

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

Jamie Todd, et al.,	)	
	)	
<i>Plaintiffs,</i>	)	
	)	
v.	)	Case No.: 3:24-cv-615-wmc
	)	
Ashley Furniture Industries, LLC, et al.,	)	
	)	
<i>Defendants.</i>	)	

DECLARATION OF DANIEL B. SNYDER

I, Daniel B. Snyder, declare as follows:

1. I am over the age of eighteen (18) years, am competent to make this declaration, and make this declaration based on my personal knowledge.

2. I am an attorney duly licensed to practice law in the State of Wisconsin, and I am an attorney with the Environmental Litigation Group P.C. (“the Firm”), counsel of record for Plaintiffs in the above-captioned matter. I have practiced law for more than 15 years. My practice includes significant experience with complex and class action litigation, including consumer protection, employment, commercial, environmental exposure, and civil rights matters.

3. I am familiar with the time, labor, and resources required to litigate complex and class action matters of this nature, including the specialized skill and experience necessary to prosecute claims of this type through settlement or trial.

4. The Firm is a boutique toxic tort and environmental litigation firm founded in 1990 in Birmingham, Alabama, with more than 35 years of experience representing individuals, families, and communities harmed by exposure to asbestos, ethylene oxide, PFAS/AFFF, paraquat, and other hazardous substances in occupational and environmental settings. The Firm's practice areas include mass tort and class action litigation, personal injury, products liability, veterans' toxic

exposure claims, and environmental toxic tort matters nationwide, and the Firm and its attorneys have collectively recovered more than \$3 billion in compensation on behalf of injured workers, veterans, and their families. A copy of the Firm's resume, describing its relevant experience and qualifications, is attached hereto as Attachment A.

5. The timekeepers whose hours are included in the Firm's lodestar submission, and their relevant experience, tenure, and roles, are described below:

- a. Kevin McKie is an attorney with the Firm who received his Bachelor's degree from Auburn University in 2001 and his Juris Doctor from the University of Alabama School of Law in 2005, and who has practiced law for over 20 years. He is admitted to practice in Alabama and Illinois, as well as before the U.S. Court of Federal Claims. His work for the Firm focuses on complex environmental toxic tort litigation, including community and individual exposure cases.
- b. Gary Anderson is a toxic tort and complex litigation attorney with the Firm who possesses over 15 years of experience in the field. He earned his Juris Doctor and Masters of Business Administration from Samford University's Cumberland School of Law in 2010 and his undergrad from Auburn University. His work for the Firm focuses on toxic exposure litigation, Multidistrict Litigation work, class actions, community exposure cases, and CERCLA claims. He currently oversees the firm's PFAS personal injury docket, numerous EtO litigations, wood pellet emissions cases, MDL work, and a variety of other toxic torts.
- c. Daniel Snyder is class action and complex litigation attorney with the Firm who graduated Magna Cum Laude from the University of Alabama School of Law in 2010. He completed a federal judicial clerkship before joining the Firm and has developed significant experience in complex and class action litigation. His work for the Firm includes prosecuting mass tort and class claims on behalf of individuals harmed by toxic exposure, and has prior experience service as class counsel for national class actions.
- d. Jordan Cade is an attorney with the Firm who earned his law degree from Michigan State University College of Law in 2022, where he specialized in Environmental Health. His work for the Firm focuses on environmental exposure litigation, including ethylene oxide and

other toxic tort matters, and he has worked on personal injury, product liability, and civil rights matters as well.

- e. Heather Garrett is a litigation paralegal with the Firm who holds an associate's degree in paralegal studies. Over the past twenty years, she has worked in many areas of the legal field, including personal injury, domestic relations, criminal appellate litigation, and civil rights matters. Her work for the Firm primarily focuses on environmental exposure litigation, including ethylene oxide and product liability matters where she manages the preparation and filing of pleadings and case documents, coordinates plaintiff discovery, and maintains client tracking systems throughout the litigation process.

6. The Firm devoted significant hours to the investigation, litigation, and resolution of this matter, which is included within the total of hours reflected in Class Counsel's combined lodestar submission.

