

Venue Affiliates. Artist's personnel attempted to incorporate security measures that they felt were necessary to preserve the safety not only of the Tour personnel, but also of the guests and patrons in attendance at the Manchester Concert. The Artist team requested the use of metal detectors and wands, canines, as well as mandatory searches of all customers entering the Venue. The Venue Affiliates would not agree to the wholesale implementation of these measures. Instead, the Venue Affiliates insisted on implementing a security protocol known as "dynamic risk assessment" (i.e. the practice of mentally observing, assessing and analyzing an environment while working, to identify and remove risk. The process allows individuals to identify a hazard on the spot and make quick decisions in regard to safety). The Venue Affiliates agreed to the following security procedures as their implementation of dynamic risk assessment protocol: (a) pat downs of all patrons (and if a bottleneck situation was created, then the Venue Affiliates' security personnel would switch random pat-downs), (b) checking all bags, (c) requiring large bags to be searched and held at the customer services desk, and (d) prohibiting re-entry upon exit. Showsec personnel were responsible for determining which patrons should be subjected to such pat-downs, and which bags were considered to fall within the "large bag" category. Artist's security personnel also requested police staffing at the Venue. The Venue Affiliates rejected this request.

3. As mentioned above, the Venue Affiliates would not accommodate all of the security measures requested by the Artist team. For instance, attached hereto as Exhibit A is a May 5, 2017 email from Mr. Rik Weightman's (Live Nation's UK representative) to Mr. Fontenot¹ in response to requests from Artist's production team for additional security measures at the Venue in addition to the Venue Affiliates' implementation of the dynamic risk assessment protocol. Mr. Weightman stated that customer searches with magnetic wands were not standard in some of the venues within the United Kingdom. In response to this email, Mr. Fontenot had further telephone conversations with the Venue Affiliates to insist on obtaining the magnetic wands, regardless of the cost. However, the Venue Affiliates denied the request, and pat down searches were instead implemented by the Venue Affiliates.

¹ [INQ020175]