



Now come the Intervenor-Plaintiffs Concerned Residents of ABLA (“CRA”), Carolyn Nance, Wandra Stimage, Latonya Willett, and Lorree Brown, on behalf of themselves, and Nona Young, Ferrell Freeman, Hervene Glass, and Kizzie Johnson on behalf of themselves and all others similarly situated, collectively the “ABLA Plaintiffs,” by and through their attorneys, the Sargent Shriver National Center on Poverty Law, the Chicago Lawyers’ Committee for Civil Rights Under Law, and SONNENSCHNEIN NATH & ROSENTHAL LLP, and, pursuant to this Court’s Orders of November 4, 1999 and September 25, 2000, and Rule 24 of the Federal Rules of Civil Procedure, respectfully move that this Court allow them to intervene in this case.

In support of their motion, the ABLA Plaintiffs state:

1. The ABLA Plaintiffs are entitled to intervene as a matter of right in this action pursuant to this Court’s Orders of November 4, 1999, and September 25, 2000.

2. The ABLA Plaintiffs are entitled to intervene as a matter of right in this action pursuant to Rule 24(a)(2) of the Federal Rules of Civil Procedure, in that: (a) their motion is timely, (b) they possess an interest relating to the subject matter of this action, (c) their interest will be impaired as a practical matter by Gautreaux’s disposition, and (d) they lack adequate representation of their interest by existing Gautreaux parties.

3. In the alternative, to ¶¶ 1 - 2 above, the ABLA Plaintiffs respectfully request that this Court exercise its discretion to allow their permissive intervention pursuant to Rule 24(b)(2) of the Federal Rules of Civil Procedure, in that: (a) they have claims that share a question of law or fact in common with this action; and (b) permissive intervention would not unduly delay or prejudice the adjudication of the rights of existing Gautreaux parties.

4. In further support of this motion, the ABLA Plaintiffs are simultaneously filing herewith the ABLA Plaintiffs' Memorandum in Support of Their First Amended Motion to Intervene.

**WHEREFORE**, the ABLA Plaintiffs respectfully request that this Court grant their motion to intervene in this case.

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One of the Attorneys for the ABLA Plaintiffs

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