

CASE NO. A-6938

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

EXHIBIT LIST

1. Application
2. List of adjoining/confronting property owners
3. DPS Building Permit Number 1116230
4. Motion to Intervene from Patrick O'Neil, Esquire, attorney for subject property owner
5. (a) Envelope showing date notice mailed
(b) Notice of hearing scheduled for December 17, 2025
6. Motion to Dismiss or for Summary Disposition from Elana Robison, Assistant County Attorney
7. Opposition to Motion to Dismiss or for Summary Disposition from Soo Lee-Cho, Esquire, with attachments
 - (a) Special Exception Case No. S-807 (1982)
 - (b) Plat No. 3600
 - (c) Lease
 - (d) Gorove Slade Memorandum
 - (e) Oct. 10, 2025 Email from G. Morgan to Dr. Sithanandam
 - (f) Aug. 22, 2019 Washington Post article
 - (g) Deed
 - (h) Declaration
 - (i) Washington Adventist Hospital Demolition Update
 - (j) CON Application
 - (k) Montgomery County Code § 59-E-7.6 (1977)
 - (l) Adventist HealthCare Parking Exhibit
 - (m) Oct. 7, 2025 Letter from G. Morgan to Dr. Sithanandam
 - (n) Resp. to Additional Completeness Questions (Feb. 14, 2014)
 - (o) Takoma Park Campus Overview
 - (p) Apr. 10, 2018 letter from S.R. Ludlow to B. Steffen
 - (q) Proposed Letter from Takoma Park City Council to P.E. Parker, MHC (5-25-22)

CASE NO. A-6938

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

Page 2

8. Pre-Hearing Submission of Montgomery County from Elana Robison, Associate County Attorney
 - (a) Commercial Building Permit Application No. 1116230
 - (b) Building Permit No. 1116230
 - (c) Site Plan - Overall
 - (d) Opinion of the Board; Case No. S-807
 - (e) Resolution to Revoke Special Exception, Case No. S-238
 - (f) Montgomery County Zoning Ordinance Sec. 6.4.3
 - (g) Condominium Plat No. 3300
 - (h) MCATLAS Photo
 - (i) Aerial Photos (Google Map)
 - (j) Street View Photos (Google Map)

9. Pre-Hearing Submission of Appellant from Soo Lee-Cho, Esquire
 - (a) Commercial Building Permit Application
 - (b) Building Permit No. 116230
 - (c) Opinion of the Board: Case No. S-807
 - (d) Condominium Plat No. 3600
 - (e)(i)-(iii) Fence Permit Site Plan Markups
 - (f) October 30, 2025 Gorove Slade Parking Study
 - (g) October 17, 2025 Gorove Slade Memorandum
 - (h) October 10, 2025 Email from Geoffrey Morgan
 - (i) October 7, 2025 Letter from Geoffrey Morgan
 - (j) April 28, 2025 Washington Adventist Hospital Demolition Update
 - (k)
 - (i) Deed
 - (ii) Lease
 - (l) June 21, 1984 Washington Adventist ACC Condominium Declarations
 - (m) Montgomery County Zoning Ordinance Section 59-E-7.6(1977)
 - (n) Application for Certificate of Necessity
 - (o) Hospital Response to Additional Completeness Questions
 - (p) Takoma Park Campus Overview
 - (q) Takoma Park City Council Letter, Re: Modification of Certificate of Need
 - (r) Resume of Katie Wagner

10. Pre-Hearing Submission of Intervenor from Patrick O'Neil, Esquire
 - (a) Deed – 7600 Carroll Avenue, Takoma Park, MD 20912.
 - (b) Maryland Real Property Article, Sec. 14-108, 14-602, 14-606, 14-607 and 14-608.
 - (c) Leased Parking Area Exhibit

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

- (d) Site Plan – with parking availability outside security fence
 - (e) 9/16/25 and 9/29/25 AHC Parking Count PowerPoint
 - (f) Additional AHC Parking Counts.
 - (g) Resume of Anne (Nancy) Randall
 - (h) Resume of William Zeid, PE
11. Supplemental Pre-Hearing Submission from Soo Lee-Cho, Esquire
(a) S-807 Exhibit 16 Site Plan
12. Intervenor's Supplemental Pre-Hearing Submission of from Patrick O'Neil, Esquire
13. _____
14. _____
15. _____
16. _____
17. _____