

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)  
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 Debtor.<sup>1</sup> : **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) SECOND OMNIBUS OBJECTION  
 PURSUANT TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY  
 RULE 3007, AND LOCAL RULE 3007-1 TO CERTAIN DUPLICATE CLAIMS**

**“SECOND 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 Exhibit A 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 Exhibit A 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 in Support of the Debtor’s (Non-Substantive) Second Omnibus Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule

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<sup>1</sup> 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.

3007, And Local Rule 3007-1 To Certain 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).<sup>2</sup>

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 the Claims set forth on Exhibit A attached to the Proposed Order because they are duplicates of other Claims.

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<sup>2</sup> 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. Duplicate Claims

13. With respect to the Disputed Claims listed on Exhibit A to the Proposed Order (the “Duplicate Claims”), the Claimants, who appear to be individual bondholders, filed a Claim that was limited exclusively to the repayment of principal, interest, and/or other applicable fees and charges (“Debt Claim”) owed under any bond or note issued by the Debtor pursuant to an indenture (a “Debt Instrument”). However, pursuant to paragraph 12(f) of the Bar Date Order, the General Bar Date did not apply to a holder of a Debt Claim provided that the applicable indenture trustee under a Debt Instrument filed a Proof of Claim on or before the General Bar Date, with respect to all of the amounts owed under each of the Debt Instruments. The Debtor is a party to two issuances of bond debt—the “Senior Secured Notes”<sup>3</sup> and the “Convertible Notes.”<sup>4</sup> On October 30, 2013, U.S. Bank N.A. (“U.S. Bank”), as indenture trustee for the Convertible Notes, filed a proof of claim number 2353 (“Claim 2353”) asserting a Debt Claim regarding the Convertible Notes. On October 31, 2013, Wells Fargo Bank National Association (“Wells Fargo”), as indenture trustee for the Senior Secured Notes, filed a proof of claim number 2597 (“Claim 2597”) <sup>5</sup> asserting a Debt Claim regarding the Senior Secured Notes. The Debtor believes that the Claims filed by the individual bondholders listed on Exhibit A are duplicative of either Claim 2353 or Claim 2597. If an individual noteholder’s claim were allowed in addition to the applicable indenture trustee’s proof of claim (the “Indenture Trustee Claims”), the noteholder would recover twice - under the applicable indenture trustee’s proof of

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<sup>3</sup> Pursuant to an indenture dated as of January 25, 2011, the Debtor issued \$675 million in aggregate principal amount of 8.625% senior secured notes with a maturity date of February 1, 2018 (the “Senior Secured Notes”).

<sup>4</sup> Pursuant to an indenture dated as of March 18, 2005, the Debtor issued floating rate convertible senior subordinated notes with a maturity date of September 18, 2013 (the “Convertible Notes”).

<sup>5</sup> Claim 2597 amended and superseded proof of claim number 1831.

claim as well as under the individual claim. Double recoveries of this sort are not permitted under the Bankruptcy Code and the Debtor should not be required to satisfy the same obligation twice. Moreover, the elimination of redundant Claims will enable GCG to maintain a claims register that more accurately reflects the valid claims asserted against the Debtor.

14. Therefore, the Debtor hereby objects to the allowance of the Duplicate Claims included on Exhibit A to the Proposed Order and requests 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**

15. 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).

16. 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 Duplicate Claim as set forth on Exhibit A to the Proposed Order.

## RESPONSES TO THE OBJECTION

17. 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 exhibit 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.

18. Every Response must be filed and served upon the following entities at the following addresses: (i) the Office of the U.S. Trustee, Room 2207, Lockbox 35, 844 North King Street, 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”).

19. 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.

20. 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.

21. 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.



22. 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.

23. 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.

24. 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 Duplicate Claim.

### **RESERVATION OF RIGHTS**

25. 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 Exhibit A 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 Exhibit A to the Proposed Order on any other ground.

