

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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:
In re: : Chapter 11
:
EXIDE TECHNOLOGIES, : Case No. 13-11482 (KJC)
:
Debtor.¹ : **Hrg. Date: January 22, 2014 at 3:00 p.m. (Eastern)**
: **Obj. Due: January 6, 2014 at 4:00 p.m. (Eastern)**
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**DEBTOR’S (NON-SUBSTANTIVE) FIRST OMNIBUS OBJECTION
PURSUANT TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY
RULE 3007, AND LOCAL RULE 3007-1 TO CERTAIN
(I) AMENDED AND SUPERSEDED CLAIMS AND (II) DUPLICATE CLAIMS**
(“FIRST OMNIBUS CLAIMS OBJECTION”)

The debtor and debtor in possession in the above-captioned case (“Exide” or the “Debtor”), hereby files this omnibus objection (the “Objection”) to certain claims (the “Disputed Claims”) filed against the Debtor, and listed on Exhibits A and B to the proposed form of order (the “Proposed Order”), which is attached hereto, pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 3007-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and respectfully requests entry of an order in substantially the form of the Proposed Order filed concurrently herewith. The Disputed Claims set forth on (i) Exhibit A to the Proposed Order consist of claims that were amended and superseded by subsequently-filed claims and (ii) Exhibit B to the Proposed Order consist of claims that are duplicative of other filed claims. In support of the Objection, the Debtor relies on the Declaration of Holden Bixler

¹ The last four digits of the Debtor’s taxpayer identification number are 2730. The Debtor’s corporate headquarters are located at 13000 Deerfield Parkway, Building 200, Milton, Georgia 30004.

in Support of the Debtor's (Non-Substantive) First Omnibus Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain (I) Amended And Superseded Claims and (II) Duplicate Claims, attached hereto as Exhibit 1. In further support of the Objection, the Debtor respectfully represents:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider the Objection under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue of the case and the Objection in this District is proper under 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested herein are Bankruptcy Code section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1.

3. Pursuant to Rule 9013-1(f) of the Local Rules, the Debtor consents to the entry of a final judgment or order with respect to the Objection if it is determined that this Court would lack Article III jurisdiction to enter such final order or judgment absent the consent of the parties.

BACKGROUND

A. The Chapter 11 Case

4. On June 10, 2013 (the "Petition Date"), the Debtor commenced a case by filing a petition for relief under chapter 11 of the Bankruptcy Code (the "Chapter 11 Case").

5. The Debtor continues to operate its business and manage its property as debtor and debtor in possession pursuant to Bankruptcy Code sections 1107(a) and 1108.

6. On June 18, 2013, the United States Trustee for the District of Delaware (the "U.S. Trustee") appointed an Official Committee of Unsecured Creditors (the "Creditors' Committee") in the Chapter 11 Case pursuant to Bankruptcy Code section 1102. No trustee or examiner has been appointed in the Chapter 11 Case.

B. Bar Dates and Proofs of Claim

7. On June 11, 2013, this Court entered an order appointing GCG, Inc. (“GCG”) as the claims and noticing agent pursuant to the Order Authorizing Employment And Retention Of GCG, Inc. As Claims And Noticing Agent, Pursuant To 28 U.S.C. § 156(c), 11 U.S.C. § 105(a) And Fed. R. Bankr. P. 2002 And Del. Bankr. L.R. 2002-1(F) *Nunc Pro Tunc* To The Petition Date (Docket No. 76). GCG is authorized to maintain (i) all proofs of claim filed against the Debtor and (ii) an official claims register by docketing all proofs of claim in a claims database containing, inter alia, information regarding the name and address of each claimant, the date the proof of claim was received by GCG, the claim number assigned to the proof of claim, and the asserted amount and classification of the claim.

8. On September 13, 2013, this Court entered the Order (I) Establishing Deadlines For (A) Submitting Proofs Of Claim And (B) Requests For Payment Under Bankruptcy Code Section 503(b)(9), (II) Approving The Form And Manner For Submitting Such Proofs Of Claim And Requests For Payment, And (III) Approving Notice Thereof (Docket No. 696) (the “Bar Date Order”). Pursuant to the Bar Date Order, all persons or entities who wished to assert claims against the Debtor’s estate were required to file a proof of claim against the Debtor in the Chapter 11 Case by no later than October 31, 2013 at 5:00 p.m. (Eastern) (the “General Bar Date”). The General Bar Date applied to any person, other than governmental units, holding a claim (other than a personal injury claim related to the Debtor’s Vernon facility) against the Debtor owing as of the Petition Date, including claims under Bankruptcy Code section 503(b)(9), or any person with an alleged claim or expense to have allegedly arisen prior to the Petition Date. Any governmental unit seeking to file a claim against the Debtor was required to do so by no later than December 9, 2013 at 5:00 p.m. (Eastern). Any person seeking

to file a personal injury claim related to the Debtor's Vernon facility is required to do so no later than January 31, 2014 at 5:00 p.m. (Eastern).²

9. To date, approximately 3,300 proofs of claim (the "Claims," and the persons or entities filing such Claims, the "Claimants") have been filed in the Chapter 11 Case.

10. The Debtor and its advisors are comprehensively reviewing and reconciling all Claims. Moreover, in the ordinary course of business, the Debtor maintains books and records (the "Books and Records") that reflect, among other things, the Debtor's liabilities and the amounts thereof owed to its creditors. The Debtor is also comparing the Claims asserted in the Proofs of Claims to its Books and Records to determine the validity of the asserted claims.

11. This reconciliation process includes identifying particular categories of Claims that may be targeted for disallowance and expungement, reduction and allowance, reassignment, or reclassification. To reduce the number of Claims, and to avoid possible double recovery, or otherwise improper recovery by Claimants, the Debtor anticipates filing several omnibus objections.

RELIEF REQUESTED

12. By the Objection, the Debtor respectfully seeks entry of an order pursuant to Bankruptcy Code section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 disallowing and expunging (a) the Claims set forth on Exhibit A attached to the Proposed Order because they have been amended and superseded by later filed Claims and (b) the Claims set forth on Exhibit B attached to the Proposed Order because they are duplicates of other Claims.

² See Supplemental Order (I) Extending The Claims Bar Date Solely With Respect To Personal Injury Claims Relating To The Debtor's Vernon California Facility, (II) Approving The Form And Manner For Submitting Such Proofs Of Claim, And (III) Approving Notice Thereof, entered Oct. 24, 2013 (Docket No. 696).

