



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.: 21206

Motion of: ☐ Applicant ☐ Petitioner ☐ Appellant ☒ Party ☐ Intervenor ☐ Other \_\_\_\_\_

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

Waive the 30-day filing deadlines of Subtitle Y §§ 300.15 and 300.16, pursuant to Subtitle Y § 300.17,

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: \_\_\_\_\_

CERTIFICATE OF SERVICE

I hereby certify that on this 09 day of December, 2024

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: Hali Thurman

Address: 11325 Seven Locks Rd Suite 200, Potomac, MD 20854

Phone No.: 937-532-6331

E-Mail: permits@curbio.com

Board of Zoning Adjustment  
District of Columbia  
CASE NO.21206  
EXHIBIT NO.35

Case No.: 21206

Applicant/Petitioner: Rebecca Latorraca

Property Address: 2302 Ontario Rd NW, Washington, DC 20009

### **MOTION TO WAIVE 30-DAY FILING DEADLINE**

To the District of Columbia Office of Zoning:

The Applicant, Rebecca Latorraca, respectfully requests that the Zoning Commission to waive the 30-day filing deadlines of Subtitle Y §§ 300.15 and 300.16, pursuant to Subtitle Y § 300.17, specifically to allow for the acceptance of the revisions of the Burden of Proof Statement and the Statement of Existing and Intended Uses, which were requested by Robert Reid on 12/06/2024.

#### **Background:**

- On 12/06/2024, we received an email request from Robert Reid, the Zoning Specialist for the District of Columbia Government's Office of Zoning requesting clarification and to revise the language of the text within the Burden of Proof Statement and the Statement of Existing and Intended Uses.
- On 12/11/2024 we have our Board of Zoning Adjustment Public Hearing.

#### **Reasoning:**

- The revised information correctly demonstrates the existing and proposed uses.
- Waiving the deadline will ensure that these documents will be accepted and able to be used as part of the Board of Zoning Adjustment Public Hearing.
- The property is currently sitting vacant for an extended period of time and is being subjected to the issues of vacancy: such as youth loitering on the front porch and other security issues, illegal dumping in the backyard, and contractors from next door using electricity and water without permission. The neighbors do not want a vacant property on their block and other offices within the DC government are imposing vacancy fines and the vacancy tax rate being applied to the property.

#### **Relief Requested:**

WHEREFORE, the Applicant respectfully requests that the Zoning Commission:

- Waive the 30-day filing deadlines of Subtitle Y §§ 300.15 and 300.16, pursuant to Subtitle Y § 300.17, allowing the applicant to include the corrected documents in the hearing on December 11<sup>th</sup>, 2024, without delay.

Respectfully submitted,

Hali Thurman, Authorized Agent

Curbio Inc.

for

Rebecca Latorraca

2302 Ontario Road NW

Washington, DC 20009