

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

DOROTHY GAUTREAUX, <i>et al.</i>	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 66 C 1459
	)	Hon. Marvin E. Aspen
CHICAGO HOUSING AUTHORITY, <u>et al.</u> ,	)	
	)	
Defendant.	)	

**JOINT MOTION OF PLAINTIFFS AND
DEFENDANT CHICAGO HOUSING AUTHORITY
FOR AN ORDER APPROVING AGREEMENTS
OF THE PARTIES RESPECTING PAYMENT OF
PLAINTIFFS' ATTORNEYS' FEES**

Plaintiffs and Defendant Chicago Housing Authority ("CHA"), by their respective attorneys, move the Court pursuant to Local Rule 54.3 for entry of an Order approving two agreements between the parties for payment of Plaintiffs' attorneys' fees by CHA to Business and Professional People for the Public Interest ("BPI"). The agreements cover two consecutive time periods, following the Court's most recent fee award, as follows: 1) beginning August 1, 2003 and ending December 31, 2005; and 2) beginning January 1, 2006 and ending December 31, 2010.

In support of this Motion, the parties state as follows:

1. The last award of attorneys' fees to plaintiffs in this case, by this Court's order of August 9, 2005 (affirmed by the Seventh Circuit Court of Appeals on June 26, 2007), was for work performed during the period of August 1, 2001 through July 31, 2003. The present motion seeks approval of fees for two subsequent time periods.

2. On July 16, 2009, Plaintiffs submitted to CHA a draft fee petition pursuant to Local Rule 54.3 requesting attorneys' fees of \$1,069,668.75 for the period of August 1, 2003 through December 31, 2005. The draft fee petition reflected the following hours worked and hourly rates:

Attorney	Hours	Rate	Total
A. Polikoff	323.75	\$550	178,062.50
J. Brown	652.62	\$450	293,679.00
A. Gross	601.87	\$375	225,701.25
E. Lawrence	145.94	\$325	47,430.50
H. Ford	106.08	\$325	34,476.00
C. Hendrickson	602.06	\$325	195,669.50
K. Harsch	315.50	\$300	94,650.00
TOTAL			\$1,069,668.75

3. Pursuant to Local Rule 54.3, the parties conferred in an attempt to agree on the amount of fees. As a result of those discussions, the parties did reach agreement and CHA agreed to pay \$825,000.00 to BPI in quarterly installments over the course of the 2010 calendar year for its attorneys' work on behalf of the plaintiff class.

4. On July 20, 2011, Plaintiffs submitted to CHA a fee request pursuant to Local Rule 54.3 requesting attorneys' fees of \$1,201,417.00 for the period of January 1, 2006 through December 31, 2010. The fee request reflected the following hours worked and hourly rates:

Attorney	Hours	Rate	Total
A. Polikoff	217.25	\$600	130,650.00
J. Brown	1,412.00	\$500	706,000.00
K. Pomper	909.87	\$350	318,454.50
A. Barnea	85.25	\$325	27,706.25
T. Healy	57.25	\$325	18,606.25
TOTAL			\$1,201,417.00

5. Pursuant to Local Rule 54.3, the parties conferred in an attempt to reach agreement on the amount of fees. As a result of those discussions, the parties did reach agreement and CHA agreed to pay \$1,000,000.00 to BPI in two \$500,000.00 installments as

follows: the first payment to be received on or before December 31, 2011 and the second payment to be received on or before June 30, 2012.

6. In light of the parties' agreements, as indicated by Local Rule 54.3(f), this motion does not include supporting evidentiary materials. However, Plaintiffs stand ready to submit time records, affidavits and any other supporting material the Court may request.

WHEREFORE, Plaintiffs and CHA respectfully request entry of an order approving the parties' agreements respecting payment of attorneys' fees of \$825,000.00 for work performed during the period of August 1, 2003 through December 31, 2005, and of \$1,000,000.00 for work performed during the period of January 1, 2006 through December 31, 2010. For the Court's convenience, a proposed draft order is attached hereto.

Respectfully Submitted,

By: /s/ Julie Elena Brown
Julie Elena Brown
One of the Attorneys for the Gautreaux Plaintiffs

By: /s/ Scott W. Ammarell
Scott W. Ammarell
One of the Attorneys for the Defendant

September 6, 2011

Alexander Polikoff
Julie Elena Brown
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NOTICE OF MOTION

To: Attached List

PLEASE TAKE NOTICE that on September 8, 2011, at 10:30 A.M., we shall appear before the Honorable Marvin E. Aspen, Judge of the United States District Court, and then and there present the attached Joint Motion and proposed Order, a copy of which is hereby served upon you.

/s/ Julie Elena Brown
Julie Elena Brown
One of the Attorneys for Plaintiffs

September 6, 2011

Alexander Polikoff
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Business and Professional People
for the Public Interest
25 East Washington Street, Suite 1515
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(312) 641-5570

CERTIFICATE OF SERVICE

I, Julie Elena brown, an attorney, certify that on September 6, 2011, I caused copies of the foregoing Notice and Joint Motion to be served upon the persons whose names appear on the attached service list in the manner stated therein.

/s/ Julie Elena Brown

Julie Elena Brown

SERVICE LIST

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