

DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT

APPEAL OF:

Kalorama Citizens Association from
Administrative Decision of DCRA
On Permits B455571 and B455876

BZA Appeal N. 17109

REC'D DISTRICT OF COLUMBIA
APR 19 2004

APPELLEE'S REQUEST FOR EXTENSION OF TIME TO SUBMIT
MEMORANDUM ON JURISDICTION OF BZA
TO DECIDE ISSUES INVOLVING THE HEIGHT ACT

Comes now Appellee, through counsel, and respectfully requests that the Board grant Appellee an extension of time in which to file Appellee's response to the question of the Board's jurisdiction of matters pertaining to the 1910 Height of Buildings Act, and states for reasons as follows:

- 1) Undersigned counsel has completed a draft memorandum on the question of this Board's authority under the Height Act; however, this memorandum had to be submitted to counsel's supervisors for review and approval prior to submission to the BZA.
- 2) This process has not been completed, as undersigned counsel has been directed to perform additional research and review additional potential issues, so that the General Counsel may be able to further review and approve the positions and arguments made by undersigned counsel.

WHEREFORE, counsel respectfully requests an extension of time in which to file a memorandum on the issue of jurisdiction and leave to file such a memorandum as promptly as possible, but no later than April 19, 2004.

Respectfully submitted,

Laura Gisolfi Gilbert
Laura Gisolfi Gilbert, #203000

BZA
Case No. 17109
Exhibit No. 64

Board of Zoning Adjustment
District of Columbia
CASE NO. 17109
EXHIBIT NO. 64

Attorney for Appellee
Office of the General Counsel
Department of Consumer & Regulatory
Affairs
941 N. Capitol Street, NE
Washington, D.C. 20002

Certificate of Service


I hereby certify that a copy of the foregoing is being served on:

Appellant's counsel, Andrea Ferster, 1100 17th Street, N.W., 10th Floor, Wash., D.C.
20036;

Counsel for the Permit Holder, Carolyn Brown, Holland & Knight, 2099 Pennsylvania
Avenue, N.W., Suite 100, Washington, D.C. 20006

Chairperson, ANC 1C, Alan Roth, 1845 Vernon Street, N.W., Washington, D.C.

this 13th day of April 2004.



Laura Gisolfi Gilbert, Esq.