

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

FORM 150 – MOTION FORM

THIS FORM IS FOR PARTIES ONLY. IF YOU ARE NOT A PARTY PLEASE FILE A
FORM 153 – REQUEST TO ACCEPT AN UNTIMELY FILING OR TO REOPEN THE RECORD.

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.:					
Motion of:	<input type="checkbox"/> Applicant	<input type="checkbox"/> Petitioner	<input checked="" type="checkbox"/> Appellant	<input type="checkbox"/> Party	<input type="checkbox"/> Intervenor
<input type="checkbox"/> Other _____					

PLEASE TAKE NOTICE, that the undersigned will bring a motion to:

Waive the 14-day filing requirement to accept Appellant's Supplemental Response to the Timeliness Argument Made by DCRA in its October 1 Brief.

Points and Authorities:

Please state each and every reason why the Zoning Commission (ZC) or Board of Zoning Adjustment (BZA) should grant your motion, including relevant references to the Zoning Regulations or Map and where appropriate a concise statement of material facts. If you are requesting the record be reopened, the document(s) that you are requesting the record to be reopened for must be submitted separately from this form. No substantive information should be included on this form.

Appellant did not earlier address the timeliness argument in detail. As DCRA raised the issue in its brief, and because acceptance of this filing will not prejudice any party, the Appellant respectfully requests that the Board accept this limited Supplemental Statement on Timeliness of Filing of the Appeal.

CERTIFICATE OF SERVICE

I hereby certify that on this 10 day of October, , 2014

I served a copy of the foregoing Motion 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 _____

Signature: Martin P. Sullivan

Print Name: Martin P. Sullivan, Sullivan & Barros, LLP

Address: 1990 M Street NW, Suite 200 Board of Zoning Adjustment
District of Columbia

Phone No.: 202-503-1704 E-Mail: msullivan@sullivanbarros.com Case NO.18827
EXHIBIT NO.21