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,)
Defendant.))

AFFIDAVIT OF ELOISE P. LAWRENCE SUPPORTING MOTION FOR ATTORNEYS' FEES AGAINST CHA

I, Eloise P. Lawrence, being duly sworn, say:

- 1. I am one of the attorneys for plaintiffs in <u>Gautreaux v. Chicago Housing</u>

 <u>Authority</u>, Civil Action No. 66 C 1459, in the United States District Court for the Northern District of Illinois.
- 2. I am a graduate of Stanford University (B.A., 1996, with Honors). I am also a graduate of Northwestern University School of Law (J.D., 2002, <u>cum laude</u>). In December 2002, I was selected as a Skadden Fellow, and in September of 2002, I began work at Business and Professional People for the Public Interest (BPI).
- 3. I was inducted into the Massachusetts Bar on January 8, 2003. On February 28, 2003, I was admitted to practice law in the United States District Court for the Northern District of Illinois.
- 4. From May 2000 to August 2000, I worked as an intern at the U.S. Attorney's Office in Boston, Massachusetts, in the Major Crimes Division. I assisted in criminal trials and

hearings. My responsibilities included preparing witnesses, formulating closing arguments and drafting legal memoranda on evidentiary, criminal procedure and constitutional issues.

- 5. From August 2000 to May 2002, I worked as a student staff member at the Children and Family Justice Center at Bluhm Legal Clinic. I worked extensively on delinquency and criminal matters, including cases of possession of an unlawful weapon, arson and murder. I wrote motions to quash arrest and to suppress evidence. I interviewed witnesses, visited detained clients and gathered evidence. I also appeared before the Cook County Juvenile Court.
- 6. In the summer of 2001, I worked as a summer associate at the law firm of Hill & Barlow in Boston, Massachusetts. I researched and drafted legal memoranda on issues ranging from employment litigation to real estate transactions, as well as criminal defense.
- 7. I have worked on the <u>Gautreaux</u> litigation since joining BPI. Under the general supervision of Alexander Polikoff, I have had responsibilities relating to the redevelopment efforts within the ABLA and Cabrini-Green Revitalization Areas and to a variety of tasks relating to the CHA's Plan for Transformation.
- 8. 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. Any fees awarded for my services in this case will be paid to BPI.
- 9. Throughout most of the time that I have participated in this litigation, I recorded the hours I spent in contemporaneous daily time records. For those times when I failed to maintain time records in contemporaneous daily fashion, I did my very best to record such time carefully based upon the use of documents such as meeting agendas, my appointment calendars, and consultation with other colleagues to verify my time spent on certain tasks. In the fall of 2003, I prepared a written record (set forth in Exhibit A hereto) of the professional time that I

have spent from the time I joined BPI up to a recent date on this case. This written record is based upon time records that I maintained for that period. I did not record, nor did I set forth in Exhibit A instances in which I spent less than 15 minutes on tasks (such as telephone calls and brief discussions) related to this case. I have also eliminated time spent on matters related to this case for which I did not believe an award of attorneys' fees would be appropriate. The hours of professional time that I have spent on this case thus exceeds the number of hours set forth in Exhibit A.

Further affiant sayeth not.

Eloise P. Lawrence

Subscribed and Sworn to Before me this 23rd day of

December, 2003.

