

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF TRANSPORTATION

General Counsel



May 2, 2008

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Board of Zoning Adjustment ("BZA")
District of Columbia Office of Zoning
441 4th Street, NW
Suite 210 South
Washington, DC 20001

Re: **BZA Appeal No. 17746**

Dear BZA:

In regard to the above captioned matter, enclosed please find a Notice of Representation and Joint Motion for Continuance to be filed in this matter.

If you have any questions or need any additional information, please contact me.

Sincerely,

Charles J. Brown, Jr.
Assistant Attorney General
Office of the General Counsel
District Department of Transportation
(202) 673-6593 (direct phone)
(202) 673-2355 (facsimile)

BOARD OF ZONING ADJUSTMENT
District of Columbia

CASE NO. 17746

EXHIBIT NO. 15

cc: Reed Cooke Neighborhood Association President Maurren Gallagher
ANC commissioner Wilson Reynolds
David Bishop of Erie Associates, LLC

**DISTRICT OF COLUMBIA
Board of Zoning Adjustment**

**REED COOKE NEIGHBORHOOD
ASSOCIATION,**

Appellant,

v.

**DISTRICT OF COLUMBIA DEPARTMENT
OF TRANSPORTATION,**

Appellee.

Appeal No. 17746

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JOINT MOTION FOR CONTINUANCE

Appellee, the District of Columbia Department of Transportation ("DDOT"), by and through its undersigned counsel; Appellant, Reed Cooke Neighborhood Association ("Reed Cooke"), by and through its president, Maureen Gallagher; and, the Advisory Neighborhood Commission ("ANC"), by and through ANC Commissioner Wilson Reynolds, respectfully move to continue the appeal scheduled for hearing on May 6, 2008 before the Board of Zoning Adjustment ("Board"). The parties consent to a thirty (30) day continuance from the scheduled May 6, 2008 hearing date.

DDOT, Reed Cooke and ANC request a continuance because this matter was recently assigned to a newly hired attorney with DDOT's General Counsel's Office and DDOT, Reed Cooke and ANC have been in active discussions that may resolve the appeal before the Board.

WHEREFORE, DDOT, Reed Cooke and ANC request that this matter be continued for thirty (30) days from the scheduled May 6, 2008 hearing date.

DISTRICT OF COLUMBIA
Board of Zoning Adjustment

**REED COOKE NEIGHBORHOOD
ASSOCIATION,**

Appellant,

v.

Appeal No. 17746

**DISTRICT OF COLUMBIA DEPARTMENT
OF TRANSPORTATION,**

Appellee.

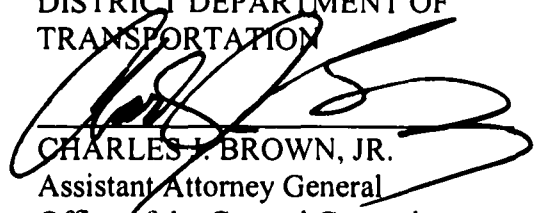
NOTICE OF REPRESENTATION

The Clerk of the Board of Zoning Adjustment will please enter the representation of Appellee through and by the undersigned counsel in the matter of *Reed Cooke Neighborhood Association v. The District of Columbia Department of Transportation*, BZA Appeal Number 17746, for the premises of 2351 Champlain Street, N.W. (Square 2563, Lot 109).

Charles J. Brown, Jr., Esq.
Assistant Attorney General for the District of Columbia
Office of the General Counsel
District Department of Transportation
2000 14th Street, N.W., Fifth Floor
Washington, D.C. 20009
Tel: (202) 673-6593
Fax: (202) 673-2355
Attorney for Appellee
E-mail: charles.jbrown@dc.gov

Respectfully Submitted,

FRANK SEALES, JR.
General Counsel
DISTRICT DEPARTMENT OF
TRANSPORTATION



CHARLES J. BROWN, JR.
Assistant Attorney General
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District Department of
Transportation
2000 14th Street, N.W., Fifth Floor
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Tel: (202) 673-6593
Fax: (202) 673-2355
Attorneys for Appellee

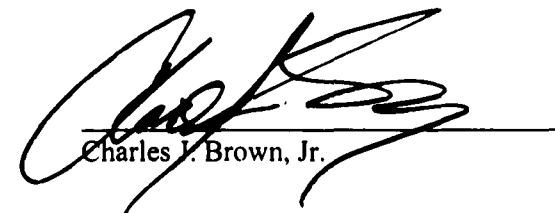
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of May 2008, a copy of the foregoing Notice of Representation for Appellee, the District of Columbia Department of Transportation was sent electronically and by first class mail, postage prepaid to:

Reed Cooke Neighborhood Association (RCNA)
c/o Maureen Gallagher, President
P.O. Box 21700
Washington, D.C. 20009
Tel: (202) 462-3830
Email: rcna@reedcooke.org

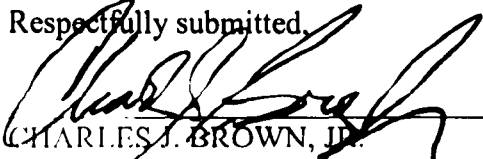
ANC 7 Commissioner Wilson Reynolds
Advisory Neighborhood Commission 1C
P.O. Box 21009, N.W.
Washington, D.C. 20009
Tel: (202) 332-2630
Email: WreynoldsANC@aol.com

Erie Associates, LLC
c/o David Bishop
2424 18th Street, N.W. – Suite C2
Washington, D.C. 20009
Tel: (202) 986-8965
Email: dbishop@dbleddevelopment.com



Charles J. Brown, Jr.

Respectfully submitted,



CHARLES J. BROWN, JR.

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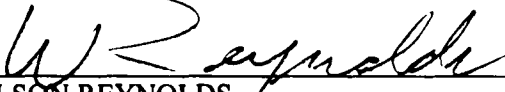
5/2/08
Date:



MAUREEN GALLAGHER

President, Reed Cooke Neighborhood Association (RCNA)
P.O. Box 21700
Washington, D.C. 20009
Tel: (202) 462-3830
Email: rcna@reedcooke.org

5/2/08
Date:



WILSON REYNOLDS

ANC 1C-07 Commissioner
Advisory Neighborhood Commission
P.O. Box 21009, N.W.
Washington, D.C. 20009
Tel: (202) 986-2213
Email: WreynoldsANC@aol.com

5/2/08
Date:

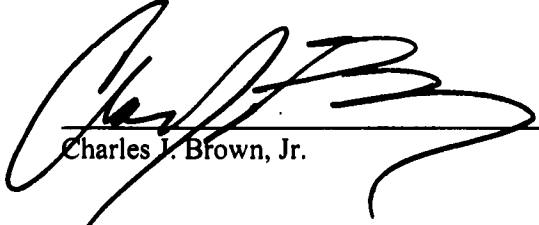
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of May 2008, a copy of the foregoing Joint Motion for Continuance was sent electronically and by first class mail, postage prepaid to:

Reed Cooke Neighborhood Association (RCNA)
c/o Maureen Gallagher, President
P.O. Box 21700
Washington, D.C. 20009
Tel: (202) 462-3830
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ANC 1C-07 Commissioner Wilson Reynolds
Advisory Neighborhood Commission
P.O. Box 21009, N.W.
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Charles J. Brown, Jr.