

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

DOROTHY GAUTREAUX, et al.,	)
	)
Plaintiffs,	)
	)
v.	) 66 C 1459
	)
CHICAGO HOUSING AUTHORITY,	) Hon. Marvin E. Aspen
	)
Defendant.	)

**AFFIDAVIT OF ROBERT L. JONES, JR.**  
**SUPPORTING MOTION FOR ATTORNEYS' FEES AGAINST CHA**

I, Robert L. Jones, Jr., being duly sworn, say:

1. I was 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 United States District Court for the Northern District of Illinois until May 31, 2002.
2. I am a graduate of the University of Notre Dame (B.A. 1980, Program of Liberal Studies and French, Summa Cum Laude). I am also a graduate of Harvard Law School (J.D., 1984, Cum Laude), where I was Managing Editor of the Harvard Law Review.
3. I was admitted to practice in the state of Illinois and before the United States District Court for the Northern District of Illinois in 1984. I have since been admitted to the Trial Bar of the United States District Court and the bar of the United States Court of Appeals for the Seventh Circuit. I am also admitted to practice in the state of Indiana.
4. During 1984-1985, I served as a Law Clerk to Judge Milton Shadur of the United States District Court for the Northern District of Illinois.

5. From 1985 until 2002, I was a full-time Staff Counsel with Business and Professional People for the Public Interest (BPI). BPI was incorporated as an Illinois not-for-profit corporation in 1969 and since that time has functioned as a public interest law and policy center.

6. From 1985 to 1999, I also served as a part-time faculty member of the Loyola University Chicago School of Law. In that capacity, I taught Professional Responsibility, Appellate Advocacy, Moot Court and Legal Writing classes, and I served as an adviser to editors of the Loyola Law Journal.

7. Since July 1, 2002, I have been a member of the faculty of the Notre Dame Law School and the Director of the Notre Dame Legal Aid Clinic.

8. During my tenure at BPI, I had primary and secondary responsibility for a variety of litigation matters, most of them complex, involving fair housing, public utility and environmental issues. I had first or second chair responsibility in litigation at all levels of both the Illinois and the federal court systems, as well as state and federal administrative agencies. A partial list of matters in which I have had major responsibility includes, in addition to this case:

(a) Federal fair housing litigation: South Suburban Housing Center, et. al. v. Greater South Suburban Association of Realtors, et al., 935 F.2d 868 (7<sup>th</sup> Cir. 1991), cert. den. 112 S.Ct. 971 (A test case involving challenges to racial diversity programs of a fair housing center and various municipalities); Jorman, et al. v. Veterans Administration, et al., 830 F.2d 1420 (7<sup>th</sup> Cir. 1987) (A challenge to the operation of federal mortgage lending programs in a racially changing neighborhood); and Kemock v. Calhoun Building Corp., 88 C 196 (N.D. ILL) (A housing discrimination lawsuit against numerous homebuilders and municipal officials).

(b) Public utilities litigation: People ex. rel. Hartigan v. Illinois Commerce Commission, 592 N.E.2d 1066 (ILL. Sup. Ct. 1992) (Recovery of nuclear power plant construction costs); Business and Professional People for the Public Interest v. Illinois Commerce Commission, 525 N.E.2d 1053 (ILL. App. CT. 1988) (Rate refunds for poor nuclear plant performance); Business and Professional People for the Public Interest, et al. v. Commonwealth Edison Co., 87 CH 11098 (Circuit Court of Cook County) (Punitive damages trial); and numerous adversarial hearings before the Illinois Commerce Commission involving electric utility rates and energy efficiency requirements for gas and electric utilities.

