Geoff Tate will be in very small venues for little money. I therefore believe that a bond for no more than \$5,000 is appropriate.

I declare under penalty of perjury of the laws of the State of Washington this <u>do</u> day of <u>do</u> that the foregoing is true and correct.

Susan Tate

4831-1461-6592, v. 1

Exhibit A

