



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



**FORM 153 – REQUEST TO ACCEPT AN UNTIMELY FILING OR TO REOPEN THE RECORD**

**THIS FORM IS FOR NON-PARTIES ONLY. IF YOU ARE A PARTY, PLEASE FILE A FORM 150 – MOTION.**

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

I, John Patrick Brown, Jr. hereby request the following relief:

- Accept an untimely filing of Applicant's Reply to NLC-SVWHCA
- To reopen the record to accept Applicant's Reply to NLC-SVWHCA

**Points and Authorities:**

**Accept an untimely filing:** Please state each and every reason you believe the Zoning Commission (ZC) or Board of Zoning Adjustment (BZA) should grant your request to accept an untimely filing, including relevant references to the Zoning Regulations or Map. If you require more space, please use a separate piece of paper.

**Reopen the Record:** Please state each and every reason you believe the ZC or BZA should grant your request to reopen the record, including relevant references to the Zoning Regulations or Map. **The document(s) that you are requesting the record to be reopened for must be submitted separately from this form (see instructions). No substantive information is to be included on this form.**

Out of an abundance of caution, the Applicant is filing this request to submit its Reply to the September 8, 2022 filing of NLC-SVWHCA. The Commission's post-hearing instructions did not specify whether this Reply is permitted.

The Applicant is procedurally and fundamentally entitled to rebut the NLC-SVWHCA filing which is contradictory, intentionally misleading and inflammatory and provides new claims beyond the Applicant's previous Supplemental Submission.

No prejudice to any party will result and this will not delay these proceedings. The Commission and other parties will be better and more fully informed by this Reply.

I/We certify that the above information is true and correct to the best of my/our knowledge, information and belief. Any person(s) using a fictitious name or address and/or knowingly making any false statement on this application/petition is in violation of D.C. Law and subject to a fine of not more than \$1,000 or 180 days imprisonment or both. (D.C. Official Code § 22-2405)

<b>Date:</b>	September 15, 2022	<b>Signature:</b>	
<b>Name:</b>	John Patrick Brown, Jr.		
<b>Address:</b>	Greenstein DeLorme & Luchs, P.C. - 801 17th Street, NW, Ste. 1000, Washington, DC 20006		
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ANY APPLICATION THAT IS NOT COMPLETED IN ACCORDANCE WITH THE INSTRUCTIONS ON THE BACK OF THIS FORM WILL NOT BE ACCEPTED.

ZONING COMMISSION  
DISTRICT OF COLUMBIA  
CASE NO. 22-13  
EXHIBIT NO.56