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DAVID W. BROWN

March 2, 2018

Members of the Board  
D.C. Board of Zoning Adjustment  
441 4th Street NW Suite 200S  
Washington, DC 20001

Re: **Case Number 19377 – The Boundary Companies and  
The Missionary Society of St. Paul the Apostle  
Application for 3015 4<sup>th</sup> Street, NE  
Request for Postponement of Hearing**

Dear Members of the Board:

On behalf of our client, St. Paul's College Neighbors for Thoughtful Development ("Neighbors"), a party to the above-referenced case, I respectfully request postponement of the public hearing currently scheduled for March 21, 2018 to an available Wednesday in April 2018.

In support of the request, undersigned counsel states as follows:

1. The current hearing date is one week later than the date set by the Board at a public meeting on September 27, 2017. The one-week adjustment was made recently at the request of the Board's Secretary, Mr. Moy. While I did not object to the change at the time, I subsequently learned that a primary member of Neighbors would be unable to participate due to an out-of-town commitment. He will be available to participate on any Wednesday in April, as will the undersigned.

2. A principal reason for the postponement the applicant sought last September was for further dialogue with Neighbors and possibly others. Nevertheless, the applicant did not share its revised plans with Neighbors before filing them in the IZIS system at the 21-day deadline, i.e., February 28, 2018. I received a service copy of the plans by mail today, March 2, 2018. Neighbors needs time to review these plans to prepare properly for the hearing, to include discussion of our concerns with Office of Planning staff. Today I secured the earliest possible appointment for an OP meeting, i.e., March 13, 2018. That date is after the due date for OP's report to the Board absent a postponement (March 9) and Neighbors considers it important to its interests, as well as the Board's, that the OP Report follow, not precede, our meeting with staff.

3. Neighbors met with the applicant yesterday, March 1, 2018, and sought the applicant's views on a brief postponement. The applicant advised that while it would

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not initiate any such request, it did not object to a postponement. If the postponement is granted to any Wednesday in April, Neighbors will be ready and available to participate in the hearing. We anticipate that the applicant will find one or more of the April dates workable as well.

Sincerely yours,

A handwritten signature in blue ink that reads "David W. Brown". The signature is fluid and cursive, with a long horizontal line extending to the right.

David W. Brown

## Certificate of Service

I HEREBY CERTIFY that on this 2<sup>nd</sup> day of March 2018, a true and correct copy of the foregoing letter has been sent, first class mail, postage prepaid, to the following:

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Thoughtful Development**  
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