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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 ALAN MILLER

Under penalty of perjury under the laws of the State of Washington, I, Alan Miller,
declare:

I have worked for the band, Queensryche, off and on (mostly on) since 1999,
primarily in the position of "front of house" sound engineer and additionally, on occasion,
as tour manager and/or production manager. I am currently the sound and production

1 manager for the band. All statements are based on personal observation. Geoff Tate
2 and Susan Tate and their family have always treated me respectfully.

3 Although I was there, I was not witness to the events in Sao Paulo, Brazil,
4 directly. I was already at the “front of house” (the audio mix position located within the
5 audience) in preparation for the start of the show. A main curtain was in use and closed,
6 blocking the view of the stage at that time.

7 I am of the opinion that there is a big difference between a creative force and an
8 oppressive force, and what I have witnessed over the years was that Geoff Tate had
9 become more of an oppressive force. This was worsened by the narcissistic style of
10 running a business as more and more of Geoff Tate’s family members became
11 employed. To quote Kelly Gray (an employee of Queensryche’s in various capacities),
12 who was personally affected by a management decision made by Susan Tate that he
13 disagreed with, he said to me, “I’m tired of the Tate’s making this their own personal
14 Disneyland” (“this” referring to Queensryche). Kelly Gray was expressing his frustration
15 in Susan Tate replacing Geno Bishop (Michael Wilton’s guitar tech) with her son-in-law
16 Chris Zukas (who is married to her daughter, Miranda Tate). The catch was this “one
17 show” was a five day cruise. Some felt the decision was based on Susan Tate favoring
18 Chris and Miranda Tate enabling them the opportunity to go on the cruise. She argued
19 that the decision was based on saving money and that Geno Bishop would not be
20 available. You will have to ask Geno to clarify whether he was, in fact, unavailable.

21 Creative is a relative and speculative thing that in itself does not imply something
22 positive. Geoff Tate’s vision obviously differed greatly from Michael Wilton’s, Eddie
23 Jackson’s and Scott Rockenfield’s, and, for the most part, the established fan base, of
24 what Queensryche should be as a viable product. Their band (that is, Michael Wilton’s,
25 Eddie Jackson’s and Scott Rockenfield’s) had been hijacked and used by Geoff Tate as

1 a vehicle to further his personal goals, family, wine, movies, etc., with seeming
2 disregard for his bandmates, the issue not being the choice of goals, but rather the
3 disregard to his business partners. One might argue that all members of the band had
4 equal opportunity to capitalize on the band's name in other areas that have nothing to
5 do with maintaining the band's viability, but I feel they (i.e., Michael Wilton, Eddie
6 Jackson and Scott Rockenfield) simply chose not to cheapen the Queensryche brand
7 by doing so.

8 Rather than taking a branded product and changing what it represents, why not
9 create a new name for the new and different direction you wish to go artistically? Geoff
10 Tate, in my opinion, should apply a new name to the product he wishes to sell as it
11 differs vastly from Queensryche, and allow Michael Wilton, Eddie Jackson and Scott
12 Rockenfield to continue the established product of Queensryche in a manner true to the
13 core of what it represents.

14 I am not surprised that it has come to this, but rather surprised it took so long. It
15 appears that Michael Wilton, Eddie Jackson and Scott Rockenfield were very patient in
16 trying to resolve their differences with Geoff Tate.

17 Signed this 4th day of July, 2012, at Grayson County, State of Texas.

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Alan Miller