LAW OFFICES
WILLIAMS & CONNOLLY LLP
725 TWELFTH STREET, N.W.
WASHINGTON, D. C. 20005-5901
(202) 434-5000
FAX (202) 434-5029

KENNETH J. BROWN
(202) 434-5818
kbrown@wc.com

EDWARD BENNETT WILLIAMS (1920-1988)
PAUL R. CONNOLLY (1922-1978)

November 18, 2005

BY FACSIMILE AND FIRST CLASS MAIL

RECEIVED
D.C. OFFICE OF ZONING
2005 NOV 22 AM 10: 48

Chairman Geoffrey Griffis
District of Columbia Board of Zoning Adjustment
One Judiciary Square
441 4th Street, N.W.
Suite 210 South
Washington, DC 20001

Re: Application of Babak Movahedi (No. 17392)

Dear Mr. Griffis:

This law firm represents David Maloff, John Evans, Alaire Rieffel, Michael Trister, Nancy Campbell and Ralph Johanson ("Objectors"), each of whom owns a property on the same block as applicant Babak Movahedi's home and has applied for party status in this matter. Objectors oppose Mr. Movahedi's eleventh-hour request for a continuance, which we received earlier today. This request is only the latest in a pattern of stalling tactics employed by this applicant, who previously has submitted no fewer than three different versions of his variance application to this Board and/or Advisory Neighborhood Commission 2B. After facing unexpected resistance to his original application from ANC 2B – on which he serves as a Commissioner – Mr. Movahedi sought and received a month's continuance before that body as well. When the ANC finally addressed the application, it voted unanimously (with one abstention) to oppose Mr. Movahedi's variance request. Subsequently, the Office of Planning likewise recommended that the application be denied.

Moreover, granting a continuance would be highly prejudicial to Objectors, who have gone to great effort to clear their schedules, prepare for the hearing, and line up witnesses ready to testify on November 22, 2005. Objectors have numerous professional and personal commitments, and should not be forced to relinquish another day due to Mr. Movahedi's transparent stalling tactics.

I appreciate your consideration of these views.

Respectfully submitted,

Kenneth J. Brown

Cc: Chris Collins, Esq.
Dareen Bowie, Chairman, ANC 2B

BOARD OF ZONING ADJUSTMENT
District of Columbia
CASE NO. 17392
EXHIBIT NO. 35

Board of Zoning Adjustment
District of Columbia
CASE NO. 17392
EXHIBIT NO. 35