OBJECTION TO CLAIMS

A. Amended Claims

13. The Disputed Claims identified on Exhibit A to the Proposed Order (the “Amended Claims”) are the Claims that have been amended and superseded by subsequently-filed proofs of claim identified under the column titled “Remaining Claim Number” on Exhibit A to the Proposed Order. Failure to disallow the Amended Claims will result in the applicable Claimants receiving an unwarranted double recovery against the Debtor’s estate, to the detriment of other creditors in this case.

14. Therefore, the Debtor objects to the allowance of each of the Amended Claims included on Exhibit A to the Proposed Order and requests that such Amended Claims under the column heading “Amended Claim to be Disallowed” be disallowed. If the Debtor’s objection to the Amended Claims is sustained, the Claims listed under the column heading “Remaining Claim Number” will remain on the claims register, subject to the Debtor’s right to object on any grounds that bankruptcy or nonbankruptcy law permits. Therefore, any Claimant holding an Amended Claim will suffer no prejudice by having the Amended Claim disallowed.

B. Duplicate Claims

15. With respect to the Disputed Claims listed on Exhibit B to the Proposed Order (the “Duplicate Claims”), it appears that the Claimants erroneously filed the same proof of Claim in the same amount against the Debtor more than once for a single alleged liability. The Debtor should not be required to satisfy the same obligation twice. Moreover, the elimination of duplicative Claims will enable GCG to maintain a claims register that more accurately reflects the valid claims asserted against the Debtor.

16. Therefore, the Debtor hereby objects to the allowance of the Duplicate Claims included on Exhibit B to the Proposed Order and request that such Duplicate Claims

under the column heading “Duplicate Claim to be Disallowed” be disallowed. If the Debtor’s objection to the Duplicate Claims is sustained, the Claims listed under the column heading “Remaining Claim Number” will remain on the claims register, subject to the Debtor’s right to object on any grounds that bankruptcy or nonbankruptcy law permits. Therefore, any Claimant holding a Duplicate Claim will suffer no prejudice by having the applicable Duplicate Claim disallowed.

APPLICABLE AUTHORITY

17. Bankruptcy Code section 502(b) provides in pertinent part that:

the court, after notice and a hearing, shall determine the amount of [a] claim in lawful currency of the United States as of the date of the filing of the petition, and shall allow such claim in such amount, except to the extent that . . . such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law for a reason other than because such claim is contingent or unmatured.

11 U.S.C. § 502(b)(1).

18. The Debtor believes the Disputed Claims noted above are unenforceable against the Debtor for the reasons set forth above. Therefore, pursuant to Bankruptcy Code sections 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1, the Debtor respectfully requests that this Court enter an order disallowing each Amended Claim and Duplicate Claim, as set forth on Exhibit A and B to the Proposed Order, respectively.

RESPONSES TO THE OBJECTION

19. Filing and Service of Responses: To contest the Objection, a Claimant must file and serve a written response to the Objection (a “Response”) so that it is actually received by the Clerk of the Bankruptcy Court and the parties in the following paragraph no later than 4:00 p.m. (Eastern) on January 6, 2014 (the “Response Deadline”). Claimants should locate their names and claims in the Objection, and carefully review the Proposed Order and the

exhibits attached thereto. A Response must address each ground upon which the Debtor objects to a particular claim. A hearing (the "Hearing") to consider the Debtor's Objection shall be held on January 22, 2014 at 3:00 p.m. (Eastern), before the Honorable Kevin J. Carey, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801.

20. Every Response must be filed and served upon the following entities at the following addresses: (i) the Office of the U.S. Trustee, 844 North King Street, Room 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Mark Kenney, Esq., (ii) the Debtor, Exide Technologies, 13000 Deerfield Parkway, Suite 100, Milton, Georgia 30004, Attn: B. Holland Pritchard, and (iii) counsel to the Debtor, Skadden, Arps, Slate, Meagher & Flom LLP, Four Times Square, New York, New York 10036, Attn: Kenneth S. Ziman, Esq. and J. Eric Ivester, Esq. and One Rodney Square, P.O. Box 636, Wilmington, Delaware 19899-0636, Attn: Anthony W. Clark, Esq. and 155 N. Wacker Drive, Chicago, Illinois 60606-1720, Attn: James J. Mazza, Jr. and Louis S. Chiappetta, in each case so as to be received **no later than 4:00 p.m. (Eastern) on January 6, 2014** (the "Response Deadline")

21. Content of Responses: Every Response to the Objection must contain, at a minimum, the following:

- (a) a caption setting forth the name of this Court, the above-referenced case number, and the title of the Objection to which the Response is directed; the name of the Claimant and description of the basis for the amount of the Claim;
- (b) a concise statement setting forth the reasons why a particular Claim should not be disallowed for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which the claimant will rely in opposing the Objection at the Hearing;
- (c) all documentation or other evidence of the Claim in question, to the extent not already included with the Claimant's proof of claim,

upon which the claimant will rely in opposing the Objection at the Hearing;

- (d) the name, address, telephone number, and fax number of the person(s) (who may be the Claimant or a legal representative thereof) possessing ultimate authority to reconcile, settle, or otherwise resolve the Claim on behalf of the Claimant; and
- (e) the name, address, telephone number, and fax number of the person(s) (who may be the Claimant or a legal representative thereof) to whom the Debtor should serve any reply to the Response, if different than the address(es) presented in the Claim.

22. Timely Response Required; Hearing: If a Response is properly and timely filed and served in accordance with the above procedures, the Debtor will endeavor to reach a consensual resolution with the applicable Claimant. If no consensual resolution is reached, this Court will conduct a hearing with respect to the Objection and the Response on January 22, 2014 at 3:00 p.m. (Eastern), or such other date and time as parties filing Responses may be notified. Only those Responses made in writing and timely filed and received will be considered by this Court at any such hearing.

23. Replies to Responses: Consistent with Local Rules 3007-1(h)(ii) and 9006-1(d), the Debtor may, at its option, file and serve a reply to a Claimant's Response no later than 4:00 p.m. (Eastern) one (1) day prior to the day the agenda for the hearing is due.

24. Adjournment of Hearing: The Debtor reserves the right to adjourn the Hearing on any Claim included in the Objection. In the event that the Debtor adjourns the Hearing, it will state that the Hearing on that particular Claim has been adjourned on the agenda for the Hearing on the Objection, which agenda will be served on the person designated by the Claimant in each Response.

25. If a Claimant whose Claim is subject to the Objection, and who is served with the Objection, fails to file and serve a timely Response in compliance with the foregoing

procedures, the Debtor will present to this Court an appropriate order without further notice to the Claimant.

26. Separate Contested Matter: Each of the Disputed Claims and the Debtor's objections thereto, as asserted in the Objection, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. The Debtor requests that any order entered by this Court with respect to an objection asserted herein be deemed a separate order with respect to each such Amended Claim and/or Duplicate Claim.

