

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

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

ANSWER OF DEFENDANT SEYMOUR
SIMON TO SUPPLEMENTAL COMPLAINT

Defendant SEYMOUR SIMON pro se answers the Supplemental
Complaint as follows:

1. He admits the allegations of paragraph 1.
2. He admits the allegations of paragraph 2 and admits that he
resides in the City of Chicago at 5900 North Christiana Avenue, which is
in the 40th Ward of the City of Chicago, and that he is the duly elected
Alderman of said Ward, and that he is without knowledge as to the place
of residence of the other persons named in paragraph 2.
3. He admits the allegations of paragraph 3.
4. He admits the allegations of paragraph 4.
5. He admits the allegations of paragraph 5.
6. He admits the allegations of paragraph 6.

7. For answer to paragraph 7, he refers to the provisions of the judgment order referred to.

8. He is without knowledge sufficient to admit or deny the allegations of paragraph 8.

9. Referring to the allegations of paragraph 9, he states that this is a matter of which the Court will take judicial notice.

10. He admits the allegations of paragraph 10.

11. He admits the allegations of paragraph 11 and states that some of the real property of which the CHA so advised the City Council was located in the 40th Ward of the City of Chicago and that some of the real property of which the CHA so advised the City Council was suitable for the purpose stated, while other of the real property which the CHA advised the City Council it proposed to acquire for the purpose stated was not suitable for such purpose.

12. Referring to the allegations of paragraph 12, he states that the matters set forth therein relate to certain orders entered by the Court and response thereto filed by the CHA and are matters of which the Court will take judicial notice, and he further states that certain of the real property referred to in paragraph 12(a) was located in the 40th Ward of the City of Chicago consisting of four (4) separate locations intended to provide for a total of twenty-three dwelling units.

13. He admits the allegations of paragraph 13.

14. He is without knowledge sufficient to admit or deny the allegations of the first sentence of paragraph 14 and alleges that a response to the

allegations of the second sentence of paragraph 14 requires a conclusion of law which he is unable to give.

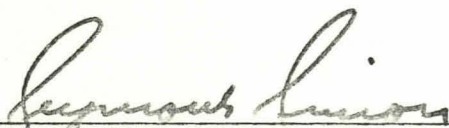
15. He admits the allegations of paragraph 15 and states that he is informed and believes that the CHA has filed with the plaintiff and with the Court a number of additional sites for dwelling units as alleged in said paragraph of the complaint, including one located in the 40th Ward at 5623-5629 North Kimball Avenue and one located at an address given as 5601-5609 North Kedzie Avenue. He further states in response to the allegations of paragraph 15 of the complaint that the aforesaid site on North Kimball Avenue is not suitable for dwelling units as intended, as it is a beautifully landscaped side yard attached to an existing dwelling unit and that its continued existence as a landscaped side yard is in conformity with the public policy of the City of Chicago, State of Illinois, and United States of America, to encourage landscaped open space in densely populated urban areas, and that in June, 1971, the Commissioner of Development and Planning of the City of Chicago informed him that for these reasons said site on North Kimball Avenue was not suitable for dwelling units as intended. He further states in response to the allegations of paragraph 15 of the complaint that there is no such address in the City of Chicago as 5601-5609 North Kedzie Avenue.

16. He further alleges in response to the Supplemental Complaint that in June, 1971 the City Council of the City of Chicago

approved the acquisition by the CHA of the real property in the 40th Ward in the City of Chicago located at the addresses set forth below with the intention of providing the number of dwelling units indicated with respect to each location in conformity with the Judgment Order:

<u>Address</u>	<u>Proposed Units</u>
5011 North Lincoln Avenue	4
1813-39 West Bryn Mawr Avenue	12
5323 North Paulina Avenue	3
5357 North Ravenswood Avenue	4

WHEREFORE, this defendant prays that the Court declare unsuitable for dwelling units as intended the proposed additional site on North Kimball Avenue referred to in paragraph 15 above and that this Court strike from the list of additional sites filed by the CHA both of the addresses referred to in paragraph 15 of this Answer.


SEYMOUR SIMON, Alderman of the
40th Ward of the City of Chicago,
appearing pro se

39 South LaSalle Street
Chicago, Illinois 60603
FI 6-3141

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CHICAGO HOUSING AUTHORITY,	)	
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	)	
Defendants)	)	

NOTICE

TO: Richard L. Curry, Esq.
Corporation Counsel of the City of Chicago
City Hall
Chicago, Illinois

Alex Elson, Esq.
Attorney for certain Defendants
11 South LaSalle Street
Chicago, Illinois 60603

Alexander Polikoff, Esq.
Attorney for Plaintiff
6 South Clark Street
Chicago, Illinois

PLEASE TAKE NOTICE that on March 3, 1972, I shall appear before the Honorable Richard B. Austin, Judge of the United States District Court for the Northern District of Illinois at the opening of his Court in the forenoon, in the courtroom usually occupied by him in the Everett McKinley Dirksen Building, Dearborn and Adams, Chicago, Illinois, and then and there present the attached motion for leave to file pro se an Answer to the Supplemental Complaint in the above cause, a copy of which motion and answer are attached hereto.


SEYMOUR F. SIMON, Alderman of
the 40th Ward of the City of Chicago,
appearing pro se

39 So. LaSalle St.
Chicago, Ill. 60603
FI 6-3141

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FOR THE NORTHERN DISTRICT OF ILLINOIS
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Plaintiffs,	)	No. 66 C 1459
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CHICAGO HOUSING AUTHORITY,	)	(Consolidated)
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	)	
Defendants.	)	

MOTION OF SEYMOUR SIMON FOR LEAVE TO
APPEAR PRO SE AND TO FILE ANSWER TO
SUPPLEMENTAL COMPLAINT

Now comes SEYMOUR SIMON, a defendant in this action, and
a member of the Bar of this Honorable Court and moves for leave to
appear pro se in this action and to file instantanr an Answer to the
Supplemental Complaint, a copy of which is attached to this motion.


SEYMOUR SIMON, one of the
Defendants in the above entitled cause.

39 South La Salle Street
Chicago, Illinois 60603
FI 6-3141

UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Name of Presiding Judge, Honorable Richard B. Austin

Cause No. 66C1459, 66C1460 (Consolidated)

Date March 3, 1972

Title of Cause

Dorothy Gautreaux, et al, vs. Chicago Housing Authority, et al.

Brief Statement
of Motion

speech and file
leave for Seymour Seymour to file pro se an Answer to the
supplemental Complaint in the above cause in ste

get into pro se

The rules of this court require counsel to furnish the names of all parties entitled to notice of the entry of an order and the names and addresses of their attorneys. Please do this immediately below (separate lists may be appended).

Names and
Addresses of
moving counsel

Seymour F. Simon, 39 S. LaSalle St., Chicago, Illinois

Representing

one of the defendants

Names and
Addresses of
other counsel
entitled to
notice and names
of parties they
represent.

Richard L. Curry, City Hall, Chicago, Illinois

Alex Elson, 11 S. LaSalle St., Chicago, Illinois

Alexander Polikoff, 109 N. Dearborn St., Chicago, Illinois

Plaintiffs

Reserve space below for notations by minute clerk

Enter order

Austin J

Hand this memorandum to the Clerk.
Counsel will not rise to address the Court until motion has been called.