



December 5, 2025

VIA IZIS

Meridith H. Moldenhauer

Direct Phone 202-747-0763

Direct Fax 202-683-9389

mmoldenhauer@cozen.com

Mr. Frederick Hill
Chairperson
Board of Zoning Adjustment
441 4th Street NW, Suite 200S
Washington, DC 20010

**Re: BZA Appeal No. 21314 – Burleith Citizens Association, Appellant
Department of General Services Motion to Postpone Hearing with DOB’s Consent**

Dear Chairperson Hill and Members of the Board:

On behalf of the District of Columbia Department of General Services (“DGS”), the intervening party in the instant appeal, DGS respectfully requests that the Board continue the scheduled December 10, 2025 hearing in this matter for good cause, and in support thereof states as follows:

The instant appeal was taken by Appellant Burleith Citizens Association (“Appellant”) from the March 7, 2025, determination of the Zoning Administrator permitting the installation of field light poles at 1700 38th Street NW (“Duke Ellington Field”). At the Virtual Public Hearing of October 29, 2025, the Board of Zoning Adjustment, on its own motion, postponed the hearing in this appeal to December 10, 2025. When the Board previously postponed this case, it did so in anticipation of the Zoning Commission’s impending vote in ZC Case No. 25-12, which proposed a text amendment that could have provided clarity on several issues relevant to this appeal. However, at the request of the Office of Planning, that text amendment was withdrawn on November 25, 2025, and no vote was taken. Following that development, DGS’s General Counsel has been out of the office and is not expected to return until December 6, 2025. When the Board selected the December 10th hearing date, it was not known the ZC deliberation would occur in such close proximity to the continued BZA date. Given these circumstances and the number of stakeholders involved, the Parties require additional time to reengage, coordinate, and determine whether a negotiated resolution remains feasible.

As such, in an effort to conserve the resources of the Parties and the Board, and in the interest of efficient government, DGS respectfully requests that the Board grant this Motion to Postpone Hearing, and continue the December 10, 2025, hearing in this matter for at least 30 days. DGS contacted Appellant’s counsel to request consent to this extension; however, Appellant has denied consent.

Sincerely,

COZEN O'CONNOR



Meridith H. Moldenhauer

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of December, 2025 a copy of the foregoing cover letter and motion was served, via electronic mail, on the following:

District of Columbia Department of Buildings
Attention: Esther Yong McGraw, Esq., General Counsel
1100 4th Street SW, Ste. 5266
Washington, DC 20024
Esther.mcgraw2@dc.gov
Attorney for DOB

Michael McDuffie
3723 R Street NW
Washington, D.C. 20007
Micahel.mcduffie@gmail.com
Attorney for Appellant

Advisory Neighborhood Commission 2E
Gwendolyn Lohse, Chairperson
Kishan Putta, SMD 2E01
2E06@anc.dc.gov
2E01@anc.dc.gov
2E@anc.dc.gov

Burleith Citizens Association
2336 Wisconsin Avenue NW
PO Box 32262, Calvert Station
Washington, D.C. 20007
bca@burleith.org
Appellant



Meridith H. Moldenhauer

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.:

Motion of: Applicant Petitioner Appellant Party Intervenor Other _____

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

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 day of ,

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:

Address:

Phone No.: E-Mail: