

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

DOROTHY GAUTREAUX, et al.

Plaintiffs,

v.

SAMUEL R. PIERCE, JR.,  
Secretary of Department of  
Housing and Urban Development,  
and CHICAGO HOUSING AUTHORITY,

Defendants.

)  
)  
)  
) 66 C 1459  
) 66 C 1460  
)  
) (Consolidated)  
)  
) Hon. Marvin E. Aspen  
)  
)  
)  
)  
)  
)  
)

RECEIVED  
JUL 5 1988

Judge Marvin E. Aspen  
U.S. District Court

PLAINTIFFS' MEMORANDUM IN SUPPORT  
OF MOTION FOR AWARD OF ATTORNEYS FEES

Plaintiffs submit this memorandum in support of their pending motion for an award of attorneys fees, pursuant to 42 U.S.C. §1988, for work relating to the establishment of a receivership for the scattered site program of defendant Chicago Housing Authority.

To establish the "lodestar" fee (reasonable hours times current hourly rate), plaintiffs submit herewith:

- (1) an affidavit of Alexander Polikoff setting forth his hours and qualifications,
- (2) an affidavit of Lowell E. Sachnoff on the reasonable current hourly rate for Mr. Polikoff,
- (3) an affidavit of Elizabeth L. Lassar setting forth her hours and qualifications, and

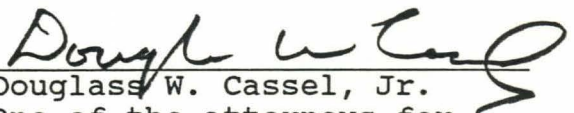
(4) an affidavit of Michael D. Sher on the reasonable current hourly rate for Ms. Lassar.

In addition, plaintiffs request an enhancement of the lodestar fee to reflect the time value of money. See Shakman v. Democratic Organization, 677 F.Supp. 933, 940-42 (N.D. Ill. 1987). Such enhancement may be accomplished by using interest rates to compute the present value of fees based on historical hourly rates. (Id.) For that purpose, plaintiffs also submit herewith two prior affidavits of Mr. Sachnoff on the hourly rate for Mr. Polikoff in 1981 and 1983, and a prior affidavit of Mr. Sher on the hourly rate for Ms. Lassar in 1985.

Respectfully submitted,

July 5, 1988

Douglass W. Cassel, Jr.  
109 N. Dearborn St.  
Chicago, IL 60602  
(312) 641-5570

  
Douglass W. Cassel, Jr.  
One of the attorneys for  
Plaintiff

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

DOROTHY GAUTREAUX, et al.,	)	
	)	
Plaintiffs,	)	Civil Action No. 66C1459
	)	66C1460
-v-	)	
	)	(Consolidated)
SAMUEL R. PIERCE, JR., Secretary	)	
of the Department of Housing and	)	
Urban Development, and CHICAGO	)	
HOUSING AUTHORITY,	)	
	)	
Defendants.	)	

AFFIDAVIT OF ALEXANDER POLIKOFF

I, ALEXANDER POLIKOFF, being duly sworn, say:

1. I am one of the attorneys of record for the plaintiffs in Gautreaux, et al. v. Chicago Housing Authority, et al., Civil Action No. 66 C 1459, in the U. S. District Court for the Northern District of Illinois, Eastern Division. Since the inception of the litigation I have been in responsible charge of this case for the plaintiffs.

2. I am a graduate of the University of Chicago (B.A. 1948, M.A. English Language and Literature 1950) and of the University of Chicago Law School (J.D. 1953), where I was Editor-in-Chief of the Law Review and a member of the Order of the Coif. I am admitted to practice in the state courts in Illinois, in



this Court, in the United States Courts of Appeals for the Seventh Circuit and the District of Columbia, and in the United States Supreme Court.

Commencing in January, 1953, I was associated with the law firm that is now known as Schiff Hardin & Waite in Chicago where I engaged in a variety of civil litigation, primarily in this Court, for the next 17 years. On November 1, 1960 I became a partner in the firm.

Since April 15, 1970, I have been Executive Director and a full-time salaried employee of Business and Professional People for the Public Interest (BPI). BPI, a not-for profit corporation, was incorporated in Illinois in 1969 and since that time has functioned as a public interest law and research center. By agreement any fees awarded for my services in this case will be paid to BPI.