RESERVATION OF RIGHTS

27. The Debtor expressly reserves the right to amend, modify, or supplement the Objection and to file additional objections to any proofs of claim or any other claims (filed or not) which may be asserted against the Debtor including, without limitation, objections as to the liability, amount, or priority of any Claims listed on Exhibits A and B to the Proposed Order. Should one or more of the grounds for the Objection be dismissed or overruled, the Debtor reserves the right to object to any Disputed Claim listed on Exhibits A and B to the Proposed Order on any other ground.

STATEMENT OF COMPLIANCE WITH LOCAL BANKRUPTCY RULE 3007-1

28. The undersigned representative of Skadden, Arps, Slate, Meagher & Flom LLP has reviewed the requirements of Local Rule 3007-1 and certifies that the Objection substantially complies with that Local Rule. To the extent that the Objection does not comply in all respects with the requirements of Local Rule 3007-1, the Debtor believes such deviations are not material and respectfully request that any such requirement be waived.

FURTHER INFORMATION

29. Questions about or requests for additional information about the Objection should be directed to the Debtor's counsel in writing at the following address: Skadden, Arps,

Slate, Meagher & Flom LLP, 155 North Wacker Drive, Chicago, Illinois 60606 (Attn: Louis S. Chiappetta). Questions regarding the amount of a Claim or the filing of a Claim should be directed to GCG toll free at (888) 985-9831 or at the Debtor's restructuring website <http://www.exiderestructuringinfo.com>. Claimants should not contact the Clerk of this Court to discuss the merits of their proofs of claim or the Objection.

NOTICE

30. The Debtor has provided notice of the Objection to (i) the Office of the U.S. Trustee; (ii) counsel to the agent under the debtor in possession financing; (iii) counsel to the agent for the Debtor's prepetition secured lenders; (iv) the indenture trustee for each of the Debtor's secured and unsecured outstanding bond issuances; (v) counsel to the unofficial committee of senior secured noteholders; (vi) counsel to the Creditors' Committee; (vii) all parties entitled to notice pursuant to Bankruptcy Rule 2002; and (viii) each of the Claimants identified on Exhibits A and B to the Proposed Order.

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WHEREFORE, the Debtor respectfully requests that this Court enter the Proposed Order attached hereto: (a) granting the relief requested herein; and (b) granting to the Debtor such other and further relief as this Court may deem just and proper.

Dated: Wilmington, Delaware
December 23, 2013

SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP

/s/ Kristhy M. Peguero
Anthony W. Clark (I.D. No. 2051)
Kristhy M. Peguero (I.D. No. 4903)
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– and –

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J. Eric Ivester
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Telephone: (212) 735-3000
Fax: (212) 735-2000

– and –

James J Mazza, Jr.
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Chicago, Illinois 60606
Telephone: (312) 407-0700
Fax: (312) 407-0411

*Counsel for Debtor and Debtor in
Possession*

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re: : Chapter 11
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EXIDE TECHNOLOGIES, : Case No. 13-11482 (KJC)
:
Debtor.¹ : **Hrg. Date: January 22, 2014 at 3:00 p.m. (Eastern)**
: **Obj. Due: January 6, 2014 at 4:00 p.m. (Eastern)**
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NOTICE OF OBJECTION

PLEASE TAKE NOTICE that the debtor and debtor in possession in the above-captioned case (“Exide” or the “Debtor”) has filed the attached **Debtor’s (Non-Substantive) First Omnibus Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain (I) Amended and Superseded Claims And (II) Duplicate Claims (the “Objection”).**²

PLEASE TAKE FURTHER NOTICE that responses to the Objection, if any, must be filed on or before **January 6, 2014 at 4:00 p.m. (Eastern)** (the “**Response Deadline**”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801; and served upon (i) the Office of the U.S. Trustee, 844 North King Street, Room 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Mark Kenney, Esq., (ii) the Debtor, Exide Technologies, 13000 Deerfield Parkway, Suite 100, Milton, Georgia 30004, Attn: B. Holland Pritchard, and (iii) counsel to the Debtor, Skadden, Arps, Slate, Meagher & Flom LLP, Four Times Square, New York, New York 10036, Attn: Kenneth S. Ziman, Esq. and J. Eric Ivester, Esq. and One Rodney Square, P.O. Box 636, Wilmington, Delaware 19899-0636, Attn: Anthony W. Clark, Esq. and 155 N. Wacker Drive, Chicago, Illinois 60606-1720, Attn: James J. Mazza, Jr. and Louis S. Chiappetta, in each case so as to be received **no later than 4:00 p.m. (Eastern) on January 6, 2014.**

PLEASE TAKE FURTHER NOTICE that responses to the Objection **MUST**, at a minimum, contain the following:

- (a) a caption setting forth the name of this Court, the above-referenced case number, and the title of the Objection to which the Response

¹ The last four digits of the Debtor’s taxpayer identification number are 2730. The Debtor’s corporate headquarters are located at 13000 Deerfield Parkway, Building 200, Milton, Georgia 30004.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

is directed; the name of the Claimant and description of the basis for the amount of the Claim;

- (b) a concise statement setting forth the reasons why a particular Claim should not be disallowed for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which the claimant will rely in opposing the Objection at the Hearing;
- (c) all documentation or other evidence of the Claim in question, to the extent not already included with the Claimant's proof of claim, upon which the claimant will rely in opposing the Objection at the Hearing;
- (d) the name, address, telephone number, and fax number of the person(s) (who may be the Claimant or a legal representative thereof) possessing ultimate authority to reconcile, settle, or otherwise resolve the Claim on behalf of the Claimant; and
- (e) the name, address, telephone number, and fax number of the person(s) (who may be the Claimant or a legal representative thereof) to whom the Debtor should serve any reply to the Response, if different than the address(es) presented in the Claim.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE OBJECTION WILL BE HELD ON **January 22, 2014 AT 3:00 P.M. (Eastern) BEFORE THE HONORABLE KEVIN J. CAREY, UNITED STATES BANKRUPTCY JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 5TH FLOOR, COURTROOM NO. 5, WILMINGTON, DELAWARE 19801.**

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PLEASE TAKE FURTHER NOTICE THAT IF YOU ARE A CLAIMANT AND FAIL TO TIMELY FILE AND SERVE A RESPONSE IN ACCORDANCE WITH THE ABOVE REQUIREMENTS THE COURT MAY GRANT THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: Wilmington, Delaware
December 23, 2013

SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP

/s/ Kristhy M. Peguero
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Fax: (312) 407-0411

