



**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.: 20594

Motion of: Applicant Petitioner Appellant Party Intervenor Other _____

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

Accept Applicant's Letter Opposing Parties' Motion for a Preliminary Ruling within 24 hours of the hearing

Points and Authorities:

On a separate sheet of 8 1/2" 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 Consent was obtained by some, but not all parties
 No attempt was made Despite diligent efforts consent could not be obtained

Further Explanation: Consent of the parties is hereby requested with transmittal of the motion and attachment

CERTIFICATE OF SERVICE

I hereby certify that on this day of , 20202020

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 _____

Signature: 

Print Name: Paul Harrison

Address: 3007 Albemarle St NW, Washington DC 20008

Phone No.: 202-270-5727

E-Mail: paul@3lobos.com

Board of Zoning Adjustment
District of Columbia
CASE NO.20594
EXHIBIT NO.153

Paul Harrison
3007 Albemarle St NW
Washington DC 20008
202-270-5727 paul@3lobos.com

July 19, 2022

via IZIS & email to bzasubmissions@dc.gov

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

Re: Motion to Accept Letter Within 24 hours of Hearing – Case #20594, 3007 Albemarle St NW

Dear Chairman Hill and Members of the Board,

I move that you accept the attached letter opposing party motion for a preliminary hearing even though it was submitted within 24 hours of the hearing. The letter required consultation with the zoning administrator. He was kind enough to turn around his response in less than two business days after Applicant's receipt of party's 61-page motion but that quick turnaround came the afternoon of the day before the hearing. Moreover, the opinion contained is vital to proper consideration of this case.

While the rules are unclear as to whether this motion is required, I submit it just in case. Thank you for your consideration.

Respectfully submitted



Paul Harrison
Applicant

cc: Cynthia Giordano, Andrea Ferster, and David Brown: Counsel for parties
Dipa Mehta, ANC 3F
Elisa Vitale, Office of Planning