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May 24, 2025

VIA ELECTRONIC AND HAND DELIVERY

Ms. Kathleen Byrne, Esq.
Office of Zoning and Administrative Hearings
100 Maryland Avenue, Suite 200
Rockville, Maryland 20850

Re: Motion to Permit Pre-Hearing Submission
Paramount Self Storage
Local Map Amendment No. H-157 and Conditional Use 25-01

Hearing Examiner Byrne,

On behalf of Paramount Self Storage, LLC (the “Applicant”), and pursuant to Rule 3.9 of the Office of Zoning and Administrative Hearings Rules of Procedure (the “Rules of Procedure”), we are submitting this Motion request to permit the late filing of a pre-hearing statement, submitted within 30 days of the hearing on the above-referenced Local Map Amendment and Conditional Use Applications (the “Applications”).

The Applications are currently scheduled for a public hearing on June 12, 2025. No new substantive information, which is not already public record, is provided in the pre-hearing statement. And there are no parties that would be prejudiced by the granting of this Motion. In fact, the Planning Board held its hearing on these Applications on May 22, 2025 and no individuals participated in that hearing. However, the Applicant would be burdened if this Motion were not granted, as the OZAH hearing would have to be delayed even further – the hearing was previously postponed from its original date of December 13, 2024, to allow the Applicant sufficient time to work through design details with Park and Planning Staff.

For these reasons, the Applicant requests that the time requirements specified in Rule 3.4 of the Rules of Procedure be waived, to permit the filing of the attached pre-hearing statement (*see* Attachment 1).

Thank you in advance for your consideration of this request.

Sincerely,


Elizabeth C. Rogers

Enclosure