

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

DOROTHY GAUTREAUX, et al.,	)	
	)	
Plaintiffs	)	No. 66 C 1459
	)	
vs.	)	No. 66 C 1460
	)	
CHICAGO HOUSING AUTHORITY, a	)	(Consolidated)
corporation, et al.,	)	
	)	
Defendants	)	

ANSWER OF DEFENDANTS WILLIAM
COUSINS JR., LEON M. DESPRES,
ANNA R. LANGFORD, DICK SIMPSON
AND WILLIAM S. SINGER TO
SUPPLEMENTAL COMPLAINT

Defendants, William Cousins, Jr., Leon M. Despres, Anna R. Langford, Dick Simpson and William S. Singer by their attorney, Alex Elson answer the Supplemental Complaint as follows:

1. They admit the allegations of paragraph 1 [alleging residency of Mayor Richard J. Daley, his authority under Illinois law to preside at meetings of the City Council and power to vote at such meetings].

2. They admit the allegations of paragraph 2 that they and all of the other named individuals are all of the duly elected and acting members of the City Council and reside in the City of Chicago.

3. They admit the allegations of paragraph 3 that Chicago is a municipal corporation having a population of more than 500,000 and that the City Council is its governing body.

4. They admit the allegations of paragraph 4 that on February 10, 1969, this Court issued its memorandum opinion in this cause, 296 F. Supp. 907.

5. They admit the allegations of paragraph 5 that this Court entered its judgment order ("Judgment Order") in this cause, 304 F. Supp. 736.

6. They admit that on September 10, 1971, the Court of Appeals for the Seventh Circuit issued its opinion in this cause, 448 F. 2d 731, and that pursuant thereto the Court entered its order of December 23, 1971.

7. They admit that the judgment order of December 23, 1971 contains the language set forth in paragraph 7.

8. They admit the allegations of paragraph 8 that CHA's efforts to increase the supply of Dwelling Units provided in the Judgment Order require CHA to acquire real property.

9. With relation to the allegations of paragraph 9 which summarizes the provisions of Section 9 of Chapter 67-1/2, Illinois Revised Statutes, they state this is a matter of which the Court will take judicial notice.

10. They admit that from July 1, 1969 until March 5, 1971, CHA did not advise the City Council of any real property proposed to be acquired by it for the purpose of increasing the supply of Dwelling Units in conformity with the Judgment Order.

11. They admit the allegations of paragraph 11 that on March 1, 1971, this Court entered an order directing CHA to advise the City Council on or before March 5, 1971, of real property proposed to be acquired by it for the purpose of providing not fewer than 1500 Dwelling Units in conformity with the Judgment Order, and that on March 5, 1971 CHA complied with such order and did so advise the City Council.

12. With reference to paragraph 12, the matters set forth therein relate to certain orders entered by the Court and response thereto filed by CHA and are matters of which the Court will take judicial notice.

13. Defendants admit that since June, 1971, the City Council has not approved the acquisition by CHA of any real property for the purpose of providing Dwelling Units in conformity with the Judgment Order.

14. Defendants do not have requisite knowledge to admit or deny that CHA has not acquired real property for

the provision of Dwelling Units in conformity with the Judgment Order of January 3, 1972 because of the failure of the City Council to approve any such acquisition, but state that it is reasonable to assume that the lack of such approval by the City Council explains the failure of CHA to comply with the Judgment Order. Defendants admit that the failure by CHA to acquire real property for such purpose has the effect of denying to the plaintiffs the relief to which they are entitled under the Judgment Order and of preventing this Court from providing a full remedy for the violations of federal constitutional rights which this Court's memorandum opinion of February 10, 1969, found to have occurred.

15. Defendants state that the allegations of paragraph 15 which set forth certain provisions of the Court order of January 3, 1972 are matters of which the Court will take judicial notice.

Dated: February 22, 1972.



Alex Elson, Attorney for
defendants William Cousins, Jr.,
Leon M. Despres, Anna R. Langford,
Dick Simpson and William S. Singer

Alex Elson
Elson, Lassers and Wolff
11 South LaSalle Street
Chicago, Illinois 60603
Fr. 2-5461