



BEFORE THE ZONING COMMISSION OR
BOARD OF ZONING ADJUSTMENT OF THE DISTRICT OF COLUMBIA

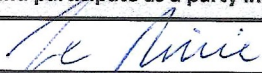


FORM 140 - PARTY STATUS REQUEST

Before completing this form, please go to www.dcoz.dc.gov > IZIS > Participating in an Existing Case > Party Status Request for instructions.
Print or type all information unless otherwise indicated. All information must be completely filled out.

PLEASE NOTE: YOU ARE NOT REQUIRED TO COMPLETE THIS FORM IF YOU SIMPLY WISH TO TESTIFY AT THE HEARING. COMPLETE THIS FORM ONLY IF YOU WISH TO BE A PARTY IN THIS CASE.

Pursuant to 11 DCMR Subtitle Y § 404.1 or Subtitle Z § 404.1, a request is hereby made, the details of which are as follows:

Name:	Jenkins Row REA, Inc.		
Address:	c/o Condominium Services, Inc., 4600 Duke St. #331, Arlington, VA 22304		
Phone No(s):	703-370-1600	E Mail:	joe@csimanagement.com
I hereby request to appear and participate as a party in Case No.:		21372	
Signature:			Date: November 5, 2025
Will you appear as a(n)	<input type="checkbox"/> Proponent	<input checked="" type="checkbox"/> Opponent	Will you appear through legal counsel? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

If yes, please enter the name and address of such legal counsel.

Name:	Designated party representative identified in attached letter.		
Address:			
Phone No(s):		E Mail:	

ADVANCED PARTY STATUS CONSIDERATION PURSUANT TO: Subtitle Y § 404.3/Subtitle Z § 404.3:

I hereby request advance Party Status consideration at the public meetings scheduled for:

PARTY WITNESS INFORMATION:

On a separate piece of paper, please provide the following witness information:

1. A list of witnesses who will testify on the party's behalf;
2. A summary of the testimony of each witness;
3. An indication of which witnesses will be offered as expert witnesses, the areas of expertise in which any experts will be offered, and the resumes or qualifications of the proposed experts; and
4. The total amount of time being requested to present your case.

PARTY STATUS CRITERIA:

Please answer all of the following questions referencing why the above entity should be granted party status:

1. How will the property owned or occupied by such person, or in which the person has an interest be affected by the action requested of the Commission/Board?
See attached for all responses to party status criteria.
2. What legal interest does the person have in the property? (i.e. owner, tenant, trustee, or mortgagee)
3. What is the distance between the person's property and the property that is the subject of the application before the Commission/Board? (Preferably no farther than 200 ft.)
4. What are the environmental, economic, or social impacts that are likely to affect the person and/or the person's property if the action requested of the Commission/Board is approved or denied?
5. Describe any other relevant matters that demonstrate how the person will likely be affected or aggrieved if the action requested of the Commission/Board is approved or denied.
6. Explain how the person's interest will be more significantly, distinctively, or uniquely affected in character or kind by the proposed zoning action than that of other persons in the general public.

Board of Zoning Adjustment
District of Columbia
CASE NO. 21372
EXHIBIT NO. 20

**JENKINS ROW REA, INC.
c/o Condominium Services Inc.
4600 Duke Street #331
Arlington, VA 22304**

November 5, 2025

Board of Zoning Adjustment
of the District of Columbia
submitted electronically via IZIS

Re: Application for Party Status, BZA Case No. 21372

To the Board of Zoning Adjustment,

Jenkins Row REA, Inc., ("Jenkins Row REA") respectfully requests party status in Case No. 21372, "1501 Erie St Construction, LLC," ("1501 Erie LLC") set for hearing on November 19, 2025.

Party Status Criteria

1. Jenkins Row REA is the controlling party of the multi-unit development at 1391 Pennsylvania Ave., SE, Washington, DC ("Jenkins Row"). It holds an easement reserved in perpetuity from the subject property, 1341 Pennsylvania Ave., SE, for ingress and egress (the "Reserved Easement") over a portion of the granted property ("Easement Area"). On October 6, 2020, the subject property was conveyed to 1501 Erie LLC with a deed specifying the Reserved Easement as excluded from such conveyance re-recorded in the Land Records of the District of Columbia at Instrument No. 2022116802 around November 28, 2022. 1501 Erie LLC seeks discretionary parking relief through its application while also requesting this Board's support for its ongoing infringement of the Reserved Easement, depriving Jenkins Row of use of the Reserved Easement and causing substantial expenses to defend the property right. *See Applicant's Statement, footnote 1.* (Jenkins Row REA would withdraw its opposition to the discretionary relief from a parking requirement absent 1501 Erie LLC's request for zoning approval to continue to impose costs on Jenkins Row REA through infringement on the Reserved Easement).
2. Jenkins Row REA is a DC Non-Profit Corporation, File No. N00005061602, which is the "Controlling Party" or Jenkins Row as such term is defined in a certain "Reciprocal Easement Agreement and Declaration of Covenants, Conditions And Restrictions for the Jenkins Project" recorded in the Land Records of the District of Columbia at Instrument No. 2007121821. Plaintiff is the successor to the relevant interest of the dominant estate with respect to the Reserved Easement.
3. Jenkins Row is adjacent (0 feet) from the subject of the application.



4. 1501 Erie LLC has infringed and seeks to continue to infringe on Jenkins Row REA's Reserved Easement. It seeks discretionary relief through this application while also causing special economic harm to Jenkins Row REA by maintaining such infringement. The Reserved Easement is used by Jenkins Row primarily for purposes of emergency pedestrian egress, emergency vehicle (i.e., fire / ladder truck) ingress to the dozens of residential units within ladder reach, and maintenance access to commercial chiller equipment.
5. As 1501 Erie LLC notes in its Application, Jenkins Row REA has been forced to file a civil action in the Superior Court of the District of Columbia, No. 2025-CAB-004642, to defend its interest in the Reserved Easement.
6. Jenkins Row REA is uniquely affected by the proposed zoning action because 1501 Erie LLC seeks to reserve rights for a permanent parking spot that would interfere with the Reserved Easement, even as it seeks discretionary relief to open a building it constructed with full knowledge that the Easement Area would be the only open space on the subject property.

Party Representative Designation

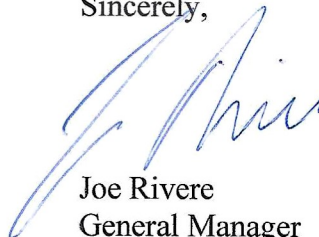
At a properly noticed and duly convened meeting of the Jenkins Row REA Board of Directors ("Board") on November 5, 2025, the Board unanimously designated Michael Shenkman, Treasurer of Jenkins Row REA, to serve as an authorized party representative in his capacity as an officer of the corporation.

Party Witness Information

Jenkins Row REA does not intend to call witnesses.

Jenkins Row REA respectfully requests three minutes to present its case.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joe Rivere", is written over the printed name.

Joe Rivere
General Manager
Jenkins Row REA

Certificate of Service

I, Joe Rivere, certify that on November 5, 2025, I have served a copy of the foregoing papers prior to filing through IZIS by e-mail on:

Martin P. Sullivan (msullivan@sullivanbarros.com)
Counsel to Applicant 1501 Erie St. Construction, LLC

Commissioner Edward Ryder (6b08@anc.dc.gov)
Chair, Advisory Neighborhood Commission 6B



Joe Rivere