

DECLARATION OF LOUISE CROOKS

I, Louise Crooks, hereby declare:

1. I am over 18 years of age and, except as otherwise stated, have personal knowledge of the facts stated below.

2. I am currently employed by Ashley Furniture Industries, LLC (“Ashley”) as the Vice President for Information Technology, Global Data and AI. In my role, I am able to access and query pricing and inventory data for the products available on [ashleyfurniture.com](https://www.ashleyfurniture.com). Those exact data points change frequently due to changes in the availability of products as well as seasonal promotions and sales.

3. I understand that the class action settlement in this matter involves a *pro rata* voucher fund that, based on information currently available to me, will provide participating class members with a voucher redeemable at [ashleyfurniture.com](https://www.ashleyfurniture.com) in the amount of approximately \$60 to \$65. I was asked to query Ashley’s internal inventory data to determine the number of products available at that price point as of July 31, 2026.

4. For example, as of July 31, 2026 (which is not even a promotional season for Ashley), there were 5,921 in-stock product items available on [ashleyfurniture.com](https://www.ashleyfurniture.com) that were priced at \$60 or below. These items include a range of home goods and furnishings encompassing, among many other things, desks, bookcases, home décor items, rugs, sheets, mattress protectors, and pillows. A list of those products is attached as **Exhibit A**.

5. In sum, customers may choose from thousands of products that are available on [ashleyfurniture.com](https://www.ashleyfurniture.com) at or below the anticipated voucher amount.

6. Resident Home’s Nectar, DreamCloud, and Siena mattresses are also available on Ashley’s website, due to the acquisition of Resident Home by an affiliated Ashley entity in March

2024. Those products are also available at nectarsleep.com, dreamcloudsleep.com, and sienasleep.com (where the vouchers may also be redeemed). Because Resident Home's business has focused on mattresses, whereas Ashley is a home furnishing retailer, there is a wider variety of products available on Ashley's website.

7. Class members will also be able to use the vouchers, if they so choose, to receive a discount on products that are priced above the voucher amount.

8. David King, Chief Technology Officer for Ashley Digital (which encompasses Ashley and Resident Home's websites) has confirmed that the vouchers that will be made available to participating class members can be used in combination with other site-wide discounts offered directly by Ashley and Resident Home on their websites to the general public, provided that the transaction and/or customer otherwise qualifies for the generally available promotion.

9. As is typical in Ashley's online transactions, class members will not be required to present their voucher until they are prompted to enter their payment method when completing their transaction.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 18th day of August 2026.


Louise Crooks