

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Consumer and Regulatory Affairs

Office of the General Counsel



May 17, 2005

Ms. Jerrily R. Kress, FAIA
c/o Mr. Geoffrey Griffis
Chairman, Board of Zoning Adjustment
441 Fourth Street, N.W., Suite 210-S
Washington, D.C. 20001

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Re: *In the Matter of Patrick J. Carome*
BZA Appeal No. 17285

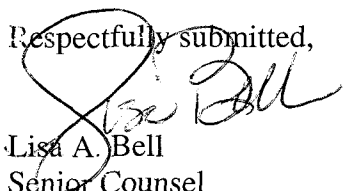
Dear Ms. Kress:

On May 10, 2005, at the hearing in the Matter of Patrick J. Carome, the Board of Zoning Adjustment (Board) granted the District of Columbia an opportunity to file its objections to the expert witness testimony offered by the National Park Service. The Board requested that the District provide its submission by May 17, 2005. The District seeks an extension of that deadline up to, and including, Monday, May 23, 2005.

The District can show good cause for its request for additional time. The extension sought by the District is based upon the additional time needed by the Building and Land Administration as well as the Zoning Division, to review the expert's written statement, copies of his exhibits (delivered by letter from Patrick Carome on May 17, 2005), and other relevant materials. As you know, the District was not provided with the NPS statement or materials before the May 10th hearing and the testimony presented new and novel arguments such as the "erection of structures for which no building code compliance is needed." The short extension of time requested by the District will provide the Zoning Administration with sufficient time to coordinate and review the matter with other administrations and fully present its objections. The delay will not prejudice the parties since the submission will be provided before the next hearing date.

The District will also provide its responses to written questions to the Zoning Administrator at that time.

Respectfully submitted,


Lisa A. Bell
Senior Counsel

BZA

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Board of Zoning Adjustment
District of Columbia
CASE NO. 17285
EXHIBIT NO. 79

Case No. 17285
Exhibit No. 79

cc: Toye Bello, Zoning Administrator
 Patrick J. Carome, Esquire, Appellant
 Richard L. Aguglia, Esquire, Counsel for Permit Holder
 Jeffrey Bernstein, Esquire, U.S. Department of Interior
 Alma Gates, ANC