Notary Public

"OFFICIAL SEAL" PAULA KRUGER

Notary Public, State of Illinois My Commission Expires Feb. 16, 2004

DATE	ATE HOURS		DESCRIPTION
09/12/02	,	0.75	OC w/AEG re svce connector questionnaire, mtg w/Kate Walz, Geoff Heeren re questionnaire
09/12/02		0.75	OC w/JEB re research on mobility counseling programs around the country
09/16/02		2.00	Mtg. at ABLA re CSS
09/18/02		1.50	GTX team meeting re site specific criteria and the Year 4 plan
09/23/02		1.00	Cabrini Working Group meeting
09/23/02	2	2.00	Review of responses to the ABLA RFP; review of LR Development Co. and Team Chicago responses
09/23/02		1.50	Discussion with NJB re ABLA and Cabrini
09/26/02	(0.50	Discussion with NJB re ABLA
09/27/02	2	2.00	ABLA Working Group mtg. re response to proposals and preparation for interviews on 10/10/02
10/02/02		1.00	Mtg. at Cabrini Green
10/02/02		1.50	GTX team mtg.
10/03/02	2	2.00	ABLA planning mtg. for interviews of developers, planning questions, evaluating qualifications
10/07/02	(0.50	Mtg. with NJB on ABLA
10/08/02	2	2.00	Mtg. at ABLA re CSS
10/08/02	1	1.00	Cabrini Green mtg. re the developers for the North Extension site
10/09/02	2	2.00	GTX team mtg.
10/09/02	1	1.00	Mtg. with NJB on Cabrini and ABLA
10/10/02	5	5.25	ABLA WG interviews of LR Development and Team Chicago
10/11/02	3	3.00	Internal evaluation of LR vs. Team Chicago responses to the ABLA RFP
10/16/02	(0.75	Mtg. with NJB on ABLA

DATE 10/19/02	HOURS 2.00	DESCRIPTION Cabrini Extension North Working Group mtg. at CHA - discussion w/Holsten North Park development team
10/22/02		ABLA CSS mtg. re Employment Task Force
10/25/02	3.00	ABLA Working Group mtg.
10/29/02	0.25	Discussing ABLA with Dan Rockafield of Habitat and NJB
10/31/02	0.50	OC w/Nick Brunick re BPI 's evaluation of the ABLA developer proposals
11/04/02	2.50	ABLA Working Group mtg. to further discuss site plans issues with the developers and latest materials received from developers
11/07/02	0.50	Discussion w/Benet Haller from DPD re the near north extension selection process
11/19/02	0.50	OC w/NJB/ALP re ABLA working group
11/21/02	0.50	OC w/NJB/ALP re ABLA working group procedures and configuration of dwelling units
11/26/02	2.00	Mtg. at ABLA ranking LR and Team Chicago
11/27/02	2.00	GTX team mtg.
12/02/02	1.00	OC w/Nick Brunick re ABLA and Cabrini issues; OC w/ALP re ABLA
12/03/02	3.00	ABLA Working Group mtg. re debating and reviewing the two development team proposals
12/05/02	4.00	Trip to Peoria LR site w/members of ABLA Working Group
12/06/02	2.00	ABLA Working Group mtg. to finalize decision on ABLA developer
12/11/02	1.00	Mtg. w/Brian Ellison of Habitat re Cabrini concerns
12/11/02	1.00	GTX team mtg. w/JEB, ALP and AEG
12/17/02	1.50	CHA board mtg. at ABLA about reasons for BPI's choice of the LR Development team for ABLA redevelopment
12/17/02	4.50	Cabrini Green Working Group mtg. at CHA - interviews of development teams for the near north high school site.
01/02/03	0.50	TC w/Brian Ellison on Domain

DATE	HOURS	DESCRIPTION
01/06/03	1.50	Mtg. w/Carole Steele and NJB to transfer Working Group duties to EPL
01/07/03	0.40	TC w/Thom Finerty
01/08/03	0.65	TC w/Latrell Montgomery (resident) and Sarah Mervine about relocation rights
01/09/03	0.50	OC w/NJB re ABLA numbers in relation to CRA lawsuit
01/09/03	1.50	Mtg. at Lawyers' Committee re CRA lawsuit
01/09/03	0.75	OC w/ALP and JEB re CRA lawsuit
01/09/03	0.50	OC w/ALP re ABLA and Cabrini
01/10/03	0.50	TC w/Carol Steele
01/10/03	1.00	Contacting GTX plaintiffs
01/10/03	0.50	TC w/Steve Porras
01/14/03	1.00	Read Sullivan's report
01/14/03	0.50	TC w/Steve Porras
01/14/03	0.50	Contacting GTX plaintiffs
01/14/03	0.50	TC w/Thom Finerty re CSS and education
01/15/03	0.50	OC w/JEB re fee petition
01/15/03	1.00	TC w/Thom Finerty, and finished reading Sullivan's report
01/16/03	3.00	ABLA meeting
01/21/03	2.50	ABLA CSS meeting
01/24/03	1.00	TC w/Thom Finerty and TC w/Jeff Head re heat crisis at Rockwell Gardens
01/27/03	1.50	Worked on CRA lawsuit
01/28/03	0.75	TC w/Thom Finerty re ABLA
01/28/03	0.50	Worked on CRA lawsuit

