

NOTICE OF CLAIM AND ITEMIZED STATEMENT OF RELIEF

To: City of West Allis
Attn: Kail Decker, City Attorney
7525 W Greenfield Ave
West Allis, WI 53214

PLEASE TAKE NOTICE that pursuant to the provisions of Wis. Stat. § 893.80(1d)(a), claimant Ursidae Acquisitions LLC (“Ursidae”), by its attorneys, Mallery, s.c., hereby notifies the City of West Allis (“City”) of its claim against the City. On March 1, 2018, the County of Milwaukee (the “County”) accepted Claimant’s Vacant Land Offer to Purchase (the “Offer”) for the property located at 52 Burnham Street, West Allis, Wisconsin (“Premises”). Claimant subsequently began environmental investigations on the Premises as detailed on the attached Exhibit A (the “Environmental Work”) based on the expectation that Claimant would purchase the Premises. The County refused to grant Claimant an extension of Claimant’s due diligence period under the Offer based on discussions between the City and the County that the City would like to acquire the Premises from the County, and the Offer was terminated.

The City took, or is anticipated to take, ownership of the Premises and rely on and benefit from Claimant’s Environmental Work. Claimant is entitled to compensation from the City for the Environmental Work.

Pursuant to Wis. Stat. § 893.80(1d)(b), Claimant provides the following itemized statement of the relief it seeks as a result of the City’s use of the Environmental Work: \$246,116.56.

Dated this 25th day of August, 2023.

PLEASE DIRECT ALL
CORRESPONDENCE,
INQUIRIES AND PLEADINGS TO:

Andrew G. Frank
Stephen L. Lovell
Mallery sc
731 North Jackson Street, Suite 900
Milwaukee, Wisconsin 53202
(414) 271-2424
afrank@mallerysc.com
slovell@mallerysc.com

MALLERY sc
Attorneys for Claimant, Ursidae Acquisitions
LLC

By: *Electronically signed by Andrew G. Frank*
Andrew G. Frank
State Bar No. 1046021
Stephen L. Lovell
State Bar No. 1127933