

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

DOROTHY GAUTREAUX, et al.,	)	
Plaintiffs,	)	
	)	
-vs-	)	No. 66 C 1459
	)	
CHICAGO HOUSING AUTHORITY, et al.,	)	Hon. Marvin E. Aspen
Defendants.	)	

**JOINT MOTION OF PLAINTIFFS AND DEFENDANT CHICAGO HOUSING AUTHORITY FOR
AN ORDER WAIVING THE RESTRICTION ON HOUSING FAMILIES WITH CHILDREN IN
PUBLIC HOUSING UNITS ABOVE THE THIRD FLOOR FOR ONE SPECIFIC BUILDING IN
PHASE II-B OF PARKSIDE OF OLD TOWN LOCATED IN THE NEAR NORTH
REVITALIZING AREA**

The Plaintiffs and Defendant Chicago Housing Authority ("CHA") respectfully move this Court to enter an Order in the form attached, which would:

- A. Waive the Gautreaux restriction on housing families with children in public housing units above the third floor for one specific building located at 459 W. Division Street in the Near North Revitalizing Area (NNRA). This building is part of the Parkside of Old Town ("Parkside") development, a redevelopment of the former Cabrini-Green Extension North public housing development. The Affidavit of Peter Holsten (hereinafter "Holsten Affidavit") describes the project in greater detail and is attached as Exhibit A. A site plan showing the proposed building is attached as Exhibit 1 to the Holsten Affidavit.

- B. Amend the CHA's Tenant Assignment Plan to require that the 36 public housing units to be built in Phase IIB of Parkside of Old Town be made available to eligible CHA families or former CHA families, with priority given to families on the Cabrini-Green Lottery List – pursuant to the Cabrini-Green Consent Decree. If there are no longer such families seeking to return under the Consent Decree, then priority should be given to CHA families relocating under CHA's Plan for Transformation. If there are no such families seeking to relocate under CHA's Plan for

Transformation available to occupy the units, such units shall be made available to CHA families seeking to transfer within the CHA portfolio, and then to those listed on the CHA public housing waiting list.

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

1. The parties seek the Court's authority for development of family public housing units above the third floor in one building in Phase IIB of Parkside of Old Town – the redevelopment of the former site known as Cabrini Extension North. As described in the Holsten Affidavit, attached as Exhibit A, Parkside of Old Town is a mixed-income development well underway in the NNRA on the former site of Cabrini Extension North. Holsten Real Estate Development Corporation is a private development company with considerable experience in the development of mixed-income and affordable housing in Chicago. After being competitively selected as the Developer for Cabrini Extension North, Holsten Real Estate Development Corporation partnered with the Cabrini-Green Community Development Corporation ("Cabrini CDC"), pursuant to the Cabrini-Green Consent Decree, to redevelop the site.

2. The overall development plan for Parkside calls for approximately 718 new units, of which 215 are planned to be public housing, 146 affordable housing, and 357 market-rate housing. To date, 486 units, of which 295 are mixed-income rental units and 191 for-sale units, have been constructed and occupied as part of Phase I and IIA.

3. On July 1, 1969, this Court entered an Order which provided that, "CHA shall not concentrate large numbers of Dwelling Units (CHA public housing units) in or near a single location." The Order provided specifically that,

"No Dwelling Units shall be provided above the third story in any structure except for families without children...."

The Order also provided that the Court, "by order," could give its approval to developments that were "specifically designed to assist in achieving the purposes" of the Gautreaux Order. 304F.Supp. 736, 739 (N.D. Ill. 1969).

4. On November 6, 1997, this Court entered an Order designating a Near North Revitalizing Area and Authorizing the Acquisition of Public Housing Units Therein.

5. On September 12, 2000, this Court entered an Order reclassifying census tracts 0806 and 0807 of the City of Chicago as General Areas and expanding the NNRA to include more of the Cabrini neighborhood and to allow for the development of at least 700 public housing units therein. Both Orders acknowledge the revitalizing nature of the Cabrini neighborhood and its strong potential to improve desegregated housing opportunities for Plaintiff class families.

