

LAW OFFICES OF

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July 15, 2022

Board of Zoning Adjustment for the
District of Columbia
441 4th Street, N.W.
Washington, D. C. 20001

Re: Special Exception Application No. 20594,
Nezahat and Paul Harrison

Dear Chairman Hill and Members of the Board:

On behalf of John F. Baringer, a party to this case and his wife, Michela Perrone, I consent to the filing of the motion today by counsel for Deborah Ann Hernandez, as well as the relief she requested. Specifically, counsel requests that the application be summarily rejected as incomplete, and that her request be taken up as a preliminary matter. It makes no sense to overlook the manifest legal deficiencies in the application on the ground that, on account of self-certification, those deficiencies will be addressed later.

Sincerely,



David W. Brown
Knopf & Brown

Board of Zoning Adjustment
District of Columbia
CASE NO.20594
EXHIBIT NO.133

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 15, 2022, a copy of the attached letter was served on the following by email:

Elisa Vitale, D.C. Office of Planning, via email: Elisa.Vitale@dc.gov

Nezahat and Paul Harrison, Applicants, via email: paul@3lobos.com

ANC3F and Chair Claudette David, via email: commissioners@anc3f.com & 3f05@anc.dc.gov

ANC3F03 SMD Commissioner Dipa Mehta, via email: 3f03@anc.dc.gov

Party Deborah Hernandez via attorney Cynthia Giordano by email: Cynthia.Giordano@saul.com

Party Mary Lee via attorney Andrea Ferster by email: [aferster@railstotrails.org](mailto: aferster@railstotrails.org)

Party John F. Baringer via email: jfbaringer@gmail.com


David W. Brown