

**Before the Zoning Commission or Board of Zoning Adjustment
of the District of Columbia
FORM 140 - Party Status Request**

AMENDMENT to Request Submitted on September 12, 2018

BZA case number 19751 (MED Developers, LLC)

ATTACHMENT

(Below are one change with regard to appearing through legal counsel and several updates to the witness list)

MED Developers, LLC only recently in its Pre-Hearing Statement dated September 5, 2018 provided new, critically material information about its application such that MAHCA has not had a commercially reasonable amount of time to prepare its case or secure expert witnesses. Experts have provided proposals with lead times of approximately six (6) weeks to review the case, conduct research and do analysis, prepare a written report and prepare for a BZA hearing. MAHCA was able to retain counsel on September 12, 2018, but counsel cannot attend the September 26, 2018 hearing, and even if counsel had been able to, she would not have had enough time to be prepared on September 26, 2018.

Will you appear through legal counsel? Yes No

PARTY WITNESS INFORMATION:

On a separate piece of paper, please provide the following witness information:

1. A list of witnesses who will testify on the party's behalf

Impacted neighbors and community members including:

- Amiee Aloï
- William Brownfield
- Anita Crabtree (MAHCA Zoning Coordinator on behalf of MAHCA)
- Daniel Crabtree
- Paul Cunningham (MAHCA President)
- Rosalyn Doggett
- Victoria Gersten
- Thomas Henneberg
- Kristie Kenney
- Dana LePere
- Robert McDiarmid
- Edward Rossotti

Expert witnesses:

- *To be determined as MAHCA is able to locate experts for issues raised by the applicant's new proposal made and presented to the public August 29, 2018, fewer than ten (10) business days ago.*

Expert witnesses added in this amendment:

- MCV Associates, Inc., Joe Mehra, PE, PTOE (traffic/parking expert)

MCV Associates, Inc. is working on its expert review, analysis and report.

Please note **Applicant added "Applicant's Supplemental Memorandum on Parking" to the IZIS system on September 17, 2018** (Exhibit 107), which MCV Associates, Inc. will have to review and factor into its analysis and report.

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Paul Cunningham

President

Massachusetts Avenue Heights Citizens Association

BZA Case No. 19751 (MED Developers, LLC)

AFFIDAVIT OF SERVICE

I hereby certify that on September 24, 2018 a copy of the foregoing Amendment to MAHCA's Request for Party Status was served via e-mail to the following:

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A handwritten signature in blue ink that reads "P.P. Amis-Croffee". The signature is written over a horizontal line.

Paul Cunningham
President
Massachusetts Avenue Heights Citizens Association