



**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.: Z.C. 22-13: Wesley Theological Campus Plan

Motion of: Applicant Petitioner Appellant Party Intervenor Other _____

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

See attached

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

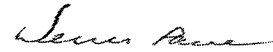
Further Explanation: _____

CERTIFICATE OF SERVICE

I hereby certify that on this day of , 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: Dennis Paul
Address: 3700 University Avenue NW
Phone No.: (202) 669-1500 **E-Mail:** NLC.WashDC@gmail.com

ZONING COMMISSION
 District of Columbia
 CASE NO. 22-13
 EXHIBIT NO. 41

Form 150: Motion

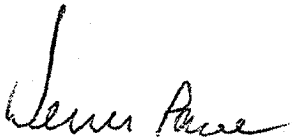
Z.C. Case No. 22-13: Wesley Theological Seminary Campus Plan

Neighbors for a Livable Community (NLC) – Spring Valley-Wesley Heights Citizens Association (SVWHCA) make this motion to request the Commission to reopen the record in the above referenced case to accept the printed copy of oral testimony presented by NLC-SVWHCA at the June 13, 2022 hearing. At the conclusion of the hearing on June 13, NLC-SVWHCA was unable to request that the Commission allow the party to submit a printed copy of its oral testimony for inclusion in the case log due to the virtual format. Additionally, NLC-SVWHCA thought the record would still be open until the applicant in the case had filed its Closing Statement for the hearing on June 17, 2022. Also, no announcement was made at the end of the evening that the record had been closed. The oral testimony could not be submitted in advance of the hearing because NLC-SVWHCA was still reviewing the more than 70 pages of new evidence submitted by the applicant on the two business days preceding the hearing. As required, we have submitted the printed copy of the oral testimony in a separate file.

As the oral testimony is no different than that delivered on June 13 and captured on the hearing video, inclusion of the printed version of the oral testimony in the case log will not prejudice any party and will serve the public interest by ensuring a full and complete case log.

Thank you for your consideration.

Sincerely,



Dennis Paul, President
Neighbors for a Livable Community

S/William F. Krebs
DC Bar No. 960534
Interim President and Counsel
Spring Valley-Wesley Heights Citizens Association
Counsel, Neighbors for a Livable Community

Certificate Of Service

We hereby certify that on June 17, 2022, this was delivered via electronic mail to the following:

Mr. John Patrick Brown, Jr.
Greenstein DeLorme & Luchs
jpb@gdllaw.com

Ms. Jennifer Steingasser
Office of Planning
Jennifer.steingasser@dc.gov

Mr. Aaron Zimmerman
D.C. Department of Transportation
Aaron.zimmerman@dc.gov

Mr. William Clarkson
Spring Valley Neighborhood Association
wclarksonv@gmail.com

ANC 3D
3D@anc.dc.gov

ANC 3E
3E@anc.dc.gov



Dennis Paul, President
Neighbors for a Livable Community

S/William F. Krebs
DC Bar No. 960534
Interim President and Counsel
Spring Valley-Wesley Heights Citizens Association
Counsel, Neighbors for a Livable Community