

IN THE DISTRICT OF COLUMBIA  
COURT OF APPEALS



Clerk of the Court  
Received 12/09/2024 01:35 PM

Patrick Woodley,

Appellant,

v.

Woodberry Village Apartments

Appellees.

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Case No.: 23-CV-0965  
2021-CA-002357-B

*Appeals from the Superior Court of the District of Columbia,  
Civil Division No. 2021-CA-002357B (Hon. Robert Rigsby, Judge)*

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**BRIEF FOR APPELLEE WOODBERRY VILLAGE APARTMENTS**

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**CERTIFICATE REQUIRED BY RULE 28(A)(2) OF THE RULES OF THE**  
**DISTRICT OF COLUMBIA COURT OF APPEALS**

The undersigned, counsel of record for Woodberry Village Apartments, certifies that the following listed parties and their counsel appeared in the trial court below and will appear before this court:

1. Appellee Woodberry Village Apartments

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## **TABLE OF AUTHORITIES**

1. [D.C. SCR-Civil Rule 38](#)
2. [Technical Land, Inc. v. Firemen's Ins. Co., 756 A.2d 439](#)

### **STATEMENT OF JURISDICTION**

District of Columbia Code, section 11-721 provides that this Court has jurisdiction over appeals from “all final orders and judgments of the Superior Court of the District of Columbia.”

### **ISSUES PRESENTED FOR REVIEW**

Appellant’s appears to be arguing that he was not treated fairly at the trial court level and was entitled a trial by a jury that he was unlawfully denied.

### **STATEMENT OF THE CASE**

At the trial Court Plaintiff argued that he was discriminated against by his landlord due to claimed disabilities and that he was subject to housing code deficiencies. Plaintiff prevailed on his claim regarding housing code deficiencies and was awarded \$7,500. Plaintiff / Appellant appeals the decision claiming what appears to be due process arguments and that he disagrees with the trial Court’s finding regarding his disability. Appellant does not cite any legal basis or authority in support of his appeal.

### **STATEMENT OF FACTS**

Appellee submits on the trial court’s record for its statement of facts.

## **SUMMARY OF ARGUMENT**

The Appellant fails to cite any legal authority as a basis for his appeal. The trial court is awarded great discretion with respect to findings of fact. (See. Technical Land, Inc. v. Firemen's Ins. Co. No 97-CV-1518) The Appellant's arguments regarding his claim of disability do not appear to be relevant to an appeal because the only claim he made at trial with respect to his disability was that he was not allowed to bring his service dogs into the rental office area. The Appellant did not put forth evidence at trial as to how this rule imposed by the Management Company of the building affected his enjoyment of the property and does not make any arguments toward that element in this appeal either.

Appellants other arguments appear to be procedural, the record does not support an argument that the Appellant was not allowed to question witnesses against him, or to testify himself.

The trial court appears to have denied the request for a jury because of the timeliness of the request. However, Appellant does state a legal basis or argument for what the trial court's error was with respect to the trial proceeding as a bench trial.

Respectfully submitted,

/s/ Christopher J. Gowen

Christopher J. Gowen, #995102

DeCaro, Doran, Siciliano, Gallagher &

DeBlasis, LLP

17251 Melford Boulevard, Suite 200

Bowie, MD 20715

Telephone: (301) 352-4940

Fax: (301) 352-8691

cgowen@decarodoran.com

*Counsel for Appellee*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 9, 2024, I caused a copy of the foregoing to be served  
via postage pre-paid, First Class mail, to:

Patrick Woodley  
2245 Savannah Terrace, SE  
Apt G1  
Washington, DC 20020  
***Pro Se Plaintiff***

/s/ Christopher J. Gowen  
Christopher J. Gowen, Esq.