*Counsel for Debtor and Debtor in
Possession*

EXHIBIT 1

Declaration of Holden Bixler

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re:	:	Chapter 11
	:	
EXIDE TECHNOLOGIES,	:	Case No. 13-11482 (KJC)
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Debtor. ¹	:	
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**DECLARATION OF HOLDEN BIXLER IN SUPPORT OF DEBTOR’S
(NON-SUBSTANTIVE) FIRST OMNIBUS OBJECTION
PURSUANT TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY
RULE 3007, AND LOCAL RULE 3007-1 TO CERTAIN
(I) AMENDED AND SUPERSEDED CLAIMS AND (II) DUPLICATE CLAIMS**

I, Holden Bixler, pursuant to 28 U.S.C. § 1746, declare:

1. I am a Senior Director for Alvarez & Marsal (“A&M”). I am currently one of the restructuring advisors to the debtor and debtor in possession in the above-captioned case (“Exide” or the “Debtor”). In this capacity, I am one of the persons responsible for overseeing the claims reconciliation and objection process in the Debtor’s Chapter 11 Case.² I have read the Debtor’s (Non-Substantive) First Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 To Certain (I) Amended and Superseded Claims and (II) Duplicate Claims (the “Objection”), and am directly, or by and through my personnel or agents, familiar with the information contained therein, the proposed form of order (the “Proposed Order”), and the exhibits attached thereto.

¹ The last four digits of the Debtor’s taxpayer identification number are 2730. The Debtor’s corporate headquarters are located at 13000 Deerfield Parkway, Building 200, Milton, Georgia 30004.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

2. Resources and time have been expended in reviewing and reconciling the proofs of claim filed or pending against the Debtor in this case. The Claims were carefully reviewed and analyzed in good faith utilizing due diligence by the appropriate personnel, including A&M personnel, company personnel, and the Debtor's Court-appointed claims and noticing agent, GCG, Inc. ("GCG"). These efforts resulted in the identification of the Amended Claims and the Duplicate Claims as defined in the Objection and identified respectively in Exhibits A and B to the Proposed Order.

3. The information contained in Exhibits A and B to the Proposed Order is true and correct to the best of my knowledge.

4. The Debtor has determined that the Claimants asserting the Claims identified on Exhibit A to the Proposed Order are Claims that have been amended and superseded by subsequently-filed proofs of claim. Therefore, the Debtor seeks to disallow in full the Claims under the heading "Amended Claim to be Disallowed" on Exhibit A to the Proposed Order and have the Claims under the heading "Remaining Claim Number" remain on the claims register.

5. The Debtor has determined that the Claims identified on Exhibit B to the Proposed Order are duplicative of other Claims filed in the Chapter 11 Case. Accordingly, to prevent the Claimants from receiving an unwarranted double recovery, the Debtor seeks to disallow the Duplicate Claims identified on Exhibit B to the Proposed Order in full.

[Remainder of page intentionally left blank.]

I declare under penalty of perjury that the foregoing information is true and correct to the best of my knowledge, information and belief.

Executed on December 23, 2013

/s/ Holden Bixler
Holden Bixler

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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	:	
In re:	:	Chapter 11
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EXIDE TECHNOLOGIES,	:	Case No. 13-11482 (KJC)
	:	
Debtor. ¹	:	Related Docket No. _____
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**ORDER SUSTAINING DEBTOR’S (NON-SUBSTANTIVE) FIRST OMNIBUS
OBJECTION PURSUANT TO BANKRUPTCY CODE SECTION 502(b),
BANKRUPTCY RULE 3007, AND LOCAL RULE 3007-1 TO CERTAIN
(I) AMENDED AND SUPERSEDED CLAIMS AND (II) DUPLICATE CLAIMS**

Upon the Debtor’s (Non-Substantive) First Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 to Certain (I) Amended and Superseded Claims and (II) Duplicate Claims (the “Objection”),² and it appearing that notice of the Objection was good and sufficient upon the particular circumstances and that no other or further notice need be given; and this Court having considered the Objection, the claims listed on Exhibits A and B attached hereto, and any responses thereto; and upon the Declaration of Holden Bixler in Support of the Debtor’s (Non-Substantive) First Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 to Certain (I) Amended and Superseded Claims and (II) Duplicate Claims; and upon the record herein; and after due deliberation thereon and good and sufficient cause appearing therefor; it is hereby

¹ The last four digits of the Debtor’s taxpayer identification number are 2730. The Debtor’s corporate headquarters are located at 13000 Deerfield Parkway, Building 200, Milton, Georgia 30004.

² Unless otherwise defined herein, capitalized terms used herein shall have the meanings ascribed to them in the Objection.

ORDERED, ADJUDGED, AND DECREED that:

1. The relief requested in the Objection is GRANTED, as set forth herein.
2. The Amended Claims listed on Exhibit A in the column titled “Amended Claim to be Disallowed” are disallowed because they are superseded and amended by the Claims in the column titled “Remaining Claim Number” (collectively, the “Remaining Claims”), which Remaining Claims shall remain on Exide’s general claims register subject to the Debtor’s right to further object as set forth herein
3. All information included on and all documentation filed in support of any Amended Claim shall be treated as having been filed in support of and included in the corresponding Remaining Claim.
4. The Duplicate Claims listed on Exhibit B in the column titled “Duplicate Claim to be Disallowed” are disallowed.
5. The Debtor’s objection to each Claim addressed in the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each claim. Any stay of this Order pending appeal by any of the Claimants subject to this Order shall only apply to the contested matter which involves such Claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters covered hereby.
6. The Debtor shall retain and shall have the right to object in the future to any of the proofs of claim listed on Exhibits A and B hereto on any additional grounds, and to seek to amend, modify, and/or supplement this Order as may be necessary. In addition, the Debtor’s rights are reserved to file future objections to Claims asserted in proofs of claim that have been or may subsequently be filed in the Chapter 11 Case, or Claims that may be listed on the

Debtor's schedules, on the grounds set forth herein or any other appropriate grounds that bankruptcy and non-bankruptcy law permits.

7. Nothing contained herein shall constitute, nor shall it be deemed to constitute, the allowance of any Claim asserted against the Debtor, including, but not limited to the Disputed Claims.

8. This Court shall retain jurisdiction over the Debtor and the Claimants whose Disputed Claims are subject to the Objection with respect to any matters related to or arising from the Objection or the implementation of this Order.

