

**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 Impact For Equity (“IFE”). The agreement covers the period following the Court’s most recent fee award, beginning January 1, 2023 and ending July 31, 2024.

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 November 20, 2023, was for work performed between January 1, 2021 and December 31, 2022.
2. The Settlement Agreement approved by this Court’s order of January 23, 2019, provides that the Plaintiffs may seek attorneys’ fees for monitoring and enforcing the Agreement.

3. On August 29, 2024, Plaintiffs submitted to CHA a fee request pursuant to Local Rule 54.3 requesting fees for work performed by the Plaintiffs' legal team in monitoring and enforcing the Settlement Agreement, in the sum of \$265,406.25, as follows:

	<u>Hours</u>	<u>Rates</u>	<u>Total</u>
J. Brown	257.25 hours	\$625	\$160,781.25
Cara Hendrickson	91.25 hours	\$600	\$54,750.00
Ashley Meeder	142.50 hours	\$350	\$49,875.00
Total	491 hours		\$265,406.25

The rates requested were the same as rates approved by the Court in the prior fee award for those with comparable experience. The request also included an additional amount for fee preparation time of over \$7850, based on the rates listed above, the precise amount of which was to be determined upon resolution of the base fee amount.

4. 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 \$268,000.00 to IFE following approval by the Court.

5. 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 \$268,000.00 for work performed during the period from January 1, 2023, through July 31, 2024. For the Court's convenience, a proposed draft order is attached hereto.

Respectfully Submitted,

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

By: /s/ Cara Hendrickson
Cara Hendrickson
One of the Attorneys for the Gautreaux Plaintiffs

November 21, 2024

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