

CASE NO. A-6938

**APPEAL OF WASHINGTON ADVENTIST ACC, BOARD OF COUNCIL OF UNIT
OWNERS by LAVANYA SITHANANDAM, MD, PRESIDENT**

EXHIBIT LIST

1. Application (**PDF 1, PDF Page Number 3**)
 2. List of adjoining/confronting property owners
 3. DPS Building Permit Number 1116230 (**PDF 1, PDF Page Number 4**)
 4. Motion to Intervene from Patrick O'Neil, Esquire, attorney for subject property owner (**PDF 1, PDF Page Number 5**)
 5. (a) Envelope showing date notice mailed
(b) Notice of hearing scheduled for December 17, 2025
(**PDF 1, PDF Page Number 1**)
 6. Motion to Dismiss or for Summary Disposition from Elana Robison, Assistant County Attorney (**PDF 1, PDF Page Number 8**)
 7. Opposition to Motion to Dismiss or for Summary Disposition from Soo Lee-Cho, Esquire, with attachments (**PDF 1, PDF Page Number 13**)
 - (a) Special Exception Case No. S-807 (1982) (**PDF 1, PDF Page Number 28**)
 - (b) Plat No. 3600 (**PDF 1, PDF Page Number 42**)
 - (c) Lease (**PDF 1, PDF Page Number 43**)
 - (d) Gorove Slade Memorandum (**PDF 1, PDF Page Number 57**)
 - (e) Oct. 10, 2025 Email from G. Morgan to Dr. Sithanandam
(**PDF 1, PDF Page Number 58**)
 - (f) Aug. 22, 2019 Washington Post article (**PDF 1, PDF Page Number 60**)
 - (g) Deed (**PDF 1, PDF Page Number 64**)
 - (h) Declaration (**PDF 1, PDF Page Number 72**)
 - (i) Washington Adventist Hospital Demolition Update
(**PDF 1, PDF Page Number 132**)
 - (j) CON Application (**PDF 1, PDF Page Number 142**)
 - (k) Montgomery County Code § 59-E-7.6 (1977)
(**PDF 1, PDF Page Number 308**)
 - (l) Adventist HealthCare Parking Exhibit (**PDF 1, PDF Page Number 309**)
 - (m) Oct. 7, 2025 Letter from G. Morgan to Dr. Sithanandam
(**PDF 1, PDF Page Number 310**)
 - (n) Resp. to Additional Completeness Questions (Feb. 14, 2014)
(**PDF Page Number 313**)
 - (o) Takoma Park Campus Overview (**PDF 1, PDF Page Number 361**)
- Continued to Page 2**

CASE NO. A-6938

APPEAL OF WASHINGTON ADVENTIST ACC, BOARD OF COUNCIL OF UNIT OWNERS by LAVANYA SITHANANDAM, MD, PRESIDENT

EXHIBIT LIST

Page 2

Exhibit 7 Continued

(p) Apr. 10, 2018 letter from S.R. Ludlow to B. Steffen (**PDF 1, PDF Page Number 368**)

(q) Proposed Letter from Takoma Park City Council to P.E. Parker, MHC (5-25-22) (**PDF 1, PDF Page Number 373**)

ALL PRE-HEARING SUBMISSIONS ARE SEPARATE FROM THE HEARING PACKET. EACH DOCUMENT HAS ITS OWN PAGE NUMBERS.

