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October 11, 2006

Zoning Commission of the District of Columbia  
441 4<sup>th</sup> Street, NW  
Washington, DC 20001

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2006 OCT 11 PM 4: 19

**Case No. 05-42 Sibley Hospital – Consolidated Planned Unit Development and Related Zoning Map Amendment**

**MOTION FOR CONTINUANCE**

Dear Members of the Commission:

*On behalf of myself and Sibley Neighbors for Responsible Growth, I hereby move that the public hearing on the above matter, now scheduled for 6:30 PM, October 12, 2006, be continued for one week, to October 19, 2006, or to a date thereafter at the convenience of the Commission, on the grounds that parties to the proceeding will have inadequate opportunity to prepare responses to Applicant's revised proposal, to be released for the first time at the Commission's October 12, 2006.*

I have been advised by the Mr. Jerry Price, Applicant's Chief Operating Officer, that the Applicant has prepared a revised proposal and will present this to the Commission and to other parties to this matter at the October 12 hearing. On Monday, October 9, 2006, I requested a copy of that proposal from the Applicant, through Mr. Jerry Price, so that Sibley Neighbors for Responsible Growth could have adequate time to prepare its cross-examination of Applicant's witnesses and to prepare its affirmative case based on the new proposal. On Tuesday, October 10, 2006, Applicant, through Mr. Jerry Price, advised that it was not prepared to provide the new proposal until the Commission's October 12, 2006, hearing.

Applicant's refusal to provide the new proposal in advance of the said hearing deprives Sibley Neighbors for Responsible Growth of its right to effectively represent its interests at before the Commission. Not only will it deprive us of adequate time to prepare our cross-examination of Applicant's witnesses and our affirmative case in light of the new proposal, but it will also hamstring the District of Columbia Office of Planning (OP), the District of Columbia Department of Transportation (D-DOT), and the

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Neighborhood Commission from effectively commenting on Applicant's plans. This will further prejudice Sibley Neighbors for Responsible Growth by denying us the opportunity to learn the considered views of these three bodies on the new proposal, and, in turn, to effectively cross-examine their representatives and incorporate their analyses and findings into our affirmative case.

We believe elementary principles of fairness and due process require the continuance we seek and that the Applicant must not gain advantage from its disregard of such principles.

A handwritten signature in black ink, reading "L. S. Spector". The signature is written in a cursive style with a horizontal line underneath the name.

Leonard S. Spector  
5224 Loughboro Road, NW  
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on Behalf of Sibley Neighbors for Responsible Growth