

Mary Carolyn Brown (202) 763-7538 carolynbrown@donohuestearns.com

November 13, 2018

## Via IZIS

Board of Zoning Adjustment for the District of Columbia 441 4<sup>th</sup> Street, N.W., Suite 200S Washington, D.C. 20001

Re: BZA Application No. 19823

Wisconsin Avenue Baptist Church and Sunrise Senior Living

3920 Alton Place, N.W. (Square 1779, Lot 14)

## Dear Members of the Board:

On behalf of Wisconsin Avenue Baptist Church ("WABC") and Sunrise Senior Living, the applicants in the above-referenced case, we hereby submit the outline of testimony for the applicants' witness, Mr. Andrew Altman, an expert in land planning. This omission was just brought to our attention and we request a waiver of 11-Y DCMR § 300.15 and 300.16 to provide this outline less than 21 days before the date of the hearing based on good cause. The omission is a minor in nature, particularly since Mr. Altman was previously identified as a proposed expert witness, he is well-known as the former Director of the Office of Planning, and his proposed testimony can be gleaned from his area of expertise. Consequently, no party will be prejudiced by this omission. The applicant also advises the Board that Patricia Dueholm and Janet Brooks, Trustees of WABC, will testify on behalf of the church, consistent with the outline of testimony previously submitted for Rev. Bergfalk.

Respectfully submitted,

DONOHUE & STEARNS, PLC

By: Man Jaraly Dun-Many Carolyn Brown

Enclosure

cc: Maxine Brown-Roberts, OP (via email: Maxine.BrownRoberts@dc.gov)

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing letter was served November 13, 2018,

via email, on the following:

Tenleytown Neighbors Association c/o Judy Chesser, President 3901 Alton Place, N.W. Washington, D.C. 20016 via email: chesser1@rcn.com

Andrea Ferster, Esq.
Law Offices of Andrea Ferster
2121 Ward Court, N.W., 5<sup>th</sup> Floor
Washington, D.C. 20036
Via email: <u>aferster@railstotrails.org</u>
Counsel for Yuma Street Requesters

Advisory Neighborhood Commission 3E c/o Lisner Home 5425 Western Avenue, N.W., Suite 219 Washington, D.C. 20015 Via email: <a href="mailto:sherryacohen@gmail.com">sherryacohen@gmail.com</a>

Jonathan McHugh, ANC 3E-05 4524 Van Ness Street, N.W. Washington, D.C. 20016 Via email: jmchughdc@gmail.com

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