(c) Environmental litigation: Sierra Club, Illinois Chapter, et al. v. United States Department of Transportation, et al., 962 F.Supp. 1037 (N.D. ILL. 1997) (challenge to Environmental Impact Statement for new toll highway); People of the State of Illinois, et al. v. CWM Chemical Service, Inc., et al., 91 CH 04768 (Circuit Court of Cook County, Illinois) (Environmental enforcement action regarding hazardous waste incinerator); CWM Chemical Service, Inc. v. Environmental Protection Agency, Illinois Pollution Control Board No. 89-177 (Appeal of hazardous waste incinerator permit denial); and In the Matter of Groundwater Technology Standards, Illinois Pollution Control Board, R89-5 (Promulgation of statewide groundwater protection regulations).

9. I worked on the Gautreaux litigation continuously from 1991 through May 31, 2002. Although I worked on a variety of matters within the case and participated generally in the development of legal strategy on behalf of the plaintiffs class, my principal responsibility after September 1999 was representing Plaintiffs on the Working Groups and related evaluation panels shaping redevelopments in the North Kenwood-Oakland area, including the Lakefront property, the Drexel site, and the Madden Park/Ida B. Wells/Clarence Darrow development.



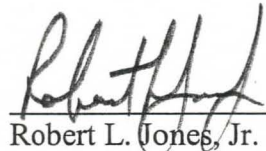
10. All three Working Groups were active during 2001-2002, meeting regularly and overseeing the development and implementation of plans for new mixed income communities. During the summer of 2001, the Madden/Wells/Darrow Working Group also interviewed potential Phase 1 developers and selected a development team. During the second half of 2001 and early 2002, I was also involved in litigating motions regarding the tenanting of North Kenwood-Oakland scattered sites.

11. 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 the individual attorneys. Any fees awarded for my services in this case will be paid to BPI.

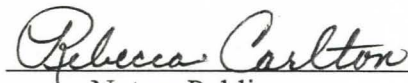
12. Throughout the time I participated in this litigation, I recorded the hours I spent in contemporaneous daily records. Using those records, I prepared a written summary, set forth in Exhibit A hereto, of time that I spent on this case from August 1, 2001 to May 31, 2002.

13. The actual amount of professional time that I spent on this case exceeds the time set forth in Exhibit A. I did not record, nor did I set forth in Exhibit A, numerous instances in which I spent less than 15 minutes on tasks (such as telephone calls and brief discussions). In addition, I have omitted time set forth in my daily time sheets for this case where I judged that tasks performed were inappropriate for an award of fees.

Further affiant sayeth not.

  
Robert L. Jones, Jr.

Subscribed and sworn to  
before me this 14<sup>th</sup> day  
of November, 2003

  
Notary Public

REBECCA D. CARLTON  
Notary Public, State of Indiana  
County of St Joseph  
My Commission Expires Nov. 15, 2009

Robert L. Jones, Jr.  
Gautreaux Attorneys' Fees  
August 1, 2001 through  
July 31, 2003

DATE	HOURS	DESCRIPTION
08/01/01	0.75	GTX team mtg.
08/01/01	2.75	Conf. Lakefront working group at Draper and Kramer re financing issues and site plan for Lakefront development
08/13/01	0.50	TC w/Mary Anderson re Madden/Wells mtgs./ interviews/proposals
08/13/01	0.50	TC w/Tracey Sanchez re Madden/Wells proposals
08/13/01	2.50	Read Madden/Wells proposals
08/13/01	0.25	OC w/JMK, ALP re motion to modify Kenwood-Oakland revitalizing area including Madden-Wells
08/14/01	2.75	Attend Madden/Wells evaluation panel meeting to vote on finalists for community interviews
08/15/01	1.75	GTX team mtg. re redevelopment issues
08/16/01	0.50	OC w/JMK, NJB, JEB, AEG re filing waiver motions re building height exceptions
08/16/01	2.00	Edit, revise, finalize proposed draft order, reply on K-O tenanting; phone: CHA counsel and Habitat counsel; conf. BPI co-counsel re same
08/20/01	3.25	Attend Madden/Wells working group meeting and public presentations by developer candidates at Monumental Baptist church
08/21/01	2.50	Lakefront working group meeting at Habitat
08/27/01	0.50	Read NJB memo re financing of transformation plan; TC w/NJB re same
08/27/01	2.25	OC w/GTX team, Habitat staff to discuss issues of unit mix, unit dispersal, and financing of CHA redevelopments
08/28/01	2.00	Lakefront working group meeting to review unit mix issues
08/29/01	4.25	Interview with finalist developer candidates for Madden/Wells site
08/30/01	0.25	Review draft of Madden/Wells revitalizing motion
08/30/01	1.75	OC w/GTX team re analysis of financial resources available to carry out transformation plan