**STATEMENT OF COMPLIANCE WITH LOCAL BANKRUPTCY RULE 3007-1**

26. 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**

27. 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**

28. 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 Exhibit A to the Proposed Order.

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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P.O. Box 636  
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– and –

Kenneth S. Ziman  
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– and –

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155 N. Wacker Dr.  
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
	:
EXIDE TECHNOLOGIES,	: Case No. 13-11482 (KJC)
	:
Debtor. <sup>1</sup>	: <b>Hrg. Date: January 22, 2014 at 3:00 p.m. (Eastern)</b>
	: <b>Obj. Due: January 6, 2014 at 4:00 p.m. (Eastern)</b>
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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) Second Omnibus Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain Duplicate Claims (the “Objection”)**.<sup>2</sup>

**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, Room 2207, Lockbox 35, 844 North King Street, 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 is directed; the name of the Claimant and description of the basis for the amount of the Claim;

<sup>1</sup> 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.

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

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

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– and –

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Telephone: (312) 407-0700  
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)
	:
Debtor. <sup>1</sup>	:
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**DECLARATION OF HOLDEN BIXLER IN SUPPORT OF DEBTOR’S  
SECOND (NON-SUBSTANTIVE) OMNIBUS OBJECTION  
PURSUANT TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY  
RULE 3007, AND LOCAL RULE 3007-1 TO CERTAIN 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.<sup>2</sup> I have read the Debtor’s (Non-Substantive) Second Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 To Certain 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 exhibit attached thereto.

<sup>1</sup> 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.

<sup>2</sup> 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 Duplicate Claims as defined in the Objection and identified in Exhibit A to the Proposed Order.

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

4. The Debtor has determined that the Claims identified on Exhibit A 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 A 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. <sup>1</sup>	:	Related Docket No. _____
	:	
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**ORDER SUSTAINING DEBTOR’S (NON-SUBSTANTIVE)  
SECOND OMNIBUS OBJECTION PURSUANT TO BANKRUPTCY  
CODE SECTION 502(b), BANKRUPTCY RULE 3007,  
AND LOCAL RULE 3007-1 TO CERTAIN DUPLICATE CLAIMS**

Upon the Debtor’s (Non-Substantive) Second Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 to Certain Duplicate Claims (the “Objection”),<sup>2</sup> 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 Exhibit A attached hereto, and any responses thereto; and upon the Declaration of Holden Bixler in Support of the Debtor’s (Non-Substantive) Second Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 to Certain Duplicate Claims; and upon the record herein; and after due deliberation thereon and good and sufficient cause appearing therefor; it is hereby

<sup>1</sup> 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.

<sup>2</sup> 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, to the extent set forth herein.
2. The Duplicate Claims listed on Exhibit A in the column titled “Duplicate Claim to be Disallowed” are disallowed.
3. If the Court subsequently orders that an Indenture Trustee Claim is not appropriately duplicative of the corresponding “Duplicative Claim to be Disallowed,” then the claims agent shall be authorized and directed to immediately reinstate such “Duplicative Claim to be Disallowed” in these chapter 11 cases (the “Reinstated Claim”), and the rights of all interested parties with respect to the Reinstated Claim shall be expressly reserved.
4. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, the Indenture Trustee Claims.
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 Exhibit A 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

