

RECEIVED

JUL 16 2001

Hon. Marvin E. Aspen

1. The Chicago Housing Authority (CHA) has made progress in recent weeks filling vacant Kenwood-Oakland units. Nonetheless, CHA anticipates that there may be as many as 11 vacant units by the time the remaining scattered site units are delivered to CHA in late July.
2. In its June 29, 2001 Response to the Motion of Plaintiffs to Show Cause, CHA proposed a plan for occupancy of Kenwood-Oakland scattered site units. Plaintiffs and CHA have discussed CHA's proposed plan extensively.
3. Plaintiffs propose certain modifications to CHA's plan that Plaintiffs believe will best ensure that new Kenwood-Oakland public housing units are tenanted in a prompt and orderly manner, while also ensuring first priority to eligible, displaced Lakefront tenant families.

4. Plaintiffs propose the following plan:
 - A. Eligible displaced Lakefront families shall continue to have first priority for all of the 441 new units to be built as Lakefront Replacement Housing, in accordance with this Court's June 3, 1996 Order.
 - B. CHA shall review all information submitted by the Lakefront Community Organization (LCO) in an effort to identify eligible, displaced LCO families to fill all existing vacant scattered-site units in North Kenwood-Oakland and the additional units expected to be transferred to CHA by the end of July 2001. To the extent that CHA does not have sufficient applications from eligible, displaced LCO families by July 23, 2001 to fill all of those units, then any remaining vacant units shall promptly be filled in accordance with the Tenant Assignment Plan for scattered site housing.
 - C. The Tenant Assignment Plan previously approved by this Court requires that 50% of new scattered-site units be allocated to eligible community residents, 25% allocated to CHA residents on the CHA Transfer List, and 25% allocated to families on the CHA Waiting List. The Tenant Assignment Plan shall be amended to permit CHA to assign Transfer List and Waiting List units on a first priority basis to relocatees from other CHA developments.
 - D. No later than September 15, 2001, the CHA shall complete a plan for finally identifying the universe of eligible, displaced Lakefront families, complete with a bar date which will cut off all future claims to replacement housing by displaced Lakefront families, and thereafter CHA shall

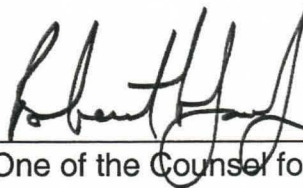
implement this plan. The bar date shall be set no later than December 31, 2001. Notwithstanding the bar date, any eligible, displaced Lakefront resident who attains his or her majority and first becomes eligible for public housing after December 31, 2001 and who submits an application for Lakefront Replacement Housing within 60 days of becoming eligible for public housing, shall be treated as if he or she had applied before the bar date.

- E. Occupants shall not be selected for future Lakefront Replacement Housing units beyond those identified in Paragraph B until the outreach program described in Paragraph D has been completed and the bar date has passed. Eligible, displaced LCO families identified through the outreach process discussed in Paragraph D shall have first priority to occupy all future Lakefront Replacement Housing units beyond those identified in Paragraph B. Any unit for which no eligible, displaced LCO family can be identified shall be filled in accordance with the revised Tenant Assignment Plan.
- F. In the future, the Receiver shall continue to provide regular notices to both CHA and the LCO of the estimated dates for transferring new Kenwood-Oakland units to the CHA. No later than 210 days before the estimated transfer date of a new unit, CHA shall request applications from eligible, displaced LCO families identified through the outreach process described in Paragraph D. No later than 180 days before the estimated transfer date of each new Lakefront Replacement Housing Unit, CHA shall commence

reviewing the files of at least three prospective tenants for compliance with any applicable occupancy or eligibility requirements established by the CHA, a private developer, or a private manager. No later than 60 days before the estimated transfer date for each unit, CHA shall determine the unit's occupant.

5. Plaintiffs have attached a proposed draft order setting forth this plan.
6. Plaintiffs have discussed the proposed draft order with CHA. CHA is reviewing the form of the order. Counsel for CHA has authorized the undersigned counsel to represent that CHA will send this Court a letter promptly, in advance of the July 20, 2001 status hearing, indicating whether it agrees to entry of the proposed order.