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DATE	HOURS	DESCRIPTION
09/04/01	1.25	OC w/ALP re Madden/Wells development, revitalizing area expansion in K-O; TC w/L.Grisham, J.Head, ALP re Centrum units; K-O revitalizing area expansion; Madden/Wells
09/07/01	0.25	TC w/Shirley Newsome re Madden/Wells evaluation panel process
09/10/01	0.50	TC w/Whitney Weller (HUD) re Kenwood-Oakland court orders and redevelopment agreements.
09/10/01	1.75	Madden/Wells eval. panel
09/10/01	1.50	Mtg. w/Toni Preckwinkle re potential revitalizing motion for Hearts United III
09/12/01	1.75	GTX team (ALP, EHM, AEG, JEGP) and Leroy Square (Ujima) re review of Ujima supportive services program
09/12/01	1.00	Tour of Kenwood-Oakland revitalizing area and prospective Hearts United revitalizing area with BPI staff
09/12/01	1.50	OC w/GTX team (ALP, JEB, AEG, NJB, JMK) re redevelopment and transformation plan status
09/14/01	2.00	Prep for meeting with team on Transformation Plan Year III. Attend team meeting to analyze.
09/17/01	3.75	Madden/Wells eval. panel third interviews with developer teams.
09/18/01	2.50	Mtg. w/Lakefront working group for update; conf. Shirley Newsome re redevelopment issues
09/19/01	2.25	OC w/ALP, JEB, NJB, Habitat staff re analysis of Year III transformation plan issues.
09/20/01	3.50	Mtg. w/MaddenWells eval. panel; Drexel working group at 4th Ward office.
09/20/01	0.50	OC w/ALP, OC w/AG re Madden/Wells developments
09/21/01	2.25	Mtg. w/Beverly Bishop, Whitney Weller, CHA staff, Habitat staff, et al. re Lakefront Community Organization issues relating to Lakefront redevelopment
09/25/01	0.75	TC w/Sue McCann re outreach to LCO families, issues surrounding LCO role in redevelopment

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DATE	HOURS	DESCRIPTION
09/25/01	0.75	TC w/Whitney Weller re HUD response to LCO complaints about redevelopment process
09/25/01	0.75	Review proposed CHA/TWO outreach plan to LCO and draft letter to CHA with comments
09/26/01	1.25	Edit, send letter to CHA re outreach plan for Kenwood-Oakland relocatees; phone: Tom Stokes, Sue McCann re same.
10/03/01	1.50	GTX team meeting
10/11/01	0.50	TC w/Rose Joshua, new LCO attorney, re background on K-O litigation
10/16/01	2.25	Mtg. w/CHA supportive services staff, devo staff, TCB re supportive services for Lakefront redevelopment
10/16/01	2.00	Lakefront working group meeting
10/22/01	0.50	TC w/D. Schwarz re M-W working group meeting; TC w/L.Grisham re Drexel working group meeting.
10/24/01	1.50	GTX team mtg.
10/25/01	0.25	Review NJB's memo on financing CHA redevelopments
10/31/01	1.25	Mtg. w/Habitat staff, Cedric Hampton, Paige McC re revisions to PH units in Lakefront redevelopment and Drexel
11/14/01	0.50	Review and comment on NJB's latest memo on financing Plan for Transformation
11/15/01	0.25	OC w/NJB re financing memo
11/19/01	1.50	Madden/Wells Working Group Meeting
12/05/01	2.00	Conf. with Joe Williams (Target Group) to discuss Ujima, Madden/Wells and Drexel developments.
12/05/01	1.50	GTX team mtg. re redevelopment issues
12/13/01	0.25	Review CHA motions to extend bar date in K-O and to compel compliance with subpoena
12/13/01	1.00	Review pleadings re LCO motion to intervene in GTX; phone calls Eddie Feldman re same



