



**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. Case No. 23-08A

**Motion of:**  Applicant  Petitioner  Appellant  Party  Intervenor  Other \_\_\_\_\_

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

Neighbors for a Livable Community (NLC) and the Spring Valley-Wesley Heights Citizens Association (SVWHCA) request the record in the above referenced case be reopened so the Commission may consider a motion. (See Attached Rationale)

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

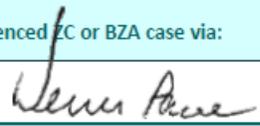
Further Explanation: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that on this   day of , 20

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, President, NLC

Address: 3700 University Avenue NW, Washington, DC 200126

Phone No.: (202) 669-1500      E-Mail: nlc.washdc@gmail.com

**Attachment Form 150: Z.C. Case No. 23-08A**  
**Request to Reopen the Record**

Neighbors for a Livable Community (NLC) – Spring Valley-Wesley Heights Citizens Association (SVWHCA), a joint party in **Z.C. Case No. 23-08A** request that the record in the case be reopened so the Commission may consider a motion that, if granted, would promote due process and avoid additional procedural errors that would further prejudice NLC-SVWHCA.

No party or individual in the case will be prejudiced by the Commission decision to reopen the record to consider the motion. On the other hand, NLC-SVWHCA will be irreparably harmed if the record is not opened for the Commission to consider the issues presented by the procedural motion that NLC-SVWHCA seeks to make in this case.

## Certificate of Service

We hereby certify that on December 1, 2025 copies of the attached were delivered via e-mail to the following:

Ms. Maxine Brown-Roberts  
Mr. Joel Lawson  
DC Office of Planning  
1100 4<sup>th</sup> Street NW, Suite E650  
Washington, DC 20024  
[Maxine.brownroberts@dc.gov](mailto:Maxine.brownroberts@dc.gov)  
[Joel.lawson@dc.gov](mailto:Joel.lawson@dc.gov)

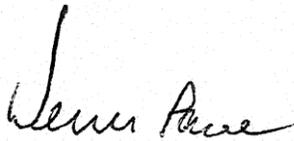
Mr. Erkin Ozberk  
D.C. Department of Transportation  
[Erkin.ozberk1@dc.gov](mailto:Erkin.ozberk1@dc.gov)

Mr. John Patrick Brown, Jr.  
Greenstein DeLorme & Luchs  
[jpb@gdllaw.com](mailto:jpb@gdllaw.com)

ANC 3D  
[3D@anc.dc.gov](mailto:3D@anc.dc.gov)

ANC 3E  
[3E@anc.dc.gov](mailto:3E@anc.dc.gov)

William Clarkson  
SVNA  
[wclarksonv@gmail.com](mailto:wclarksonv@gmail.com)



Dennis I. 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