BEFORE THE ZONING COMMISSION OR
BOARD OF ZONING ADJUSTMENT FOR THE DISTRICT OF COLUMBIA

FORM 150 – MOTION FORM

THIS FORM IS FOR PARTIES ONLY. IF YOU ARE NOT A PARTY PLEASE FILE A FORM 153 – REQUEST TO ACCEPT AN UNTIMELY FILING OR TO REOPEN THE RECORD.

Before completing this form, please review the instructions on the reverse side. Print or type all information unless otherwise indicated. All information must be completely filled out.

CASE NO.:	20382					
Motion of:	☐ Applicant	☐ Petitioner	☐ Appellant	☑ Party	☐ Intervenor	☐ Other _____

PLEASE TAKE NOTICE, that the undersigned will bring a motion to:

Request a continuance of 5-days to submit statement and a

Points and Authorities:

On a separate sheet of 8 ½" x 11" paper, state each and every reason why the Zoning Commission (ZC) or Board of Zoning Adjustment (BZA) should grant your motion, including relevant references to the Zoning Regulations or Map and where appropriate a concise statement of material facts. If you are requesting the record be reopened, the document(s) that you are requesting the record to be reopened for must be submitted separately from this form. No substantive information should be included on this form (see instructions).

Consent:

Did movant obtain consent for the motion from all affected parties?

- ☐ Yes, consent was obtained by all parties
- ☐ No attempt was made
- ☐ Consent was obtained by some, but not all parties
- ☐ Despite diligent efforts consent could not be obtained

Further Explanation: _____

CERTIFICATE OF SERVICE

I hereby certify that on this 0 8 **day of** March , 2 0 2 1

I served a copy of the foregoing Motion to each Applicant, Petitioner, Appellant, Party, and/or Intervenor, and the Office of Planning in the above-referenced ZC or BZA case via: ☐ Mailed letter ☐ Hand delivery ☐ E-Mail ☐ Other IZIS

Signature:	Randi Spivak		
Print Name:	Randi Spivak		
Address:	313 10th Street, NE		
Phone No.:		**E-Mail:**	randispivak08@gmail.com

Board of Zoning Adjustment
District of Columbia
CASE NO.20382
EXHIBIT NO.43

March 8, 2021

VIA IZIS

Chairperson Frederick L. Hill
Board of Zoning Adjustment
441 4th Street, NW
Suite 210S
Washington, DC 20001

RE: BZA Case No. 20382, Parties in Opposition Request for 5-day Continuance to File Statement

Chairperson Hill and Honorable Members of the Board:

The following Parties in Opposition to BZA Case No 20382, Theresa Harrison, Thomas Sheeran, Winfield Wilson, Veena Srinivasa, Darrin Howell, MaryJoy Ballantyne, Randi Spivak, and Andy Kerr submit this motion to request a 5-day continuance to file our joint statement. On February 24, you requested that we submit a joint statement and arguments by March 10, 2021. We are working to put together our statement, but respectfully request a 5-day extension to permit us to submit our statement by March 15, 2021.

We have contacted counsel for the Applicant, Martin Sullivan, who stated he does not object to the continuance.

Sincerely,

Randi Spivak
313 10th Street, NE
Washington, DC 20002
Randispivak08@gmail.com

Certificate of Service

I hereby certify that on March 8, 2021, I served a copy of this motion via e-mail to the following:

Martin Sullivan
Sullivan & Barros, LLP
1990 M Street
Washington, DC 20036
msullivan@sullivanbarros.com

D.C. Office of Planning
c/o Brandice Elliott
1100 4th Street SW, Suite E650
Washington, DC 20024
Brandice.Elliott@dc.gov