6. On September 12, 2000, this Court also entered an Order approving the Consent Decree between the Cabrini-Green Local Advisory Council, Terry Peterson and the Chicago Housing Authority, and Richard M. Daley and the City of Chicago, *Cabrini Green Local Advisory Council v. Chicago Housing Authority et al.* 96 C 6949. This consent decree acts as a "full and final settlement of all claims alleged" in litigation between the five parties over the "design and implementation of the Near North Redevelopment Initiative (NNRI) and HOPE VI revitalization plans for Cabrini Green." Cabrini Consent Decree, p.1. The Consent Decree mandates the construction of at least 700 replacement public housing units and 270 affordable units. Furthermore, Section II.D. Replacement Housing, Income Mix, states that "[t]he income mix for all housing developed pursuant to this Consent Decree on.... CHA owned land shall be as follows: 50% market rate, 20% affordable...and 30% public housing," Cabrini Consent Decree, p.9.

7. On September 25, 2006, this Court entered an Order waiving the restriction on housing families with children in public housing units above the third story in Phase I of Parkside of Old Town. Phase I included three mid-rise buildings: 437 W. Division Street; 511 W. Division Street; and 545 West Division Street. (See Order of September 25, 2006 and Order of July 15, 2009 amending such Order to designate an additional five units as public housing units in 437 W. Division and 511 W. Division and allow those units to be occupied by families with children).

8. On April 1, 2010, this Court entered an Order waiving the restriction on housing families with children in public housing units above the third story in Phase IIA of Parkside of Old Town. Phase IIA included a 106-unit mid-rise building (544 W. Oak) with an additional 6 townhomes (5 public housing and 1 affordable) attached to its base. The mid-rise has 46 one-bedroom units and 60 two-bedroom units. See Order of April 1, 2010.

9. As of June 2014, occupancy in Phase I was at 96.7% and Phase IIA was 95%.

10. Phase IIB of Parkside of Old Town consists of two rental buildings located at 459 W. Division Street (Building #2) and 1151 N. Cleveland Avenue (Building #11). No for-sale units are contemplated for this phase.

a. **Building #2**, a nine-story high-rise, to be located at 459 W. Division Street is proposed as follows:

- i. 94 total units, which include five townhouse – style units and two walk-up flats at the rear façade of the building with individual entrances;
- ii. Of the 94 total units, 31 will be public housing units evenly dispersed throughout the building;
- iii. An overall income mix of approximately 33% public housing, 28% affordable, and 39% market-rate.

a. **Building #11**, a three-story walk-up, to be located at 1151 N. Cleveland Avenue is proposed as follows:

- i. 12 total units, 5 will be public housing units dispersed throughout the building;
- ii. An overall income mix of approximately 42% public housing, 8% affordable, and 50% market-rate.

11. The parties believe that housing CHA families in these buildings, with twenty-one (21) public housing units above the third floor in Building #2, meets the goal of creating mixed-income, desegregated housing opportunities for the following reasons:

- a. The twenty-one (21) public housing units consist of seventeen (17) one-bedroom units and four (4) two-bedroom units. Under current occupancy standards, a total of two people can be assigned to a one-bedroom unit and no more than four people can be assigned to a two-bedroom unit.
- b. Permitting this high-rise building and public housing units above the third floor allows development at a slightly higher density, necessary in light of the Cabrini-Green Consent Decree's requirement of 700 public housing units on specified parcels. Defendant CHA and Plaintiffs' counsel have carefully reviewed several proposed floor plans to arrive at a distribution that furthers the goals of both the Consent Decree and the Gautreaux Judgment Order.
- c. Concentrations of families in public housing units will not occur in these buildings. Public housing units will account for just under one-third of the units and will be dispersed among and externally indistinguishable from affordable and market-rate units. Plaintiff's counsel and the Defendant CHA have approved the initial locations of each public housing unit. Though some public housing families with children may be housed above the third floor, they will be neighbors with market-rate families and other working families, thereby providing the Plaintiff class families with mixed-income housing opportunities that may be racially mixed as well.
- d. This Court has previously approved the area under consideration as a Revitalizing Area. At the time of approval, the Court received significant evidence about the strength and vitality of the surrounding area and the potential for strong development in Cabrini Green. The NNRA has since undergone even more significant public and private development, continuing its strong revitalizing nature. In addition, the neighborhoods surrounding the NNRA are among the wealthiest in the city and provide quality housing, amenities, jobs, retail services, good schools, and outstanding cultural and recreational opportunities. The attached affidavit (Exhibit B) from Kathy Caisley, Development