9. The Debtor is authorized and empowered, to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

10. The Debtor's Claims and Noticing Agent, GCG, Inc., is hereby directed to serve this Order, including any relevant exhibits, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

Dated: _____, 2013
Wilmington, Delaware

THE HONORABLE KEVIN J. CAREY
UNITED STATES BANKRUPTCY

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS**

	REMAINING CLAIM NUMBER	AMENDED CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
1 ADVANCED GEOSERVICES CORP ATTN L PERANTEAU 1055 ANDREW DR STE A WEST CHESTER, PA 19380	2739	23	\$199,723.12	Amended and superseded by later filed Proof of Claim.
2 AIRGAS USA LLC C/O AIRGAS INC ATTN DAVID BOYLE 259 N RADNOR CHESTER RD RADNOR, PA 19087	910	316	\$12,513.49	Amended and superseded by later filed Proof of Claim.
3 ALL-LINES LEASING A DIV OF FIRST WESTERN BANK & TRUST 100 PRAIRIE CENTER DR EDEN PRAIRIE, MN 55344	1714	561	\$46,511.36	Amended and superseded by later filed Proof of Claim.
4 ASSOCIATED EQUIPMENT CORP 5043 FARLIN AVE ST LOUIS, MO 63115	655	197	\$22,092.39	Amended and superseded by later filed Proof of Claim.
5 BOARD OF PUBLIC UTILITIES 540 MINNESOTA AVE KANSAS CITY, KS 66101	1587	175	\$330,249.56	Amended and superseded by later filed Proof of Claim.
6 BOARD OF PUBLIC UTILITIES 540 MINNESOTA AVE KANSAS CITY, KS 66101	1587	279	\$330,249.56	Amended and superseded by later filed Proof of Claim.

* Plus unliquidated and/or undetermined amounts
(a) Claim also contained on Exhibit A of the Fourth Omnibus Objection for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS**

	REMAINING CLAIM NUMBER	AMENDED CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
7 BOARD OF PUBLIC UTILITIES 540 MINNESOTA AVE KANSAS CITY, KS 66101	1587	264	\$330,249.56	Amended and superseded by later filed Proof of Claim.
8 CALIFORNIA COMMUNITIES AGAINST TOXICS PO BOX 845 ROSAMOND, CA 93560	2693	538	\$20,000,000.00	Amended and superseded by later filed Proof of Claim.
9 CARL'S AUTO ELECTRIC 4564 NORTH PECK ROAD EL MONTE, CA 91732	1279	852	\$977.03	Amended and superseded by later filed Proof of Claim.
10 CELLUSUEDE PRODUCTS INC C/O HINSHAW & CULBERTSON LLP ATTN CHARLES M TATELBAUM ONE E BROWARD BLVD STE 1010 FT LAUDERDALE, FL 33301	1757	173	Undetermined*	Amended and superseded by later filed Proof of Claim.
11 CHEM-AQUA A DIV OF NCH CORPORATION 2727 CHEMSEARCH BLVD IRVING, TX 75062	580	357	\$2,692.00	Amended and superseded by later filed Proof of Claim.
12 CIMCO RESOURCES 1616 WINDSOR RD LOVES PARK, IL 61111	3222	2643	\$38,077.95	Amended and superseded by later filed Proof of Claim.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit A of the Fourth Omnibus Objection for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS**

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	AMENDED CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
13	CIMCO RESOURCES, INC PO BOX 15427 LOVES PARK, IL 61132-5427	3222	922	\$29,124.75	Amended and superseded by later filed Proof of Claim.
14	CK-KLEIN-MACFARLANE LTD C/O VANDEVENTER BLACK LLP ATTN J BRANDON SIEG, ESQ EIGHTH & MAIN BLDG 707 E MAIN ST STE 1700 PO BOX 1558 RICHMOND, VA 23218-1558	2136	169	\$1,109.58	Amended and superseded by later filed Proof of Claim.
15	COLLIN COUNTY TAX ASSESSOR/COLLECTOR C/O GAY MCCALL ISAACKS ET AL 777 E 15TH ST PLANO, TX 75074	1595	438	\$80,801.72*	Amended and superseded by later filed Proof of Claim.
16	CONVERTED PRODUCTS INC C/O MONZACK MERSKY MCLAUGHLIN & BROWDER PA ATTN BRIAN J MCLAUGHLIN 1201 N ORANGE ST STE 400 WILMINGTON, DE 19801-1155 TRANSFERRED TO: BLACKWELL PARTNERS, LLC C/O DUMAC, INC. ATTN JANNINE LALL 280 SOUTH MANGUM STREET, SUITE 210 DURHAM, NC 27701-3675	568	566	\$65,519.40	Amended and superseded by later filed Proof of Claim.

* Plus unliquidated and/or undetermined amounts
(a) Claim also contained on Exhibit A of the Fourth Omnibus Objection for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS**

	REMAINING CLAIM NUMBER	AMENDED CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
17 DAWKINS, HENRY 815 E 77TH ST LOS ANGELES, CA 90001-2816	3210 (a)	2153 (a)	\$1,894,886,000.00*	Amended and superseded by later filed Proof of Claim.
18 DELL MARKETING LP C/O STREUSAND LANDON OZBURN LLP ATTN SABRINA L STREUSAND 811 BARTON SPRINGS RD STE 811 AUSTIN, TX 78704	416	52	\$11,376.15	Amended and superseded by later filed Proof of Claim.
19 DOCUTEAM INC DEPT 3180 PO BOX 2153 BIRMINGHAM, AL 35287-0002	2222	848	\$178.86	Amended and superseded by later filed Proof of Claim.
20 DODGE CITY INTERNATIONAL INC 2201 E WYATT EARP BLVD DODGE CITY, KS 67801	930	558	\$690.00	Amended and superseded by later filed Proof of Claim.
21 EAST PENN MANUFACTURING CO INC PO BOX 147 DEKA RD LYON STATION, PA 19536-0147	489	8	\$83,856.75	Amended and superseded by later filed Proof of Claim.
22 ELECTRIC CONVERSIONS ATTN GREGORY MCCREA 515 N 10TH ST SACRAMENTO, CA 95811	2518	321	\$195,574.26	Amended and superseded by later filed Proof of Claim.

* Plus unliquidated and/or undetermined amounts
(a) Claim also contained on Exhibit A of the Fourth Omnibus Objection for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS**

	REMAINING CLAIM NUMBER	AMENDED CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
23 ENGINEERED PLASTIC PRODUCTS INC 269 MERCER ST PO BOX 196 STIRLING, NJ 07980	993	36	\$54,498.52	Amended and superseded by later filed Proof of Claim.
24 EXPRESS EMPLOYMENT PROFESSIONALS C/O EXPRESS SERVICES 8516 NW EXPRESSWAY OKLAHOMA CITY, OK 73162	1688	322	\$5,623.62	Amended and superseded by later filed Proof of Claim.
25 FERRO MAGNETICS CORPORATION C/O POLSINELLI PC ATTN SHANTI M KATONA 222 DELAWARE AVE STE 1101 WILMINGTON, DE 19801	521	9	\$210,632.40	Amended and superseded by later filed Proof of Claim.
26 FMC CORPORATION C/O CURTIN & HEEFNER LLP ATTN ROBERT SZWAJKOS, ESQ 250 N PENNSYLVANIA AVE PO BOX 217 MORRISVILLE, PA 19067	2287	35	\$15,729.48	Amended and superseded by later filed Proof of Claim.
27 FRASIER TRANSPORT INC 8171 E EXECUTIVE AVE NAMPA, ID 83687	880	21	\$1,950.00	Amended and superseded by later filed Proof of Claim.

