

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

DOROTHY GAUTREAUX, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 66 C 1459
	)	
	)	Hon. Marvin E. Aspen
CHICAGO HOUSING AUTHORITY, <i>et al.</i> ,	)	
	)	
Defendant.	)	

**JOINT MOTION OF PLAINTIFFS AND  
DEFENDANT CHICAGO HOUSING AUTHORITY  
FOR AN ORDER APPROVING AGREEMENT OF  
THE PARTIES RESPECTING  
PAYMENT OF PLAINTIFFS' ATTORNEYS' FEES**

Plaintiffs and Defendant Chicago Housing Authority (“CHA”), by their respective attorneys, move the Court pursuant to Local Rule 54.3 for entry of an Order approving an agreement between the parties for payment of Plaintiffs’ attorneys’ fees by CHA to Business and Professional People for the Public Interest (“BPI”). The agreement covers the period of time following the Court’s most recent fee award, beginning January 1, 2013 and ending December 31, 2014.

In support of this Motion, the parties state as follows:

1. The last award of attorneys' fees to plaintiffs in this case, by this Court's order of October 17, 2013, was for work performed between January 1, 2011 and December 31, 2012.

2. On September 25, 2015, Plaintiffs submitted to CHA a fee request pursuant to Local Rule 54.3 requesting attorneys' fees of \$792,625.00 for the period of January 1, 2013 through December 31, 2014. The fee request reflected the following hours worked and hourly rates:

<b>Attorney</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
A. Polikoff	223.37 hours	\$700	\$156,359.00
J. Brown	662.88 hours	\$575	\$381,156.00
A. Barnea	28.38 hours	\$375	\$10,642.50
E. Blumberg	169.38 hours	\$375	\$63,517.50
K. Bemis	367 hours	\$350	\$128,450.00
J. Tresnowski	150 hours	\$350	\$52,500.00
<b>TOTAL</b>	<b>1601.01 hours</b>		<b>\$792,625.00</b>

3. Pursuant to Local Rule 54.3, the parties conferred in an attempt to reach agreement on the amount of fees. As a result of those discussions, the parties did reach agreement and CHA agreed to pay \$775,000 to BPI in one installment promptly following approval by the Court.

4. In light of the parties' agreement, as indicated by Local Rule 54.3(f), this motion does not include supporting evidentiary materials. However, Plaintiffs stand ready to submit time records, affidavits and any other supporting material the Court may request.

WHEREFORE, Plaintiffs and CHA respectfully request entry of an order approving the parties' agreement respecting payment of attorneys' fees of \$775,000 for work performed

during the period from January 1, 2013 through December 31, 2014. For the Court's convenience, a proposed draft order is attached hereto.

Respectfully Submitted,

By: /s/ Julie Elena Brown  
Julie Elena Brown  
One of the Attorneys for the Gautreaux Plaintiffs

By: /s/ Elizabeth M. Silas  
Elizabeth M. Silas  
One of the Attorneys for the Defendant

March 1, 2016

Alexander Polikoff  
Julie Elena Brown  
Business and Professional People  
for the Public Interest  
25 East Washington Street, Suite 1515  
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(312) 641-5570

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Defendant.	)	

AGREED ORDER

This matter coming to be heard on the Joint Motion of Plaintiffs and Defendant Chicago Housing Authority (“CHA”) for an Order Approving an Agreement of the Parties Respecting Payment of Plaintiffs’ Attorneys’ Fees, and, based on the presentations and submissions of the parties, the Court finding that the agreement of the parties is reasonable,

IT IS HEREBY ORDERED:

The Court approves the agreement of the parties respecting payment by CHA to Business and Professional People for the Public Interest of Plaintiffs’ attorneys’ fees in the amount of \$775,000 for work performed during the period of January 1, 2013 through December 31, 2014.

ENTER:

\_\_\_\_\_  
Judge Marvin E. Aspen

\_\_\_\_\_, 2016

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**NOTICE OF MOTION**

To: Attached List

PLEASE TAKE NOTICE that on Thursday, March 3, 2015, at 10:30 a.m., we shall appear before the Honorable Marvin E. Aspen, Judge of the United States District Court, and then and there present the attached Joint Motion and proposed Order, a copy of which is hereby service upon you.

/s/ Julie Elena Brown  
\_\_\_\_\_  
Julie Elena Brown  
One of the Attorneys for Plaintiffs

March 1, 2016

Alexander Polikoff  
Julie Elena Brown  
Business and Professional People  
for the Public Interest  
25 East Washington Street, Suite 1515  
Chicago, IL 60614  
(312) 641-5570

**CERTIFICATE OF SERVICE**

I, Julie Elena brown, an attorney, certify that on March 1, 2016, I caused copies of the foregoing Notice and Joint Motion to be served upon the persons whose names appear on the attached service list in the manner stated therein.

/s/ Julie Elena Brown  
Julie Elena Brown

**SERVICE LIST**

Elizabeth Silas (via CM/ECF)  
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