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THE HONORABLE JULIA GARRATT
KING COUNTY
HEARING W/ORAL ARGUMENT: DEC. 13, 2013 9:00 AM
SUPERIOR COURT CLERK

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,

vs.

**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

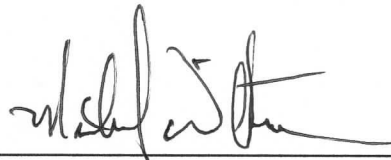
**DECLARATION OF MICHAEL
WILTON**

Under the penalty of perjury under the laws of the State of Washington, I,
Michael Wilton, declare:

I am over 18 years of age.

1 In 1994 all five band members signed separate employment and songwriter's
2 agreements as well as the shareholders agreement for the Tri-Ryche Corporation.
3 Although those agreements had thresholds requiring 80% votes to do things like
4 terminate a member's employment or make a change in use of the Queensryche name,
5 we understand that as, if every member but one agreed on something, then it was okay.
6 So when Chris DeGarmo left the band in 1997 and the four remaining members had
7 25% shares of stock instead of 20%, we simply presumed that 75% replaced 80% as the
8 thresholds in all those corporate agreements. Otherwise, it meant that everything would
9 have to be 100% as a practical matter, and it was never anyone's intent that everything
10 had to be unanimous. We also never formally changed anything in writing because the
11 80% or 75% threshold was never an issue until we had to fire Geoff Tate after his assault
12 on the other members and other erratic behavior.

13 SIGNED this 13th day of November, 2013, at King County, State of
14 Washington.

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18 Michael Wilton

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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 method indicated:

Joshua C. Allen
Benjamin J. Stone
Denver R. Grant
VERIS LAW GROUP, PLLC
1809 Seventh Avenue, Suite 1400
Seattle WA 98101
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- Overnight Delivery via Fed Ex
- First Class Mail via USPS
- Hand-delivered via ABC Legal Messenger
- Facsimile
- Email

DATED this 14th day of November, 2013, at Tacoma, Washington.

OSINSKI LAW OFFICES, PLLC

By *s/ Thomas T. Osinski, Jr.*
Thomas T. Osinski, Jr., Esq., WSBA #34154
Attorney for Defendants
Jackson, Rockenfield and Wilton