



**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.:**

**Motion of:**

- Applicant   
  Petitioner   
  Appellant   
  Party   
  Intervenor   
  Other \_\_\_\_\_

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

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**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: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that on this   day of ,

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:**

**Print Name:**

**Address:**

**Phone No.:**

**E-Mail:**

June 22, 2022

**VIA IZIS**

Anthony J. Hood, Chairman  
Zoning Commission for the District of Columbia  
441 Fourth Street, NW, Suite 200S  
Washington, DC 20001

Re: Z.C. Case No. 21-18: Dance Loft Ventures LLC (“**Applicant**”) Application for a Consolidated PUD and related Zoning Map Amendment (the “**Application**”) for 4608-4618 14th Street, NW – Objection to Portion of Party Opponent Submission

Dear Chairman Hood and Commissioners:

On June 14, 2022, Friends of 14<sup>th</sup> Street (“**FOFS**”), the party opponent in the above-referenced application, filed its post-hearing submission.

On Page 54 of Exhibit 798, FOFS raises new issues and allegations regarding Dance Loft seeking to disparage Dance Loft. The Applicant objects to the inclusion of such page in the record. This page is not responsive to any request by the Zoning Commission and is not responsive to any materials submitted by the Applicant, in particular this page’s discussion of “vertical marketing” and “dancer compensation”. The page includes erroneous information about Dance Loft including its statement regarding the first year that Dance Loft began work with DC Public Schools (which was the Spring of 2017 rather than 2021). The statements and allegations made by FOFS do not reflect reality and are potentially harmful to a non-profit arts organization and the individuals working for and associated with that group. This page is an unjustified attack on credibility and does not belong in the Zoning Commission forum.

While the Applicant takes issue with many contentions and statements within the FOFS submission and wishes to maintain its posture of fostering an open dialogue about the Application, it respectfully requests the removal of Page 54 of Exhibit 798 from the record.

We greatly appreciate the time you have spent to review this application.

Respectfully submitted,

/s/ Jeffrey C. Utz

/s/ David A. Lewis

## Certificate of Service

I certify that on or before June 22, 2022 (except as noted below), I delivered a copy of the foregoing document and attachments via e-mail, hand delivery, or first-class mail to the addresses listed below.

/s/ David A. Lewis  
As Attorney for the Applicant

District of Columbia Office of Planning (*via e-mail only*)  
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Commissioner Maria Barry, ANC 4C02 (*via e-mail only*: [4C02@ANC.DC.gov](mailto:4C02@ANC.DC.gov))  
1409 Ingraham Street, NW  
Washington, 20011

Chairperson Namatie Sia Mansaray, ANC 4C06 (*via e-mail only*: [4C06@ANC.DC.gov](mailto:4C06@ANC.DC.gov))  
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Friends of 14th Street  
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