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THE HONORABLE KEVIN J. CAREY  
UNITED STATES BANKRUPTCY

**EXIDE TECHNOLOGIES 13-11482 (KJC)  
SECOND OMNIBUS CLAIMS OBJECTION  
EXHIBIT A -DUPLICATE CLAIMS**

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	4-VEGA LP (A FAMILY PARTNERSHIP) 809 S LEON AVE MONAHANS, TX 79756	2597	413	\$171,365.82	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
2	4-VEGA LP (A FAMILY PARTNERSHIP) 809 S LEON AVE MONAHANS, TX 79756	2597	1236	\$100,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
3	ABEL, JANI 105 LEXINGTON AVE #4B NEW YORK, NY 10016	2597	1851	\$29,701.07	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
4	AMARNANI, CYNTHIA 18391 VERONA LAGO DR MIROMAR LAKES, FL 33913	2597	1854	\$987.00*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
5	ANDERSON, GEORGE KENT 95-532 WIKAO ST E304 MILILANI, HI 96789	2597	2697	\$7,156.30	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
6	ARBUTHNOTT, KATHRYN A 8968 LANGHORNE RD ESMONT, VA 22937	2597	1720	\$20,862.50	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
7	AZAN SOLUTIONS LLC FBO SYED M ADIL 38 RIEDER RD EDISON, NJ 08817	2597	1703	\$10,000.00*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
8	BALOG, DENNIS W 2176 PENSTONE LOOP ROSEVILLE, CA 95747	2597	633	\$5,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
9	BEHRENS, KENNETH G 912 S BUTTERNUT PL BROKEN ARROW, OK 74012	2597	2998	\$5,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

\* Plus unliquidated and/or undetermined amounts

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10	BHAT FAMILY TRUST UAD 3/6/03 C/O NARAYANA B BHAT 7332 RIVER BEND RD NASHVILLE, TN 37221	2597	1037	\$9,000.00*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
11	BIALY, PAUL M 5523 COUNTRY LAKES TRL SARASOTA, FL 34243-3812	2597	2018	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
12	BOHANNAN, LARRY C 488 LANDERS LOOP RD DOVER, AR 72837	2597	1581	\$5,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
13	BOLLINGER, DANIEL C 10987 FAWN MEADOW LN STRONGSVILLE, OH 44149	2597	980	\$4,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
14	BRYANT, DALE 5119 S TIERNEY DR INDEPENDENCE, MO 64055	2597	1498	\$6,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
15	BUDD, KRISTEN 1814 JUNIPER DR MERRITT, BC V1K 1J6 CANADA	2597	1693	\$8,897.71*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
16	BURT K FISCHER TRUST 9245 N SUNSET RIDGE FOUNTAIN HILLS, AZ 85268	2597	350	\$17,557.99	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
17	CABLE, JOHN V 985 BRIDGE MILL CANTON, GA 30114	2597	1036	\$12,081.66	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

\* Plus unliquidated and/or undetermined amounts

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18	CARR, FORREST C & EDITH M 1729 INDIAN HILLS RD LEBANON, TN 37087	2597	2135	\$24,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
19	CELTIC CROSS CHARITABLE FOUNDATION C/O SCOTIA MCLEOD 650 W GEORGIA ST STE 1100 VANCOUVER, BC V6B 4N9 CANADA	2597	2141	\$100,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
20	CHARLES CHARITIES TRUST C/O SUSAN SINCLAIR, TTEE PO BOX 836 MILLER PLACE, NY 11764-0836	2597	2455	\$47,040.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
21	CHEEK, GARY 2354 BRANDON CIR CHINO HILLS, CA 91709	2597	1117	\$3,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
22	CHIAPPELLI, BRYAN 161 CARPIN LN WEEDVILLE, PA 15868	2597	900	\$83,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
23	CHIAPPELLI, LUANN 161 CARPIN LN WEEDVILLE, PA 15868	2597	901	\$13,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
24	COLEMAN, RONALD A 20 PEYTON PL PALM COAST, FL 32164	2597	1431	\$2,863.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
25	CONNELL, THOMAS & PATRICIA 1980 AMBER DR NEWTOWN, PA 18940	2597	1179	\$24,036.25	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.



