

**DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT**

In re:)	
Advisory Neighborhood Commission 1A, Appellant,)	
)	
vs.)	BZA Appeal No. 17671
)	
Government of the District of Columbia)	
Department of Consumer & Regulatory Affairs, Appellee,)	
)	
And)	
)	
Peter Dabrowski, Intervener.)	

**NOTICE OF ENTRY OF APPEARANCE ON BEHALF OF INTERVENER
AND INTERVENER'S PARTIAL CONSENT MOTION FOR CONTINUANCE**

Please note the entry of appearance of Robert Clayton Cooper and Kenneth C. Crickman, Cooper & Crickman, PLLC, on behalf of the Intervener, Peter Dabrowski, the owner of the subject property located at 1432 Monroe Street, N.W. Please forward all future correspondence to counsel at the address set forth below.

On Tuesday, October 23, 2007, this matter was scheduled to be heard before the Board. The Intervener and Appellee District of Columbia appeared. The Appellant, Advisory Neighborhood Commission 1A, did not appear when the matter was called. The Board did not dismiss the appeal, but continued the matter until Tuesday, October 30, 2007, at 1:00 pm. On the original hearing date, the Intervener informed the Board that its key witness and participant in the DCRA permitting process, architect James Phillips, had been hospitalized for over 3 weeks at Johns Hopkins University Hospital in Baltimore. Upon information and belief, Mr. Phillips had to undergo multiple surgical operations. As a result, Mr. Phillips had not been able to speak to or meet with the Intervener or the Respondent, in preparation for this Appeal. Since that date, Mr. Phillips has been contacted by phone, and it was learned that he was released from the hospital on Friday, October 26th, but is under strict post-surgical medical care, and is confined to his home. (See attached letter from his medical provider, Johns Hopkins University Hospital). Therefore, a key witness, who is uniquely situated to provide important testimony and documents to the Board in consideration of this Appeal, is not available for the next 30 days.

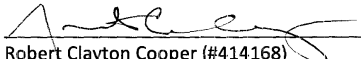
BOARD OF ZONING ADJUSTMENT
District of Columbia

CASE NO. 17671
EXHIBIT NO. 15

The Intervener has met with Appellee to review the Appeal. Unfortunately, the Intervener is currently without sufficient documents to adequately respond to this Appeal. The Appellee has consented to this Motion for Continuance, in order to ensure that all documents and relevant testimony are presented to this Board for consideration. Intervener has heard nothing from the Appellant.

THEREFORE, Intervener, with the consent of Appellee District of Columbia, submits this Motion for Continuance. It is expected that Mr. Phillips will be available to appear in 30 days. Granting the continuance is not prejudicial to the Appellant. However, denying the partial consent Motion for Continuance would be highly prejudicial to the Intervener, as both due process and important property rights are at risk. The property owner respectfully requests that this partial Consent Motion be granted to ensure that his interests, as well as those of the Appellee and Appellant, are fully presented to this Board.

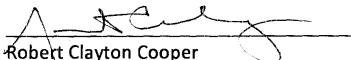
Respectfully submitted,


Robert Clayton Cooper (#414168)

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Washington, DC 20036
202-265-4520 (Main)
202-265-4525 (Fax)
rcoper@cocrlaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Entry of Appearance and Partial Consent Motion for Continuance was mailed first-class, postage prepaid and also emailed this 2nd day of October 2007 to: Dennis M. Taylor, Assistant Attorney General, Department of Consumer & Regulatory Affairs, 941 North Capitol Street, NE, Room 9401, Washington, DC 20001 (Dennis.Taylor@dc.gov), and to Advisory Neighborhood Commission, 1A, Attn: Anne Theisen, Chair ANC 1A Planning and Zoning Committee, 2905-11th Street NW, Washington DC 20001 (1A05@anc.dc.gov).


Robert Clayton Cooper

DISTRICT OF COLUMBIA
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BOARD OF ZONING ADJUSTMENT
District of Columbia

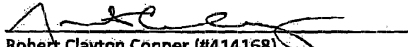
CASE NO. 17671

EXHIBIT NO. 15 FAX

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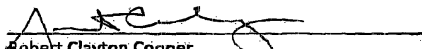
Respectfully submitted,


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Robert Clayton Cooper

Oct 24 07 04:48p

202-516-8720

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Nursing Administration



THE SIDNEY KIMMEL
COMPREHENSIVE CANCER CENTER
AT JOHNS HOPKINS

The Harry and Jeanette Weinberg Building
401 North Broadway, Room 137D
Baltimore, MD 21231-2410
410-955-8845 Fax: 410-502-1602

To whom it may concern,

Mr James Phillips has been an inpatient at Johns Hopkins Hospital since October 16th and has been unable to work. He will be continuing daily treatments as an outpatient for an additional month, and will be unable to work.

Sincerely

Priscilla Braslow, MD

410 502 5010



NCI
CCC

At the Johns Hopkins
Cancer Center, we are
committed to the
care of our patients.

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Washington, D.C. 20036
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Cooper & Crickman, PLLC

Fax

To:	Richard Nero	From:	Robert Cooper
Fax:	202/727-6072	Pages:	4
Phone:	(202) 727-2806	Date:	10/30/2007
Re:	Peter Dabrowski	cc:	

Urgent For Review Please Comment Please Reply Please Recycle

• **Comments:**

Mr. Nero,

Attached is the document filed with the Board of Zoning Adjustment in re: Advisory Neighborhood Commission 1A, Appellant, v. Government of The District of Columbia Department of Consumer & Regulatory Affairs, Appellee, and Peter Dabrowski, Intervener.

The letter, also attached, from Johns Hopkins is the attachment that was inadvertently not included in the original submission.

Feel free to contact me if you have any questions.

Yolanda Woodward for

Robert C. Cooper, Esq.

The information contained in this transaction is privileged and confidential. It is for the use of the individual or entity named above. If the reader of this message is not the intended recipient, the reader is hereby notified that any consideration, dissemination, or duplication of this communication is strictly prohibited. If you have received this communication in error, please return this transmission to us at the above address by mail.