Respectfully Submitted,



One of the Counsel for Plaintiffs

Dated: July 16, 2001

Alexander Polikoff
Robert Jones, Jr.
Julie Elena Brown
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) Hon. Marvin E. Aspen
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ORDER

This matter coming to be heard on the Motion of Plaintiffs to Show Cause why Defendant Chicago Housing Authority should not promptly tenant vacant scattered site housing units in the North Kenwood-Oakland neighborhood, and the Court having received presentations from both parties, IT IS HEREBY ORDERED:

- A. Eligible displaced Lakefront families shall continue to have first priority for all of the 441 new units to be built as Lakefront Replacement Housing, in accordance with this Court's June 3, 1996 Order.
- B. CHA shall review all information submitted by the Lakefront Community Organization (LCO) in an effort to identify eligible, displaced LCO families to fill all existing vacant scattered-site units in North Kenwood-Oakland and the additional units expected to be transferred to CHA by the end of July 2001. To the extent that CHA does not have sufficient applications from eligible, displaced LCO families by July 23, 2001 to fill all of those units, then any remaining vacant

units shall promptly be filled in accordance with the Tenant Assignment Plan for scattered site housing.

- C. The Tenant Assignment Plan previously approved by this Court requires that 50% of new scattered-site units be allocated to eligible community residents, 25% allocated to CHA residents on the CHA Transfer List, and 25% allocated to families on the CHA Waiting List. The Tenant Assignment Plan shall be amended to permit CHA to assign Transfer List and Waiting List units on a first priority basis to relocatees from other CHA developments.
- D. No later than September 15, 2001, the CHA shall complete a plan for finally identifying the universe of eligible, displaced Lakefront families, complete with a bar date which will cut off all future claims to replacement housing by displaced Lakefront families, and thereafter CHA shall implement this plan. The bar date shall be set no later than December 31, 2001. Notwithstanding the bar date, any eligible, displaced Lakefront resident who attains his or her majority and first becomes eligible for public housing after December 31, 2001 and who submits an application for Lakefront Replacement Housing within 60 days of becoming eligible for public housing, shall be treated as if he or she had applied before the bar date.
- E. Occupants shall not be selected for future Lakefront Replacement Housing units beyond those identified in Paragraph B until the outreach program described in Paragraph D has been completed and the bar date has passed. Eligible, displaced LCO families identified through the outreach process discussed in Paragraph D shall have first priority to occupy all future Lakefront Replacement

Housing units beyond those identified in Paragraph B. Any unit for which no eligible, displaced LCO family can be identified shall be filled in accordance with the revised Tenant Assignment Plan.

- F. In the future, the Receiver shall continue to provide regular notices to both CHA and the LCO of the estimated dates for transferring new Kenwood-Oakland units to the CHA. No later than 210 days before the estimated transfer date of a new unit, CHA shall request applications from eligible, displaced LCO families identified through the outreach process described in Paragraph D. No later than 180 days before the estimated transfer date of each new Lakefront Replacement Housing Unit, CHA shall commence reviewing the files of at least three prospective tenants for compliance with any applicable occupancy or eligibility requirements established by the CHA, a private developer, or a private manager. No later than 60 days before the estimated transfer date for each unit, CHA shall determine the unit's occupant.

Enter _____

Date _____

JUL 16 2001

JUDGE MARVIN E. ASPEN
UNITED STATES DISTRICT COURT

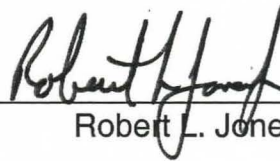
Defendant.

Hon. Marvin E. Aspen

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CERTIFICATE OF SERVICE

I, Robert L. Jones, Jr., an attorney, certify that on July 16, 2001, I caused copies of the foregoing Plaintiffs' Reply In Support of Motion to Show Cause to be served upon the persons whose names appear on the attached service list in the manner stated therein.

A handwritten signature in black ink, appearing to read "Robert L. Jones, Jr.", is written over a horizontal line.

Robert L. Jones, Jr.

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