DATE	HOURS	DESCRIPTION
01/29/03	0.50	Worked on Cabrini consent decree modification
01/31/03	2.25	ABLA working group mtg.
02/03/03	1.50	North Town Park meeting
02/05/03	1.00	GTX team mtg.
02/07/03	1.00	Prepare for mtg. w/LR
02/07/03	1.00	Mtg. w/LR
02/07/03	1.00	Mtg. w/Dan Rockafield regarding CRA lawsuit
02/10/03	4.00	ABLA CSS mtg.
02/12/03	0.50	TC w/Dan Rockafield re CRA lawsuit
02/14/03	2.00	ABLA working group mtg.
02/18/03	1.45	North Town park meeting
02/19/03	1.00	TC w/Andy Geer and Dan Rockafield re CRA lawsuit and RFQ for off-site units
02/19/03	2.00	GTX team mtg.
02/20/03	1.00	TC w/Andy Geer and Jeff Head
02/25/03	1.00	OC w/AEG re ABLA WG issues
02/25/03	0.50	TC w/Thom Finerty re ABLA
02/25/03	1.25	Worked on Cabrini and ABLA CSS issues
02/26/03	0.25	Cabrini Consent Decree
02/26/03	0.50	TC w/Thom Finerty re ABLA WG issues
02/27/03	0.50	OC w/AEG re ABLA issues, incl. income mix among affordable units
02/27/03	2.50	TC w/Dan Rockafield, examined ABLA materials re CRA lawsuit, called Andy Geer
02/27/03	0.25	TC w/Dan Rockafield

DATE 02/28/03	HOURS 0.50	DESCRIPTION Worked on CRA lawsuit issues
02/28/03	0.50	OC w/ALP and NJB
02/28/03	0.50	TC w/Tim Venstra about ABLA
02/28/03	2.00	ABLA working group mtg.
03/03/03	0.50	TC w/Thom Finerty re ABLA
03/03/03	1.50	OC w/ALP and TC w/Clyde Murphy and TC w/Steve Porras re CRA lawsuit
03/03/03	1.25	Worked on CRA lawsuit issues
03/04/03	3.25	CRA lawsuit - prep for mtg; mtg. w/Bill Wilen and Clyde Murphy; TC w/Steve Porras and Jeff Head
03/04/03	1.50	North Town Park meeting
03/05/03	0.25	TC w/Wilen re CRA lawsuit
03/05/03	0.50	OC w/ALP and JEB re CRA lawsuit
03/05/03	0.50	Setting up meeting with LR and Habitat
03/05/03	0.25	TC w/Thom Finerty re ABLA physical planning
03/05/03	0.50	Reading over off-site RFQ; wrote up short memo to ALP, JEB and AEG to discuss off-site RFQ in relationship with GTX
03/06/03	0.50	CRA lawsuit - QC w/JEB re agenda for 3/11 mtg. with LR and Habitat; examined RFP and LR proposal and ABLA revit order
03/07/03	1.75	Cabrini CSS meeting discussing workplan for HUD
03/10/03	0.50	Drafted agenda for CRA lawsuit mtg. w/LR and Habitat; TC w/Dan Rockafield re maps
03/10/03	3.00	ABLA CSS planning meeting with LR and Telesis
03/11/03	0.25	Mtg. w/ALP to discuss above
03/11/03	2.50	Mtg. w/LR and Habitat re CRA lawsuit
03/11/03	0.25	OC w/Nick re CRA lawsuit

