

John Patrick Brown, Jr., Esq.
jpb@gdllaw.com

Lyle M. Blanchard, Esq.
lmb@gdllaw.com

June 2, 2022

BY IZIS

Mr. Anthony J. Hood, Chairman
D.C. Zoning Commission
One Judiciary Square
441 4th Street, N.W., Second Floor
Washington, D.C. 20001

Re: Zoning Commission Case No. 22-13
Application of The Wesley Theological Seminary of the United Methodist Church
for Approval for a Campus Plan to Thrive in Place (2022-2032)
4500 Massachusetts Avenue, N.W.
Square 1600, Lots 6 (818 and 819), 7, 8 and 9.

Dear Chairman Hood and Members of the Commission:

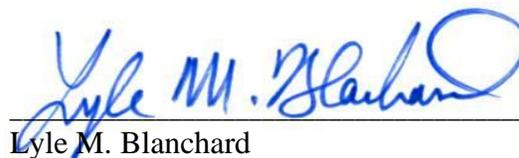
On June 1, 2022, the Applicant, through undersigned counsel, filed through IZIS and served a proposed list of witnesses for the June 13, 2022 Public Hearing. (ZC Exhibit No. 17). On the advice of the Office of Zoning staff, we are respectfully requesting a waiver pursuant to Subtitle §101.9, including attached Form 150 Motion to authorize acceptance of this filing. The proposed witnesses have been significantly involved in the Applicant's lengthy and ongoing community engagement process and/or critical to its case presentation and, in particular, to fully responding to the groups who have recently requested party status in opposition. No prejudice or surprise will result to any party or person to this case.

Thank you for your assistance in this matter.

Sincerely,
GREENSTEIN DELORME & LUCHS, P.C.



John Patrick Brown, Jr.



Lyle M. Blanchard

Enclosure

CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2022, the foregoing letter and list of proposed witnesses Form 150 Motion was delivered via electronic mail to the following:

Ms. Jennifer Steingasser

Mr. Joel Lawson

Mr. Stephen Cochran

D.C. Office of Planning

1100 4th Street, SW

Suite E650

Washington, D.C. 20024

Jennifer.steingasser@dc.gov

joel.lawson@dc.gov

stephen.cochran@dc.gov

Mr. Aaron Zimmerman

D.C. Department of Transportation

55 M Street, SE, Suite 400

Washington, D.C. 20003

aaron.zimmerman@dc.gov

ANC 3D

3D@anc.dc.gov

Mr. Ben Bergmann, Chair, ANC 3D

3D08@anc.dc.gov

Ms. Elizabeth Pemmerl, ANC 3D02

3D02@anc.dc.gov

ANC 3E

3E@anc.dc.gov

Mr. Jonathan Bender, Chair, ANC 3E

jonbender@gmail.com

Commissioner Gianinno, ANC 3E05

3E05@anc.dc.gov

William Clarkson

Spring Valley Neighborhood Association

wclarksonv@gmail.com

Dennis Paul

Neighbors for a Livable Community

dennis.paul@verizon.net

William F. Krebs

Spring Valley-Wesley Heights Citizens

Association

w_krebs@msn.com



John Patrick Brown, Jr., Esq.



**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.: **ZC 22-13**

Motion of: Applicant Petitioner Appellant Party Intervenor Other _____

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

Please see attached letter.

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 **02** day of **June**, **2022**

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: **John Patrick Brown, Jr., Esq.**

Address: **801 17th Street, NW, Suite 1000, Washington, DC 20006**

Phone No.: **(202) 452-1400** E-Mail: **jpb@gdllaw.com**