DISTRICT OF COLUMBIA

BOARD OF ZONING ADJUSTMENT

441 4th Street, N.W., Washington, D.C. 20001

Appeal of ANC 4C re: Building Permit B1505734

Appeal No. 19067

MOTION FOR CONTINUANCE

The Department of the District of Columbia Department of Consumer and Regulatory

Affairs ("DCRA") respectfully requests that the Board of Zoning Adjustment ("Board") grant a

continuance for three (3) weeks to allow the permit holder to tender a set of plans requested by

the Zoning Administrator ("ZA") to facilitate the resolution of this appeal. DCRA maintains that

Building Permit No. B1505734 ("Permit") was properly issued, but has requested that the

Permit Holder provide a set of plans that more clearly depicts the parameters of the planned

construction, so as to allow the Board and Appellant to better understand the basis for the ZA's

decision to issue the Permit. DCRA has requested that the Permit Holder provide these more

detailed plans no later than Tuesday, October 6, 2015, so that Appellant would have sufficient

time to review the more detailed plans before the hearing.

DCRA has requested Appellant's consent to this Motion to Continue on Tuesday,

September 22, but Appellant has refused. Nonetheless, DCRA believes that granting a

continuance is in the interest of judicial economy, as the availability of the clearer plans that the

ZA has requested of the Permit Holder at the appeal hearing will conserve scarce judicial

resources that might otherwise be expended in the explication of extant plans.

DCRA therefore respectfully requests that the Board order a continuance of this hearing

for three (3) weeks or as best fits the Board's schedule.

Respectfully submitted,

CHARLES THOMAS

General Counsel

Department of Consumer and Regulatory Affairs

Date: 9/13/15

Derek Hora*

Attorney-Advisor Fellow

Board of Zoning Adjustment
District of Columbia
CASE NO.19067
EXHIBIT NO.25

Maximilian Tondro** Assistant General Counsel Office of General Counsel Department of Consumer and Regulatory Affairs 1100 4th Street, S.W., Suite 5266 Washington, D.C. 20024 (202) 442-8403 (office) (202) 442-9477 (fax) derek.hora@dc.gov maximilian.tondro@dc.gov

Counsel for Department of Consumer and Regulatory Affairs

- * Admitted to practice in Virginia. Practicing in the District of Columbia pursuant to D.C. Court of Appeals Rule 49(c)(4).
- ** Admitted to practice in Maryland. Practicing in the District of Columbia pursuant to D.C. Court of Appeals Rule 49(c)(4).

<u>CERTIFICATE OF SERVICE</u>

I hereby certify that on this 23rd day of September 2015, a copy of the foregoing Motion to Continue was served via electronic mail to:

Lyn Abrams P.O. Box 60847 Washington, D.C. 20039-0847 lynster3@gmail.com Appellant

Marty P. Sullivan Sullivan & Barros, LLP 1990 M Street, N.W., Suite 200 Washington, D.C. 20036 msullivan@sullivanbarros.com Attorney for Permit Holder

Taalib-Din A.Uqdah Advisory Neighborhood Commission ANC-4C 1373 Jefferson Street NW Washington, D.C. 20011 4C01@anc.dc.gov

Elisa M. Irwin, Single Member Advisory Neighborhood Commissioner ANC-4C03 1500 Varnum Street NW Washington, D.C. 20011 4C03@anc.dc.gov

Date: 9/23/15

Derek Hora

Vandella