DATE 03/11/03	HOURS 1.5	
03/12/03	0.50	Mtg. w/ALP and JEB re CRA lawsuit
03/13/03	2.50	ABLA working group mtg.
03/17/03	0.2	5 Cabrini Green working group mtg.
03/17/03	1.7	5 North Town Park mtg. at CHA
03/17/03	0.2	OCs w/JEB re ABLA negotiations
03/18/03	0.4	Called Rich Wheelock and OC w/AEG about unit distribution at Cabrini and horner
03/19/03	1.50	O GTX team mtg.
03/19/03	0.2	Reviewed working group notes for ABLA
03/19/03	0.50	OC w/NJB about Cabrini
03/21/03	1.2	Discussed and reviewed charts and numbers for CRA lawsuit mtg.
03/21/03	0.50	Reviewed Cabrini CSS work plan and left messages for Jackie Taylor of Holsten and Bryan Samuels, consultant to CSS committee, TC w/Brian Ellison re Cabrini
03/24/03	1.25	Pulled together all the revitalizing areas, OC w/JEB about the compilation of revitalizing areas materials as well as CRA lawsuit
03/24/03	1.00	Wrote up conversation with E&ES about case management; sent memo to GTX team
03/24/03	0.25	OC w/AEG and NJB re Cabrini
03/24/03	0.25	TC w/Steve Porras; OC w/JEB; e-mailed Jeff Head re ABLA meeting of LR and CRA plaintiff's counsel
03/24/03	0.25	TC w/Brian Ellison and Lorri Newson on GTX waiver for domain lofts
03/25/03	0.25	5 TC w/Thom Finerty about ABLA
03/25/03	0.25	OC w/ALP regarding Domain lofts
03/25/03	1.25	Reviewed ALP's file on Centrum/Domain, OC w/ALP and TC w/Brian Ellison

DATE 03/26/03	J RS 0.50	DESCRIPTION OC w/JEB and ALP re Hearts United/Centrum match
03/27/03	0.25	TC w/Bill Wilen about CRA lawsuit
03/27/03	2.28	ABLA working group mtg.
03/28/03	0.50	TC w/Thom Finerty re ABLA
03/28/03	0.25	OC w/ALP about CRA lawsuit
03/28/03	0.50	TC w/Jackie Taylor about Cabrini social services
03/31/03	0.25	Drafted email to Wilen re LR meeting - gave copy of exchange to ALP - CRA lawsuit
03/31/03	0.25	OC w/NJB re ABLA
04/01/03	0.25	Left message for Rich Wheelock, read Holsten CSS plan
04/01/03	1.00	TC w/Brian Ellison, studied distribution map, e-mailed JEB and ALP about next steps for Domain lofts, OC w/AEG about Phase III move out activity, e-mailed the group about questions/ observations
04/02/03	0.50	OC w/ALP about Domain iofts and CRA lawsuit
04/02/03	2.00	GTX team mtg.
04/03/03	1.42	Drafted letter for Domain lofts
04/03/03	1.00	Mtg. w/Dan Levin - GTX team
04/07/03	1.72	Prep. for ABLA CSS meeting
04/07/03	1.00	CRA lawsuit; OC w/JEB
04/07/03	1.32	North Town Park meeting
04/07/03	3.00	ABLA CSS meeting
04/08/03	0.13	OC w/ALP about ABLA lawsuit and Cabrini
04/08/03	1.42	Cabrini Green working group mtg. at DOH
04/08/03	1.50	Worked on Domain/Hearts United issue
04/09/03	1.00	Reviewed tenant assignment issue, tried to find language with regard to Horner, Cabrini and ABLA

DATE	HOURS	DESCRIPTION
04/09/03	1.85	TC w/Brian Ellison about Cabrini letter, about HUD approval on HOPE VI projects, TC w/Michelle Lanaux at LR and Thom Finerty regarding ABLA CSS
04/09/03	1.50	Edited letter from CHA to BPI on Domain lofts
04/09/03	0.77	Worked on the letter from Habitat
04/10/03	2.50	ABLA working group mtg.
04/10/03	2.00	Cabrini mtg. for the Coalition to Protect Public Housing
04/14/03	0.10	Wrote e-mail to Lawrence Grisham on Domain lofts
04/17/03	3.00	MPC stakeholders meeting
04/18/03	2.45	Mtg. w/Brian Ellison - toured Cabrini and new developments
04/18/03	0.30	TC w/Bryan Samuels about Cabrini CSS plan
04/18/03	0.27	Reviewed Telesis contract ; left message for Tim Venestra
04/21/03	0.55	Research for fee petition
04/21/03	0.95	Researched legal issues for fee petition
04/21/03	0.68	OC w/JEB and AEG about GTX issues
04/21/03	1.00	North Town Park meeting
04/22/03	1.18	Reviewing the tenant selection criteria and management plan for domain
04/23/03	1.00	Mtg. w/ABLA development team
04/23/03	2.50	Mtg. w/Habitat
04/23/03	0.25	OC w/JEB re ABLA working group meeting
04/24/03	1.00	ABLA working group mtg.
04/25/03	2.25	Cabrini CSS meeting
04/29/03	0.70	Drafted comments on Domain documents and faxed to Lorri Newson
04/30/03	1.67	Researching question by Holsten on GTX and Cabrini

