

**DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT
441 4th Street, N.W.
Washington, D.C. 20001**

Appeal by Michael D. Hays
Appeal by DuPont East Civic Action Assoc.

BZA Appeal No. 20452
BZA Appeal No. 20453

**D.C. DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS’ PRAEIPCE
JOINING PERSEUS TDC, LLC’S OPPOSITION TO REQUEST TO INTEREVENE**

NOW COMES, D.C. Department of Consumer and Regulatory Affairs (“DCRA”) and for its *Praeipce Joining Perseus TDC, LLC’s Opposition to Request to Intervene*, states as follows:

Wendy Schumacher (“Ms. Schumacher”) filed a *Request to Intervene in Appeals 20452 and 20453* (the “Motion”) seeking intervenor status in these matters. In response, DCRA hereby *joins* in *Perseus TDC, LLC’s Opposition to Request to Intervene*. In short, Ms. Schumacher’s Motion is untimely and fails to satisfy all the requirements of Subtitle Y § 502.13(b).

In addition, it is clear that Ms. Schumacher’s Motion is a furtive attempt to expand these appeals in violation Subtitle Y § 302.13, by attempting to raise Subtitle B §324.1(a) as a basis for error. *See* Attachment to Form 141 Intervenor Request, p.7. Under Subtitle Y §502.13(b)(4), the Board must deny Ms. Schumacher’s Motion as her intervention will unduly broaden the issues on appeal.

For the foregoing reasons, DCRA prays that the Board deny intervenor status to Wendy Schumacher.

Respectfully submitted,

/s/ Esther Yong McGraw

ESTHER YONG MCGRAW

General Counsel

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/s/ Melanie Konstantopoulos
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CERTIFICATE OF SERVICE

I certify that on this November 2, 2021, a copy of the foregoing was served to:

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