7. I have reviewed the time records submitted by the Firm in connection with this litigation and confirm that those records were kept using the Firm's contemporaneous timekeeping practices.

8. I have also reviewed the summary of hours and task descriptions organized by category and submitted as part of D.G. Pantazis' declaration, and I confirm that those categories and descriptions fairly and accurately reflect the nature of the work performed by my Firm and by Class Counsel generally.

9. Among other tasks, my Firm's work in this litigation included: factual investigation, pleadings, discovery, motion practice, and mediation/settlement negotiations, consistent with the time entries and category summaries referenced above.

10. My Firm engaged with over 4,000 clients to gather data and details regarding problems associated with fiberglass in the subject mattresses. When the Firm began this process, Ashley and Nectar were separately owned, which required investigations into two different client

groups, independent analysis of separate entities and mattress brands, and the involvement of separate sets of defense counsel. The Firm did not learn of Ashley's acquisition of Nectar until the spring of 2024, only a few months before the complaint was filed.

11. My Firm also incurred expenses in connection with this matter, which are reflected in the itemized expense report submitted with D.G. Pantazis' declaration. I have reviewed that itemization and confirm that the expenses attributable to my Firm were reasonably and necessarily incurred in the prosecution of this matter.

12. Were the Firm to bill on an hourly basis for this type of work, the Firm's blended billing structure would be as follows: Partner Level Experience (8+ years) at \$1,000/hr, Associate Level Experience (1-9 years) at \$700/hr, Paralegals at \$250/hr.

13. Clients in matters of this type are typically unable to afford hourly billing arrangements and instead retain my Firm on a contingent-fee basis, generally ranging from 33% to 50% of any recovery, depending on the complexity, risk, and expected duration of the litigation. The engagement in this matter was consistent with that practice.

14. I agree that the hourly rates used in Class Counsel's fee application are consistent with the prevailing market rates charged by attorneys and legal professionals of comparable experience and skill for similar litigation in the Seventh Circuit.

15. Class Counsel provided real value and relief to the Class through the settlement and allocated vouchers. Moreover, Defendants ceased manufacturing and selling mattresses containing fiberglass as a result of this litigation.

16. The result achieved for the Class is fair, reasonable, and adequate, and is attributable to the work performed by Class Counsel. Absent the time, effort, and resources

devoted by Class Counsel—necessarily to the exclusion of other compensable work—the Class would not have achieved this outcome.

17. For these reasons, I believe that Class Counsel's request for an award of attorneys' fees and reimbursement of expenses is fair and reasonable and should be approved by the Court.

18. I am also aware that the Class Representatives devoted substantial time and effort to the prosecution of this action on behalf of the Class, including participation in discovery, communications with counsel, and review of settlement terms. Their willingness to serve in this representative capacity benefited the Class as a whole, and I believe their requested case contribution awards are warranted.

19. My Firm, together with co-counsel, respectfully requests an award of attorneys' fees and reimbursement of expenses from the Settlement Fund in the total amount of \$3,000,000.00, and further requests that the Court approve case contribution awards to the Class Representatives in the amounts set forth in the application to the Court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: August 17, 2026

s/ Daniel B. Snyder

Daniel B. Snyder
Environmental Litigation Group P.C.

ATTACHMENT A

ENVIRONMENTAL LITIGATION GROUP, P.C.

Environmental Litigation Group, P.C. (“ELG”) is a litigation firm with a nationwide practice, headquartered in Birmingham, Alabama. Founded in 1990, ELG concentrates on complex, aggregate, and class litigation arising from toxic exposure, defective and hazardous consumer products, environmental contamination, and related consumer protection claims. Over more than three decades the firm has represented in excess of 25,000 clients residing in all fifty states and has recovered more than \$3 billion on their behalf. ELG has resolved claims on an individual, mass, and class-wide basis, and its attorneys have served as court-appointed Class Counsel in nationwide consumer class litigation.

