



BECK, CHAET,
BAMBERGER & POLSKY, S.C.

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SEP 25 2020

Two Plaza East, Suite 1085
330 East Kilbourn Avenue
Milwaukee, Wisconsin 53202

414.273.4200
Fax 414.273.7786

BY:

September 23, 2020

VIA FIRST CLASS U.S. MAIL

The Wisconsin Dept. of Workforce
Development
Dislocated Worker Unit
P.O. Box 7972
Madison, WI 53707

City of Madison
Attn: Satya Rhodes-Conway, Mayor
210 Martin Luther King Jr. Blvd., Room 403
Madison, WI 53703

Green Bay City Hall
Attn: Eric Genrich, Mayor
100 North Jefferson Street
Green Bay, WI 54301

City of Waukesha
Attn: Shawn Reilly, Mayor
201 Delafield Street
Waukesha, WI 53188

City of Fort Atkinson
Municipal Building
Attn: Matt Trebatoski, City Administrator
101 North Main Street
Fort Atkinson, WI 535

City of Beaver Dam
Attn: Becky Glewen, Mayor
205 South Lincoln Avenue
Beaver Dam, WI 53916

City of Sheboygan City Hall
Attn: Mike Vandersteen, Mayor
828 Center Avenue, Suite 300
Sheboygan, WI 53081

City of Kenosha
Attn. John Antaramian, Mayor
625 52nd Street, Room 300
Kenosha, WI 53140

City of Greenfield, City Hall
Attn: Michael J. Neitzke, Mayor
7325 West Forest Home Avenue, Room 101
Greenfield, WI 53220

Re: Notice of potential plant closing or mass layoff – APM Wisconsin MSO, LLC
and certain related entities

Dear Members of the Dislocated Worker Unit and City Officials:

We regret to inform you that on September 21, 2020, due to unexpected business and industry circumstances, APM Wisconsin MSO, LLC and certain related entities (collectively, the “APM MSO”) filed a Voluntary Assignment for the Benefit of Creditors proceeding in the Circuit Court for Milwaukee County, Wisconsin pursuant to Chapter 128 of the Wisconsin Statutes. Michael S. Polsky, Esq., has been nominated as the Court-appointed Receiver for the purpose of winding down the APM MSO’s business operations and conduct an orderly liquidation of the APM MSO’s assets. The ultimate



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closure of the APM MSO ambulatory surgical center facilities and corporate headquarters listed on the attached **Exhibit A** will result in the permanent elimination of approximately 238 employee positions on or before October 31, 2020.

This letter is provided pursuant to state and federal laws, which encourage employers who are not required to comply with the business closing notice statutes to, nonetheless, provide such notice, and should not be construed as an admission of coverage under 29 U.S.C. § 2101, *et seq.*, or Wis. Stat. § 109.07.

We appreciate whatever assistance you may provide to any of the employees ultimately affected by this decision. Should you have any questions, please do not hesitate to contact me at 414-390-5935, or by e-mail at mpolsky@bcblaw.net.

Very truly yours,

BECK, CHAET, BAMBERGER & POLSKY, S.C.

Michael S. Polsky

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Exhibit A - Receivership Entities and Locations

BY:

Defendant

Advanced Pain Management, LLC
Advanced Pain Management Holdings, Inc.
APM Wisconsin MSO, LLC
APM Minnesota MSO, LLC
Wisconsin Health Center, LLC
Surgi Center of Greater Madison, LLC
Sheboygan Medical Center, LLC
Access Medical Center LLC
United Medical Center LLC
Pain Centers of Wisconsin - Franklin, LLC
Pain Centers of Wisconsin - Kenosha, LLC
Pain Centers of Wisconsin - Fox Point, LLC
Pain Centers of Wisconsin - Appleton, LLC
Pain Centers of Wisconsin - West Bend, LLC
Pain Centers of Wisconsin - Sauk Prairie, LLC
APM Indiana MSO, LLC
Pain Centers of Indiana - Evansville, LLC
Pain Centers of Indiana - South Bend, LLC

Location

4313 W. Loomis Road, Suite 300 Greenfield, WI 53220
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4313 W. Loomis Road, Suite 300 Greenfield, WI 53220
4448 W. Loomis Road, Suite LL20 Greenfield, WI 53221
34 Schroeder Court, Suite 100 Madison, WI 53711
2124 Kohler Memorial Drive Sheboygan, WI 53081
4216 Old Green Bay Road Racine, WI 53403
9120 W. Capitol Drive Milwaukee, WI 53222
4202 W. Oakwood Park Court Franklin, WI 53132
9697 St. Catherine's Drive Pleasant Prairie, WI 53158
7950 Port Washington Road, Suite 300 Fox Point, WI 53217
1616 N. Casaloma Drive, Suite 200 Appleton, WI 54913
1000 Gateway Court, Suite 200 West Bend, WI 53095
250 26th Street Prairie du Sac, WI 53578
4313 W. Loomis Road, Suite 300 Greenfield, WI 53220
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