



INTERNATIONAL EXPOSITION CENTER

I-X CENTER

One I-X Center Drive • Cleveland, Ohio 44135
Phone: 216.265.2630 or Fax: 216-898-2853

May 13, 2020

Via Facsimile, E-mail and Certified Mail

Mayor Frank G. Jackson
Cleveland City Hall
601 Lakeside Ave
Cleveland, Ohio 44114
mayorsactioncenter@city.cleveland.oh.us

Breeyn Handberg
Rapid Response Program Manager
Office of Workforce Development
4020 E Fifth Ave
Columbus, OH 43219
breeyn.handberg@jfs.ohio.gov

Re Action Notice

Dear Mayor Jackson and Ms. Handberg:

On or about March 20, 2020, in response to federal and CDC guidance recommending social distancing and in anticipation of Governor DeWine's March 22, 2020 "stay at home" order (the "March 22 Order"), I-X Center Corporation (the "Company") temporarily closed its International Exposition Center located at One I-X Center Drive, Cleveland, Ohio 44135 (the "I-X Center") to the public, resulting in a temporary furlough of most of employees, including 76 full and part-time employees and approximately 100 seasonal employees. The furloughs were implemented on a rolling basis, with the first furloughs being implemented on March 20, 2020 and the last furloughs being implemented on April 3, 2020. The March 22 Order did not include the Company's business as an "Essential Business or Operation" and, as a result, the Company was no longer permitted to operate its business until the March 22 Order either expired or was rescinded or modified.

At the time these temporary furloughs were announced, the Company did not believe there was a reasonable probability that the furloughs would last more than 6 months. However, the Company has determined that it is now reasonably foreseeable that these furloughs could, at least in part, last for more than six months, which is of a sufficient duration to qualify as "employment losses" (i.e., furloughs

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lasting more than 6 months) under applicable law. The Company has come to this determination in light of recent intervening and extended applicable governmental shutdown orders (including Governor DeWine's April 27, 2020 Responsible Restart Ohio reopening plan, which extends the mandatory closure of the I-X Center to some indefinite date in the future), and intervening and extended federal and CDC guidance regarding social distancing. While the Company still expects these furloughs to be temporary, it is unable to predict precisely when the I-X Center will reopen or when the Company will be able to recall affected employees.

Accordingly, the Company is providing this notice to you out of an abundance of caution and for the express purpose of complying with applicable law.

In light of the foregoing, and given the rapid pace at which this situation has developed, the Company is providing as much notice as is possible under the circumstances. All affected employees have been notified of their furlough dates and that their furloughs are anticipated to be temporary. There are no "bumping rights" for non-union employees, meaning non-union employees will not be able to displace other non-union employees with less seniority to avoid layoff/furlough. For union employees affected by this mass layoff, bumping rights may exist, but were not implicated by the initial furloughs. These union employees are represented by The International Brotherhood of Teamsters, Local 507, and their Chief Elected Officer is:

Carl Pecoraro
Secretary - Treasurer, Teamsters Local 507
5425 Warner Road, Unit 7
Cleveland, OH 44125

If you have any questions or want additional information concerning this matter, please contact Lisa Vo, Executive Vice President, at 216-265-2630. We wish you all the best during this difficult time.

Sincerely



Lisa Vo
Executive Vice President