3. Using contemporaneous time records and my case files, I have prepared a written record (set forth in paragraph 6 hereof) of some of the professional time I have spent seeking the establishment of a Receivership in this case with respect to the scattered site program of the defendant, Chicago Housing Authority (CHA), up to the effective date of the Receivership, December 2, 1987.

4. The record of my time set forth in paragraph 6 does not include any of my time spent on a number of additional activities in this case, including:

- (a) The proceedings of the receivership selection committee appointed by Judge Aspen.

- (b) Any negotiations, conversations, meetings and other dealings, including litigation activity, of any nature whatsoever with the U. S. Department of Housing and Urban Development ("HUD") concerning any matter other than the establishment of a Receivership;
- (c) Any negotiations, conversations, meeting and other dealings, including litigation activity, of any nature whatsoever with CHA concerning any matter other than the establishment of a Receivership; and
- (d) The proceedings before Judge Crowley in 1979-80 relating to the appointment of a receiver.

5. The record of my time set forth in paragraph 6 does not include any time spent by certain other attorneys of record for the plaintiffs in this case, or of time spent by law clerks and others, although such persons did in fact spend time on this case, including with respect to the establishment of a Receivership. Such other attorneys of record include:

Timothy W. Wright, III  
John R. Hammell

6. The written record referred to in paragraph 6 hereof is as follows:

<u>Date</u>	<u>Activity</u>	<u>Hours</u>
7/1/81 to 12/31/81	Monitor CHA activity pursuant to order of Judge Crowley of 6/6/80, including meetings with CHA, correspondence, etc.	20.75
1/1/82 to 6/30/82	Monitor CHA activity pursuant to order of Judge Crowley of 6/6/80, including meetings with CHA, correspondence, etc.	15.50



7/1/82 to 10/31/82	Monitor CHA activity pursuant to Judge Crowley order of 6/6/80, including meetings with CHA and the City of Chicago, correspondence, etc.	19.75
11/1/82 to 4/13/83	Legal and factual research, preparatory to filing receivership motion	9.75
4/18/83 to 5/1/83	Preparation and filing (4/27/83) of receivership motion, secure order (4/29/83) re briefing schedule, etc.	11.00
5/1/83 to 6/21/83	Notice, prepare for, take and review deposition of Elmer Beard (5/16/83 and 6/6/83) and related receivership activities	30.25
6/13/83 to 6/28/83	Review CHA response (6/21/83) to receivership, motion, prepare and file (6/28/83) plaintiffs' reply, secure orders re briefing schedule (6/13/83) and setting receivership hearing (6/24/83) and related activities	13.00
6/25/83 to 7/13/83	Prepare for and conduct receivership hearing (7/13/83)	42.25
7/14/83 to 8/9/83	Meetings, correspondence with CHA and fact gathering following receivership hearing	3.50
8/10/83 to 10/28/83	Research, drafting, correspondence and meetings relating to motion for entry of receivership order (filed 10/25/83, presented to Judge Aspen 10/28/83), including preparation and submission of status report to Judge Aspen (9/12/83)	28.00
10/30/83 to 11/21/83	Meetings, drafting and correspondence respecting receivership order (entered 11/21/83), including preparation and filing (11/14/83) of plaintiffs' reply to CHA response (filed 11/7/83) to plaintiffs' motion	14.75

11/28/83 to 1/13/84	Meetings, drafting and correspondence respecting CHA scattered site activities, submission of suggested names to Judge Aspen of persons to act as receiver, meeting with Judge Aspen re the same (12/22/83) and review of CHA report on site acquisition and vacation of receivership order (1/13/84)	11.75
4/29/87 to 5/5/87	Conversations, meetings and related activity respecting CHA emergency motion (presented 5/5/87) to cease scattered site rehabilitation work, including preparation of "Selected Gautreaux Materials" and appearance before Judge Moran on 5/5/87	9.50
5/5/87 to 5/14/87	Preparation, filing (5/8/87) and presentation to Judge Aspen (5/14/87) of plaintiffs' renewed motion for appoint- ment of a receiver, and related activity	14.00
5/17/87 to 5/26/87	Work in connection with CHA motion to vacate oral ruling on receivership (presented 5/26/87)	2.25
5/27/87 to 6/16/87	Preparation, filing (6/5/87) and presentation (6/16/87) of plaintiffs' proposed order appointing receiver, and related activity, including work on scope of receivership memorandum	25.00
6/17/87 to 7/27/87	Prepare for and attend hearing (7/27/87) on plaintiffs' proposed order appointing receiver, and related activity, including review of CHA objections to proposed order and review of HUD management Review of CHA and CHA Response thereto	20.25
8/2/87 to 8/15/87	Work in connection with securing entry of order of 8/14/87 appointing Receiver, including preparation for and court appearance of 8/3/87, further work on and mailing to Judge Aspen and counsel of scope of receivership memorandum, work	



on and conferences respecting various  
drafts of receivership order, and court  
appearance on 8/14/87 18.50

