

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

DOROTHY GAUTREAUX, ET AL.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 66 C 1459
	)	
CHICAGO HOUSING AUTHORITY,	)	
	)	
Defendant.	)	

**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 applications for fees filed by Alexander Polikoff, Julie Elena Brown, Robert L. Jones, Jr., Adam Gross, Jonathan M. Kaden, Mary Anderson, Nicholas J. Brunick, Henry Ford, Jr. and Eloise Lawrence in connection with their work in the Gautreaux v. Chicago Housing Authority litigation.

2. I am the senior litigation partner in Sachnoff & Weaver, Ltd., a 140-person Chicago law firm. For many years a substantial portion of my 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 attorneys' 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. In addition, I have represented attorneys in several recent fee shifting and common fund fee cases in the Seventh Circuit including: Skelton v. General Motors Corp., 860 F.2d 250 (7th Cir. 1988); In the Matter of Continental

Illinois Sec. Litig., 962 F.2d 566 (7th Cir. 1992); Florin v. Nationsbank of Georgia, N.A., 60 F.3d 1245 (7th Cir. 1995).

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 or am familiar with the current and historical hourly schedules of charges in use by ten 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 backgrounds, experience, skill and reputations of Alexander Polikoff, Julie Elena Brown, Robert L. Jones, Jr., Adam Gross, Jonathan M. Kaden, Mary Anderson, Nicholas J. Brunick, Henry Ford, Jr. and Eloise Lawrence, counsel for the plaintiffs in this case. I should add that I have known Mr. Polikoff, Ms. Brown and Mr. Jones for many years and I have first-hand knowledge of their skill and experience as lawyers.

4. Based upon my knowledge of the reasonable and customary charges that were in effect among lawyers in the City of Chicago of like experience, skill and reputation in civil rights litigation, it is my opinion that reasonable and appropriate currently hourly rates for the services of attorneys in this case would be:

<b><u>Attorney</u></b>	<b><u>Hourly Rate</u></b>
Alexander Polikoff	\$ 400
Julie Elena Brown	350
Robert L. Jones, Jr.	350
Adam Gross	265
Jonathan M. Kaden	240
Mary Anderson	240
Nicholas J. Brunick	225
Henry J. Ford, Jr.	200
Eloise P. Lawrence	200

5. These hourly rates are for services of lawyers of the skill, experience and reputations of Mr. Polikoff, Ms. Brown, Mr. Jones, Jr., Mr. Gross, Mr. Kaden, Ms. Anderson, Mr. Brunick, Mr. Ford, Jr. and Ms. Lawrence in matters in which fees are charged to and paid by clients on an ongoing basis, without regard to the outcome of the litigation.

  
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Lowell E. Sachnoff

SUBSCRIBED AND SWORN to  
before me this 21<sup>st</sup> day  
of October, 2003.

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

