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October 30, 2024

VIA EMAIL ONLY

Jonathan E. Farnham, Ph.D.
Executive Director
Philadelphia Historical Commission
Jon.Farnham@phila.gov

**Re: 1330-36 Chestnut Street
PHC Hearing: November 8, 2024**

**REQUEST FOR 30-DAY CONTINUANCE
(TO DECEMBER 2024 PHC MEETING)**

Dear Dr. Farnham:

As you know, this firm is counsel to Treeco/Manor Limited Partnership (“Treeco”), the owner of real property located at 1330-36 Chestnut Street, Philadelphia, PA (the “Property”). On behalf of Treeco, I am writing to respectfully request a **30-day continuance** of the Philadelphia Historical Commission’s (the “Commission”) review and consideration of the instant nomination, (*i.e.*, from the upcoming November 8, 2024 meeting to the following meeting scheduled for December 13, 2024).

By way of background, the instant historic nomination was considered by the Committee on Historic Designation (the “CHD”) on April 17, 2024. The Commission thereafter approved consecutive 90-day continuances of its review and consideration of the nomination to afford Treeco’s experts additional time to consider and respond to the CHD’s comments and discussion. Treeco requires an additional 30-day extension of time to finalize its presentation in coordination with its expert witnesses and the undersigned counsel. No prejudice would result from the proposed continuance as the Property remains under the Commission’s jurisdiction during the pendency of the nomination.

Thank you in advance for your consideration and attention to this matter.

Respectfully yours,

Michael V. Phillips
Michael V. Phillips

cc: Daniel Shachar-Krasnoff