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May 19, 2005

By Hand

Board of Zoning Adjustment
c/o Ms. Gerrily Kress
Director
District of Columbia Office of Zoning
441 4th Street, N.W.
Suite 210 South
Washington, DC 20001

RECEIVED
D.C. OFFICE OF ZONING
2005 MAY 19 PM 2:43

Re: *BZA Appeal No. 17285*

Dear Board Members:

We are in receipt of DCRA counsel's letter (dated May 17, but postmarked May 18) requesting an extension of time to make a further written submission regarding the Park Service's presentation and to provide Mr. Bello's answers to my written questions. The Board had set Tuesday, May 17 as the deadline for both of these filings. The Board's purpose in doing so was to ensure that there would be an adequate period of time for me to respond to these submissions in my rebuttal case and closing argument at the hearing scheduled for May 24.

I strongly object to DCRA's failure to meet the entirely reasonable deadline set by the Board. I obviously would be greatly prejudiced by having less than a day to react to whatever DCRA submits before Tuesday's hearing. The reasons Ms. Bell belatedly provides for extending the deadline are not persuasive. I would also note that Ms. Bell's letter offers no reason whatsoever for DCRA's failure to submit timely answers to my written questions to Mr. Bello.

I respectfully ask that the Board reject DCRA's request for an extension of time and that DCRA not be permitted to make any further filings in this Appeal other than the answers of Mr. Bello to my written questions.

BZA

Case No. 17285
Exhibit No. 80

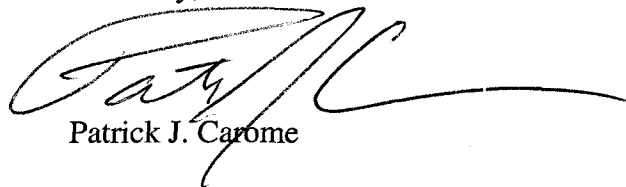
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In addition, please note that I wish to reserve the right to request a postponement of the May 24th hearing depending upon the nature and content of what DCRA submits or attempts to submit before that date, and depending on the Board's decision on the request I have made in the preceding paragraph.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Patrick J. Carome', with a long horizontal flourish extending to the right.

Patrick J. Carome

cc via PDF:

Lisa Bell, Esq.
Richard L. Aguglia, Esq.
Alma Gates
David Murphy
Jeffrey Bernstein, Esq.