

**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>	)	

**CLASS COUNSEL’S MOTION FOR ATTORNEY’S FEES,
EXPENSES, AND CASE CONTRIBUTION AWARDS**

COME NOW, the Class Representatives and Class Counsel and hereby move the Court to approve attorneys’ fees to Class Counsel in the amount of \$2,860,926.18, reimbursement of \$139,073.82 in litigation costs, and case contribution awards totaling \$85,000.00. In support of this request, Class Counsel states as follows:

1. In support of this Motion, Class Representatives and Class Counsel submit herewith their Memorandum of Law in Support of Class Counsel’s Motion for Attorney’s Fees, Expenses, and Case Contribution Awards, along with the following exhibits (and their respective attachments):

- **Exhibit 1:** Declaration of Daniel B. Snyder
- **Exhibit 2:** Declaration of D. G. Pantazis, Jr.
- **Exhibit 3:** Declaration of Christopher Cueto and Lloyd M. Cueto
- **Exhibit 4:** Declaration of Anya Verkhovskaya
- **Exhibit 5:** Declaration of Robert M. Foote

2. The requested distributions are appropriate and reasonable in comparison to awards in similar cases. The record provides ample support for the requests as Class Counsel has provided

documentation of the work performed to reach this Settlement, including its lodestar. Class Counsel's requested fees and costs are consistent with the amount typically awarded and reimbursed in complex, long-running consumer cases such as this one. Likewise, the proposed case contribution awards for the Class Representatives are authorized under the Settlement Agreement and are well within the bounds of what has been approved in other litigation. Accordingly, Class Representatives and Counsel respectfully request that the Court approve the requested distributions.

3. For these reasons, as well as those set forth in the supporting materials submitted herewith, Class Representatives and Class Counsel respectfully request that the Court grant their Motion to approve the requested attorneys' fees, expenses, and case contribution awards.

Respectfully submitted,

/s/ D. G. Pantazis, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2026, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will serve a Notice of Electronic Filing generated by CM/ECF on all counsel of record.

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