

**DISTRICT OF COLUMBIA
OFFICE OF ADMINISTRATIVE HEARINGS**

<p>HARRY GURAL <i>Tenant/Petitioner,</i></p> <p style="text-align:center">v.</p> <p>EQUITY RESIDENTIAL MANAGEMENT and SMITH PROPERTY HOLDINGS VAN NESS LP <i>Housing Provider/Respondent</i></p>	<p>2016-DHCD-TP 30,855</p> <p><i>In re:</i> 3003 Van Ness St. NW, S-707</p> <p>Chief Judge M. Colleen Currie</p>
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TENANT’S MOTION TO APPEND DOCUMENTS TO LIST OF EXHIBITS

Tenant/Petitioner requests the Court’s permission to add documents requested by the Tenant but not yet received from the Housing Provider to the list of exhibits the Tenant will submit on or before Dec. 15th, 2023.

In the Court’s order of June 14th, 2023, Judge Colleen Currie set a Dec. 15th, 2023, deadline for Housing Provider and Tenant to provide a list of exhibits they each plan to introduce as evidence in the evidentiary hearing scheduled for Jan. 24th and 25th, 2024. The Housing Provider submitted its list of exhibits on Dec. 5th, 2023. Tenant plans to submit his list of exhibits by the Dec. 15th deadline, without one final exhibit – internal Equity Residential correspondence regarding the Tenant – that has not yet been released by the Housing Provider.

Tenant submitted a Motion for Discovery on July 31st, 2023, requesting documents held by the Housing Provider that include the Tenant’s name. The Oct. 17th, 2023, court Order Denying in Part and Granting in Part Tenant/Petitioner’s Motion for Discovery granted the Tenant’s request, stating that “he may submit to Housing Provider one request to produce “any document, email, or information in any other digital or printed form, held by the Housing

Provider, containing the words ‘Harry Gural’ or ‘Gural’” and dated prior to August 30, 2016.” After seeking legal advice about the proper method for submitting such a request, on Dec. 4th, 2023, the Tenant submitted his Request to Housing Provider for the Production of Documents. Tenant believed that he was giving the Housing Provider sufficient time to provide a limited number of internal documents and was not aware of any rule or other impediment to providing such documents.

Housing Provider’s attorney has notified the Tenant that the Housing Provider does not plan to provide the requested document by the Dec. 15th deadline for exhibits, arguing that by DC Superior Court Civil Rule 34 it is permitted 30 days to fulfill such a document request. The Housing Provider’s attorney states that the Housing Provider will provide the requested documents on or before Jan. 3rd, 2024.

For this reason, Tenant/Petitioner requests the Court’s permission to name the missing compendium of internal documents on the list of exhibits that he plans to submit by the deadline of Dec. 15th.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'H. Gural', with a stylized flourish at the end.

HARRY GURAL

CERTIFICATE REGARDING CONSENT

I certify that I have made a good-faith effort to ask Housing Provider whether it consents to the relief sought in this motion. I did so by e-mailing counsel for Housing Provider on Dec. 4th and December 11th. Counsel for Housing Provider declined to consent.

A handwritten signature in black ink, appearing to read 'H. Gural', with a stylized flourish at the end.

HARRY GURAL

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Tenant's Motion to Append Documents to List of Exhibits was served on this 11th day of December, 2023, by email upon:

Richard W. Luchs (D.C. Bar No. 243931)
Spencer B. Ritchie (D.C. Bar No. 167352)
Greenstein, DeLorme and Luchs
801 17th Street, N.W., Suite 1000
Washington, DC 20006-3967



Dec. 11, 2023

Harry Gural
Tenant/Petitioner, *pro se*

3003 Van Ness St, NW #S-707
Washington, DC 20008