

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

Appeal of
Building Permit No. B1410380

Appeal No. 19080

**OWNER'S MOTION TO WAIVE THE TIME
REQUIREMENTS AND REOPEN THE RECORD**

Pursuant to 11 DCMR Section 3121.9, Adams Morgan Hotel Owner, LLC, ("Owner"), the owner of the property at 1770 Euclid Street, N.W., respectfully requests that this Board waive the time requirements and re-open the record in the above-referenced appeal. Specifically, Owner requests that this Board consider the subdivision plat of the subject property attached hereto as Exhibit I.

Owner submits Exhibit I primarily to respond to Appellant's Pre-Hearing Submission, which, although timely dated September 22, 2015—the date the record in this matter closed, was untimely filed on September 23, 2015, as confirmed by the Interactive Zoning Information System ("ISIZ"). Exhibit I plainly establishes that the subject property is a corner lot that abuts three streets—Columbia Road, N.W., Euclid Street, N.W., and Champlain Street, N.W.

Additionally, Exhibit I is a public record, which has been available to Appellant, and any member of the public, since it was recorded by the Office of the Surveyor on September 4, 2015.

Further, the hearing in this matter is scheduled for October 6, 2015, so Appellant will have sufficient time to prepare any necessary response to the Exhibit.

Therefore, Appellants will not be prejudiced by the inclusion of this material in the record, and there is good cause to waive the time requirements and allow Owner to submit this Exhibit for the Board's consideration in this matter.

Accordingly, Owner requests that this Court waive the time requirements and accept Exhibit I into the record for consideration in this matter.

Date: September 29, 2015

Respectfully Submitted,

HOLLAND & KNIGHT LLP

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Waive the Time Requirements and Reopen the Record filed electronically with the Board of Zoning Adjustment and was sent by electronic mail, this 29th day of September 2015, to the following:

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By: /s/ Philip T. Evans