

Christine A. Roddy croddy@goulstonstorrs.com (202) 721-1116 (tel)

Lawrence Ferris lferris@goulstonstorrs.com (202) 721-1135 (tel)

Lee Sheehan lsheehan@goulstonstorrs.com (202) 721-1153 (tel)

July 2, 2021

## **VIA IZIS**

Frederick L. Hill, Chairperson Board of Zoning Adjustment 441 4<sup>th</sup> Street, NW, Suite 200-S Washington, DC 20010

> Re: <u>Board of Zoning Adjustment ("BZA") Appeal Nos. 20452 & 20453 –</u> Prehearing Submission

Dear Chairperson Hill and Members of the Board:

On behalf of Perseus TDC, LLC ("**Perseus**"), ground lessee of the property located at 1732 15<sup>th</sup> Street NW (Square 192, Lot 111) constituting a portion of prior Lot 108 in Square 192 which is the subject of this appeal (the "Property"), we hereby submit the enclosed Prehearing Statement and Motion to Exclude in response to the above-referenced appeals.

Enclosed herewith are the following:

- Prehearing Statement and accompanying exhibits:
  - Exhibit A 1919 Baist Map of Former Lot 800;
  - o Exhibit B Building Height Measurement Elevations;
  - Exhibit C Zoning Diagram;
  - Exhibit D Appendix of Prior BZA Decisions;
  - o Exhibit E Appendix of Prior Zoning Administrator Determination Letters;
  - o Exhibit F Act of June 1, 1910 ch. 263, 36 Stat. 452 (Original Height Act);
  - o Exhibit G Temple Building Permit No. 1527 and Permit Application;
  - <u>Exhibit H</u> Examples of Architectural Embellishments Functioning as a Roof;
- Motion to Exclude Appellant Dupont East Civic Action Association's proffered expert, Ravi Ricker, and accompanying Form 150.
- Letter of Authorization;

Please feel free to contact the undersigned if you have any questions regarding the enclosed materials.

Respectfully Submitted,
/s/
Christine A. Roddy
/s/
Lawrence Ferris
<u>/s/</u>
Lee Sheehan

Enclosure

## **Certificate of Service**

The undersigned hereby certifies that copies of the foregoing documents were delivered by electronic mail to the following addresses on July 2, 2021.

Matthew LeGrant, Zoning Administrator
Office of the Zoning Administrator
Department of Consumer and Regulatory Affairs
matthew.legrant@dc.gov

Hugh J. Green, Esq., Counsel for DCRA
Office of the General Counsel
Department of Consumer and Regulatory Affairs
hugh.green@dc.gov

Michael D. Hays, *Appellant in Case No. 20452* michael.hays@comcast.net

Edward V. Hanlon, *Representative of Appellant in Case No. 20453* Dupont East Civic Action Association ed.hanlon.3@gmail.com

Andrew Zimmitti, Counsel for Supreme Council of the Scottish Rite of Freemansory, 33<sup>rd</sup> Degree, Southern Jurisdiction, USA Manatt, Phelps & Phillips, LLP <a href="mailto:azimmitti@manatt.com">azimmitti@manatt.com</a>

Moshe Pasternak, Single Member District Representative for ANC 2B04 2B04@anc.dc.gov

/s/	
Lee Sheehan	