THE LAW FIRM OF
BELVA D. NEWSOME

5402 Connecticut Avenue, N.W.
Suite 503
Washington, DC 20015
(202) 362-0134
(888) 675-3091
(202) 362-1459 (facsimile)
Belva@newsomelawfirm.com

BOARD OF ZONING ADJ
2002 SEP 13 PM 1:09

September 13, 2002

By Facsimile

Shari Poole, Secretary
Board of Zoning Adjustment
441 4th Street, N.W.
Suite 210
Washington, DC 20001

Re: Case No. 16913 – Application of Chase Plaza Dental Clinic

Dear Ms. Poole:

Pursuant to our telephone conversation of this morning, please find attached the application of Cathy Prego, President of the Board of Directors of the Louie Condominium Association, for party status in the above case scheduled for September 17, 2002 at 1:00 p.m. This letter is to request also a waiver of the 14-day rule for applying for party status.

The reasons for this request are as follows: 5402 Connecticut Avenue, N.W. is within 200 feet of the property for the requested variance; neither the President nor the Resident Manager were notified of the hearing in this matter; the parking lot located away from the Chase Plaza Dental Clinic is located behind 5402 Connecticut Avenue, N.W.; condominium owners in 5402 Connecticut Avenue, N.W. currently rent parking spaces on this parking lot; 5402 Connecticut Avenue, N.W. has an easement between the end of its property line and the beginning of the parking lot for access to the condominium's dumpster; and, the grant of the variance will affect adversely the condominium owner's parking and the location of condominium's dumpster.

The Board of Directors of the Louie Condominium Association met on September 4, 2002 and unanimously voted to hire this law firm to represent the association at the hearing in the above-matter after the sign in 5406 Connecticut Avenue, N.W. was brought to the board's attention. Since the hearing is during the work day, this law firm may not only represent but also present the testimony of the association. If possible, the President, Cathy Prego, Board member, Matilda S. Davis, and Treasurer, Javier Paparizos, will present testimony.

BZA
Case No. 16913
Exhibit No. 34

Board of Zoning Adjustment
District of Columbia
CASE NO.16913
EXHIBIT NO.34

If you need any further information, please do not hesitate to contact this law firm at (202) 362-0134. Thank you in advance for your prompt attention to this matter.

Sincerely,



Belva D. Newsome
Attorney-at-Law

Attachment

D.C. BOARD OF ZONING
2002 SEP 13 PM 1:09

Form 140
(Revised 03/15/02)

Case No. 16913

PARTY STATUS APPLICATION

Notice: See other side of party status form for instructions.

NAME: Last	First	Middle I.
Prego	Cathy	

ADDRESS: Street	Apt. # (if any)	City	State	Zip Code
5402 Connecticut Ave., NW #304		Washington, DC		20015

Phone No.	Fax No.	E-Mail
(202) 237-7870		louiecondo@yahoo.com

Will you appear through legal counsel? Signature Date

Will you appear as an: ☐ Person ☒ Party ☐ Amicus Will you appear through legal counsel? ☒ Yes ☐ No

If yes, please enter the name and address of such legal counsel.

NAME: Last	First	Middle I.
Newsome	Belva	D.

ADDRESS: Street	Ste. # (if any)	City	State	Zip Code
5402 Connecticut Ave., NW	Ste. 503	Washington, DC		20015

Phone No.	Fax No.	E-Mail
(202) 362-0134	(202) 362-1459	Belva@newsomelawfirm.com

Please answer all of the following questions referencing why the above person should be granted party status. If you require additional space please attach an additional sheet.

1). How will the property owned or occupied by such person, or in which the person has an interest be affected by the action requested of the Board?

The parking lot is 8 feet from the property line of 5402 Conn. Ave., NW across an easement that accesses the condominium's dumpster. Additionally, owners lease space on the parking lot.

2). What legal interest does the person have in the property? (i.e. owner, tenant, trustee, or mortgagee)

Tenant of a parking lot space.

3). What is the distance between the person's property and the property that is the subject of the appeal or application before the Board? (Preferably no farther than 200ft.)

My personal automobile occupies a parking space.

4). What are the environmental, economic or social impacts that are likely to affect the person and/or the person's property if the action requested of the Board is approved or denied?

The loss of the use of the parking lot by the condominium owners will add to the crowded on-street parking if variance approved.

5). Describe any other relevant matters that demonstrate how the person will likely be affected or aggrieved if the action requested of the Board is approved or denied.

Although the parking lot is less than 200 feet from 5402 Conn. Ave., NW, I, as President of the Board of Directors nor Marvin Goldberg, as Resident Manager, were notified of the hearing.

6). Explain how the person's interest will be more significantly, distinctively or uniquely affected in character or kind by the proposed zoning action than that of other persons in the general public.

The members of the Louie Condo Association are more significantly affected in kind because the placement of the condo's dumpster and the rental of parking spaces to condo owners will be affected (next)

Form 140 (con't.)

6). adversely if the variance is granted. Access to the dumpster as currently located may be denied by the reconfiguration of access to the parking lot. Condo owners who currently lease parking spaces on the parking lot will be required to park on the street where parking is so limited that zone permit parking is strictly enforced. Additionally, Connecticut Avenue, NW is a major commuter thoroughfare with rush hour parking restrictions that further reduce available parking.