Manager at the CHA, provides greater detail about CHA development and acquisition activities in the NNRA, while the attached affidavit (Exhibit A) from Peter Holsten provides additional detail about new development activities that add to the strength and vitality of the NNRA and the surrounding communities. A map of the area highlighting some of the new development is attached as Exhibit 1 to the Holsten affidavit.

Wherefore, Plaintiffs and the Defendant CHA request the Court to enter an order in the form attached hereto waiving the restriction on housing families with children in public housing units above the third story for the above described building in the Near North Revitalizing Area and amending the CHA's Tenant Assignment Plan to require that the 36 public housing units to be built in Phase IIB of Parkside of Old Town be made available to eligible CHA families or former CHA families, with priority given to families on the Cabrini-Green Lottery List – pursuant to the Cabrini-Green Consent Decree. If there are no longer such families seeking to return under the Consent Decree, then priority should be given to CHA families in the following order: 1) to those relocating under CHA's Plan for Transformation; 2) to CHA families seeking to transfer within the CHA portfolio; and 3) those families listed on the CHA public housing waiting list.

June 9, 2014

Respectfully submitted,

/s/ Julie Elena Brown

One of the Attorneys for Plaintiffs
Alexander Polikoff
Julie Elena Brown
Business and Professional People for the
Public Interest
25 E. Washington Street, Suite 1515
Chicago, IL 60602

/s/ Scott Ammarell

One of the Attorneys for
Chicago Housing Authority
Joanne P. Boy, Assistant General Counsel
Scott Ammarell, Chief Legal Officer
Chicago Housing Authority
60 E. Van Buren Street
Chicago, IL 60605

EXHIBIT A

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

DOROTHY GAUTREAUX, et al.,	)	
Plaintiffs,	)	
	)	
-vs-	)	No. 66 C 1459
	)	
CHICAGO HOUSING AUTHORITY, et al.,	)	Hon. Marvin E. Aspen
Defendants.	)	

AFFIDAVIT OF PETER HOLSTEN

I, Peter Holsten, President of Holsten Real Estate Development Corporation, being first duly sworn on oath, state on behalf of Holsten Real Estate Development Corporation:

1. The Chicago Housing Authority ("CHA"), the Gautreaux plaintiffs, Parkside Associates, LLC – a partnership between Holsten Real Estate Development Corporation ("HDC") and the Cabrini-Green Community Development Corporation (Cabrini "CDC") (a development entity of the Cabrini-Green Local Advisory Council) have developed plans to construct the next phase (Phase IIB) of Parkside of Old Town. Phase II B will consist of one nine-floor high-rise building and a three-floor walk-up building.
2. The plan for the Parkside of Old Town development has been endorsed and accepted as a blueprint by various stakeholders including the CHA, the Gautreaux Plaintiffs, the City of Chicago, the Cabrini Green Local Advisory Council, and the Alderman of the 27th Ward (collectively referred to as "the Working Group").
3. Exhibit 1, attached hereto, is the proposed site plan for Phase IIB. The phase will consist of two buildings. The building at 459 W. Division (Building #2) will be a nine-story high-rise with 94 units, and includes five townhouse-style units and two walk-up flats on the rear façade of the building – these seven units will have individual entrances. The building at 1151 N. Cleveland Avenue (Building #11) will be a three-story walk-up building with 12 units. This

building will have one- and three-bedroom units with individual entrances for the ground floor units. The public housing units will be interspersed between affordable units and market rate units to ensure a mixed-income environment. The two buildings have the following bedroom and income mixes:

