

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

In Re Application Of: :
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D.C. Department of General Services : **BZA Case Number 19452**
Ward 5 Homeless Shelter Project : **Presiding Officer: Frederick L. Hill**
1700 Rhode Island Avenue, NE : **Chairperson**

**REQUEST OF CITIZENS FOR RESPONSIBLE OPTIONS
FOR EXTENSION OF TIME TO FILE
PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW**

Introduction and Summary

Citizens For Responsible Options (“CFRO”) 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 five 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.

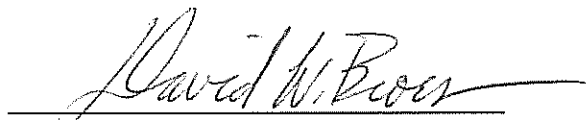
3. Even if the transcript is filed later today, CFRO submits that given the exceptional length and complexity of this case, the seven-day minimum in Y§601.2 is

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,



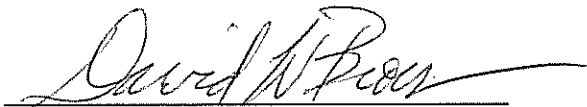
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Attorney for
Citizens For Responsible Options

March 10, 2017

CERTIFICATE OF SERVICE

The Citizens for Responsible Options, by and through the undersigned counsel, on March 10, 2017, served the foregoing Request for Extension of Time to File the Proposed Findings of Fact and Conclusions of Law by email on the applicant, Meridith Moldenhauer, Esq., Griffin, Murphy, Moldenhauer & Wiggins, LLP, 1912 Sunderland Place, NW, Washington, DC 20036 MMoldenhauer@washlaw.com and ABigley@washlaw.com; the by mailing, first class mail, postage prepaid, to the local ANC, Advisory Neighborhood Commission 5B, 1920 Irving Street, NE, Washington, DC 20018, and the DC Office of Planning, 1100 4th Street, SW, Suite 650 East, Washington, DC 20024.

Respectfully submitted,

A handwritten signature in cursive script, reading "David W. Brown", written in black ink. The signature is fluid and extends to the right with a long horizontal stroke.

David W. Brown