

HAINES LAW GROUP, APC

Paul K. Haines (SBN 248226)
phaines@haineslawgroup.com
Fletcher W. Schmidt (SBN 286462)
fschmidt@haineslawgroup.com
Andrew J. Rowbotham (SBN 301367)
arowbotham@haineslawgroup.com
2155 Campus Drive, Suite 180
El Segundo, California 90245
Tel: (424) 292-2350
Fax: (424) 292-2355
Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

HEATHER-ANN MONTERO, as an
individual and on behalf of all others similarly
situated,

Plaintiff,

vs.

BISCO INDUSTRIES, INC., an Illinois
corporation; and DOES 1 through 100,
inclusive

Defendants.

Case No. 23STCV00918

*[Case Assigned for all purposes to the Hon.
William F. Highberger; Dept. SSC-10]*

**DECLARATION OF RANDY SALAS
REGARDING NOTICE OF CLASS
ACTION SETTLEMENT**

Action Filed: January 13, 2023
Trial Date: None Set

[illegible]

I, Randy Salas, declare as follows:

1. I am an individual over the age of 18. I have personal knowledge of the facts stated
declaration and could testify competently to them if called upon to do so.

2. I was originally hired by Bisco Industries, Inc. (“Bisco”) to work as an Intern at the Anaheim, California location in the summer of 2022. I returned to work at Bisco in 2023 as a Salesperson, for approximately one year.

3. Although I did not originally receive notice of this class action settlement in the [redacted], after contacting the attorneys representing the employees of Bisco, I was told that I am a member of the Settlement Class and I have been provided with a copy of my notice packet. The attorneys have answered all my questions regarding this settlement. I would like to participate in the settlement and I have no objections to the settlement. I do not want to opt-out.

I declare under penalty of perjury under the laws of the state of California and the United States of America that the foregoing is true and correct. Executed on June 7, 2025, in Anaheim, California.

Randy Salas