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November 21, 2025

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: Applicant's Opposition to NLC/SVWHCA Motion
Application of The Wesley Theological Seminary of the United Methodist Church
for Further Processing of a Campus Plan (Z.C. Case No. 23-08A)
4500 Massachusetts Avenue, N.W.
Square 1600, Lots 6 (818 and 819), 7, 8 and 9.

Dear Chairman Hood and Members of the Commission:

The Wesley Theological Seminary ("Wesley") respectfully submits this brief opposition to the November 20, 2025 Motion filed by NLC/SVWHCA to make Landmark a co-applicant in this case. The Motion is untimely, legally and factually unsupported, and unnecessary and should be denied.

NLC/SVWHCA unsuccessfully raised the same issue in filings made on August 22, 2025 (ZC Exhibit 6) and again on September 12, 2025 (ZC Exhibit 12). NLC/SVWHCA requested joint party status on September 26, 2025 (ZC Exhibit 13) which was granted without opposition at the October 23, 2025 public meeting. Without justification, filing this Motion three days (one business day) before the public hearing is untimely and prejudicial to the Commission and Wesley's orderly conduct of these proceedings.

NLC/SVWHCA is factually and legally incorrect. Wesley will at all times retain sole ownership of its entire campus property. The application was properly filed in the name of Wesley as the owner of the property under Subtitle Z, Section 302.4. Reliance on unrelated cases is not established and creates no binding precedence.

NLC/SVWHCA claims an undefined inability to cross-examine Landmark at the public hearing. Landmark is listed as a witness for the hearing and will testify. Regardless of Landmark's party status, NLC/SVWHCA will have the ability to cross-examine the Landmark witness based on the testimony given in accordance with normal Commission procedures.

Mr. Anthony J. Hood, Chairman

November 21, 2025

Page 2 of 3

For these reasons, Wesley requests the Commission to DENY this Motion.

Wesley looks forward to presenting this application to the Zoning Commission at the November 24, 2025 public hearing date.

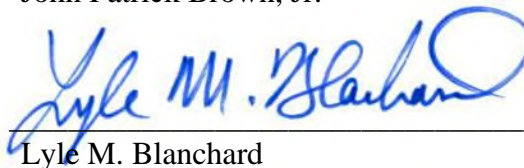
Thank you for continued assistance in this matter.

Very truly yours,

GREENSTEIN DELORME & LUCHS, P.C.



John Patrick Brown, Jr.



Lyle M. Blanchard

Enclosure

CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2025, the foregoing Applicant's Opposition to NLC/SVWHCA's Motion was delivered via electronic mail to the following:

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