Parkside Phases IIB – Building #2				
	Public Housing	Affordable Rental	Market Rate Rental	TOTAL
One bedroom	21	11	13	45
Two bedroom	6	12	24	42
Three bedroom	3	3	0	6
Four bedroom	1	0	0	0
Five bedroom	0	0	0	0
Unit totals	31	26	37	94
Income Mix	33%	28%	39%	

Parkside Phases IIB – Building #11				
	Public Housing	Affordable Rental	Market Rate Rental	TOTAL
One bedroom	0	0	6	6
Two bedroom	0	0	0	0
Three bedroom	5	1	0	6
Four bedroom	0	0	0	0
Five bedroom	0	0	0	0
Unit Totals	5	1	6	12
Income Mix	42%	8%	50%	

4. **Public Housing Units Above Third Floor.** Concentrations of families in public housing units will not occur in Building #2 (459 W. Division). Public housing units will account for just over one-third of the total number of units and will be dispersed among and externally indistinguishable from affordable and market-rate units. Current plans call for 21 total public housing units to be located above the third floor. Plaintiff's counsel, the Defendant CHA, the Cabrini-Green LAC, and Holsten Real Estate Development Corporation and its partner CDC have approved the initial locations of each public housing unit. Though some public housing

families with children may be housed above the third floor, they will be neighbors with affordable and market-rate families. Within this building, units for public housing families will be dispersed in the following manner:

Unit Dispersal Above Third Floor – Building #2									
	CHA Units		Total CHA units above 3 rd floor	Affordable Units		Total Affordable units above 3 rd floor	Market Units		Total Market units above 3 rd floor
Floor	1BR	2BR		1BR	2BR		1BR	2BR	
4	4	0	4	1	2	3	1	4	5
5	3	0	3	0	3	3	3	3	6
6	3	1	4	2	2	4	1	3	4
7	3	1	4	1	1	2	2	4	6
8	2	1	3	1	1	2	1	3	4
9	2	1	3	1	1	2	1	3	4
Total	17	4	21	6	10	16	9	20	29

5. **Management.** Buildings #2 and #11 will be developed by Parkside Associates, LLC and managed by Holsten Management Corporation . Parkside Associates, LLC is implementing the larger redevelopment of the Cabrini-Green Extension North site, including Phase I and Phase IIA. This creates an incentive to provide high-quality management and maintenance of these two rental buildings in Phase IIB.

6. **Status of Cabrini-Green Extension North Redevelopment.** The Parkside of Old Town development provides public housing and affordable housing units in proportion to market rate units, with an income mix of 50% market rate units, 30% public housing units, and 20% affordable units. The overall plan calls for the construction of approximately 718 new units with a proposed unit mix of 215 units of public housing, 146 units of affordable housing, and 357

units of market-rate housing. The Parkside of Old Town development will be constructed in multiple phases. The first phase, Larrabee Place, is complete and includes two condominium mid-rise buildings and one rental mid-rise building (545 W. Division) in which public housing families with children are housed above the third floor. The rental units are complete and fully occupied. All 191 for-sale units have been built and sold. Of the 20 affordable for-sale units, two units were purchased by former CHA/public housing residents under the CHA's Choose to Own Program. Phase IIA of Parkside of Old Town is complete and includes a 106-unit mid-rise building (544 W. Oak) with an additional 6 townhomes (5 public housing and 1 affordable) attached to its base. The mid-rise has 46 one-bedroom units and 60 two-bedroom units.