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	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
26	CUNNINGHAM, DOROTHY A 4939 ANZA ST #2 SAN FRANCISCO, CA 94121	2597	1341	\$8,396.25	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
27	CUNNINGHAM, TIMOTHY J 2924 PROMONTORY LOOP BROOKFIELD, CO 80023	2597	2216	\$10,862.50	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
28	CZARNIECKI, JOSEPH L 532 SWAN CREEK RD FORT WASHINGTON, MD 20744	2597	1416	\$5,368.44	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
29	DAIGNEAULT, ROBERT E 17700 S WESTERN AVE SPC #16 GARDENA, CA 90248	2597	1114	\$4,527.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
30	DALTON, SANDRA K 6805 WINCHESTER AVE VENTNOR, NJ 08406	2597	1849	\$18,708.92	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
31	DALTON, SANDRA K 6805 WINCHESTER AVE VENTNOR, NJ 08406	2597	1850	\$18,708.92	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
32	DALTON, SANDRA K 6805 WINCHESTER AVE VENTNOR, NJ 08406	2597	1852	\$21,514.35	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
33	DAMON, JAMES J 23 REVERE PL RIDGEFIELD, CT 06877-4714	2597	1384	\$15,646.50	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
34	DE SANTIS, FRANCIS P 154-05 BEECH AVE FLUSHING, NY 11355	2597	2894	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

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	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
35	DEARMENT, WILLIAM S C/O CHANNELLOCK INC 1306 S MAIN ST MEADVILLE, PA 16335	2597	1380	\$26,904.69	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
36	DEWALT, RONALD D PO BOX 1637-C ALVIN, TX 77512	2597	1483	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
37	DONEFER, BARBIE L 12337 ROCKLEDGE CIR BOCA RATON, FL 33428-4813	2597	1952	\$35,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
38	DUNN FAMILY TRUST C/O TIMOTHY J DUNN 3 MIRA FLORES LANE TIBURON, CA 94920	2597	1735	\$200,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
39	EATON, ROLLA L 8465 GRAND AVE OMAHA, NE 68134	2597	1406	\$1,680.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
40	ECKERT, LARRY L PO BOX 9454 FLEMING ISLAND, FL 32006	2597	1241	\$15,602.57*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
41	ECKERT, LARRY L PO BOX 9454 FLEMING ISLAND, FL 32003	2597	1248	\$2,117.21*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
42	ECKERT, W KELSEA 170 N RIDGE DR FLEMING ISLAND, FL 32003	2597	1240	\$5,293.01*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

\* Plus unliquidated and/or undetermined amounts

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43	EHLERT, DAVID FMT CO CUST IRA ROLLOVER FBO DAVID GEORGE EHLERT 50 PARK AVE ASHEVILLE, NC 28803-2056	2597	928	\$1,661.60	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
44	ELARDO, ROSALIE G 4580 KENNISON PKWY HAMBURG, NY 14075	2597	1180	\$5,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
45	EPSTEIN, ERICA L 31549 S WOODLAND RD PEPPER PIKE, OH 44124	2597	1018	\$37,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
46	EPSTEIN, SHERRY STEIN 31549 S WOODLAND RD PEPPER PIKE, OH 44124	2597	1017	\$35,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
47	EQC GLOBAL OPPORTUNITIES FUND C/O EQUILIBRIA CAPITAL MANAGEMENT O'HARA HOUSE ONE BERMUDIANA RD HAMILTON HM08 BERMUDA	2597	1706	\$7,906.25	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
48	EQC GLOBAL OPPORTUNITIES FUND C/O EQUILIBRIA CAPITAL MANAGEMENT O'HARA HOUSE ONE BERMUDIANA RD HAMILTON HM08 BERMUDA	2597	1405	\$7,906.25	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
49	ESTATE OF ATHENA GEORGAKAKOS GEORGE ONORATO EXEC 69-04 DITMARS BLVD JACKSON HEIGHTS, NY 11370-1031	2597	2032	Undetermined*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

