

Exhibit 6

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UPSOLVE, INC., *et al.*,

Plaintiffs,

-v-

Case No. _____

LETITIA JAMES, Attorney General of New
York,

Defendant.

DECLARATION OF LIZ JURADO

1. My name is Liz Jurado. I am over the age of twenty-one and competent to testify to the matters set forth in this Declaration. Unless otherwise indicated, the facts stated herein are based on my personal knowledge or upon my review of documents to which I have access.

BACKGROUND

2. I was born in Puerto Rico, where I lived until I was four years old. I speak fluent Spanish, as well as English.

3. I currently live in Bay Shore, Long Island, where I have lived for the past twenty-two years. My husband and I have four children.

4. I work for DoorDash, Inc., a technology and logistics company that provides door-to-door delivery of food and other goods. I started as a Dasher Support Labs Agent in June 2019, and my job was to answer questions and resolve issues for the Dashers. I was a top performer and was asked to work with the expansion of DoorDash in Puerto Rico. In November 2021, I was promoted to Trust and Reactive Safety Representative, where I conduct investigations into safety and injury incidents concerning the Dashers.

MY EXPERIENCE WITH DEBT AND THE LEGAL SYSTEM

5. I have experienced first-hand the shortcomings of the legal system when it comes to debt collection. My inability to understand and access my rights has caused me substantial stress and anxiety and, at times, has put mine and my family's financial security at risk and risked causing substantial long-term damage to my credit.

6. Specifically, I had one experience with a debt-collection lawsuit for a surprise medical bill relating to childbirth that I did not have the knowledge or support to adequately fight. I received no legal support or assistance in connection with the debt-collection lawsuit, as I was not even notified that I was being sued at the time. As a result, I did not respond, and my anesthesiologist got a default judgment against me.

7. While I was eventually able to find resources on my own to help me figure out how to get that surprise medical bill discharged in bankruptcy, I remain nervous about the possibility of facing another debt-collection lawsuit in the future and wish there were free help available to help me and other people like me learn more about what our rights are.

8. Prior to working at DoorDash, I was primarily a stay-at-home mom. My husband was the primary breadwinner for the household and he supported the children and me, while I focused on taking care of him and our four kids.

9. During this time, we had some credit card debt, student loans, and medical bills, and a car loan. I've received countless harassing calls from debt collectors; they've even called my neighbors. But we were responsible and hardworking and did everything we could to make payments on any debt we owed.

10. Everything changed when my husband lost his job in 2016. He was a manager for twenty years and it is not his fault he got laid off. It had been a dream of mine for a while that my husband would be able to retire because he has done so much for our family over the years. But when my husband lost his job unexpectedly, it was scary to suddenly be the sole breadwinner responsible for making ends meet in my family.

11. To help make ends meet for our family, I got a job managing an office in Bohemia, Long Island, but the pay was not enough to keep up with our expenses. I then started working as a Dasher for DoorDash to earn extra money as an independent contractor to try to make ends meet.

12. Things were okay at first financially, but then they got really rough. We could not afford to pay the whole electric and gas bills and started making small payments, just to pay something. We almost lost our house (which is in my husband's name) to foreclosure because we could not afford the monthly mortgage payment. I had to apply for food stamps, which we really needed. It was a really stressful and scary time, and I hated not being able to provide for my kids.

13. When DoorDash offered me a full-time job with a salary and benefits in 2019, I jumped on it. I was so relieved and happy to finally have a really good job that would allow me to provide for my kids and take care of my husband

14. Just when things were starting to go well again, and three months after I started my new, salaried job at DoorDash in 2019, I received a letter from the Suffolk County Sheriff's Office

saying that they had a judgment against me from 2010 for \$12,774. The letter said that if I did not pay the whole amount due, they were going to garnish my wages.

15. I was completely shocked and scared. I had absolutely no idea what was going on or why the Sheriff's Office was coming after me just as I was getting back on my feet, as I was not aware of any outstanding debt I owed in that amount and I was not aware of having lost any lawsuit.

16. I considered hiring a lawyer to help me deal with this debt but I could not afford a lawyer. I also did not know of any resources that would provide me with legal assistance for free.

17. After I received the letter from the Sheriff's Office, I looked at the papers on my own, and I was able to figure out that back in 2010, after I gave birth to my youngest children, my anesthesiologist, Suffolk Anesthesiology, apparently sued me for thousands of dollars for a surprise medical bill related to getting epidural anesthesia during childbirth. I could not figure out if the medical bill was from 2007 or 2008, as I delivered a child in each of those years and needed an epidural for each birth to manage the labor pains. Everything was otherwise the same for each birth—my doctors, my insurance, my hospital—and I believed that the epidural was covered as a basic part of childbirth. But I got a bill and lawsuit against me for one of the births and not the other. No one at the hospital told me to expect a bill for the epidural anesthesia, a procedure that I know so many women get while giving birth. As far as I know, I never got a letter from the anesthesiologists, or a bill, or even a phone call. It felt so confusing and wrong.

18. The first time I heard about the debt was in 2019, when I received the letter threatening to garnish my wages because of the default judgment against me.

19. I have had the same home address for twenty-two years. My youngest kids are now 13 and 14. I was floored that unknown costs from their births were now coming back to haunt me.

As far as I know, no one from Suffolk Anesthesiology or the court ever communicated anything to me at all about this lawsuit. Even if I had learned about the lawsuit, I would not have known how to respond.

20. When I got the wage garnishment letter, I was so upset because I was caught completely off-guard. I didn't know what to do, but I knew that having my wages garnished would have severe effects for myself and my family. I was incredibly worried because even with my new job, we were living paycheck-to-paycheck and my salary was never quite enough. We were still getting food stamps.

21. The challenges caused by not understanding the legal system and having my wages garnished are especially difficult for me because I have a child with special needs, and have an auto-immune condition myself. If my wages were garnished, I would not be able to pay for our house, clothes and shoes for the kids, the cell phone bill, the electric and gas, the car, extra food, and I certainly wouldn't be able to save anything for my family's future. I am also concerned that unknown bills like this one could harm my credit.

22. What's worse is that all of these very harmful consequences could happen without me understanding my rights or how to fight the debt-collection action against me. The whole thing felt so unfair. I felt like I was being bullied with a bill that I had no knowledge of, or means of fixing it, until it was too late. I was facing permanent, life-altering consequences for something that I didn't even know how to do anything about.

23. I did not receive any legal advice in connection with this threat of wage garnishment.

24. I ultimately decided to file for Chapter 7 bankruptcy in November 2019, largely due to the judgment from the surprise medical bill. I was so grateful to find Upsolve to empower

me to file bankruptcy on my own because I could not afford the fees for a lawyer. I had my hearing in December 2019 and the court discharged my debts—which included the surprise anesthesiology bill—in February 2020.

25. I am slowly rebuilding my credit. I can finally pay my bills on time and I can pay the whole utility bill each month.

26. It was scary to have to deal with the legal system alone without any advice.

27. This experience is why I believe that free, accurate legal advice on how to respond to debt collection lawsuits is so important. In my own situation, I believe it would have been a quick, but reliable solution, and helped me avoid the negative and unforeseen consequences nearly a decade later.

28. I trust Upsolve to run this program in a way that will help people like me. I was comforted by the fact that their services were free; it means they are not trying to gain anything from me.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 23 day of December, 2021.



Liz Jurado