

**BEFORE THE BOARD OF ZONING
ADJUSTMENT OF THE DISTRICT OF
COLUMBIA**

**APPEAL OF 2101 CONNECTICUT AVENUE
COOPERATIVE APARTMENTS, INC. FROM A
DETERMINATION OF THE ZONING
ADMINISTRATOR PERTAINING TO A PROPOSED
REAR ADDITION TO 2012 KALORAMA ROAD,
NW, WASHINGTON, DC 20009
SQUARE 2537, LOT 0150 (R-5-B)**

Appeal No. 18540

AND REQUEST FOR STAY

MOTION TO CONTINUE APPEAL HEARING TO APRIL 30, 2013

2101 Connecticut Avenue Cooperative Apartments, Inc. (the “Cooperative”), Appellant, with consent by counsel from Appellee, Department of Consumer and Regulatory Affairs, through undersigned counsel moves this Board for a continuance of the hearing date for the above referenced appeal (the “Appeal”) from March 26, 2013 to the originally scheduled date of April 30, 2013. The unexpected expediting of the hearing date will not allow the Advisory Neighborhood Commission 1-C (the “ANC”) to complete its regular review process by reviewing the Appeal at its Planning, Zoning and Transportation subcommittee meeting scheduled for March 20 and then having the full ANC vote on the matter at its April 3, 2013 meeting. Further, the Cooperative does not have sufficient time to prepare its experts and reports, now due on March 12, 2013 (previously April 16, 2013), having only been given one week to make this adjustment. Moreover, the Cooperative and Lock 7 Development, the contract purchaser of the subject property (“Lock 7”) continue substantive discussions regarding the design of the project, and delaying the Appeal hearing until April 30 would also allow more time for the parties to narrow or eliminate differences between them, including differences as to issues presented by the present Appeal.

The Continuance does not harm either party or Lock 7 because the Appeal hearing was previously scheduled for April 30 and was only recently advanced to March 26 by the Board at its March 5 meeting.

Based on the above, the undersigned do hereby respectfully request that the Board grant this motion by or before March 12, the deadline to submit pre-hearing statements for the Board's March 26 meeting.

Respectfully submitted,

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Consented to: Jay Surabian /scm with Authority

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March 8, 2013

CERTIFICATE OF SERVICE

I hereby certify that on this 8th of March, 2013, a copy of the foregoing was mailed, first class postage prepaid to:

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