The firm has brought claims against national and multinational defendants across the manufacturing, chemical, pharmaceutical, retail, energy, and consumer products sectors.

FOCUS AND SPECIALIZATION

- Prosecution of class actions under Rule 23, including claims for design defect, failure to warn, negligence, breach of express and implied warranty, unjust enrichment, and violations of state consumer protection statutes.
- Participation in federal multidistrict litigation, including case workup, common-benefit discovery, science and causation development, and resolution of aggregate inventories.
- Comprehensive case evaluation, scientific analysis, case development, management, and litigation of complex environmental cases, specializing in public health, personal injury, property damage, and compliance.
- Mass tort case evaluation, inventory management, and resolution.
- Actions under the Comprehensive Environmental Response, Compensation, and Liability Act (“CERCLA”), “Superfund” designations, and analogous state law.
- Administrative and judicial enforcement actions; development of EPA-compliant regulatory policies and coordination with regulatory bodies in the enforcement of environmental policy.
- Claims programs and statutory compensation regimes, including the Camp Lejeune Justice Act.

REPRESENTATIVE CASES

Forward Momentum, LLC v. Team Health, Inc., 2022 U.S. Dist. LEXIS 158923. Daniel Snyder, prior to joining ELG, was appointed Class Counsel and reached a class-wide settlement on behalf of emergency department physicians nationwide providing over 15 million dollars in relief.

In re Aqueous Film-Forming Foams Products Liability Litigation, MDL No. 2873 (D.S.C.) (Gergel, J.). ELG was appointed to the Plaintiffs’ Executive Committee and various subcommittees as part of Plaintiffs’ MDL leadership and represents water systems as well as firefighters, military and civilian personnel, and residents of contaminated communities asserting personal injury and property claims arising from exposure to PFAS compounds in aqueous film-forming foam.

In re Hair Relaxer Marketing, Sales Practices, and Products Liability Litigation, MDL No. 3060 (N.D. Ill.) (Rowland, J.). ELG was appointed to the Plaintiffs' Steering Committee as part of Plaintiffs' MDL leadership and represents women alleging uterine, ovarian, and endometrial cancers caused by chemical hair straightening products.

In re Insulin Pricing Litigation, MDL No. 3080 (D.N.J.) (Martinotti, J.). ELG was appointed to the Steering Committee for the Self-Funded Payer Track in coordinated proceedings alleging that insulin manufacturers and pharmacy benefit managers unlawfully inflated the price of insulin over two decades.

In re Camp Lejeune Water Litigation, No. 7:23-cv-897 (E.D.N.C.). ELG represents veterans, family members, and civilian workers exposed to contaminated water at Marine Corps Base Camp Lejeune between August 1, 1953 and December 31, 1987, asserting claims under the Camp Lejeune Justice Act. [ROLE / CLIENT COUNT / STATUS.]

Community Exposure Litigation against Drummond Company, Inc.—North Birmingham, AL (numerous individual lawsuits in Jefferson County, AL). ELG represented numerous community members exposed to contaminants in North Birmingham, Alabama, and obtained a substantial settlement.

Community Exposure Litigation against Cerro Flow Products, Inc., et al.—East Saint Louis, IL (numerous individual lawsuits in St. Clair County, IL). ELG represented numerous community members exposed to contaminants in East Saint Louis, Illinois, and obtained a substantial settlement.

FIRM HISTORY

ELG was founded in Birmingham, Alabama almost four decades ago by Bill Lewis, who left an established tax practice to build a firm devoted to industrial toxic exposure claims after his father died of a disease caused by toxic exposure. The firm began with approximately fifty clients and represented more than 8,000 within four years. Gregory A. Cade joined the firm in 1992 as a paralegal while completing his Master of Public Health in Occupational Health, Safety, and Industrial Hygiene at the University of Alabama at Birmingham, and later earned his Juris Doctor. As the practice matured it expanded beyond asbestos into CERCLA, PCB, dioxin, and community exposure litigation, and subsequently into PFAS, ethylene oxide, paraquat, pharmaceutical mass torts, and class litigation nationwide.