* Plus unliquidated and/or undetermined amounts
(a) Claim also contained on Exhibit A of the Fourth Omnibus Objection for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS**

	REMAINING CLAIM NUMBER	AMENDED CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
28 HCL AMERICA INC ATTN MANISHA AURORA 330 POTRERO AVE SUNNYVALE, CA 94085	2795	377	\$1,983,618.05*	Amended and superseded by later filed Proof of Claim.
29 HEUBEL MATERIAL HANDLING INC ATTN NANCY STREETER 611 NE EQUITABLE RD KANSAS CITY, MO 64120	818	656	\$86,973.65	Amended and superseded by later filed Proof of Claim.
30 HYPHEN TRANSPORTATION MANAGEMENT INC 391 CREDITSTONE RD CONCORD, ON L4K 1N8 CANADA	2957	662	\$22,411.34	Amended and superseded by later filed Proof of Claim.
31 IBT INC 9400 W 55TH ST MERRIAM, KS 66203 TRANSFERRED TO: BLACKWELL PARTNERS, LLC C/O DUMAC, INC. ATTN JANNINE LALL 280 SOUTH MANGUM STREET, SUITE 210 DURHAM, NC 27701-3675	607	556	\$64,171.31	Amended and superseded by later filed Proof of Claim.

* Plus unliquidated and/or undetermined amounts
(a) Claim also contained on Exhibit A of the Fourth Omnibus Objection for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS**

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	AMENDED CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
32	INBATEC GMBH KONRAD ADENAUER RING 40 58135 HAGEN GERMANY	1326	223	\$3,400.83*	Amended and superseded by later filed Proof of Claim.
33	KENDALL ELECTRIC 5101 S SPRINKLE RD PORTAGE, MI 49002	929	409	\$7,452.08	Amended and superseded by later filed Proof of Claim.
34	KW PLASTICS PO DRAWER 707 TROY, AL 36081	2144	1336	\$79,506.54	Amended and superseded by later filed Proof of Claim.
35	KW PLASTICS INC C/O EULER HERMES NORTH AMERICA INSURANCE CO 800 RED BROOK BLVD OWINGS MILLS, MD 21117	2144	427	\$78,409.80	Amended and superseded by later filed Proof of Claim.
36	LITTRUP, KIRK C/O GEORGE T UNDERWOOD JR, ATTORNEY 5401 KINGSTON PIKE, STE 520B KNOXVILLE, TN 37919	2399	260	\$2,500,000.00	Amended and superseded by later filed Proof of Claim.
37	LOS ANGELES COUNTY TREASURER AND TAX COLLECTOR PO BOX 54110 LOS ANGELES, CA 90054-0110	389	249	\$116,647.83	Amended and superseded by later filed Proof of Claim.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit A of the Fourth Omnibus Objection for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS**

	REMAINING CLAIM NUMBER	AMENDED CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
38 LUBBOCK CENTRAL APPRAISAL DISTRICT C/O PERDUE BRANDON FIELDER COLLINS & MOTT LLP ATTN LAURA J MONROE PO BOX 817 LUBBOCK, TX 79408	962	19	\$6,963.21*	Amended and superseded by later filed Proof of Claim.
39 MCMASTER-CARR SUPPLY COMPANY PO BOX 4355 CHICAGO, IL 60680	400	49	\$214,670.02	Amended and superseded by later filed Proof of Claim.
40 MCMASTER-CARR SUPPLY COMPANY PO BOX 4355 CHICAGO, IL 60680	400	256	\$214,670.02	Amended and superseded by later filed Proof of Claim.
41 METAL CONVERSION TECHNOLOGIES LLC PO BOX 1026 CARTERSVILLE, GA 30120	738	584	\$16,510.26	Amended and superseded by later filed Proof of Claim.
42 MIDWEST SCRAP MANAGEMENT (BUR-131) C/O BRUCE E STRAUSS 1044 MAIN ST 400 PECK'S PLAZA KANSAS CITY, MO 64105	2647	275	\$277,948.85	Amended and superseded by later filed Proof of Claim.
43 P & K RIVERSIDE TRACTOR INC (P & K EQUIPMENT INC) 102 S VAN BUREN ENID, OK 73703	475	63	\$315.00	Amended and superseded by later filed Proof of Claim.

* Plus unliquidated and/or undetermined amounts
(a) Claim also contained on Exhibit A of the Fourth Omnibus Objection for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS**

	REMAINING CLAIM NUMBER	AMENDED CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE	
44	PACIFIC CHLORIDE INTERNATIONAL C/O MCCARTER & ENGLISH LLP ATTN KATHARINE L MAYER ESQ 405 N KING ST WILMINGTON, DE 19801	3234	2619	\$8,391,617.46*	Amended and superseded by later filed Proof of Claim.
45	PACIFIC CHLORIDE INTERNATIONAL C/O MCCARTER & ENGLISH LLP ATTN KATHARINE L MAYER ESQ 405 N KING ST WILMINGTON, DE 19801	3234	2620	\$8,391,617.46*	Amended and superseded by later filed Proof of Claim.
46	PANHANDLE ALARM & TELEPHONE CO INC 10 INDUSTRIAL BLVD PENSACOLA, FL 32503	941	412	\$129.00	Amended and superseded by later filed Proof of Claim.
47	PENN-AIR & HYDRAULICS CORPORATION PO BOX 22190 YORK, PA 17402-0193 TRANSFERRED TO: FAIR HARBOR CAPITAL, LLC ANSONIA FINANCE STATION PO BOX 237037 NEW YORK, NY 10023	2381	1023	\$5,454.73	Amended and superseded by later filed Proof of Claim.

