

[REDACTED]
Charlottesville, VA 22902

September 8, 2019

Hon. Llezelle Agustin Dugger
Circuit Court Clerk
315 East High Street
TEMPORARY ADDRESS OF CLERK'S OFFICE:
614 East High Street
Charlottesville, VA 22902

Re: amending petition Case Number: 540CL 1900045600

Dear Honorable Llezelle Agustin Dugger,

With the court's permission, we are requesting to amend the petition Case Number: 540CL 1900045600.
Please make the following changes to the plaintiff list:

A. Please remove the following names:

1. Allison Ruffner
2. Bill Emory
3. Karen Katz
4. David Katz
5. Brian Wimer

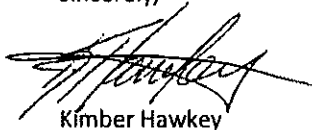
B. Please add the following names:

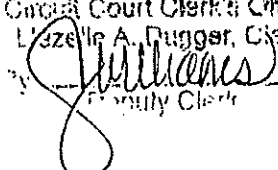
1. Raman Pfaff
2. Stuart Taylor
3. Kimberly Taylor
4. Pam Bracey
5. Elaine Oakey
6. Nancy Jane Hampson
7. John Hampson
8. William Harlow

Please find enclosed is a copy of the amended first page for these names on the petition for your convenience.

Thank you very much for your time and attention in this regard.

Sincerely,


Kimber Hawkey

9/9/19 ^{FILED} @ 3:50 pm
(Date & Time)
City of Charlottesville
Circuit Court Clerk's Office
Llezelle A. Dugger, Clerk

Deputy Clerk

IN THE CIRCUIT COURT FOR THE CITY OF CHARLOTTESVILLE, VA

KIMBER HAWKEY, CHARLES GENDROT, KIMMIE BURKE-HARLOW, RAMAN)
 PFAFF, KEVIN MURPHY, GRIER MURPHY, IVANA KADJIA, DEREN BADER,)
 PAUL LYONS, M.D., TOMAS RAHAL, MARK KAVIT, TINA KAVIT, PAM)
 BRACEY, CAROL STARLING, CLARA MINCER, ELAINE OAKEY, ALMA MILLS,)
 CHRISTINE PALAZZOLLO, EUGENE SCHETTINI, JANET HATCHER, AMY)
 GARDNER, TRUDY NEOFITIS, MARGARET PARSONS, MONTY PARSONS,)
 JOHN MILLER, DEB JACKSON, FRANCIS BIASIOLLI, EVEYLN BIASIOLLI,)
 STUART TAYLOR, KIMBERLY TAYLOR, NANCY JANE HAMPSON, JOHN)
 HAMPSON, ROSEMARY EVANS, WILLIAM HARLOW)

The citizen signatories to this action have legal standing to bring this petition as either)
 they live in the designated Belmont-Carlton neighborhood and will suffer the effects of)
 this capricious and arbitrary decision to rezone 750 Hinton Avenue to Neighborhood)
 Corridor Commercial (NCC) and/or are citizens of Charlottesville, Virginia and fear the)
 effects of the precedent set by this faulty rezoning decision.)

Plaintiffs, PRO SE

v.

CHARLOTTESVILLE CITY COUNCIL, NIKUYAH WALKER, HEATHER HILL,
 KATHLEEN GALVIN, MIKE SIGNER, WES BELLAMY

Defendants.

Pleading for Declaratory Relief and Injunctive Relief

Complaint

I. Contrary to the Code of Virginia § 15.2-2285. *Preparation and adoption of zoning ordinance and map and amendments thereto; appeal* Paragraph B which states: "The governing body shall publish a notice of the public hearing in a newspaper having general circulation in the locality at least two weeks prior to the public hearing date and shall also publish the notice on the locality's website, if one exists."

The specific facts are these:

The City has a history of failure to notify residents of zoning changes; this is in contradiction to both state law and local policy. There are various instances of capricious behavior in this matter.

- A. Public Postings: The City has either failed to post signage in a timely manner or failed to post up-to-date signage so that residents are informed of meetings. Even after the last-minute cancellation of the first scheduled Planning Commission Meeting, the signage