

1/4/67

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

DOROTHY GAUTREAU, ODELL JONES,
DOREATHA R. CRENCHEW, EVA RODGERS,
JAMES RODGERS and ROBERT M. FAIRFAX,

Plaintiffs,

v.

THE CHICAGO HOUSING AUTHORITY,
a Corporation, and ALVIN E. ROSE,
Executive Director,

Defendants.

No. 66 C 1459

OBJECTIONS AND ADMISSIONS OF DEFENDANTS
IN RESPONSE TO PLAINTIFFS' REQUEST FOR
ADMISSIONS UNDER FEDERAL RULE 36

To: Alexander Polikoff
Attorney for Plaintiffs
231 South La Salle Street
Chicago, Illinois 60604

Responding to plaintiffs' request for admissions under Federal Rule 36 received by defendants the 15th day of December 1966, and pursuant to stipulation by and between the parties extending the time within which defendants may serve upon plaintiffs their written response to plaintiffs' said request to and including January 9, 1967, defendants hereby make the following objections and admissions in response to plaintiffs' said request, the admissions being made for the purposes of this action only and subject to all pertinent objections to admissibility which may be interposed at the trial:

Objections

(1) Defendants make no admission as to the document annexed to plaintiffs' request and marked Exhibit A, but object to same as being irrelevant to this action and as stating matters of opinion merely and not matters of fact.

(2) Defendants make no admission as to the document

annexed to plaintiffs' request and marked Exhibit B, but object to same as being irrelevant to this action.

(3) Defendants make no admission as to the document annexed to plaintiffs' request and marked Exhibit C, but object to same as being irrelevant to this action, and further responding state that defendants have never seen the original public statement of Elizabeth Wood of which Exhibit C purports to be an accurate excerpt, and further responding state that Exhibit C states largely matters of opinion merely and not matters of fact.

(4) Defendants make no admission as to the document annexed to plaintiffs' request and marked Exhibit D, but object to same as being irrelevant to this action, and further responding state that defendants have diligently searched their records and have been unable to find the original (or any copy) of any memorandum of which Exhibit D purports to be a true copy, that George Weber the purported author of such memorandum is now deceased, and that defendants therefore could not truthfully admit or deny in any event that the document annexed to plaintiffs' request and marked Exhibit D is a true copy of any such memorandum.

Admissions

(5) Defendants admit that the document annexed to plaintiffs' request and marked Exhibit E is a true copy of current Section 7126 of the Standard Operating Manual of the CHA and states the CHA regulations concerning "Desirability."

(6) Defendants admit that the document annexed to plaintiffs' request and marked Exhibit F accurately states occupancy data which appears in the official records of the CHA.

(7) Defendants admit that the document annexed to plaintiffs' request and marked Exhibit G is a true copy of current Section 7135.3(a) of the Standard Operating Manual of the CHA and states the reasons for which inter-project transfers have been authorized by the CHA since November 20, 1963; and, further responding, state that current Sections 7135.3(b), (c) and (d) provide as follows:

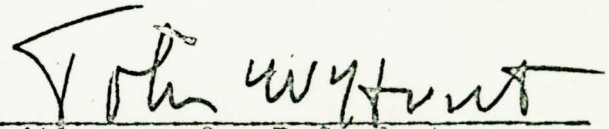
"b Tenants shall submit requests for transfer in writing, supported by substantiating evidence. In the case of requests for transfer on the basis of health problems, a certificate (Exhibit 12) signed by a physician will be provided.

"c When a request for transfer is obviously not justified

by the evidence submitted, the project manager shall disapprove it without referral to the Central Rental Office. However, in the event of an appeal of the project manager's decision by the tenant, or in questionable cases, or if the project manager recommends approval, the request will be submitted to the Chief of Central Rental and Relocation for decision. Such requests shall be prepared on CHA Form 474 (Exhibit 13), and shall have attached thereto the tenant's written request together with any supporting documents.

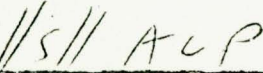
".d All inter-project transfers, after approval by the Chief of Central Rental and Relocation, shall be made as soon as an appropriate vacancy occurs, and shall take precedence over intra-project transfers and the move-in of new families."

(8) Defendants admit that the document annexed to plaintiffs' request and marked Exhibit H is a true copy of former Section 7135.3(a) of the Standard Operating Manual of the CHA and states the reasons for which inter-project transfers were authorized by the CHA prior to November 20, 1963; and, further responding state that former Sections 7135.3(b), (c) and (d) contained the same provisions in haec verba as are contained in current Sections 7135.3(b), (c) and (d).



Attorney for Defendants

Received a copy of the
above Objections and Admissions
this 6 day of January, 1967.



Attorney for Plaintiffs