

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

In Re: )  
 ) Case No. 307-09024  
SOFA EXPRESS, INC., ) Chapter 11  
 ) Hon. George C. Paine  
Debtor. )

**DECLARATION OF KENNETH SCOTT PASQUITH  
IN SUPPORT OF THE UNSECURED CREDITORS' COMMITTEE'S  
THIRTY-EIGHTH OMNIBUS OBJECTION TO CLAIMS – EMPLOYEE WAGE OR  
BENEFIT CLAIMS**

I, **Kenneth Scott Pasquith**, hereby declare under penalty of perjury that the following statements are true to the best of my knowledge, information and belief:

1. I am the Chief Financial Officer (“CFO”) of Sofa Express, Inc. (the “Debtor”). I have been the CFO since July 2003, which is when I was hired by the Debtor. I have held no other positions with the Debtor.

2. I helped prepare the Debtor’s Schedules, filed in the above-captioned case. At the time the Debtor filed its bankruptcy case, certain prepetition wages, salaries and other compensation were due and owing to employees. Pursuant to the Order (A) Authorizing, but not Directing, the Debtor to Pay Certain PrePetition (I) Wages, Salaries, Bonuses and other Compensation, (II) Reimbursable Employee Expenses and (III) Employee Medical and Similar Benefits and (B) Authorizing and Directing Banks and other Financial Institutions to Honor all Related Checks and Electronic Payment Requests (the “Order”) [Docket No. 69], the Debtor was authorized to pay those prepetition wages, salaries and other compensation pursuant to said Order. Those payments were made in two pay groups – hourly and salaried/commissioned. At the time of bankruptcy filing, the Debtor owed the salaried/commissioned group for a two (2)

week pay period plus three (3) days. For hourly employees, the Debtor owed for four (4) days. All amounts were paid on the normal payment schedule after the Order was entered.

3. I have reviewed the Unsecured Creditors' Committee's Thirty-Eighth Omnibus Objection to Claims – Employee Wage or Benefit Claims (“Objection”) and Exhibit A attached thereto.

4. I verify that the facts stated in the Objection and Exhibit A are true and correct to best of my knowledge, information and belief.

5. I further verify that the grounds for the objections to Claims as stated in the Objection and Exhibit A are sound and based on information known to the Debtor as of the filing of the Objection.

/s/ Kenneth Scott Pasquith  
Kenneth Scott Pasquith