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THE HONORABLE CAROL SCHAPIRA  
KING COUNTY

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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 MICHAEL BEYER

I, Michael Beyer, declare as follows:

1. I was the Tour Manger and Front Of House Sound Mixer for Queensryche during the Operation Mindcrime tour, from August of 1988 to May of 1989. This is my statement of an incident I witnessed:

2. On the night of 11-19-88 at approximately 12:15am a Metallica crewmember came to our tour bus to tell me that Eddie Jackson was very drunk, he was offending the Metallica band members, and I needed to get him out of their dressing room right away.

1           3.     As I walked Eddie back to the bus, he was ranting randomly about wanting to  
2 fight someone.

3           4.     When he got to the top of the bus entry stairs, he said to Geoff Tate, “you’ll  
4 fight me Geoff, cause you got balls!” Geoff Tate told him, “I’m not going to fight you  
5 Eddie.”

6           5.     Eddie seemed to calmly walk down the aisle past Geoff who was sitting and  
7 eating at the front lounge table.

8           6.     Suddenly, as he passed Geoff, Eddie threw a near-perfect roundhouse kick and  
9 hit Geoff squarely on the right side of his jaw.

10          7.     As I and other crew members pulled Eddie away, he again told Geoff, “come on  
11 and fight me, I know you’ve got balls!” Geoff grabbed his jaw, looked at Eddie with his eyes  
12 wide, doing everything he could to restrain himself, and snapped, “I’m not going to fight  
13 you, Eddie!”

14          8.     We got Eddie down on the front lounge couch, and held him there to try and get  
15 him to calm down.

16          9.     After some time, after he seemed to relax, we would let him up, and every time  
17 he would go after Geoff, and start swinging at him. We kept pulling him away from Geoff.

18          10.    We finally had to have crewmember, Alex Raphael, who was a competitive  
19 body builder physically sit on Eddie to restrain him on the couch for approximately 2 hours.  
20 When Alex finally let Eddie up, he went to his bunk and went to sleep.


21          11.    Eddie was remorseful when he got up later that day. He and Geoff had a talk,  
22 made up, and did a show together that night.

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I declare under penalty of perjury of the laws of the State of Washington this 5<sup>th</sup> day of October, 2012 that the foregoing is true and correct.

  
Michael Beyer

4837-2385-9217, v. 1