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October 31, 2003

BY HAND

Mr. Geoffrey Griffis
Chairperson
Board of Zoning Adjustments
441 4th Street, NW, Room 201
Washington, DC 20001

Re: BZA Application No. 16970 / National Child Research Center ("NCRC")

REQUEST OF STEVEN R. HUNSICKER, GAYLORD NEELY AND LINDA BADAMI, AND HENRY P. LITTLE FOR ADDITIONAL TIME TO PRESENT TESTIMONY

Dear Mr. Griffis:

I am writing pursuant to Section 3117.5 of the zoning regulation (11 D.C.M.R. § 3117.5) on behalf of Linda Badami and Gaylord Neely, Henry Little and myself to request a modest amount of additional time to present our cases in opposition. We are the three parties in opposition to NCRC that have yet to present our testimony in this matter, but expect to do so at the hearing scheduled for November 4, 2003.

Our concern is that of the 1 hour and 45 minutes total time allotted for the testimony of all parties in opposition, only approximately 18 minutes remain. Although each of us will endeavor to avoid any redundancy with other witnesses, 18 minutes is simply not enough time to present the particular perspectives that each of us needs time to address. We anticipate that no more than approximately 20 minutes of total additional time will be required, and quite possibly less. Accordingly, we request that the clock be set at 40 minutes when we commence our individual presentations on November 4.

We believe that this modest amount of additional time is fully warranted under Section 3117.5 of the zoning regulations. Based on observations of the hearings to date, and judging from a count of transcript pages (estimated by court reporters as generally at 45 to 50 pages per hour of hearing time), it appears that the NCRC party proponents have had at least 2 hours and 30 minutes to present their direct cases. Additional time will be afforded for rebuttal. We are not seeking an equal amount of time. However, the additional time requested is fully justified under the requirement of Section 3117.5 that the Board "shall ensure reasonable balance in the time allocation between proponents and opponents."

DC01:372313.1

BZA
Case No. 16970
Exhibit No. 267

Board of Zoning Adjustment
District of Columbia
CASE NO.16970
EXHIBIT NO.267

The additional time requested also is appropriate in light of our active participation in the case to date, and the particular perspectives we will present as neighbors that either adjoin the NCRC property or are otherwise uniquely impacted by the NCRC expansion proposal. In addition, Henry Little will again take the time and bear the expense of traveling from his current home in California. As the neighbor who is perhaps most directly and adversely affected by NCRC's expansion proposal, Mr. Little's presentation should not be unfairly curtailed.

Thank you for your consideration of this matter.

Respectfully submitted,

Steven R. Hunsicker
3083 Ordway St., NW
Washington, DC 20008

Gaylord Neely and Linda Badami by SRH
3207 Highland Place, NW
Washington, DC 20008

Henry P. Little by SRH
1336 Shrader Street
San Francisco, CA 94117
(owner of 3220 Ordway St., NW)

cc: Service List