8. Pre-Hearing Submission of Montgomery County from Elana Robison, Associate County Attorney (**PDF 2, PDF Page Number 1**)
 - (a) Commercial Building Permit Application No. 1116230 (**PDF 2, PDF Page Number 4**)
 - (b) Building Permit No. 1116230 (**PDF 2, PDF Page Number 5**)
 - (c) Site Plan – Overall (**PDF 2, PDF Page Number 6**)
 - (d) Opinion of the Board; Case No. S-807 (**PDF 2, PDF Page Number 7**)
 - (e) Resolution to Revoke Special Exception, Case No. S-238 (**PDF 2, PDF Page Number 21**)
 - (f) Montgomery County Zoning Ordinance Sec. 6.4.3 (**PDF 2, PDF Page Number 24**)
 - (g) Condominium Plat No. 3300 (**PDF 2, PDF Page Number 26**)
 - (h) MCATLAS Photo (**PDF 2, PDF Page Number 27**)
 - (i) Aerial Photos (Google Map) (**PDF 2, PDF Page Number 28**)
 - (j) Street View Photos (Google Map) (**PDF 2, PDF Page Number 30**)
9. Pre-Hearing Submission of Appellant from Soo Lee-Cho, Esquire (**PDF 3, PDF Page Number 1**)
 - (a) Commercial Building Permit Application (**PDF 3, PDF Page Number 5**)
 - (b) Building Permit No. 116230 (**PDF 3, PDF Page Number 6**)
 - (c) Opinion of the Board: Case No. S-807 (**PDF 3, PDF Page Numbers 7-20**)
 - (d) Condominium Plat No. 3600 (**PDF 3, PDF Page Number 21**)
 - (e)(i)-(iii) Fence Permit Site Plan Markups (**PDF 3, PDF Page Number 22-24**)
 - (f) October 30, 2025 Gorove Slade Parking Study (**PDF 3, PDF Page Number 25-40**)
 - (g) October 17, 2025 Gorove Slade Memorandum (**PDF 3, PDF Page Number 41**)
 - (h) October 10, 2025 Email from Geoffrey Morgan (**PDF 3, PDF Page Number 42-43**)

Continued to Page 3

CASE NO. A-6938

APPEAL OF WASHINGTON ADVENTIST ACC, BOARD OF COUNCIL OF UNIT OWNERS by LAVANYA SITHANANDAM, MD, PRESIDENT

EXHIBIT LIST

Page 3

Exhibit 9 Continued

- (i) October 7, 2025 Letter from Geoffrey Morgan
(PDF 3, PDF Page Number 44-46)
 - (j) April 28, 2025 Washington Adventist Hospital Demolition Update
(PDF 3, PDF Page Number 47-56)
 - (k) (i) Deed **(PDF 3, PDF Page Number 57-64)**
(ii) Lease **(PDF 3, PDF Page Number 65-78)**
 - (l) June 21, 1984 Washington Adventist ACC Condominium Declarations
(PDF 3, PDF Page Number 79-138)
 - (m) Montgomery County Zoning Ordinance Section 59-E-7.6(1977)
(PDF 3, PDF Page Number 139)
 - (n) Application for Certificate of Necessity **(PDF 3, PDF Page Number 140-305)**
 - (o) Hospital Response to Additional Completeness Questions
(PDF 3, PDF Page Number 306-353)
 - (p) Takoma Park Campus Overview **(PDF 3, PDF Page Number 354-360)**
 - (q) Takoma Park City Council Letter, Re: Modification of Certificate of Need
(PDF 3, PDF Page Number 361-384)
 - (r) Resume of Katie Wagner **(PDF 3, PDF Page Number 385-386)**
10. Pre-Hearing Submission of Intervenor from Patrick O'Neil, Esquire
(PDF 4, PDF Page Number 1)
- (a) Deed – 7600 Carroll Avenue, Takoma Park, MD 20912
(PDF 4, PDF Page Number 6)
 - (b) Maryland Real Property Article, Sec. 14-108, 14-602, 14-606, 14-607 and 14-608 **(PDF 4, PDF Page Number 9)**
 - (c) Leased Parking Area Exhibit **(PDF 4, PDF Page Number 14)**
 - (d) Site Plan – with parking availability outside security fence
(PDF 4, PDF Page Number 15)
 - (e) 9/16/25 and 9/29/25 AHC Parking Count PowerPoint
(PDF 4, PDF Page Number 16)
 - (f) Additional AHC Parking Counts **(PDF 4, PDF Page Number 22)**
 - (g) Resume of Anne (Nancy) Randall **(PDF 4, PDF Page Number 23)**
 - (h) Resume of William Zeid, PE **(PDF 4, PDF Page Number 27)**
11. Supplemental Pre-Hearing Submission from Soo Lee-Cho, Esquire
(PDF 5, PDF Page Number 1)
- (a) S-807 Exhibit 16 Site Plan **(PDF 5, PDF Page Number 2)**

CASE NO. A-6938

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EXHIBIT LIST

Page 4

12. _____
13. _____
14. _____
15. _____
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