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Defendant.

Hon. Marvin E. Aspen

Judge Marvin E. Aspen
U.S. District Court

2. The Plaintiffs are not a signatory to the Revised Agreement.

Nonetheless, they have previously informed this Court, and continue to hold the view, that the replacement housing envisioned in the Revised Agreement – up to 241 scattered, mixed-income units in North Kenwood-Oakland and 200 units in other neighborhoods -- is both appropriate and desirable.

3. The Plaintiffs are also of the view that the Receiver is proceeding as effectively and expeditiously as possible, under challenging circumstances, to provide such housing in a manner consistent with Gautreaux principles.

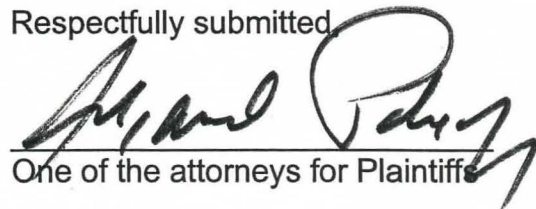
4. Nonetheless, Plaintiffs do not object to LCO's presenting to this Court its concerns about the Receiver's performance if there are in fact eligible "displaced Lakefront tenant families," in numbers exceeding the number of replacement housing units already constructed or under construction by the Receiver, who desire and are ready to occupy such housing. However, plaintiffs have previously raised a question as to that assumption – "On information and belief, completed replacement housing in North Kenwood-Oakland has been offered to LCO families, but no LCO families have been identified to occupy such offered units, which have instead been occupied by other plaintiff class families." (Statement of Gautreaux Plaintiffs, November 30, 1998, p. 3.) Plaintiffs now have further information and belief to the same effect. Plaintiffs therefore suggest that before this Court and the parties expend further time and resources on this matter, thereby diverting resources from remedial activities, LCO should be required to demonstrate that there are in fact such families in such numbers.

5. The Receiver's Statement raises further questions whether the intervention requirements of Rule 24 have been met. If this Court concludes that those requirements are not met, but that there are nonetheless eligible displaced Lakefront tenant families whose desire for replacement housing is not being met by the Receiver's current development activities, the Court could by informal conference or in other ways, including a hearing, afford LCO an opportunity to

present its perceived grievances. Moreover, because LCO's grievances involve the performance of the Receiver, this is the only Court that could properly consider them.

6. In any event, Plaintiffs oppose granting the specific relief requested in the LCO Complaint. Such a rigid schedule is impractical and undesirable for the reasons stated in the Receiver's Statement.

Respectfully submitted,


One of the attorneys for Plaintiffs

March 4, 1999

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

RECEIVED

MAR 4 1999

Judge Marvin E. Aspen
U.S. District Court

DOROTHY GAUTREAUX, et al.,

Plaintiffs,

v.

CHICAGO HOUSING AUTHORITY,

Defendant.

66 C 1459

Hon. Marvin E. Aspen

NOTICE OF FILING

To: Attached Service List

PLEASE TAKE NOTICE that on Thursday, March 4, 1999, we filed in the United States District Court for the Northern District of Illinois, Eastern Division, Plaintiffs' Response to Second Motion of the Lakefront Community Organization to Intervene, a copy of which is attached hereto and served upon you.

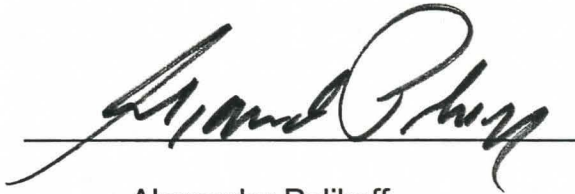

One of the Attorneys for Plaintiffs

March 4, 1999

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CERTIFICATE OF SERVICE

Alexander Polikoff, an attorney, hereby certifies that on March 4, 1999, I caused copies of Plaintiffs' Response to Second Motion of the Lakefront Community Organization to Intervene to be served on the persons shown on the attached service list in the manner shown on such list.

A handwritten signature in black ink, appearing to read "A. Polikoff", is written over a horizontal line.

Alexander Polikoff

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Date: March 4, 1999

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In case of trouble, contact:

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REMARKS: