



BEFORE THE ZONING COMMISSION AND
BOARD OF ZONING ADJUSTMENT OF THE DISTRICT OF COLUMBIA



FORM 150 – MOTION / REQUEST

Before completing this form, please review the instructions on the reverse side. Print or type all information unless otherwise indicated. All information must be completely filled out.

CASE NO.: 18429

Motion/Request of: ☐ Applicant ☐ Petitioner ☒ Appellant ☐ Party ☐ Intervenor ☐ Other _____

Motion/Request to:

- | | |
|--|--|
| ☐ Amend the Relief Sought | ☐ Reopen a Hearing (before decision) |
| ☐ Waive Posting / Affidavit of Posting Requirement | ☐ Dismiss on the Merits |
| ☐ Waive Notice Requirement to Shorten Period of Time Case is
Advertised in the DC Register | ☒ Postpone November 2, 2012 Hearing |
| ☐ Accept a Proffered Expert Witness | ☐ Continue |
| ☐ Allow Non-Authorized Representative to Perform Cross-
Examination | ☐ Correct a Transcript |
| ☐ Reopen the Record | ☐ Waive the following Time Deadline (i.e. 14-day filing deadline):
_____ |
| | ☐ Other: _____ |

Points and Authorities:

On a separate sheet of 8 1/2" x 11" paper, state each and every reason why the Zoning Commission (ZC) or Board of Zoning Adjustment (BZA) should grant your motion or request, including relevant references to the Zoning Regulations or Map.

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd 1st day of October Month, 2011 2011

I served a copy of the foregoing Motion or Request to each Applicant, Petitioner, Appellant, Party, and/or Intervenor, and the Office of

Planning in the above-referenced ZC or BZA case via: ☐ Mailed letter ☐ Hand delivery ☐ E-Mail ☒ Other FAX (202) 442-9447 888-318-2443

Signature:

Print Name: Edward Hanlon

Firm/Organization:

Address: 1523 Swann Street NW

Phone No.: 301-474-1800 E-Mail: bankruptcy-courts@verizon.net

To be notified of hearing and decision: (Maker of Motion/Request or Authorized Agent)

In the event an authorized agent files a Motion or Request on behalf of the Maker of the Motion or Request, a letter signed by the Maker of the Motion or Request authorizing the agent to act on his/her behalf shall accompany the notice of application, petition, or appeal.

Print Name: Edward Hanlon

Address: 1523 Swann Street NW, Washington, DC 20009

Phone No.: 301-474-1800 E-Mail: bankruptcy-courts@verizon.net

Board of Zoning Adjustment
District of Columbia
CASE NO. 18429
EXHIBIT NO. 27

BEFORE THE BOARD OF ZONING ADJUSTMENT

EDWARD V. HANLON

Appellant

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No.: 18429

Hearing Date: November 2, 2012

APPELLANT'S MOTION TO CONTINUE NOVEMBER 2, 2012 HEARING

Comes Now the Appellant, Edward V. Hanlon, and files this Motion to Continue the November 2, 2012 Hearing and states as follows:

1. On or about August 3, and August 16, 2012 the Public Hearing in this case was noticed for October 30, 2012 at 1 pm.
2. Due to inclement weather the Mayor declared a state of emergency and all city offices were closed on October 29 and 30, 2012. The Public Hearing in this matter had not yet begun.
3. On or about 12:20pm today, October 31, 2012, Appellant's secretary received a telephone call from the Board of Zoning Adjustment that the hearing scheduled for October 30, 2012 would be held Friday, November 2, 2012 at 1 pm. No written notice of the November 2, 2012 hearing has been issued.
4. No notice has been given to the public of the November 2, 2012 hearing. The *home page* of the BZA website does not give any notice that the public hearing in this case has been changed to November 2, 2012.

5. Only if one goes to the BZA website home page, then opens up the calendar page and then proactively goes the original hearing date or the November 2 date, will the new date appear.
6. Neither written notice nor email notice of the new date has yet been given.
7. IZIS carries no Notice on the Docket Sheet of the hearing being re-scheduled to November 2, 2012.
8. If a member of the public had intended to appear on October 30, 2012, to testify, re-scheduling on such short notice appears ineffectual to give notice to the public of the new date.
9. The undersigned, a consumer bankruptcy attorney, is a sole practitioner. The undersigned had weeks ago blocked off Monday and Tuesday, October 29 and October 30, 2012 in order to prepare for and attend the October 30, 2012 Public Hearing. The undersigned had numerous appointments with clients scheduled instead for Thursday and Friday, November 1 and November 2, 2012. These include clients who need their bankruptcy cases filed this week. Having to cancel these appointments is a serious hardship for these clients.
10. There is also a Motion to Dismiss filed on IZIS on Friday, October 26, 2012 the undersigned would also like time to properly respond to the motion prior to the Public Hearing. The undersigned had recurring internet connectivity problems during Hurricane Sandy, which affected his ability to prepare a response.

11. The Appellant appreciates the Board's desire to expeditiously reschedule public hearings cancelled due to inclement weather. The undersigned appreciates the Board's staff contacting the undersigned's office by phone today about the reschedule. Otherwise, the undersigned may never have learned in time of the November 2, 2012 hearing

12. However, the undersigned requests a postponement to a future date convenient to the Board for the reasons given above. No previous postponement has been requested by the Appellant.

For all the foregoing reasons the Appellant requests this Motion be granted.

Respectfully submitted,



Edward V. Hanlon
1523 Swann Street NW
Washington, DC 20009

CERTIFICATE OF SERVICE

I certify that on this date one copy of the foregoing was mailed first class postage pre-paid to:

Advisory Neighborhood
Commission 2B
#9 Dupont Circle, NW
Washington, DC 20036

I further certify that on this date one copy of the foregoing was sent via facsimile to:

Jay A. Surabian, Esq.
Assistant Attorney General

Department of Consumer and Regulatory Affairs
1100 4th Street SW, 5th Floor
Washington, DC. 20024
Fax: (202) 442-9447

Martin P. Sullivan, Esq.
Sullivan & Barros, LLP
1990 M Street NW, Suite 200
Washington, DC 20036
Fax: (888)-318-2443

A handwritten signature in black ink, appearing to read "Edward V. Hanlon", written over a horizontal line.

Edward V. Hanlon

10/31/12

Date