

# Attachment 2

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EDWARD BENNETT WILLIAMS (1920-1988)  
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March 6, 2026

**VIA COURIER**

The Attorney General of the United States  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

**VIA CERTIFIED MAIL OR EMAIL**

State Attorneys General  
(identified on the attached distribution list) via certified mail or email

**Re: *Todd v. Ashley Furniture Industries, LLC, et al.*, Case No. 3:24-cv-00615-wmc  
(W.D. Wis.); Proposed Settlement of Class Action**

Dear Sir/Madam:

I write on behalf of Ashley Furniture Industries, LLC, Ashley Global Retail, LLC, and Resident Home LLC (collectively, “Defendants”) regarding the above-referenced action currently pending in the United States District Court for the Western District of Wisconsin (“the Action”). Pursuant to 28 U.S.C. § 1715, Defendants hereby provide notice that a motion for preliminary approval of a settlement between Defendants and a putative class of customers was filed on February 25, 2026.

The proposed class consists of:

All individual end consumers who purchased an Affected Mattress in the United States from October 1, 2017 to June 30, 2024, which was designed, manufactured, produced, distributed, sold, or marketed by Defendants and contained fiberglass as a fire-retardant material in the inner sock of the mattress.

Excluded from the Class are: (1) the Judges presiding over the Action, and members of their immediate families; and (2) Defendants, their subsidiaries, parent companies, successors, predecessors, any entity in which the Defendants or their parents have a controlling interest, and their current or former officers and directors.

Enclosed please find copies of:

WILLIAMS & CONNOLLY<sup>LLP</sup>

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1. 28 U.S.C. § 1715(b)(1): Complaints. Plaintiffs' First Amended Complaint, filed September 10, 2025, is enclosed. (Attachment 1). As is Plaintiffs' Original Class Action Complaint. (Attachment 2).
2. 28 U.S.C. § 1715(b)(2): Notice of Scheduled Judicial Hearings. As of March 6, 2026, a hearing with respect to Plaintiffs' motion for preliminary approval of the settlement in *Todd v. Ashley Furniture Industries, LLC, et al.*, Case No. 3:24-cv-00615-wmc (W.D. Wis.), ECF 64, has not yet been scheduled.
3. 28 U.S.C. § 1715(b)(3): Proposed Notifications to Class Members. Counsel for the Plaintiffs has filed the enclosed proposed notice plan on the above-referenced docket at 3:24-cv-00615-wmc (W.D. Wis.), ECF 69, ¶¶ 24-43. (Attachment 3)
4. 28 U.S.C. § 1715(b)(4)–(5): Proposed Settlement. Plaintiffs' motion for preliminary approval and the proposed settlement is enclosed. (Attachment 4).
5. 28 U.S.C. § 1715(b)(5): Contemporaneous Agreements. None.
6. 28 U.S.C. § 1715(b)(6): Final Judgment or Dismissal. As of March 6, 2026, no final judgment or notice of dismissal has been entered with respect to Plaintiffs' claims against Defendants.
7. 28 U.S.C. § 1715(b)(7): Class Members and Proportionate Share. Counsel for the proposed class have not, to date, identified any data as to the number of class members residing in each state or the estimated proportionate share of the claims of such members to the settlement.
8. 28 U.S.C. § 1715(b)(8): Judicial Opinions. There is no written judicial opinion issued in this action relating to the materials described in 28 U.S.C. § 1715(b)(3)–(6).

Sincerely,

/s/ Edward C. Barnidge

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