

Christine A. Roddy  
croddy@goulstonstorrs.com  
(202) 721-1116 (tel)

Lawrence Ferris  
lferris@goulstonstorrs.com  
(202) 721-1135 (tel)

Lee Sheehan  
lsheehan@goulstonstorrs.com  
(202) 721-1153 (tel)

July 2, 2021

**VIA IZIS**

Frederick L. Hill, Chairperson  
Board of Zoning Adjustment  
441 4<sup>th</sup> Street, NW, Suite 200-S  
Washington, DC 20010

Re: **Board of Zoning Adjustment (“BZA”) Appeal Nos. 20452 & 20453 –  
Prehearing Submission**

Dear Chairperson Hill and Members of the Board:

On behalf of Perseus TDC, LLC (“**Perseus**”), ground lessee of the property located at 1732 15<sup>th</sup> Street NW (Square 192, Lot 111) constituting a portion of prior Lot 108 in Square 192 which is the subject of this appeal (the “Property”), we hereby submit the enclosed Prehearing Statement and Motion to Exclude in response to the above-referenced appeals.

Enclosed herewith are the following:

- Prehearing Statement and accompanying exhibits:
  - Exhibit A – 1919 Baist Map of Former Lot 800;
  - Exhibit B – Building Height Measurement Elevations;
  - Exhibit C – Zoning Diagram;
  - Exhibit D – Appendix of Prior BZA Decisions;
  - Exhibit E – Appendix of Prior Zoning Administrator Determination Letters;
  - Exhibit F – Act of June 1, 1910 ch. 263, 36 Stat. 452 (Original Height Act);
  - Exhibit G – Temple Building Permit No. 1527 and Permit Application;
  - Exhibit H – Examples of Architectural Embellishments Functioning as a Roof;
  
- Motion to Exclude Appellant Dupont East Civic Action Association’s proffered expert, Ravi Ricker, and accompanying Form 150.
  
- Letter of Authorization;

Board of Zoning Adjustment  
District of Columbia  
CASE NO.20453  
EXHIBIT NO.38

July 2, 2021  
Board of Zoning Adjustment

---

Please feel free to contact the undersigned if you have any questions regarding the enclosed materials.

Respectfully Submitted,

                /s/                  
Christine A. Roddy

                /s/                  
Lawrence Ferris

                /s/                  
Lee Sheehan

Enclosure

## Certificate of Service

The undersigned hereby certifies that copies of the foregoing documents were delivered by electronic mail to the following addresses on July 2, 2021.

Matthew LeGrant, *Zoning Administrator*  
Office of the Zoning Administrator  
Department of Consumer and Regulatory Affairs  
[matthew.legrant@dc.gov](mailto:matthew.legrant@dc.gov)

Hugh J. Green, Esq., *Counsel for DCRA*  
Office of the General Counsel  
Department of Consumer and Regulatory Affairs  
[hugh.green@dc.gov](mailto:hugh.green@dc.gov)

Michael D. Hays, *Appellant in Case No. 20452*  
[michael.hays@comcast.net](mailto:michael.hays@comcast.net)

Edward V. Hanlon, *Representative of Appellant in Case No. 20453*  
Dupont East Civic Action Association  
[ed.hanlon.3@gmail.com](mailto:ed.hanlon.3@gmail.com)

Andrew Zimmitti, *Counsel for Supreme Council of the Scottish Rite of Freemasonry, 33<sup>rd</sup> Degree, Southern Jurisdiction, USA*  
Manatt, Phelps & Phillips, LLP  
[azimmitti@manatt.com](mailto:azimmitti@manatt.com)

Moshe Pasternak, *Single Member District Representative for ANC 2B04*  
[2B04@anc.dc.gov](mailto:2B04@anc.dc.gov)

\_\_\_\_\_  
/s/  
Lee Sheehan