9/4/87 Work on various matters relating to the  
to effectiveness of the receivership,  
10/29/87 including memorandum of agreement  
between HUD and CHA, meeting with HUD  
and Receiver in Washington (9/17/87),  
motion and order (entered 9/29/87)  
respecting modification of consent  
decree, and conference call with Judge  
Aspen and counsel (10/29/87) 21.75

10/30/87 Further work on various matters  
to relating to the effectiveness of the  
12/2/87 receivership, including review of  
agreement effective 11/27/87 between  
HUD, CHA and the receiver, and Receiver's  
Notice of Effective Date, filed  
12/2/87 6.25

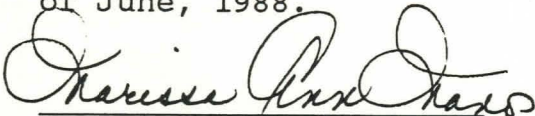
8/10/87 Prepare affidavit in support of motion  
to for attorneys' fees 8.50  
6/16/88

Total 346.25

Further affiant says not.

  
Alexander Polikoff

Subscribed and sworn to  
before me this 16<sup>th</sup> day  
of June, 1988.

  
Notary Public







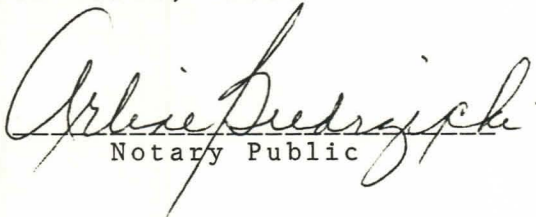
for plaintiffs in this case. I should add that I have known Alexander Polikoff for many years and I have first-hand knowledge of his skill and experience as a lawyer.

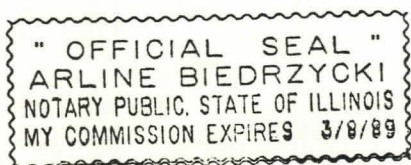
4. Based upon my knowledge of the reasonable and customary charges in effect among lawyers in the City of Chicago of like experience, skill and reputation in civil rights litigation, it is my opinion that a reasonable and appropriate current hourly rate for the services of Mr. Polikoff in this case would be \$200.00 per hour.

5. This hourly rate is for services of a lawyer of the skill, experience and reputation of Mr. Polikoff in matters in which fees are charged to and paid by clients on an ongoing basis, without regard to the outcome of the litigation. In several instances higher hourly rates are charged.

  
Lowell E. Sachnoff

SUBSCRIBED AND SWORN TO  
before me this 29th day  
of March, 1988.

  
Notary Public



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

DOROTHY GAUTREAUX, et al.,	)	
	)	
Plaintiffs,	)	Civil Action No. 66C1459
	)	66C1460
-v-	)	
	)	(Consolidated)
SAMUEL R. PIERCE, JR., Secretary	)	
of the Department of Housing and	)	
Urban Development, and CHICAGO	)	
HOUSING AUTHORITY,	)	
	)	
Defendants.	)	

AFFIDAVIT OF ELIZABETH L. LASSAR IN SUPPORT OF PLAINTIFFS'  
MOTION FOR AWARD OF ATTORNEYS' FEES

I, ELIZABETH L. LASSAR, being duly sworn, say:

1. I was a salaried staff attorney for Business and Professional People for the Public Interest ("BPI") from June 1977 through January 1984. In such capacity, I did a substantial amount of work and had significant responsibility respecting many of the matters litigated on behalf of the plaintiffs in Gautreaux, et al., v. Samuel R. Pierce, et al., Civil Action No. 66 C 1459/60 in the U.S. District Court for the Northern District of Illinois, Eastern Division.



