HANNA ASSOCIATION INC.

1814 LAMONT STREET, N.W.
WASHINGTON, D.C. 20010
(202) 362-1638

'00 SEP 11 P1:54
OFFICE OF ZONING
DISTRICT OF COLUMBIA

September 11, 2000

Government of the District of Columbia
Board of Zoning Adjustment
Attention: Ms. Sheila Cross Reid, Chair
441 4th Street, N.W., Suite 210
Washington, D.C. 20001

Re: Motions For Reconsideration and Stay in Application No. 16573 – BZA Decision and Order Dated August 31, 2000

Dear Ms. Cross Reid:

The undersigned, Hanna Association Inc., ("Hanna"), a neighboring landowner to Applicant Martin E. Hardy, respectfully requests the Board of Zoning Adjustment to reconsider the above captioned Decision and Order on the grounds that the record contains factual errors and erroneous conclusions of law.

In addition, the undersigned joins the Lothrop House Unit Owners Association, Inc. in moving the BZA for Stay of Decision and Order for the reasons stated in the Motion for Stay of Decision and Order filed on September 7, 2000 on behalf of the Lothrop House Unit Owners Association, Inc. by Elaine K. Morris.

With regard to the undersigned's motion for reconsideration, Hanna requests that the BZA reconsider its findings of fact and conclusions of law. This is so because the conclusions of law are not based on substantial evidence in the record, do not flow rationally from the findings of fact, and are inconsistent with prior precedent. In addition, if the BZA grants this motion, Hanna will introduce additional evidence to prove (1) that applicant's property is not "unique" as that term has been interpreted by BZA precedent; (2) there is no "practical difficulty" or "undue hardship" to Applicant, and (3) the BZA Decision and Order will result in "substantial detriment to the public good," particularly with respect to the loss of light and air amenities for, and diminution in economic value of, the investments of neighboring landowners.

In addition, the undersigned is in the process of selecting qualified zoning counsel to assist in advancing this motion for reconsideration and in pursuing all available remedies in the DC Court of Appeals. Hanna will therefore be supplementing the record of this case

BZA
Case No. 16573
Exhibit No. 81

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EXHIBIT NO.81

with materials which Hanna will supply at least ten (10) days prior to the October BZA Hearing.

We attach a certificate of service sheet for all affected parties.

Sincerely,

Hanna Association, Inc.

By: _____

Name: Boushra Hanna
Title: President

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on this 11th day of September, 2000, I served by first-class mail, postage prepaid, a true copy of the foregoing to:

Martin E. Hardy
871 Dolley Madison Boulevard
McLean, Virginia 22101

Linda Softli, Chairperson
ANC 1C
2335 18th Street, N.W.
Washington, D.C. 20009

Michael D. Johnson, Zoning Administrator
Building and Land Regulation Administration
Department of Consumer and Regulatory Affairs
941 North Capitol Street, N.E., Suite 2000
Washington, D.C. 20002

Elaine K. Morris
Lothrop House Unit Owners Association, Inc.
1822 Vernon Street, N.W.
Washington, D.C. 20009

Boushra Hanna N.H
Boushra Hanna