DATE	HOURS	DESCRIPTION
04/30/03	0.43	Reviewed and discussed w/JEB CRA lawsuit letter from Sonnenschein
05/01/03	0.67	TC w/Grayson Mitchell about education and services at ABLA
05/01/03	2.00	Research for fee petition
05/05/03	4.25	ABLA CSS mtg. re employment taskforce
05/05/03	0.25	OC w/EPL re ABLA
05/07/03	0.50	Researched issues re site-specific criteria
05/07/03	1.50	GTX team mtg.
05/08/03	2.00	ABLA Working group meeting
05/12/03	0.72	Reviewed CHA progress reports; OC w/AEG; reviewed latest site-specific criteria questions for JEB
05/13/03	2.42	Cabrini working group mtg. at DOH
05/14/03	3.25	Mtg. re Taylor and Stateway in relation to revitalizing order
05/21/03	1.50	Mtg. w/Habitat re Stateway and Taylor
05/22/03	0.25	OC w/AEG re CSS issues at Cabrini and ABLA
05/22/03	1.50	CSS Cabrini meeting
05/27/03	2.75	Habitat mtg. re Taylor revitalizing area; f/u
05/28/03	1.50	Mtg. w/Habitat
06/02/03	3.25	ABLA CSS meeting
06/03/03	2.00	OC re teams for Cabrini Near North High School
06/04/03	2.00	GTX team mtg.
06/04/03	0.33	TC w/Thom Finerty regarding the site-specific criteria at ABLA
06/05/03	2.00	Mtg. on site-specific criteria at ABLA
06/05/03	1.78	HCV working group mtg.
06/10/03	1.48	Cabrini Green working group mtg.

DATE	HOURS	DESCRIPTION
06/12/03	2.50	ABLA working group mtg.
06/19/03	1.25	Mtg. re Taylor revitalizing order
06/25/03	1.25	Mtg. w/Habitat
06/26/03	2.50	Working group meeting at ABLA
06/30/03	1.00	OC w/Eva Dziekonski, PK, AEG and HJF re time and filing fees
06/30/03	0.60	TC w/Thom Finerty and reviewing CSS subcommittee notes for ABLA
06/30/03	1.00	OC w/JEB about ABLA - TC w/Eddie Feldman, e-mailed the briefing sheet
07/10/03	1.25	TC w/Eddie Feldman (3 times); OC w/ALP; e-mailed Kate Walz re CRA lawsuit
07/10/03	0.75	Reviewed ABLA minutes and reviewed Domain loft lease
07/11/03	0.25	Responding to Habitat's request for all relevant GTX orders to CRA lawsuit
07/14/03	0.25	TC w/Thom Finerty re ABLA
07/14/03	0.25	Dictating CRA litigation notes
07/14/03	3.50	ABLA CSS meeting
07/15/03	1.75	Cabrini working group mtg.
07/16/03	2.00	GTX mtg.
07/17/03	3.00	ABLA working group mtg.
07/18/03	2.00	Edited draft of Cabrini CSS work plan; TC w/Daniele Bell re CSS work plan
07/18/03	0.25	Worked on Domain waivers
07/22/03	3.00	Prepared for mtg. w/Habitat and CHA re CRA lawsuit
07/23/03	0.50	Worked on drafting of domain waiver
07/23/03	2.00	Mtg. w/Habitat

DATE	HOURS	DESCRIPTION
07/23/03	1.00	Worked on issues re CRA lawsuit
07/28/03	1.00	ABLA working group issues
07/29/03	0.50	TC w/Jeff Head re ABLA working group issues
07/29/03	1.50	Drafting Domain waiver
07/31/03	0.75	Drafting Domain waiver
	274.89	Total Hours