2. I am a graduate of the University of Michigan (B.A., History, Honors 1972) and of Northwestern University Law School (J.D. 1976), where I worked in the Legal Aid Clinic. I am admitted to practice in the state courts of Illinois, in this Court, in the state courts of Indiana and in the U. S. District Court for the Southern District of Indiana.

Prior to joining BPI I worked as a staff attorney for the Legal Services Organization of Indiana in Indianapolis (1976-1977) where I had primary and secondary responsibility for litigating a number of cases on behalf of low-income clients before various state courts in Indiana, the U. S. District Court for the Southern District of Indiana, and various federal administrative agencies.

From June 1977 through January 1984 I was a staff attorney and salaried employee of BPI, working on a full-time basis from June 1977 through December 1980, and after a "maternity leave" of nearly six months on a part-time basis from June 1981 through January 1984. BPI was incorporated in Illinois in 1969 and since that time has functioned as a public interest law and research center.

Since February 1984 I have devoted "full time" to family responsibilities. I have been also involved in various community activities, including the North Suburban Housing Center, the Interfaith Housing Development Corporation and the League of Women Voters of Highland Park.

As a staff attorney at BPI, I had substantial responsibility for a number of matters involving housing and urban development issues, including cases in this Court and administrative complaints with the Department of Housing and Urban Development.

I began work in the present litigation in June 1977 when I became a salaried attorney at BPI. BPI has an understanding with its salaried attorneys (including me) that any attorneys' fees awarded for their services will be paid to the organization and not to the individual attorneys. By agreement any fees awarded for my services in this case will be paid to BPI.

3. I have prepared a written record (set forth in paragraph 5 hereof) of some of the professional time I have spent respecting the establishment of a receivership in this case with respect to the scattered site program of the defendant, Chicago Housing Authority (CHA), using case files in the BPI office, and based on my daily time records. For each activity I recorded only what I believe to be the least amount of time I actually spent. I have no doubt that I actually spent substantially more time on the matters set forth in paragraph 5 than is there recorded.

4. The record of my time in paragraph 5 of this affidavit does not include any of my time spent on any other activities in this case.

5. The written record referred to in paragraph 3 hereof is as follows:

<u>Date</u>	<u>Activity</u>	<u>Hours</u>
11/6/82 to 4/13/83	Legal and factual research, preparatory to filing receivership motion	25.50
4/18/83 to 5/1/83	Preparation and filing (4/27/83) of receivership motion, secure order (4/29/83) re briefing schedule, etc.	18.50
5/1/83 to 6/21/83	Notice, prepare for, take and review deposition of Elmer Beard (5/16/83 and 6/6/83) and related receivership activities	33.75
6/13/83 to 6/28/83	Review CHA response (6/21/83) to receivership motion, prepare and file (6/28/83) plaintiffs' reply, secure orders re briefing schedule (6/13/83) and setting receivership hearing (6/24/83) and related activities	8.25
6/25/83 to 7/13/83	Prepare for and conduct receivership hearing (7/13/83)	23.00
7/14/83 to 8/9/83	Meetings, correspondence with CHA and fact gathering following receivership hearing	16.25
8/10/83 to 10/28/83	Research, drafting, correspondence and meetings relating to motion for entry of receivership order (filed 10/25/83, presented to Judge Aspen 10/28/83), including preparation and submission of status report to Judge Aspen (9/12/83)	37.25
10/30/83 to 11/21/83	Meetings, drafting and correspondence respecting receivership order (entered 11/21/83), including preparation and filing (11/14/83) of plaintiffs' reply to CHA response (filed 11/7/83) to plaintiffs' motion	7.50



11/28/83	Meetings, drafting and correspondence	
to	respecting CHA scattered site activities,	
1/13/84	submission of suggested names to Judge	
	Aspen of persons to act as receiver,	
	meeting with Judge Aspen re the same	
	(12/22/83) and review of CHA report on	
	site acquisition and vacation of	
	receivership order (1/13/84)	2.50
8/10/87	Prepare affidavit and related	
to	materials in support of motion for	
5/87	attorneys' fees	1.00
		<hr/>
	Total	173.50

Further affiant says not.

*Elizabeth L. Lassar*  
 ELIZABETH L. LASSAR

Subscribed and sworn to  
 before me this 5<sup>th</sup> day  
 of May, 1988.

