## KLEHR, HARRISON, HARVEY, BRANZBURG & ELLERS LLP

ATTORNEYS AT LAW

BRETT D. FELDMAN

Direct Dial: (215) 569-3697 BFeldman@Klehr.com 260 S. BROAD STREET PHILADELPHIA, PA 19102

(215) 568-6060 FAX: (215) 568-6603

www.klehr.com

July 14, 2006

New Jersey Office 457 Haddonfield Road Suite 510 Cherry Hill, New Jersey 08002-2220 (856) 486-7900

Delaware Office 919 Market Street Suite 1000 Wilmington, Delaware 19801-3062 (302) 426-1189

## VIA HAND DELIVERY

Ms. Claire Gatzmer Administrator Board of Building Standards Municipal Services Building - Concourse Level 1401 JFK Boulevard Philadelphia, PA 19102-1687

RE:

3 Rector Street, Manayunk

Appeal to the Board of Building Standards

Dear Ms. Gatzmer:

I write on behalf of our client Rector Street Associates, L.P., the equitable owner of the above property. It has come to our attention that an appeal of the Historical Commission's unanimous decision in favor of my client has been filed. The hearing is scheduled for July 20, 2006 at 3:00 PM.

Pleased be advised that by this letter I enter my appearance of behalf of my client and request that it be allowed to intervene as a necessary party to this action. In doing so, my client reserves the right to present testimony at the hearing as well as cross examine any witnesses that the Appellant's might present.

Furthermore, my client asserts that the Appellant lacks standing to appeal the decision of the Historical Commission since it is not an aggrieved party and has suffered no injury. Moreover, the unanimous decision of the Historical Commission was supported by substantial evidence, consistent with the Property Maintenance Code, and accordingly must be affirmed.

In advance, thank you for your consideration of this matter. Please feel free to call me if you have any questions or if you need any additional information.

/<u>/</u> //

Sincerely,

Brett D. Feldman

cc: Mr. David J. Perri, Chief Code Official (via hand delivery) Leonard Reuter, Esquire (via hand delivery) Kevin Smith (via electronic mail)