

Summary of Contents

Volume 1

- Chapter 1. Introduction
- Chapter 2. Summary of Substantive Provisions of the Fair Housing Act and the Civil Rights Act of 1866
- Chapter 3. Title VIII: Enforcement—Weighing the Options
- Chapter 4. Litigating a Private Suit, Part I: Pretrial
- Chapter 5. Litigating a Private Suit, Part II: Trial
- Chapter 6. Litigating a Private Suit, Part III: Relief
- Chapter 7. Settlement

Chapter Appendices

- APPENDIX 2A. HUD Policy Memoranda on Reasonable Occupancy Restrictions
- APPENDIX 2B. HUD Guidance Regarding Advertisements Under § 3604(c)
- APPENDIX 2C. Joint Statement of HUD and the Department of Justice on Reasonable Accommodations
- APPENDIX 2D. Response to concerns about housing security following September 11, 2001
- APPENDIX 2E. Interagency Statement on Discrimination in Lending
- APPENDIX 2F. Joint Statement of HUD and The Department of Justice on Reasonable Modifications
- APPENDIX 2G. Immigration Status and Housing Discrimination Frequently Asked Questions
- APPENDIX 2H. Domestic Violence Guidance
- APPENDIX 2I. Presidential Memoranda on Discriminatory Housing Practices and Policies
- APPENDIX 3A. List of States and Localities Certified as Substantial Equivalents on Date Fair Housing Amendments Act Became Effective
- APPENDIX 3B. List of States and Localities Certified as Substantial Equivalents

- APPENDIX 3C. Summary of Time Limitations and Flowchart
Depicting Enforcement Options
- APPENDIX 3D. HUD ALJ Rulings on Intervention
- APPENDIX 3E. HUD and DOJ Letters on Intervention
- APPENDIX 3F. Sample Motion for Leave to Intervene in Pending
DOJ Federal Court Case and Pending HUD ALJ
Proceeding
- APPENDIX 3G. HUD Declaration on Tolling of Statute Pending
Agency Action
- APPENDIX 3H. HUD Memorandum on Procedural Limitations for
Cases that Implicate the First Amendment
- APPENDIX 3I. Sample Motion Concerning Application of
Continuing Violations Theory
- APPENDIX 3J. Sample Statements in Support of HUD Complaint
- APPENDIX 4A. List of Private Fair Housing Organizations
- APPENDIX 4B. Sample Retainer Agreements
- APPENDIX 4C. Sample Complaints

Volume 2

Chapter Appendices (Continued)

- APPENDIX 4D. Sample Briefs in Support of Motion for Leave to
Amend Complaint
- APPENDIX 4E. Sample Motions and Orders for Temporary
Restraining Order and Preliminary Injunctive
Relief
- APPENDIX 4F. Sample Interrogatories
- APPENDIX 4G. Sample Answers to Interrogatories
- APPENDIX 4H. Sample Letter to Opposing Party Providing
Reasons Why Discovery Responses Are
Inadequate (Foundation for Motion to Compel)
- APPENDIX 4I. Sample Document Requests
- APPENDIX 4J. Sample Answers to Document Requests
- APPENDIX 4K. Sample Tenant Site Survey Forms
- APPENDIX 4L. Sample 30(B)(6) Deposition Notices
- APPENDIX 4M. Motion for Protective Order (Timing of Deposition)
- APPENDIX 4N. Motion for Protective Order (Access to Test
Reports and Tester's Manual) and Sample
Stipulated Protective Orders

SUMMARY OF CONTENTS

- APPENDIX 4O. Sample Motion for Protective Order (Placing Psychiatric Reports Under Seal)
- APPENDIX 4P. Sample Pleadings Regarding Medical Records
- APPENDIX 4Q. Sample Motions and Orders to Compel Financial Information
- APPENDIX 4R. Sample Motion for Protective Order (Producing Former Testers for Deposition)
- APPENDIX 4S. Sample Motions to Compel Access to Documents and Files
- APPENDIX 4T. Sample Oppositions to Motions to Dismiss
- APPENDIX 4U. Sample Brief in Support of Plaintiffs' Motion for Summary Judgment
- APPENDIX 4V. Sample Briefs in Opposition to Motion for Summary Judgment

Volume 3

Chapter Appendices (Continued)

- APPENDIX 4W. Sample Motion for Class Certification
- APPENDIX 4X. Sample Amicus Brief in Support of Plaintiffs' Opposition to Motion for Judgment on the Pleadings
- APPENDIX 4Y. Sample Stipulations of Fact
- APPENDIX 4Z. Sample Pretrial Statements
- APPENDIX 4AA. Sample Pretrial Statement and Trial Brief
- APPENDIX 4BB. Sample Jury Instructions and Verdict Forms
- APPENDIX 4CC. Checklist of Questions for Determining Emotional Distress
- APPENDIX 4DD. Topics to Cover in Intake Interview
- APPENDIX 4EE. Sample Motion for Sanctions for Alteration of Documents
- APPENDIX 4FF. Sample Motions in Limine
- APPENDIX 4GG. *[Reserved]*
- APPENDIX 4HH. Motion to Obtain Prior Complaints of Discrimination from Human Rights Agency
- APPENDIX 4II. Sample Complaint Allegations and Discovery Requests Relating to Piercing the Corporate Veil
- APPENDIX 4JJ. Sample Freedom of Information Act Request
- APPENDIX 4KK. Sample Motions for Reconsideration

HOUSING DISCRIMINATION PRACTICE MANUAL

- APPENDIX 4LL. Sample Objections and Responses to Objections to Magistrate Judge’s Recommendation
- APPENDIX 5A. Sample Voir Dire Questions for a Typical Fair Housing Case
- APPENDIX 5B. Sample Proposed Voir Dire Questions for Families with Children Case
- APPENDIX 5C. Sample Expert Exhibits
- APPENDIX 6A. Sample Post-Trial Brief on Damages
- APPENDIX 6B. Sample Post-Trial Motion for Injunctive Relief
- APPENDIX 6C. Sample Memorandum In Opposition to Defendant’s Post-Trial Motion for Judgment as Matter of Law on Punitive Damages
- APPENDIX 6D. Sample Frustration of Mission and Diversion of Resources Damages Worksheets
- APPENDIX 6E. Sample Lost Housing Opportunity Damages Worksheet
- APPENDIX 6F. Unpublished Decision in *Fair Housing Council of Suburban Philadelphia v. Mercury Peerless Publications, Inc.*
- APPENDIX 7A. Sample Consent Decrees
- APPENDIX 7B. Sample Application for Fees and Expenses
- APPENDIX 7C. Sample Motion to Enforce Consent Decree
- APPENDIX I. The Fair Housing Act, Title VIII of the Civil Rights Act of 1968, As Amended, (42 U.S.C. §§ 3601 et seq.), and Related Provisions
- APPENDIX II. Legislative History Materials: Selected Excerpts from 1988 House Report on the Fair Housing Amendments Act

Table of Cases

Index