* Plus unliquidated and/or undetermined amounts
(a) Claim also contained on Exhibit A of the Fourth Omnibus Objection for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS**

	REMAINING CLAIM NUMBER	AMENDED CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
48 PRAXAIR INC ATTN TRACEY BOUTOT, CREDIT MANAGER 39 OLD RIDGEBURY RD DANBURY, CT 06810-5113	821	33	\$125,605.59	Amended and superseded by later filed Proof of Claim.
49 PRO CLEAN JANITORIAL SERVICE INC PO BOX 1501 FORT SMITH, AR 72902	509	468	\$14,578.38	Amended and superseded by later filed Proof of Claim.
50 QUEST DIAGNOSTICS INCORPORATED ATTN CHAWN M WRIGHT 1001 ADAMS AVE MAIL CODE - MR461 NORRISTOWN, PA 19403	2601	258	\$5,734.89	Amended and superseded by later filed Proof of Claim.
51 R & L CARRIERS PO BOX 10020 PORT WILLIAM, OH 45164	1609	1213	\$1,206,504.43	Amended and superseded by later filed Proof of Claim.
52 R&L CARRIERS PO BOX 10020 PORT WILLIAM, OH 45164-2000	1610	1212	\$436,290.60	Amended and superseded by later filed Proof of Claim.
53 R&L CARRIERS PO BOX 10020 PORT WILLIAM, OH 45164-2000	1608	1214	\$67,093.66	Amended and superseded by later filed Proof of Claim.

* Plus unliquidated and/or undetermined amounts
(a) Claim also contained on Exhibit A of the Fourth Omnibus Objection for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS**

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	AMENDED CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
54	R&L CARRIERS / GLOBAL PO BOX 10020 PORT WILLIAM, OH 45164-2000	1607	1215	\$19,392.35	Amended and superseded by later filed Proof of Claim.
55	R&L TRUCKLOAD SERV 7290 COLLEGE PWKY 200 FORT MYERS, FL 33907	1611	1211	\$461,016.05	Amended and superseded by later filed Proof of Claim.
56	RYDER TRUCK RENTAL INC ATTN JENNIFER MORRIS 6000 WINDWARD PKWY ALPHARETTA, GA 30005	1513	606	\$246,808.80	Amended and superseded by later filed Proof of Claim.
57	S & S METAL RECYCLERS II INC 336 E SULLIVAN RD AURORA, IL 60505	1011	181	\$8,057.31	Amended and superseded by later filed Proof of Claim.
58	SALSON LOGISTICS INC 888 DOREMUS AVE NEWARK, NJ 07114	625	82	\$144,299.17	Amended and superseded by later filed Proof of Claim.
59	SALSON LOGISTICS INC 888 DOREMUS AVE NEWARK, NJ 07114	625	458	\$165,638.69	Amended and superseded by later filed Proof of Claim.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit A of the Fourth Omnibus Objection for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS**

	REMAINING CLAIM NUMBER	AMENDED CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
60 SEIBEL MODERN MFG & WELDING CORP C/O HODGSON RUSS LLP ATTN CRAIG T LUTTERBEIN THE GUARANTY BLDG 140 PEARL ST STE 100 BUFFALO, NY 14202-4040	725	26	\$252,957.75	Amended and superseded by later filed Proof of Claim.
61 SELLERS EQUIPMENT INC PO BOX 1940 SALINA, KS 67402-1940	1269	1268	\$34,281.57	Amended and superseded by later filed Proof of Claim.
62 SEMINOLE ENERGY SERVICES LLC C/O BURNHAM LAW ASSOCIATES LLC ATTN NOEL C BURNHAM 10 BERGER CT MIDDLETOWN, DE 19709	2270	569	\$102,688.39	Amended and superseded by later filed Proof of Claim.
63 SHERTEK INC 3000A SHAWNEE INDUSTRIAL WAY STE 110 SUWANEE, GA 30024	1392	118	\$4,725.89	Amended and superseded by later filed Proof of Claim.
64 SHERTEK INC. 3000 SHAWNEE IND. WAY, SUITE 110 SUWANEE, GA 30024	1392	1349	\$4,725.89	Amended and superseded by later filed Proof of Claim.

* Plus unliquidated and/or undetermined amounts
(a) Claim also contained on Exhibit A of the Fourth Omnibus Objection for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS**

	REMAINING CLAIM NUMBER	AMENDED CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
65 SIERRA LIQUIDITY FUND LLC - ASSIGNEE & ATT-IN-FACT FOR DE-MAR & ASSOCIATES INC - ASSIGNOR 2699 WHITE RD STE 255 IRVINE, CA 92614	1280	594	\$685.72	Amended and superseded by later filed Proof of Claim.
66 SOUTHERN CONTROLS INC PO BOX 210399 MONTGOMERY, AL 36121 TRANSFERRED TO: BOWERY OPPORTUNITY FUND, L.P. ATTN VLADIMIR JELISAVCIC 1325 AVENUE OF THE AMERICAS, 28TH FLOOR NEW YORK, NY 10019	677	644	\$13,159.43	Amended and superseded by later filed Proof of Claim.
67 SPARKS COMMERCIAL TIRE INC PO BOX 177 FINDLAY, OH 45839	733	109	\$21,069.96	Amended and superseded by later filed Proof of Claim.
68 SUPERIOR PLUMBING 1645 COPPER CT SALINA, KS 67401	56	55	\$137,071.35	Amended and superseded by later filed Proof of Claim.
69 TANNOR PARTNERS CREDIT FUND LP AS ASSIGNEE FOR NICKELSON INDUSTRIAL 150 GRAND ST STE 401 WHITE PLAINS, NY 10601	691	661	\$3,004.40	Amended and superseded by later filed Proof of Claim.

* Plus unliquidated and/or undetermined amounts
(a) Claim also contained on Exhibit A of the Fourth Omnibus Objection for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS**

	REMAINING CLAIM NUMBER	AMENDED CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
70 THE BAILEY COMPANY 501 COWAN ST NASHVILLE, TN 37207	816	243	\$78,647.76	Amended and superseded by later filed Proof of Claim.
71 THE DOE RUN RESOURCES CORPORATION C/O POLSINELLI PC ATTN CHRISTOPHER A WARD 222 DELAWARE AVE STE 1101 WILMINGTON, DE 19801	1423	96	\$279,636.11	Amended and superseded by later filed Proof of Claim.
72 THE SYSTEM GROUP INC C/O KEITH S SMARTT PO BOX 869 B MCMINNVILLE, TN 37111	2843	114	\$34,000.00*	Amended and superseded by later filed Proof of Claim.
73 THOMAS, NORMA FNA NORMA TIRINO C/O LAW OFFICES OF ROBERT WASHUTA PC ATTN ROBERT WASHUTA ESQ 11 BROADWAY STE 615 NEW YORK, NY 10004	749	115	Undetermined*	Amended and superseded by later filed Proof of Claim.
74 THOMAS, NORMA FNA NORMA TIRINO C/O LAW OFFICES OF ROBERT WASHUTA PC ATTN ROBERT WASHUTA ESQ 11 BROADWAY STE 615 NEW YORK, NY 10004	749	152	Undetermined*	Amended and superseded by later filed Proof of Claim.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit A of the Fourth Omnibus Objection for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS**

