

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>	)	

PLAINTIFFS’ MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

COME NOW, the Class Representatives and Class Counsel and hereby move this Court for an Order finally approving the Class Settlement (the “Settlement Agreement”) of the Plaintiffs’ Claims against Ashley Furniture Industries, LLC, Ashley Global Retail, LLC and Resident Home LLC (collectively “Defendants”) and certifying the Settlement Class for settlement purposes only.

The Class Representatives seek final approval of their Class and Settlement Agreement. The Class and other terms of the Settlement Agreement were agreed upon after intense litigation and arm’s-length negotiations with the assistance of a respected mediator.

The Settlement Agreement is fair, reasonable, adequate, and likely to warrant Final Approval under the Seventh Circuit’s long standing class settlement fairness factors as well as the requirements of Fed. R. Civ. P. 23(e). Moreover, the Settlement Class satisfies and is certifiable under Fed. R. Civ. P. 23(a) and (b)(3).

In support of this Motion, the Class Representatives and Class Counsel submit herewith their Memorandum of Law in Support of Plaintiffs’ Motion for Final Approval of Class Action Settlement.

After the Court conducts its Final Approval Hearing on September 24, 2026, for these reasons, as well as those set forth in the supporting materials submitted herewith, the Class

Representatives and Class Counsel respectfully request that the Court finally approve the Settlement pursuant to Federal Rule of Civil Procedure 23(e) and enter the proposed Final Approval Order previously provided and attached to Plaintiffs' Memorandum in Support of Motion for Final Approval of Class Action Settlement as **Exhibit 1**.

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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