*Susan E. Skarbek*  
 Notary Public



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

DOROTHY GAUTREAUX, et al.,	)	
	)	
Plaintiffs,	)	Civil Action No. 66C1459
	)	66C1460
-v-	)	
	)	(Consolidated)
SAMUEL R. PIERCE, JR., Secretary	)	
of the Department of Housing and	)	
Urban Development, and CHICAGO	)	
HOUSING AUTHORITY,	)	
	)	
Defendants.	)	

AFFIDAVIT OF MICHAEL D. SHER IN SUPPORT OF  
PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES

MICHAEL D. SHER, being first duly sworn on his oath, deposes  
and states as follows:

1. I am an attorney duly licensed and authorized to  
practice law in the State of Illinois and the United States  
District Court for the Northern District of Illinois, and am a  
member of the Trial Bar of this Court. I give this affidavit in  
support of the application for fees filed by Elizabeth L. Lassar  
in connection with her work in the Gautreaux v. Chicago Housing  
Authority litigation.

2. I have been a member of the bar since 1974, and my professional work has been devoted almost exclusively to civil and criminal litigation in the federal courts. These cases have involved, inter alia securities, civil rights, antitrust, trade secrets, and general commercial matters.


3. As a result of this work, I am familiar with certain federal statutes which authorize the payment of attorneys' fees with the customary hourly rates charged by attorneys in the City of Chicago for their professional services in many types of litigation, including civil rights matters. In particular, I am generally familiar with the current hourly schedule of charges of several Chicago law firms ranging in sizes from 25 to 300 lawyers, including the hourly fee schedule in effect in my own law firm, which employs approximately 70 attorneys. I also am familiar with the background, experience, skill, character and reputation of Elizabeth L. Lassar, one of the attorneys for plaintiffs in this case. I have known Ms. Lassar for approximately 20 years and have knowledge of her scholarship and her experience as a lawyer, especially in civil rights and housing matters.

4. Based upon my knowledge of the reasonable and customary charges in effect among lawyers in the City of Chicago of like experience, skill and reputation in civil rights and housing litigation, it is my opinion that a reasonable appropriate current hourly rate for the services of Ms. Lassar in this case would be \$100.00 per hour.



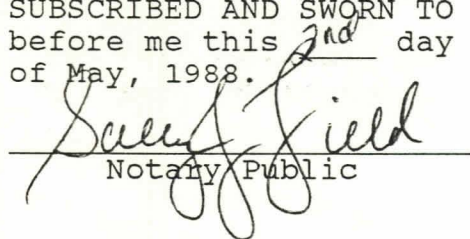
5. This hourly rate is for services of a lawyer of the skill, experience and reputation of Ms. Lassar in matters in which fees are charged to and paid by clients on an ongoing basis, without regard to the outcome of the litigation.

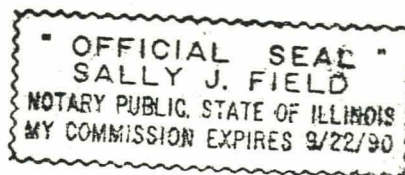
FURTHER AFFIANT SAYETH NOT.



MICHAEL D. SHER

SUBSCRIBED AND SWORN TO  
before me this 2nd day  
of May, 1988.

  
Notary Public



AFFIDAVIT OF LOWELL E. SACHNOFF  
IN SUPPORT OF MOTION FOR ATTORNEYS FEES

LOWELL E. SACHNOFF, being duly sworn on oath, states:

1. I am an attorney duly authorized to practice law in the State of Illinois and the United States District Court for the Northern District of Illinois. I give this affidavit in support of the application for fees filed by Alexander Polikoff in connection with his work in the Gautreaux v. Chicago Housing Authority litigation.

2. For many years a substantial portion of my law practice has involved representation of both plaintiffs and defendants in complex actions in the United States District Court in which, by statute or otherwise, provision is made for the payment of attorney's fees to counsel for prevailing plaintiffs. These cases have involved, inter alia, antitrust cases, securities cases, civil rights cases, and class actions of other kinds.

