

EXHIBIT 6

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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SCOTT SMITH, <i>et al.</i> ,)	
)	
Plaintiffs,)	
v.)	Case No. 1:21-cv-10654-DJC
)	
CHELMSFORD GROUP, LLC, <i>et al.</i> ,)	
)	
Defendants.)	
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DECLARATION OF BRIAN J. O'DONNELL

I, Brian J. O'Donnell, state that the following facts are true and accurate, based on my personal knowledge, and that I am competent to testify to the truth and accuracy of the same:

1. I have been a member in good standing of the Bar of the Commonwealth since 2018, membership which I obtained following my studies at Boston University School of Law, where I obtained my *juris doctor* degree in 2018.

2. Prior to my employment at the Northeast Justice Center, I served as an attorney at South Coastal Counties Legal Services pursuant to an AmeriCorps Fellowship.

3. Between September of 2019 and August of 2022, I served as a Staff Attorney of the Northeast Justice Center, a civil legal aid organization primarily serving Essex and Northern Middlesex Counties.

4. As a Northeast Justice Center Staff Attorney, I worked as lead counsel for Scott Smith in the above-captioned action from its commencement until March of 2022 and in the related matter docketed at 21-CV-10522-DJC from its commencement until its conclusion.

5. I left the employ of the Northeast Justice Center in August of 2022 but have continued to serve as counsel for Mr. Smith and the putative classes he seeks to represent on a volunteer basis through the Justice Center.

6. During the course of this litigation, I maintained time records in the normal course of my duties as a Staff Attorney of the Northeast Justice Center, records which I kept in good faith and which I created both routinely as well as contemporaneously with the conduct described in each record – or within a reasonable time thereafter (“Time Records”).

7. Upon review of the Time Records corresponding to the above-captioned and the related matter, I have determined that I spent more than 300 hours on tasks which benefitted Mr. Smith and the classes he seeks to represent, a number which I expect to increase by the conclusion of this litigation.

I affirm that the foregoing is true and accurate, to the best of my personal knowledge, and do so under the pains and penalties of perjury. Executed this 11th day of September, 2022.

/s/Brian J. O'Donnell
Brian J. O'Donnell