Michael S. Polsky, Esq. Email: mpolsky@bcblaw.net 414-390-5935

June 18, 2025

VIA EMAIL AND FIRST CLASS U.S. MAIL

WIOATitleI@dwd.wisconsin.gov

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

Mayor@milwaukee.gov

Mayor Cavalier Johnson Milwaukee City Hall 200 E. Wells Street, Room 201 Milwaukee, WI 53202

RE: NOTICE OF PLANT CLOSING OR MASS LAYOFF

This Notice is being provided to you pursuant to the Worker Adjustment and Retraining Notification Act, 29 U.S.C. § 2101, et seq.; and the Wisconsin Business Closing Mass Layoff Law, Wis. Stat. § 109.07(collectively, the "WARN Statutes"). Effective as of March 25, 2025, Michael S. Polsky, Esq. was appointed as receiver (the "Receiver") of Milwaukee Forge, LLC and MF Real Estate Holdings, LLC (collectively, "Milwaukee Forge") by the Circuit Court for Milwaukee County, Wisconsin under Chapter 128 of the Wisconsin Statutes, Case No. 2025CV2571.

Since that date, the Receiver and his financial consultant have been attempting to sell the assets of Milwaukee Forge on a going concern basis. Unfortunately, the Receiver has been unable to sell Milwaukee Forge's assets as a going concern through the court-supervised receivership proceeding. Therefore, a mass layoff or plant closing will follow with the employee separations to take place on or beginning August 18, 2025. All health care benefits will also terminate as of that date. The affected facility is located at 1532 East Oklahoma Avenue, Milwaukee, Wisconsin 53207 (the "Facility").

All employee positions will be permanently eliminated. We expect this will affect 67 employee positions. A list of affected titles and the number of employees in each position is enclosed herewith. A job bumping system will not be available, meaning employees will not be able to displace more junior employees out of their job positions, because all positions at the company will be eliminated. Further, no other employment opportunities will be available.



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Affected employees that are part of a bargaining unit are represented as follows:

<u>Union</u>	Contact Information
United Steel Workers AFL-CIO,	Attn: Brad Dorff
CLC & Local Union No. 3205	1135 70 th Street, Suite 502
USW District 7	West Allis, WI 53214
	414-475-4560
International Association of	Attn: Frank Carrillo
Machinists and Aerospace	1650 South 38 th Street
Workers and Its Affiliated Local	Milwaukee, WI 53215
Lodge D.S 140	414-671-3800

Milwaukee Forge was not able to provide earlier notice, as it qualifies under the "unforeseeable business circumstances," "faltering company," and "liquidating fiduciary" exceptions set forth in the WARN Statutes. Further, Milwaukee Forge was actively seeking capital and business to enable it to avoid or postpone indefinitely the potential business closing or mass layoff, and Milwaukee Forge believed that giving the notices as required under the WARN Statutes would have prevented it from selling the business as a going concern or obtaining necessary capital.

The information provided in this letter is based upon the best information available to the Receiver and Milwaukee Forge at this time. 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., Wis. Stat. § 109.07 or other similar law.

We regret having to make the decision; however, business and industry circumstances leave us no alternative. We thank you for your hard work and dedication. 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, Receiver

Michael S. Polsky

Enclosure

Job Title	Positions
Accounting Assistant	1
Accounting Manager	1
Blast Driver	1
Business Development Specialist	1
Chief Executive Office	1
Chief Financial Officer	1
Chief Operations Officer	1
Die Polisher	3
Drum Blast Operator	1
Engineering Manager	1
Flood Welder	1
General Labor	17
Hammer Heater	1
Hammer Operator	2
Human Resource Generalist	1
Inside Sales Engineer	1
Machinist	8
Mag Lead	1
Maintenance Electrician	1
Maintenance Manager	1
Maintenance Supervisor	1
Maintenance Technician	4
Maintenance Engineer	1
Master Scheduler	1
Plaint Superintendnent	1
Production Supervisor	4
Quality Manager	1
Quality Supervisor	1
Saw Operator	1
Senior Customer Service Manager	1
Set Up Operator	2
Staff Engineer	1
Trim Press Operator	1
Vice President of Sales	1
	67