3. As a result of the foregoing, I have had occasion to become familiar with the customary hourly rates charged by attorneys in the City of Chicago for their services in all types of litigation, including civil rights matters. In order to update my knowledge in this regard for the specific purpose of preparing this affidavit, I have examined the current hourly schedule of charges in use by six Chicago law firms ranging in size from 25 to 200 lawyers, as well as the hourly fee schedule in effect in my own law firm. I have also familiarized myself

with the background, experience, skill and reputation of Alexander Polikoff, counsel for plaintiffs in this case. I should add that I have known Alexander Polikoff for many years and I have first-hand knowledge of his skill and experience as a lawyer.

4. Based upon my knowledge of the reasonable and customary charges in effect among lawyers in the City of Chicago of like experience, skill and reputation in civil rights litigation, it is my opinion that a reasonable and appropriate current hourly rate for the services of Mr. Polikoff in this case would be in the range of \$125 to \$175 per hour.

5. This range of hourly rates is for services of a lawyer of the skill, experience and reputation of Mr. Polikoff, in matters in which fees are charged to and paid by clients on an ongoing basis, without regard to the outcome of the litigation. In several instances higher hourly rates are charged. In litigation such as that involved in this case, where payment of any fee is dependent upon the outcome of the litigation, it is the practice of courts in this district and elsewhere in the country to award fees to the prevailing attorneys by applying a multiplier to the above fee schedule, in order to take into account and compensate the attorneys for the fact that they would receive no fee if they did not prevail in the litigation. The amount of that multiplier is determined, among other things, by the efficiency with which the litigation was conducted, the



difficulty of the litigation, the particular skill and innovation brought to the litigation by the attorneys involved, the lapse of time from inception to conclusion (including interest rate and inflation factors), and benefit conferred upon the plaintiffs whether monetary or otherwise.

J. S. G. P.

SUBSCRIBED AND SWORN to  
before me this 20th day  
of May, 1981.

Artina P. Dziuryski  
NOTARY PUBLIC

AFFIDAVIT OF LOWELL E. SACHNOFF  
IN SUPPORT OF MOTION FOR ATTORNEYS FEES

LOWELL E. SACHNOFF, being duly sworn on oath, states:

1. I am an attorney duly authorized to practice law in the State of Illinois and the United States District Court for the Northern District of Illinois. I give this affidavit in support of the application for fees filed by Alexander Polikoff in connection with his work in the Gautreaux v. Chicago Housing Authority litigation.

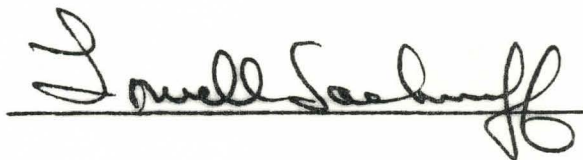
2. For many years a substantial portion of my law practice has involved representation of both plaintiffs and defendants in complex actions in the United States District Court in which, by statute or otherwise, provision is made for the payment of attorney's fees to counsel for prevailing plaintiffs. These cases have involved, inter alia, antitrust cases, securities cases, civil rights cases, and class actions of other kinds.

3. As a result of the foregoing, I have had occasion to become familiar with the customary hourly rates charged by attorneys in the City of Chicago for their services in all types of litigation, including civil rights matters. In particular, I am familiar with the current hourly schedule of charges in use by several Chicago law firms ranging in size from 25 to 200 lawyers, as well as the

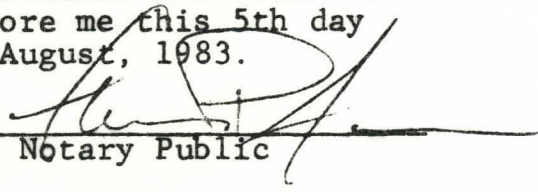
hourly fee schedule in effect in my own law firm. I have also familiarized myself with the background, experience, skill and reputation of Alexander Polikoff, counsel for plaintiffs in this case. I should add that I have known Alexander Polikoff for many years and I have first-hand knowledge of his skill and experience as a lawyer.

4. Based upon my knowledge of the reasonable and customary charges in effect among lawyers in the City of Chicago of like experience, skill and reputation in civil rights litigation, it is my opinion that a reasonable and appropriate current hourly rate for the services of Mr. Polikoff in this case would be \$165.00 per hour.

5. This hourly rate is for services of a lawyer of the skill, experience and reputation of Mr. Polikoff in matters in which fees are charged to and paid by clients on an ongoing basis, without regard to the outcome of the litigation. In several instances higher hourly rates are charged.

