

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

GREATER NEW ORLEANS FAIR HOUSING  
ACTION CENTER, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF HOUSING  
AND URBAN DEVELOPMENT, *et al.*,

Defendants.

No. 1:08-cv-1938-HHK

**NOTICE OF DISMISSAL**

NOW COME Plaintiffs, Greater New Orleans Fair Housing Action Center, the National Fair Housing Alliance, Gloria Burns, Rhonda Dents, Almarie Ford, Daphne Jones, and Edward Randolph, pursuant to Fed. R. Civ. P. 41(a)(1)(A), and file this Notice of Dismissal of the above-styled action. Plaintiffs state as follows:

1. Plaintiffs filed their Complaint on November 12, 2008, Dkt. 1., alleging racial discrimination in the “Road Home” program – the single largest housing recovery program in U.S. history – due to the use of pre-storm market value as a criterion to determine grant awards.

2. After the Complaint was filed, Defendants U.S. Department of Housing and Urban Development (“HUD”) and Robin Keegan, Executive Director of the Louisiana Office of Community Development<sup>1</sup> (“Louisiana”) changed the Road Home program grant formula to provide full relief to over 13,000 low- and moderate-income homeowners, totaling \$473 million.

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<sup>1</sup> Robin Keegan was formerly the Executive Director of the Louisiana Recovery Authority and was later named Executive Director of the Office of Community Development (“OCD”), a unit of the Division of Administration in the State of Louisiana and successor agency to the Louisiana Recovery Authority. On November 19, 2010, Keegan left her position with OCD. Pat Forbes is the interim Executive Director of OCD.

Through supplemental grants, these individuals received relief tantamount to the full relief they could have received had their initial grants been based upon the estimated cost of damage to their homes, rather than the lower pre-storm market value of their homes.

3. After additional settlement negotiations, the parties fully executed a settlement agreement to resolve this action on July 7, 2011. In the settlement agreement, HUD and the Louisiana agreed to further amend the Road Home program to (a) offer supplemental rebuilding grants totaling up to \$62 million to certain non low- and moderate-income homeowners whose initial grant awards were based upon the pre-storm market value of their homes and who have been unable to rebuild their homes; and (b) grant up to a one-year extension of the deadline for homeowners to re-occupy their homes.

4. Defendants HUD and Louisiana have neither served an answer nor a motion for summary judgment in this action.

5. By virtue of this Notice, Plaintiffs dismiss their claims against Defendants HUD and Keegan with prejudice.<sup>2</sup>

WHEREFORE, in light of the Settlement Agreement reached by all parties, Plaintiffs, pursuant to Rule 41(a)(1)(A), file this Notice dismissing the instant action without need of further Order of this Court.

Dated: July 8, 2011

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<sup>2</sup> Pursuant to Stipulation by Plaintiffs and HUD, and a subsequent order of this Court, the deadline for class certification was extended until six months after the close of discovery. *See* Dkt Nos. 15 and 16. As the action did not mature to the class certification stage, the Settlement Agreement and Notice of Dismissal are intended to bind only the parties thereto (the named Plaintiffs in this action, Defendant HUD, and Defendant Louisiana), and does not waive, compromise, or extinguish the rights of any absent members of the putative class, including the right to bring an action against HUD or Louisiana seeking the same or different relief as the Plaintiffs did in the instant action.

Respectfully submitted,

/s/ Damon T. Hewitt

John Payton, Director-Counsel  
(D.C. Bar No. 282699)  
Damon T. Hewitt (admitted *Pro Hac Vice*)  
ReNika C. Moore (admitted *Pro Hac Vice*)  
NAACP LEGAL DEFENSE &  
EDUCATIONAL FUND, INC.  
99 Hudson Street, 16th Floor  
New York, NY 10013  
(p) 212-965-2200 / (fax) 212-226-7592  
jpayton@naacpldf.org

/s/ Craig Goldblatt

WILMER HALE  
Craig Goldblatt (D.C. Bar No. 449229)  
Randall Weinstein (D.C. Bar No. 996192)  
1875 Pennsylvania Avenue, NW  
Washington DC 20006  
202-663-6006 (t)  
202-663-6363 (f)  
cgoldblatt@wilmer.com

***Attorneys for Plaintiffs***

/s/ Joseph M. Sellers

Joseph M. Sellers (D.C. Bar No. 318410)  
Jenny R. Yang (D.C. Bar No. 484874)  
Peter Romer-Friedman (D.C. Bar No. 993376)  
COHEN MILSTEIN SELLERS & TOLL PLLC  
1100 New York Avenue, NW, Suite 500  
Washington, D.C. 20005  
(p) 202-408-4600 / (fax) 202-408-4699  
jsellers@cohenmilstein.com

/s/ Morgan Williams

Morgan Williams (admitted *Pro Hac Vice*)  
Greater New Orleans Fair Housing Action  
Center  
404 S. Jeff Davis Pkwy  
New Orleans, LA 70119  
(504) 596-2100, ext. 104 (t)  
(504) 708-2476 (f)  
mwilliams@gnofairhousing.org

**CERTIFICATE OF SERVICE**

I hereby certify that on July 1, 2011, the foregoing document was filed electronically with the Court's ECF system, through which a copy was served on:

Allen J. Krouse, III  
Renee G. Culotta  
Suzanne M. Risey  
FRILOT L.L.C.  
1100 Poydras Street  
Suite 3600  
New Orleans, LA 70163  
Telephone: 504-599-8004  
Facsimile: 504-599-8104  
Email: akrouse@frilot.com  
Email: rculotta@frilot.com  
Email: srisey@frilot.com

Jam  
U.S.  
Washington,  
Telephone:  
Facsim  
Em

es D. Todd  
DEPARTMENT OF JUSTICE  
20 Massachusetts Avenue, N.W.  
DC 20001  
202-514-3378  
ile: 202- 616-8470  
ail: james.todd@usdoj.gov

*Attorneys for Defendant  
Executive Director of the  
Office of Community Development  
State of Louisiana*

*Attorney  
of*

*for Defendant  
United States Department  
Housing and Urban  
Development*