

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

In Re Application Of: :
: **BZA Case Number 19450**
D.C. Department of General Services : **Presiding Officer: Frederick L. Hill**
Ward 3 Homeless Shelter Project : **Chairperson**
3320 Idaho Avenue, NW :

**REQUEST OF NEIGHBORS FOR RESPONSIVE GOVERNMENT
FOR EXTENSION OF TIME TO FILE
PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW**

Neighbors for Responsive Government (“NRG”) respectfully moves pursuant to Y§407 and Y§204.5 for an extension of time for the filing by the parties in this case of the proposed findings of fact and conclusions of law requested by the Board at the close of the hearing on this case on March 1, 2017. A two-week extension is requested, i.e., from March 17, 2017 to March 31, 2017. In support of the motion, NRG states as follows:

1. The hearing on this case lasted over seven hours. The hearing transcript will likely run to hundreds of pages. As of the time of the filing of this motion, the transcript has not been posted on the Office of Zoning website.

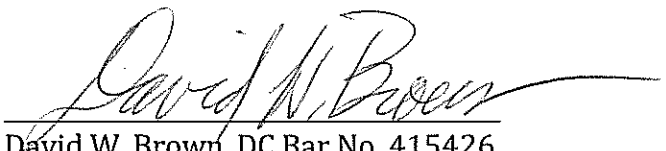
2. Under Y§601.2, the parties are to have a minimum of seven days after the transcript becomes available to submit Board-requested proposed findings and conclusions. Unless the transcript is filed today, the parties will not be afforded that minimum time without an extension of the filing deadline.

3. Even if the transcript is filed later today, NRG submits that given the exceptional length and complexity of this case, the seven-day minimum in Y§601.2 is insufficient for the preparation of proposed findings and conclusions commensurate with the scope and significance of this matter.

4. Having access to the transcript is essential to the preparation of proper findings and conclusions. Without the transcript, the task is exceedingly difficult, notwithstanding access to the video recording of the proceedings.

5. The minimal extension requested is in the interest of justice and will not unduly delay this proceeding. Rather, the extension should facilitate the Board's decisional process by ensuring that the parties have had adequate time to present complete and thorough proposed findings of fact and conclusions of law.

Respectfully submitted,



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Attorney for

Neighbors for Responsive Government

March 10, 2017

CERTIFICATE OF SERVICE

The Neighbors for Responsive Government, by and through the undersigned counsel, on March 10, 2017, served the foregoing Request for Extension of Time to File Findings of Fact and Conclusions of Law by email on the attorney for the applicant, Meridith Moldenhauer, Esq., Griffin, Murphy, Moldenhauer & Wiggins, LLP, 1912 Sunderland Place, NW, Washington, DC 20036 MMoldenhauer@washlaw.com and ABigley@washlaw.com ; and the DC Office of Planning, 1100 4th Street, SW, Suite 650 East, Washington, DC 20024; via email to the local ANC, Advisory Neighborhood Commission 3C, Nancy MacWood, Planning and Zoning Committee Chairperson, nmacwood@gmail.com; and via email to Angela Bradbery, Single Member District 3C06, 3C06@anc.dc.gov.

Respectfully submitted,


David W. Brown