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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 J. MARK REEVES

I, J. Mark Reeves, declare as follows:

1. I met Geoff Tate in October 2007 at a party he hosted at his home. Over the almost five years since then he has become a dear friend, trusted confidant, and respected advisor. I count him as one of my closest and most respected friends. I find him principled, honorable, loyal, and trustworthy. That opinion is derived from countless personal interactions with Geoff in his home and mine; in his workplace and mine; under stress and calm. I have

1 given him the keys to my car and my house and I have entrusted him with the safety of my
2 children. I would do so again without hesitation.

3 2. I would offer the following specific examples of my personal experience with
4 Geoff to illustrate how I arrived at this opinion of him.

5 3. Geoff's professionalism was demonstrated to me when I watched the work he
6 put in on the research and writing of the *American Soldier* album. Geoff was deeply interested
7 in the stories of active duty servicemen and women. He spoke to my wife about conducting an
8 interview with her father who is a veteran of the Korean War. He also asked me about possible
9 contacts I could help with due to my military connections through my job with the Federal
10 Aviation Administration. Geoff shared many of the stories about his interviews and how
11 important it was to tell their stories. Geoff's commitment to his art was demonstrated later that
12 year when he was working on the final mixing of the album and was facing a critical deadline.
13 He had to submit the master recordings to the record company within days of one of the worst
14 winter storms we experienced while living in Seattle. Geoff's house and driveway were
15 snowed in and they were unable to get their car out to get to the studio to finish the album.
16 Roads in and out of Duvall were treacherous and no one was driving. Geoff's driveway was
17 impassable due to the snow. We offered our car since it had all-wheel drive and could get him
18 back and forth to the studio where his could not. A friend brought him to our house and when
19 he came over I fully expected to see someone completely stressed out and frazzled due to the
20 nature of the issues he was facing with deadlines pending and record contracts hanging in the
21 balance. What I saw instead was a very calm and focused Geoff Tate. He arrived at the house
22 very appreciative of our offer of a car. He used the car for several days and when he returned it
23 was grateful and relieved. I never saw him on the edge nor did I see him lose his temper. He
24 just dealt with the situation.

25 4. I have been invited to Geoff's shows and watched him interact with the band
26 before the show when the group is getting ready to go on stage. Geoff takes a leadership role in

1 these instances as he talks with the other band members to decide on the set list. In all of the
2 instances I observed Geoff took on the leadership responsibilities and the band members' input
3 was always considered and respected. I didn't see anything more hostile than mildly passionate
4 discussion about whether a song was the right tempo or what order the songs should be played
5 but there was never any dictatorial attitude or tone on Geoff's part when it came to those
6 decisions.

7 5. My observation of Geoff's interaction with Scott has only revealed a
8 professional respect and a personal rapport. I watched Scott and Geoff in my home discuss
9 upcoming shows and plans for set lists for those shows. I was party to many close interactions
10 between the Rockenfields and the Tates and my wife and myself. I never sensed any animosity
11 between Geoff and Scott. In fact, I would say that I saw Geoff interact socially more with Scott
12 than any of the other band members. Geoff and Susan were always invited to events with the
13 Rockenfields marking special personal milestones like birthdays. Almost without exception,
14 when we would talk about a night out with the Tates, the Rockenfields were happily included
15 and usually showed up.

16 6. My experience with Geoff's loyalty goes back to an evening in Walla Walla,
17 WA in early December 2010 when we were sharing a house several of us rented for a barrel
18 tasting event at Three Rivers winery where Geoff, Scott, Parker Lundgren, Kelly Gray and
19 Randy Gane were all performing as part of the weekend event.

20 7. After returning from the show, Geoff was in the kitchen with all of the
21 individuals named above and Misty Rockenfield. There was a very animated discussion
22 involving all of them about their frustration with Michael Wilton and his lack of involvement
23 in the writing process for the recent album. There was a lot of frustration and emotion about
24 what Michael was bringing to the band and there were several calls to kick him out of the
25 band. I recall Geoff as the only one who was arguing that "That isn't going to happen". Geoff
26

1 was also frustrated and voiced his concerns but was unwilling to agree to kick Michael out of
2 the band.

3 8. I have seen Geoff in stressful situations with uncertain outcomes and I have
4 watched him deal calmly and confidently with adversity and work through precarious
5 scenarios. In September 2010 I joined him on a sailing trip from Seattle to Port Townsend for
6 the wooden boat festival. On the trip out we experienced engine trouble which jeopardized our
7 trip at the least and our safety at worst. I watched Geoff and Randy Gane work through a
8 diagnosis of the problem and when they disagreed about the problem there were no harsh
9 words or argument over who was right. They evaluated the problem and we called a diesel
10 mechanic who eliminated one of the possible problems which led us to the correct solution to
11 our dilemma. Again, Geoff never became flustered, irrational, out of control, despondent or
12 deflated. He didn't get defensive, authoritarian or unreasonable in the face of a significant
13 problem with potentially dire consequences. He was calm, in control and focused and
14 ultimately got us in to port safely and resolved the problem the next morning. Scott and Misty
15 Rockenfield and their children also came out for the festival. On the return trip to Seattle Geoff
16 invited Scott and his son on the boat for the return. They joined us and I observed everyone
17 having a great time on the way back. Both Scott and his son helped with duties on the sailboat
18 and took turns at the wheel.

19 9. In February 2011 I spent ten days with Geoff in China. He and I took a trip
20 together to see Beijing. He and I spent the entire time together and shared a hotel room. We
21 talked a lot about our jobs and our families. We were thousands of miles from anyone who
22 knew who we were and we were free to speak our minds about any and everything. I talked to
23 Geoff about some personnel issues I was facing at work and asked his opinion. He had ample
24 opportunity to share work related problems with me. In that whole time I never heard Geoff
25 say a negative word about anyone in the band or complain about how things were going. This
26 was near the time he was finishing up the *Dedicated To Chaos* album.

