

August 19, 2025

**Via Email**

Board of Zoning Adjustment  
441 4th Street, N.W.  
Suite 210S  
Washington, DC 20001

**Re: Applicant's Response to the Motion for Reconsideration - BZA Case No. 21119**

Dear Chairperson Hill and Members of the Board:

The following is a brief response to the Motion for Reconsideration and the Motion for a Waiver of the 10-day deadline filed by the party opponent in the above-referenced case.

Both Ms. Leftwich and I were on the same distribution list from Ms. Mehlert's email dated Tuesday, July 29. That email contained three attachments: (1) the BZA and ZC Plans Modification Form, (2) the Attestation, and (3) the BZA Order. See Exhibit A, which shows that Ms. Leftwich received the Order on July 29. Accordingly, the Motion for Reconsideration should be dismissed as untimely.

On the merits, the party opponent fails to provide any reason why the Order is erroneous. She also fails to provide any instance of newly discovered evidence that would prompt re-opening the hearing. As a matter of law, her claim fails and should be denied. On a substantive note, her main objection seems to be that she, and her tenants, did not receive notice. She fully participated in the hearing process, including raising her notice issue. Regarding tenants, the only tenants required to receive notice are an applicant's tenants, pursuant to Y-300.8(g) and (h).

For these reasons, if not dismissed for untimely filing, the Motion for Reconsideration should be denied.

Respectfully Submitted,

*Martin P Sullivan*

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Board of Zoning Adjustment  
District of Columbia

**CERTIFICATE OF SERVICE**

I hereby certify that on August 19, 2025, an electronic copy of this submission was served to the following:

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Respectfully Submitted,

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