Parkside Phases I and IIA						
Phase I	Public Housing	Affordable Rental	Market Rate Rental	Affordable For-Sale	Market For-Sale	TOTAL
Units	107	48	28	20	171	374
Income Mix	29%	13%	8%	5%	46%	
Phase IIA						
Units	39	53	20	n/a	n/a	112
Income Mix	35%	47%	18%	n/a	n/a	

7. Neighborhood Improvements. The Near North Revitalizing Area ("NNRA") continues to attract residential and commercial development necessary to build and maintain a vibrant and diverse community. The Loop is ten minutes away by public transportation and Chicago's Old Town and the Clybourn Corridor are within walking distance of the site. The neighborhood is well-served by public transportation including the CTA rapid transit Red and Brown Lines, along with bus routes at Division Street, North Avenue, and Halsted Street. The following information provides information about recent development activity in the area.

- a. Educational Institutions.** In addition to the Jenner Academy for the Arts (elementary school) on Cleveland Avenue between Elm and Oak Streets, Skinner North Classical on

Scott Street, and the Walter Payton Academy at Oak and Wells Streets, the neighborhood or surrounding neighborhood now includes Immaculate Conception St. Joseph School on North Park Avenue (grades PK-5) and West Hill Street (grades 4-8) and the CICS Quest Charter School on Ogden Avenue.

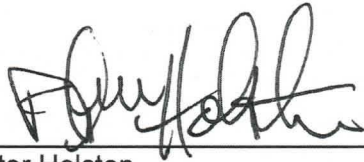
b. **Community Institutions.** On June 1, 2013, construction began on the Jesse White Community Center, a joint project between the Jesse White Foundation, City of Chicago, and Chicago Park District. The community center is located at the southern edge of the NNRA on Chicago Avenue, between Hudson Street and Sedgwick Street. In addition to being the home to the Jesse White Tumbling Team, it will feature a full-court gymnasium, gymnastics center, fitness and club rooms, locker rooms, computer labs and a community meeting area.

c. **Commercial Development.** New national retailers have set roots in the area: Whole Foods on Kingsbury just south of North Avenue; the Apple Store at the cross-section of Clybourn Avenue and North Avenue; and a new Target store on the corner of Division and Larrabee Streets. In 2013, Target completed construction of a new 150,000 square-foot store located at 1200 N. Larrabee, approximately two blocks north of the proposed Phase IIB of Parkside of Old Town. The new Target store's grand opening occurred on October 13, 2013.

8. **Mixed-Use Development.** At the northern edge of the NNRA, construction began in December 2013 on a new residential/retail development. The development, an 8.5 acre site near Clybourn Avenue and Halsted and the former location of the New City YMCA, will feature almost 200 residential apartments, 360,000 square-feet of retail space and 40,000 square feet of office space. The site will also contain an 82,000 square foot Mariano's grocery store and 52,000 square foot ArcLight movie theater. Additionally, under the Cabrini-Green Consent Decree, another selected developer is moving toward a real estate closing in early 2015 to develop the 42,628 square-foot, City-owned parcel on Clybourn Avenue and Division Street.

9. The Cabrini-Green Consent Decree requires the construction of a minimum 700 public housing units and 270 affordable rental units as part of the redevelopment of the Cabrini Green North Extension. Allowing for a waiver of the restriction on housing families with children in public housing units above the third floor for Building #2 in Phase IIB of Parkside of Old Town will assist in the effort to make adequate progress towards Consent Decree requirements; Moreover, the requested waiver will allow Parkside Associates, LLC to continue with the overall planned development of Parkside of Old Town and build units for returning Cabrini-Green families under the Consent Decree and the CHA's Plan for Transformation.

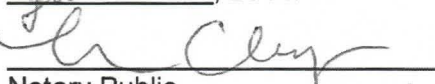
Further Affiant sayeth not.



Peter Holsten
President
Holsten Real Estate Development Corporation

SUBSCRIBED AND SWORN to

Before me this 6th day of
June, 2014.



