



**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.: BZA Case Nos. 20453 and 20656

Motion of: Applicant Petitioner Appellant Party Intervenor Other _____

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

MOTION TO REOPEN THE RECORD TO INCLUDE THE OCTOBER 31, 2022 ORDER AND INJUNCTION
ISSUED BY THE HON. YVONNE WILLIAMS IN DUPONT EAST CIVIC ACTION ASSOCIATION v. MAYOR MURIEL BOWSER
ENJOINING THE DISTRICT OF COLUMBIA, ITS OFFICERS, EMPLOYEES AND AGENTS

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: Representatives of all parties to BZA Cases 20453 and 20656 were contacted in writing and asked for their consent. Lawrence Ferris, Esq., for Perseus TDC declined in writing to consent. Andrew Zimmitti, Esq., for the Supreme Council [Masons] declined in writing to consent. Hugh Green, Esq., for DOB (DCRA) informed the undersigned due to reorganization he is no longer assigned to zoning cases. Erik Cox, Deputy General Counsel, Department of Buildings, declined in writing to consent.

CERTIFICATE OF SERVICE

I hereby certify that on this 3 0 day of November Month, 2Y 0Y 2Y 2Y

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: *Edward V. Hanlon*

Print Name: Edward V. Hanlon, Esq.

Address: 5510 Cherrywood Lane, Ste G, Greenbelt, MD 20770

Phone No.: 301 466-4492

E-Mail: Ed.Hanlon.3@gmail.com

Board of Zoning Adjustment
District of Columbia
CASE NO.20453
EXHIBIT NO.135