

**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

JOINT MOTION TO CONTINUE APPEAL HEARING FOR 75 DAYS

Appellant, 2101 Connecticut Avenue Cooperative Apartments, Inc. (the “Cooperative”), Appellee, Department of Consumer and Regulatory Affairs, and Intervener, Lock 7 Development (“Lock 7”), collectively, the “Parties”, through the undersigned counsel all move this Board to continue the hearing date for the above referenced appeal (the “Appeal”), currently scheduled for April 30, 2013, for a period of no less than 75 days. In support of this request, the Parties state:

1. The Cooperative and Lock 7 are actively negotiating a potential resolution of this matter, which would obviate the need for the Appeal hearing, but are unlikely to have reached final resolution on the settlement terms by the currently scheduled hearing date of April 30, 2013; and
2. The Parties all consent to postpone the hearing date to early July so the Cooperative and Lock 7 can attempt to reach a resolution of this matter.

Based on the above, the undersigned do hereby respectfully request that the Board grant this motion.

DEPARTMENT OF CONSUMER
AND REGULATORY AFFAIRS

Jay Surabian / scm

Jay Surabian, Esq.
Assistant Attorney General
Office of the Attorney General of the
District of Columbia
Office of the General Counsel for
Department of Consumer and
Regulatory Affairs
1100 4th Street SW
Washington, DC 20024

Counsel for Appellee

LINOWES AND BLOCHER LLP

Emily J. Vaia / scm

Emily J. Vaia, Esq.
(DC Bar #441832)
Linowes and Blocher LLP
7200 Wisconsin Avenue, Suite 800
Bethesda, MD 20814
(301-961-5174)

Samantha L. Mazo

Samantha L. Mazo, Esq.
(DC Bar #487649)
Linowes and Blocher LLP
7200 Wisconsin Avenue, Suite 800
Bethesda, MD 20814
(301-961-5261)

Counsel for Appellant

GOULSTORN & STORRS LLP

Cary R. Kadlec / scm

Cary R. Kadlec, Esq.
Goulston & Storrs LLP
1999 K Street, NW, Suite 500
Washington, DC 20006
(202) 721-1113

Counsel for Intervener

April 17, 2013

CERTIFICATE OF SERVICE

I hereby certify that on this 17th of April, 2013, a copy of the foregoing was mailed, first class postage prepaid to:

Cary R. Kadlecek, Esq.
Goulston & Storrs LLP
1999 K Street, NW, Suite 500
Washington, DC 20006

David Gorman
Patrick Conway
Lock 7 Development
3204 Stephenson PL, NW
Washington, DC 20015-2422

James C Courtovich
2012 Kalorama Road N.W.
Washington, DC 20009

Chairperson
Advisory Neighborhood Commission 1C
P.O. Box 21009
Kalorama Station
Washington, D.C. 20009

Martis Davis
Single Member District Commissioner 1C SM02
2032 Belmont Road N.W., Apt. 607
Washington, DC 20009

Matthew LeGrant, Zoning Administrator
Department of Consumer and Regulatory Affairs
Office of the Zoning Administrator
1100 4th Street SW, 3rd Floor
Washington, DC 20024

Harriet Tregoning, Director
Office of Planning
1100 4th Street SW, Suite E650
Washington, DC 20024

Alan Bergstein, Esq.
Office of the Attorney General
Chief, Land Use, Public Works
441 4th Street, NW
Washington, DC 20001

Jay Surabian, Esq.
Assistant Attorney General
Office of the Attorney General of the District of Columbia
Office of the General Counsel for Department of Consumer and Regulatory Affairs
1100 4th Street SW
Washington, DC 20024



Samantha L. Mazo

**L&B 2352418v1/12353.0001