Notary Public

My commission expires: 8/26/15

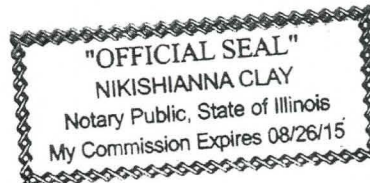
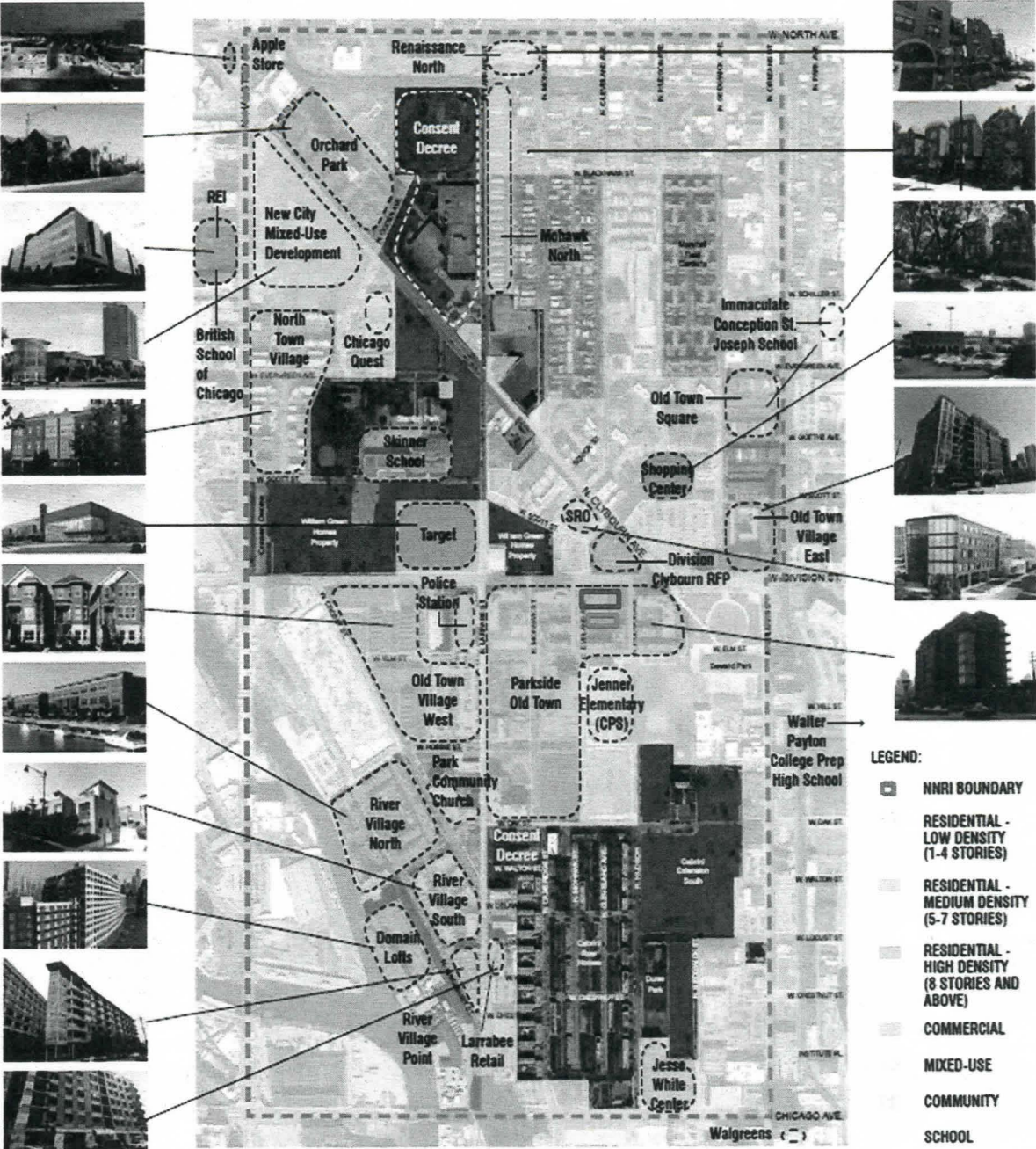