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July 31, 2003

DATE	HOURS	DESCRIPTION
12/13/01	1.00	TC w/Lawrence Grisham re (1) Problems on development team at Lakefront site; (2) Mtg. w/special master re K-O status; (3) Mtg. between BPI/Habitat to discuss financial issues with transformation plan
12/18/01	1.00	TC w/Lawrence Grisham re outstanding issues on Lakefront development process
12/18/01	2.00	Lakefront working group meeting
12/28/01	0.75	TC w/Eddie Feldman re LCO motion to intervene; review draft response brief of Receiver; phone Feldman re same
01/02/02	1.00	OC w/Lauren Raphael re Kenwood-Oakland working groups
01/02/02	1.50	Draft Plaintiffs response brief to LCO intervention motion; review draft CHA brief; TC w/Tom Johnson re CHA brief
01/03/02	2.00	Madden/Wells working group meeting
01/04/02	1.50	Mtg. w/Habitat staff, Professor Len Rubinowitz (Kenwood-Oakland ombudsman) re status of planning efforts in Kenwood-Oakland
01/15/02	1.50	Lakefront working group meeting
01/16/02	1.50	OC w/BPI GTX team, Habitat staff re; outstanding redevelopment issues
01/18/02	2.00	Madden/Wells working group
01/23/02	1.75	GTX team mtg.
01/24/02	2.00	Drexel working group meeting
01/29/02	1.25	OC w/ALP, EHM, AEG, NJB re potential conflicts of interest on ABLA and Cabrini working groups
01/30/02	0.25	OC w/AEG re proposed unit distribution at Horner phase II
01/30/02	0.25	OC w/ALP re draft conflict of interest disclosure re ABLA Working Group
02/04/02	0.75	OC w/Lauren Raphael re Drexel. Lakefront redevelopment issues
02/04/02	0.25	TC w/E. Feldman re proposed joint response to LCO motion for extension on intervention motion



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DATE	HOURS	DESCRIPTION
05/13/02	2.00	Mtg. w/Ujima directors and MA re; Madden/Wells redevelopment issues; mtg. w/Toni Preckwinkle and MA re problems with Phase 1 site plan selection; mtg. w/Shirley Newsome and MA re Madden/Wells planning.
05/14/02	2.00	Mtg. w/MA, Mikki Anderson re drafting motion for revitalizing order for Madden/Wells and supporting affidavits; begin drafting.
05/15/02	0.50	Edit Madden/Wells revitalizing motion and draft order
05/20/02	0.25	OC w/MA re draft revitalizing motion
05/21/02	0.50	TC w/Lillian Fuentes re income restrictions on Lakefront; Madden/Wells revitalizing motion
05/22/02	1.00	Edit Madden/Wells revitalizing motion, OC w/MA, ALP re same; phone Eddie Feldman re same
05/30/02	0.75	Review draft Levin aff. in support of motion to expand North K-O revitalizing area; conf. MA re same; phone: Mikki Anderson re same
05/30/02	0.25	TC w/Lillian Fuentes re whether Working Group mtgs. are subject to the Open Meetings Act
02/20/02	1.00	GTX team meeting including discussion of offsite development strategy
05/31/02	0.50	Review revised draft Levin aff. in support of revitalizng motion; conf. MA re same
	31.75	<b>Total Hours</b>