

IN THE CHANCERY COURT OF DAVIDSON COUNTY, TENNESSEE

DARYL HALL, TRUSTEE OF THE DARYL
HALL REVOCABLE TRUST, AND DARYL
HALL, AN INDIVIDUAL,

Plaintiffs,

v.

Case No. 23-1467-IV

AIMEE J. OATES AND RICHARD FLYNN, CO-
TRUSTEES OF THE JOHN W. OATES TISA
TRUST, AND JOHN W. OATES, AN
INDIVIDUAL,

Defendants.

DECLARATION OF JOHN OATES

I, John Oates, hereby declare as follows:

1. I am tremendously disappointed that Daryl Hall decided to file his declaration from our private arbitration in this proceeding and make inflammatory, outlandish, and inaccurate statements about me.

2. I am disappointed that he decided to publicize issues that are the subject of our private mediation and private arbitration.

3. Far from becoming “adversarial and aggressive instead of professional and courteous,” as Daryl has claimed, over the last fifty years I have always devoted my energy to ensuring that both the public and the music industry perceive the Hall & Oates music and brand in the most positive light.

4. Unfortunately, during the course of our ongoing legal negotiations, there have been multiple instances where Daryl and I have not seen eye to eye. I nonetheless

have tried my best to present opportunities to improve and protect the business and artistic integrity of the partnership.

5. In fact, Daryl has become unwilling to work with me to try to protect the marks and other intellectual property that we spent decades building.

6. I am very aware of the importance and reverence that our fans and the world have for the music that Daryl and I have made together. That is why I have been working hard to protect the value of our intellectual property—to allow music lovers around the world to continue to enjoy the music of Hall & Oates.

7. I have no idea who or what is motivating Daryl to take these steps and make such salacious statements, but I am deeply hurt.

8. Over the years, Daryl has consistently and publicly been adamant about being perceived as an individual rather than as part of a duo or group. Thus, he has insisted on our being known as “Daryl Hall and John Oates,” rather than the more commonly known “Hall & Oates.” On this point I agree. I now must act with truthfulness and make decisions that are right for myself, my family, and my artistic future.

9. Putting aside my disappointment, I cannot address the specific issues that Daryl raises in his declaration without violating my own obligation to keep private matters that he and I agreed to keep private.

10. Committing myself to confidentiality prohibits me from being able to discuss publicly the truth, but that is the agreement that I made. I can only say that Daryl’s accusations that I breached our agreement, went “behind” his back, “acted in bad faith,” and the like, are not true.

11. I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 29, 2023 in Nashville, Tennessee.



John Oates