EXHIBIT A-1



- Parkside IIB Site
- Building #2
- Building #11

EXHIBIT B

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

DOROTHY GAUTREAUX, et al.,	)	
Plaintiffs,	)	
	)	
-vs-	)	No. 66 C 1459
	)	
CHICAGO HOUSING AUTHORITY, et al.,	)	Hon. Marvin E. Aspen
Defendants.	)	

**AFFIDAVIT OF KATHY CAISLEY ON BEHALF OF DEFENDANT CHICAGO
HOUSING AUTHORITY**

I, Kathy Caisley, Project Manager of the Chicago Housing Authority's Office of Development Management, being first duly sworn on oath, state on behalf of the Chicago Housing Authority:

The proposed Phase IIB of Parkside of Old Town is located in a Revitalizing Area, as previously approved by this Court in an order dated November 6, 1997. The NNRA continues to attract residential and commercial development, as well as public and private, investment as evidenced by information provided in Peter Holsten's Affidavit (Exhibit B) and the following:

1. In 2013, Target completed construction of a new 150,000 square-foot store located at 1200 N. Larrabee, approximately two blocks north of the proposed Phase IIB of Parkside of Old Town. The new Target store's grand opening occurred on October 13, 2013. In order to accomplish this, the CHA completed a land swap with Target, which involved exchange of CHA-owned land at the northwest corner of Division and Larrabee for Target-owned land parcels within the NNRA. Additionally, negotiations resulted in new employment opportunities with Target for sixty-five (65) CHA residents.

2. The NNRA has also been the subject of considerable residential development, both public and private. The past twelve years have seen the completion of many new residential developments, including the Homes of Mohawk North, Mohawk Partners, Orchard Park, North Town Village, Renaissance North, Old Town Village East, Old Town Village West, Old Town Square, Domain Lofts, River Village North, River Village South, River Village Pointe, the Larrabee, and Phases I and IIA of Parkside of Old Town. These developments include public housing as part of a mixed-income development. Moreover, the public housing units at these developments serve to fulfill the CHA's obligation under the Cabrini-Green Consent Decree to provide 700 newly constructed public housing units within the NNRA.

3. Moving forward, the CHA will acquire 24 units at a private 18-story, 240-unit mixed-income rental building located at 625 W. Division. These units will operate as property-based voucher units through CHA's Property Rental Assistance program. The CHA will continue to consider other unit acquisitions at other private developments within the NNRA.

4. Lastly, under the Cabrini-Green Consent Decree, the City of Chicago issued a Request for Proposals in September of 2010 for development of the approximately one-acre, City-owned parcel bounded by Clybourn Avenue on the east, Division Street on the south, Cleveland Avenue on the west, and a public alley north of Division on the north. The selected developer is in the process of securing financing and moving toward closing in early 2015. This parcel, which fronts both Clybourn and Division, is currently used by City Farms. The redevelopment as planned comprises 82 mixed-income units, of which 25 are planned to be public housing units. It will also provide for approximately 17,200 square feet of retail/commercial space, including but not limited to, a daycare agency with slots for children from low-income families, a restaurant, and 11,227 square feet of community space, which will also include a rooftop community garden.