	REMAINING CLAIM NUMBER	AMENDED CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
75 TRIUMVIRATE ENVIRONMENTAL INC C/O BENESCH FRIEDLANDER COPLAN & ARONOFF LLP ATTN MICHAEL J BARRIE 222 DELAWARE AVE STE 801 WILMINGTON, DE 19801 PARTIALLY TRANSFERRED TO: CORRE OPPORTUNITIES FUND, L.P. ATTN CLAIMS PROCESSING (BANKRUPTCY) 1370 AVENUE OF THE AMERICAS, 29TH FLOOR NEW YORK, NY 10019	2271	567	\$78,146.22	Amended and superseded by later filed Proof of Claim.
76 VORTEX DOORS ATTN MICHELLE CRECELIUS 3198-M AIRPORT LOOP DR COSTA MESA, CA 92626-3407	448	94	\$13,568.77	Amended and superseded by later filed Proof of Claim.
77 WELLS FARGO BANK NATIONAL ASSOCIATION AS INDENTURE TRUSTEE ATTN JAMES R LEWIS 150 E 42ND ST 40TH FL NEW YORK, NY 10017	2597	1831	\$696,023,437.50*	Amended and superseded by later filed Proof of Claim.
78 WIESE USA INC 1435 WOODSON RD ST LOUIS, MO 63132	554	51	\$20,803.01	Amended and superseded by later filed Proof of Claim.

* Plus unliquidated and/or undetermined amounts
 (a) Claim also contained on Exhibit A of the Fourth Omnibus Objection for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT A - AMENDED AND SUPERSEDED CLAIMS**

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	AMENDED CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
79	WIESE USA INC 1435 WOODSON RD ST LOUIS, MO 63132	554	45	\$20,803.01	Amended and superseded by later filed Proof of Claim.
80	XPEDX A DIVISION OF INTERNATIONAL PAPER 1059 W RIDGE RD ROCHESTER, NY 14615	841	57	\$74,396.00	Amended and superseded by later filed Proof of Claim.
81	YU, CHUNMAN 8920 MERION DR DULUTH, GA 30097	2253	112	\$80,166.67	Amended and superseded by later filed Proof of Claim.
			TOTAL	\$2,639,597,484.27*	

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit A of the Fourth Omnibus Objection for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT B - DUPLICATE CLAIMS**

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	BOARD OF PUBLIC UTILITIES 540 MINNESOTA AVE KANSAS CITY, MO 66101	98	280	\$260.75	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
2	BOARD OF PUBLIC UTILITIES 540 MINNESOTA AVE KANSAS CITY, KS 66101	98	176	\$260.75	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
3	CONNER, WILLARD 6080 NW 55TH AVE OCALA, FL 34482-2786	1052	1547	\$33,000.00*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
4	EXIDE TECHNOLOGIES GMBH IM THIERGARTEN D-63654 BUDINGEN GERMANY	2493	2494	\$90,161.99	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
5	FRANKIE'S GOLF CARTS 2011 N TAYLOR AVE GARDEN CITY, KS 67846	511	944	\$1,968.40	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
6	GROSS, ORA C/O TRACI HARTLEY, ESQ 529 ALABAMA ST BRISTOL, TN 37620	324	369	Undetermined*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
7	GUTI, JERRY 451 N 12TH ST READING, PA 19604-2820	758	788	\$24,950.00	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.

* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT B - DUPLICATE CLAIMS**

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
8	HUTCHINSON, ROBERT C/O CRAY GODDARD MILLER & TAYLOR LLP ATTN MITCHELL L TAYLOR 205 WASHINGTON STE 300 BURLINGTON, IA 52601	2107	2481	Undetermined*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
9	INDIANA MICHIGAN POWER COMPANY DBA AMERICAN ELECTRIC POWER C/O LAW FIRM OF RUSSELL R JOHNSON III PLC ATTN RUSSELL R JOHNSON III ESQ 2258 WHEATLANDS DR MANAKIN-SABOT, VA 23103	2608	2610	\$70,754.18	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
10	JENNINGS, MISTY C/O TRACI HARTLEY, ESQ 529 ALABAMA ST BRISTOL, TN 37620	325	370	Undetermined*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
11	K A STEEL CHEMICALS - CHICAGO C/O JENNER & BLOCK ATTN MELISSA M HINDS 353 N CLARK ST CHICAGO, IL 60654-3456	2260	2261	\$60,707.38*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
12	MCTEL CO INC 11841 SW KERNS RD STEWARTSVILLE, MO 64490-6193	43	1942	\$959.60	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.

* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT B - DUPLICATE CLAIMS**

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
13	MILLER, EDDIE C/O TRACI HARTLEY, ESQ 529 ALABAMA ST BRISTOL, TN 37620	326	365	Undetermined*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
14	MONTGOMERY COMMUNICATIONS 222 W 6TH ST JUNCTION CITY, KS 66441	473	971	\$717.89	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
15	MURILLO SR, HERACLIO P 9308 DEARBORN AVE SOUTH GATE, CA 90280-4404	3253	3254	Undetermined*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
16	OKLAHOMA COUNTY TREASURER ATTN FOREST "BUTCH" FREEMAN 320 ROBERT S KERR RM 307 OKLAHOMA CITY, OK 73102	105	263	\$6,332.86*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
17	OLIN CORPORATION, WINCHESTER DIVISION C/O JENNER & BLOCK ATTN MELISSA M HINDS 353 N CLARK ST CHICAGO, IL 60654-3456	1753	1759	\$145,289.53	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
18	PACWEST SECURITY SERVICES ISSAN BASHAWATY 3303 HARBOR BLVD SUITE A103 COSTA MESA, CA 92626	1210	1209	\$128,472.96	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.

* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)
FIRST OMNIBUS CLAIMS OBJECTION
EXHIBIT B - DUPLICATE CLAIMS**

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
19	PACWEST SECURITY SERVICES 3303 HARBOR BLVD STE A103 COSTA MESA, CA 92626-1536	1210	1171	\$128,472.96	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
20	SECURITY GUARDS INC PO BOX 6283 WYOMISSING, PA 19610-0283	32	1004	\$34,082.56	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
21	UNIQUE SANITATION 45 DALE ST WEST BABYLON, NY 11704-1119	167	1204	\$549.36	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
			TOTAL	\$726,941.17*	

* Plus unliquidated and/or undetermined amounts