

May 13, 2025

**Via JZIS**

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

**Re: Motion for Good Cause to Waive 30-Day Filing Deadline - BZA Case No. 21296**

Dear Chairperson Hill and Members of the Board:

On behalf of the Applicant in the above-referenced case, we are requesting that the Board waive the filing requirements of Y-300.15 and Y-300.16 pursuant to Y-300.17. Subtitle Y-300.15 limits the filing deadline to 30 days prior to the hearing. The deadline to file materials was yesterday, May 12, 2025. The relevant materials including the plans, plat, and revised self-certification were all filed in a timely manner and nothing is being changed. The plat filed yesterday, however, did not have a Surveyor's signature. Accordingly, the Applicant is seeking a waiver to file a plat with signature one day later.

Subtitle Y-300.17 states that upon a motion by the applicant and for good cause shown, the Board may elect to waive the filing requirement. The Applicant is therefore filing this Motion for Good Cause to Waive the deadline. The Applicant asserts there is good cause as there is no material information being added, and the revised plat is being submitted to meet an administrative requirement. The circumstances were out of the Applicant's control as the signed plat was not issued prior to the filing deadline. We have now received the certified plat and are submitting it to be included in the case record. We respectfully request that this signed version be accepted as part of the official record for this application.

Respectfully Submitted,

*Alexandra Wilson*

Alexandra Wilson  
Sullivan & Barros, LLP

**CERTIFICATE OF SERVICE**

I hereby certify that on May 13, 2025, an electronic copy of this submission was served to the following:

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Respectfully Submitted,

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