FURTHER AFFIANT SAYETH NOT

Kathy Caisley
Kathy Caisley, AFFIANT

Sworn and subscribed to before me
This 6th day of June, 2014

[Signature]
Notary Public
My commission expires: _____



Approved as to Legality and Form
Chicago Housing Authority
Office of the General Counsel

By: _____

Joanne P. Boy
Joanne P. Boy
Assistant General Counsel

Date June 6, 2014

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Attorneys for the CHA

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
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DOROTHY GAUTREAUX, et al.,	)	
	)	
Plaintiffs,	)	
	)	No. 66 C 1459
vs.	)	
	)	Hon. Marvin E. Aspen
CHICAGO HOUSING AUTHORITY, et al.,	)	
	)	
Defendants.	)	

AGREED ORDER

This matter coming to be heard on the Joint Motion of Plaintiffs and Defendant Chicago Housing Authority, for an Order waiving the *Gautreaux* restriction on housing families with children in public housing units above the third floor in one specific building in the Near North Revitalizing Area, and amending the Tenant Selection and Assignment Plan; and

The Court having heard from the parties concerning the proposed order; and

The Court being cognizant that the principal remedial purpose of the orders previously entered in this case has been to provide plaintiff class families with desegregated housing opportunities; and

The Court being authorized to issue orders in this case “designed . . . to achieve results consistent with [the Judgment Order]” (304 F. Supp. 736, 741); and

The Court being of the view, based on the representations of the Parties that the proposal to locate thirty-one public housing units in a mid-rise building at 459 W. Division, some of which may be located above the third floor, is designed to achieve results consistent with the Judgment Order previously entered in this cause;

Now, therefore, IT IS HEREBY ORDERED:

The Chicago Housing Authority shall be free to house families with children in thirty-one non-elderly public housing units at 459 West Division, some of which may be located above the third floor, subject to approval of the location of the units by plaintiff's counsel and the CHA. This waiver applies only to the building described herein; the general restriction on housing families in public housing units above the third story remains in effect unless otherwise ordered by this Court.

Further, the Chicago Housing Authority Tenant Selection and Assignment Plan, originally approved by Order of this Court on November 24, 1969, as subsequently amended since, is hereby amended to require that the 36 public housing units in Phase IIB of Parkside of Old Town be made available to eligible CHA families or former CHA families, with priority given to families on the Cabrini-Green Lottery List – pursuant to the Cabrini-Green Consent Decree. If there are no longer such families seeking to return under the Cabrini-Green Consent Decree, then priority should be given to CHA families in the following order: 1) those relocating under CHA's Plan for Transformation; 2) CHA families seeking to transfer within the CHA portfolio; and 3) those families listed on the CHA public housing waiting list.

The public housing units described herein are to be, and remain, well distributed among the affordable and market-rate units in such building.

ENTER:

Judge

Dated: _____

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

DOROTHY GAUTREAUX, et al.,	)	
	)	
Plaintiffs,	)	
	)	No. 66 C 1459
vs.	)	
	)	Hon. Marvin E. Aspen
CHICAGO HOUSING AUTHORITY, et al.,	)	
	)	
Defendants.	)	

NOTICE OF MOTION

To: Attached List

PLEASE TAKE NOTICE that on Thursday, June 12, 2014, at 10:30 a.m., we shall appear before the Honorable Marvin E. Aspen, Judge of the United States District Court for the Northern District of Illinois, Eastern Division, and then and there present the **Joint Motion Of Plaintiffs And Defendant Chicago Housing Authority for an Order Waiving the Restriction on Housing Families with Children in Public Housing Units Above the Third Floor for One Specific Building in Phase II-B of Parkside of Old Town Located in the Near North Revitalizing Area**, a copy of which is attached and hereby served upon you.

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

June 9, 2014

Alexander Polikoff
Julie Elena Brown
Business and Professional People for the
Public Interest
25 East Washington Street, Suite 1515
Chicago, Illinois 60602
312- 641-5570; fax: 312-641-5454

CERTIFICATE OF SERVICE

I, Julie Elena Brown, an attorney, certify that on June 9, 2014, I caused copies of the foregoing Notice and Motion to be served via CSM/ECF upon the person whose name appears on the attached service list.

/s/ Julie Elena Brown
Julie Elena Brown

SERVICE LIST

Scott Ammarell, General Counsel
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60 East Van Buren Street
Chicago, IL 60605