

December 4, 2025

Board of Zoning Adjustment  
c/o Office of Zoning  
441 4th Street NW, Suite 200-S  
Washington, DC 20001

Re: BZA Case No. 21361 – 1253 Morse St NE

Applicant: Mashhood Olayinka

Parties: Natalie Martinez and Andrew Karay

Dear Members of the Board:

We submit this letter as parties to BZA Case No. 21361 regarding the property at 1253 Morse Street NE. We respectfully request a postponement of the upcoming hearing for the reasons outlined below.

First, we did not receive proper service of documents recently added to the record. As of this submission, the only filings served to us were Exhibits 41 and 42. All additional recent submissions — Exhibits 43 through 51 — were not served on us, despite our status as parties. This lack of service prevents us from adequately reviewing the applicant's new materials or preparing a meaningful response. At the time of filing any motion, a party must serve all other parties.

Second, the applicant has been engaged in active communication with all parties as recently as November 26, 2025 specifically requesting reconsideration of support for the application. These discussions remain ongoing. Given the applicant's continued outreach and attempts to negotiate, additional time is needed to allow these conversations to proceed in good faith and to ensure the Board receives complete and accurate input from all parties.

Because the record is incomplete as served to us, and in light of ongoing party-to-party communications, we believe a postponement is warranted to preserve fairness, ensure full participation of all parties, and provide adequate time for review and continued dialogue.

Thank you for your consideration.

Sincerely,  
Natalie Martinez  
Andrew Karay