  
\_\_\_\_\_

SUBSCRIBED AND SWORN TO  
before me this 5th day  
of August, 1983.

  
\_\_\_\_\_  
Notary Public

My Commission Expires June 14, 1987



STATE OF ILLINOIS       )  
                              ) SS.  
COUNTY OF COOK        )

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

DOROTHY GAUTREAUX, et al.,	)	
	)	
Plaintiffs,	)	
	)	No. 66 C 1459
v.	)	
	)	No. 66 C 1460
SAMUEL R. PIERCE, Secretary	)	
of U.S. Department of Housing	)	(Consolidated)
and Urban Development, et al.,	)	
	)	
Defendants.	)	

**AFFIDAVIT OF MICHAEL D. SHER IN SUPPORT  
OF PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES**

MICHAEL D. SHER, being first duly sworn on his oath, deposes and states as follows:

1. I am an attorney duly licensed and authorized to practice law in the State of Illinois and the United States District Court for the Northern District of Illinois, and am a member of the Trial Bar of this Court. I give this affidavit in support of the application for fees filed by Elizabeth L. Lassar in connection with her work in the Gautreaux v. Chicago Housing Authority litigation.

2. I have been a member of the bar since 1974, and my professional work has been devoted almost exclusively to civil and criminal litigation in the federal courts. These cases have involved, inter alia, securities, civil rights, antitrust, trade secrets, and general commercial matters.

3. As a result of this work, I am familiar with certain federal statutes which authorize the payment of attorneys' fees and with the customary hourly rates charged by attorneys in the City of Chicago for their professional services in many types of

litigation, including civil rights matters. In particular, I am generally familiar with the current hourly schedule of charges of several Chicago law firms ranging in sizes from 25 to 200 lawyers, including the hourly fee schedule in effect in my own law firm, which employs more than 100 attorneys. I also am familiar with the background, experience, skill, character and reputation of Elizabeth L. Lassar, one of the attorneys for plaintiffs in this case. I have known Ms. Lassar for approximately 17 years and have knowledge of her scholarship and her experience as a lawyer, especially in civil rights and housing matters.

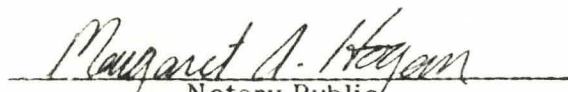
4. Based upon my knowledge of the reasonable and customary charges in effect among lawyers in the City of Chicago of like experience, skill and reputation in civil rights and housing litigation, it is my opinion that a reasonable appropriate current hourly rate for the services of Ms. Lassar in this case would be \$100.00 per hour.

5. This hourly rate is for services of a lawyer of the skill, experience and reputation of Ms. Lassar in matters in which fees are charged to and paid by clients on an ongoing basis, without regard to the outcome of the litigation.

FURTHER AFFIANT SAYETH NOT.

  
MICHAEL D. SHER

SUBSCRIBED and SWORN TO  
before me this 2<sup>nd</sup> day  
of March, 1985

  
Notary Public

My Commission Expires:

4-3-85

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

DOROTHY GAUTREAUX, et al.

Plaintiffs,

v.

SAMUEL R. PIERCE, JR.,  
Secretary of Department of  
Housing and Urban Development  
and CHICAGO HOUSING AUTHORITY,  
et al.,

Defendants.

)  
)  
)  
) 66 C 1459  
) 66 C 1460  
)  
) (Consolidated)  
)  
) Hon. Marvin E. Aspen  
)  
)  
)  
)  
)

RECEIVED  
JUL 5 1988

Judge Marvin E. Aspen  
U. S. District Court


NOTICE OF FILING

TO: Attached Service List

Please take notice that we have this day filed Plaintiffs'  
Memorandum and Affidavits in Support of their Motion for Award of  
Attorneys' Fees.

July 5, 1988

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Douglass W. Cassel, Jr.  
One of the attorneys for  
Plaintiff



CERTIFICATE OF SERVICE

I, Douglass W. Cassel, Jr., hereby certify that I caused copies of the foregoing Notice, Memorandum and Affidavits to be served on all parties on the attached service list by causing copies thereof to be deposited in the United States mail, first class postage prepaid, at 109 North Dearborn Street, Chicago, Illinois this 5th day of July 1988.

July 5, 1988

Douglass W. Cassel, Jr.

GAUTREAUX CASES CURRENT SERVICE LIST

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