

## Moses, Leonard D.

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**From:** Marilyn Taylor <mtaylor@shpa.com>  
**Sent:** Thursday, January 21, 2021 3:51 PM  
**To:** Brown, Donna J.  
**Cc:** Hawkins, Calvin S.; McNeil, Maurene E.; Kumar, Rajesh A.; Stanley Derwin Brown (attorney@stanbrown.net); Moses, Leonard D.; Arthur Horne; Francis Silberholz  
**Subject:** \*REVISED\* - Amendment to Exception - \*A-10051\* (Carozza Property)  
**Attachments:** Amendment to Exception.ltr.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**CAUTION:** This email originated from an external email domain which carries the additional risk that it may be a phishing email and/or contain malware.

### **Sent to you on behalf of Russell W. Shipley, Esq.:**

Attached please find Amendment to the Exception in the Zoning Hearing Examiner's Recommendation in the above-referenced case. Thank you for your assistance regarding this matter.

Russell W. Shipley

.....

***\*This email has been revised and resent to correctly reflect the Zoning Map Amendment "A-10051" and not "A-10071"\****



**Marilyn K. Taylor**  
**Office Manager**

The Law Offices of Shipley & Horne, P.A.  
1101 Mercantile Lane, Suite 240 | Largo, MD 20774  
tel (301) 925-1800 fax (301) 925-1803

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LAW OFFICES  
**SHIPLEY & HORNE, P.A.**

Russell W. Shipley  
Arthur J. Horne, Jr.\*  
Dennis Whitley, III\*  
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Bradley S. Farrar  
L. Paul Jackson, II\*

\* Also admitted in the District of Columbia

January 21, 2021

**VIA EMAIL**

Donna J. Brown, Clerk of the Council  
Prince George's County Council  
14741 Governor Oden Bowie Dr.  
Upper Marlboro, MD 20772

**RE: Amendment to the Exception to Zoning Hearing Examiner Decision -  
A-10051 - Maria Volpe and Sandra Carey, Trustee, Carozza Property  
R-R to M-X-T**


Dear Madam Clerk:

This is to briefly amend the Applicant's written Exceptions in the above case dated September 16, 2020, to indicate that the Applicant now supports the Recommendation of the Zoning Hearing Examiner to remand this case to her for the Applicant to submit an NRI (Natural Resource Inventory) approved by the Maryland-National Capital Park & Planning Commission in accordance with the provisions of the Section 25 of the County Code. The Applicant has prepared said application and has filed it with the Maryland-National Capital Park & Planning Commission this past week.

The Zoning Hearing Examiner's Recommendation is found on pp. 20-21 in paragraphs 1, 2 and 3. I respectfully do not see the need for the Technical Staff to submit "... any additional recommendations to guide further review of any development of the subject property." because the staff will have numerous opportunities to do so in the several successive procedures that pertain to the development process.

Our arguments on the merits as set forth in our letter of September 16, 2020, remain but will not need to be argued on January 25, 2021 if the matter is remanded to the Zoning Hearing Examiner.

Respectfully submitted,



Russell W. Shipley

January 21, 2021

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RWS:mkt

cc: Hon. Calvin Hawkins, Chair  
Maurene McNeil, Esq.  
Rajesh A. Kumar, Esq.  
Stan D. Brown, Esq.  
Leonard Moses  
Parties of Record

## Moses, Leonard D.

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**Cc:** Hawkins, Calvin S.; McNeil, Maurene E.; Kumar, Rajesh A.; Stanley Derwin Brown (attorney@stanbrown.net); Moses, Leonard D.; Arthur Horne; Francis Silberholz  
**Subject:** Amendment to Exception - A-10071 (Carozza Property)  
**Attachments:** Amendment to Exception.ltr.pdf

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Russell W. Shipley

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