

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

DOROTHY GAUTREAUX, et al.,

Plaintiffs,

v.

CHICAGO HOUSING AUTHORITY and
JOSEPH SHULDINER, Executive Director,

Defendants.

66 C 1459

Hon. Marvin E. Aspen

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MAR 04 1999

MICHAEL W. DOBBINS
CLERK, U. S. DISTRICT COURT

**CHA'S REPLY TO THE LAKEFRONT COMMUNITY ORGANIZATION'S
MEMORANDUM IN SUPPORT OF ITS SECOND MOTION TO INTERVENE**

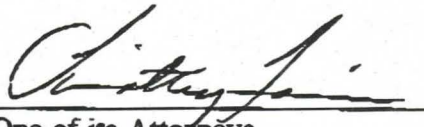
Now comes the Chicago Housing Authority and Joseph Shuldiner, Executive Director, by and through their attorneys, Jerome M. Butler and Timothy Fair, and state their reply as follows:

- 1.) The CHA denies the LCO's allegations that CHA breached the 1995 Agreement;
- 2.) Notwithstanding the denial, CHA generally does not object to the LCO's second motion to intervene;
- 3.) The CHA cannot identify any prejudice to the agency as a result of this intervention;
- 4.) The CHA admits that no unusual facts exist in relation to the timing of this intervention;

- 5.) CHA does not dispute that the construction of the 241 replacement units in a "limited area" is related to the Gautreaux subject matter;
- 6.) And to the extent that the LCO will seek specific performance for the timely completion of the replacement units, CHA does not object to the assertion that the Gautreaux court is the appropriate forum.

Therefore, as stated above, CHA denies the LCO's allegations that CHA breached the 1995 Agreement and, notwithstanding the denial, CHA generally has no objection to the LCO's motion to intervene for the limited purpose as stated above.

Respectfully Submitted,
Chicago Housing Authority

By: 
One of its Attorneys

Jerome M. Butler
Timothy Fair
Chicago Housing Authority
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(312) 791-8415
Attorney #50100

Bills

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FACSIMILE TRANSMITTAL FORM

Date: 3-5-99

Number of Pages, Not Including This Cover: 4

Priority URGENT _____ NORMAL X

FAX TO:

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Company: BPI

Location: 17 East Monroe, Suite 212, Chicago, Illinois 60603

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FAX FROM:

Originator: Timothy Fair

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COMMENTS: Notice of Filing, Certificate of Service, CHA's Reply to Lakefront Community Organization's memorandum in support of its second motion to intervene.

PLEASE CALL ORIGINATING DEPARTMENT AT THE NUMBER INDICATED ABOVE IF YOU HAVE ANY QUESTIONS OR IF YOU RECEIVED AN INCOMPLETE FAX.

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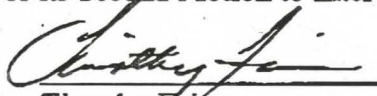
MAR 04 1999

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CLERK, U.S. DISTRICT COURT

NOTICE OF FILING

TO: Counsel on Attached Service List.

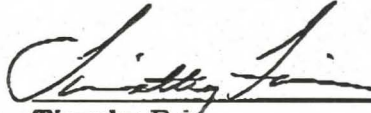
On March 4, 1999, the Defendants, the Chicago Housing Authority and Joseph Shuldiner, Executive Director, caused to be filed in the U.S. District Court for the Northern District of Illinois, Eastern Division, Defendants' Reply to the Lakefront Community Organization's Memorandum in Support of its Second Motion to Intervene.



Timothy Fair
One of Defendants' Counsel

CERTIFICATE OF SERVICE

I, Timothy Fair, an attorney, certify that I caused to be served a copy of Defendants' Reply to the Lakefront Community Organization's Memorandum in Support of its Second Motion to Intervene upon the counsel on the attached service list by depositing the same in the U.S. mail located at 200 West Adams, Chicago, Illinois, on March 4, 1999, with proper prepaid postage.



Timothy Fair

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