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50	FLAHERTY, RICHARD W 1511 WHITE TAIL CT KEWAUNEE, WI 54216	2597	1820	\$4,172.50	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
51	FLEMING, MICHAEL N 701 HARLECH DR NEWARK, OH 43055	2597	1741	\$25,035.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
52	FLETCHER, DALE W S2950 LORENE DR MARSHFIELD, WI 54449	2597	1038	\$30,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
53	FONER, HARRIET & STANLEY 500 C GRAND ST APT 5G NEW YORK, NY 10002	2597	2128	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
54	FORST, PAUL E 1231 CANON WAY WESTMINSTER, MD 21157	2597	3217	\$4,359.06	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
55	FRANCO, ROBERT & MARGARET 1 COMBS HOLLOW RD MENDHAM, NJ 07945	2597	1897	\$20,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
56	GADOLA, ANTHONY T 651 PARDEESVILLE RD HAZLE TOWNSHIP, PA 18202-2701	2597	2091	\$8,341.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
57	GARDA, JOHN A 3941 STAATZ DR YOUNGSTOWN, OH 44511	2597	1116	\$2,529.36	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
58	GERALDINE BECKER IRREVOCABLE TRUST C/O RICHARD RESLER TTEE 2873 ENDICOTT CT CLEARWATER, FL 33761-1410	2597	1979	\$13,009.40	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

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59	GILBERT D CHEATHAM IRA ROLLOVER CHARLES SCHWAB & CO CUST 3200 CHERRY TREE LN PROSPECT, KY 40059	2597	957	\$20,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
60	GILBERT D CHEATHAM IRA SEPT TD AMERITRADE 3200 CHERRY TREE LN PROSPECT, KY 40059	2597	956	\$20,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
61	GOLDAPP JR, WILLIAM ALLEN 206 COSTA BELLA DR AUSTIN, TX 78734	2597	1131	\$10,115.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
62	GONSALVES, ARTHUR 7 PARTRIDGE HILL RD ANDOVER, MA 01810	2597	1481	\$115,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
63	GONZALEZ, JOSE REVUELTA 190 E 7 ST APT 710 NEW YORK, NY 10009	2597	1029	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
64	GREEN, SPENCER W 144 MOONSHINE LN HARPERS FERRY, WV 25425	2597	1060	\$5,215.63	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
65	GRUNKE, ANN 131 CHURCH ST BOONTON, NJ 07005	2597	512	\$5,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
66	HAAG, PETER G 446 W ALDINE #3W CHICAGO, IL 60657	2597	1960	\$8,000.00*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

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67	HALEY, MICHAEL CHARLES SCHWAB & CO INC CUST IRA ROLLOVER 15 CLOUDLEAP PL SPRING, TX 77381	2597	2090	\$10,431.25	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
68	HALLFORD JR, KENNETH W 7868 HORNED LARK CIR PORT ST LUCIE, FL 34952	2597	2004	\$9,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
69	HALLFORD JR, KENNETH W 7868 HORNED LARK CIR PORT ST LUCIE, FL 34952	2597	2003	\$2,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
70	HANCORN, PETER 23 ALDERLEY CLOSE WOODLEY, READING BERKSHIRE RG5 4TG UNITED KINGDOM	2597	1376	\$897.58	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
71	HEFNER, MICHAEL P & DIANE J C/O MICHAEL P HEFNER 14124 WESTBURY DR LITTLE ROCK, AR 72223	2597	2977	\$50,000.00*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
72	HERBENER, DONALD 17295 RED WOLF LN MORRISON, CO 80465	2597	1522	\$10,309.06	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
73	HERMES, DAVID J 310 CLYDESDALE CT SPOTSYLVANIA, VA 22551-2414	2597	2082	\$5,215.63	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
74	HICKS, STEVEN P 25748 N SHORE DR ELKHART, IN 46514	2597	1168	\$2,256.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

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75	HOAGLAND, RONALD DEAN 3822 W 11TH ST #14 GREELEY, CO 80634	2597	1242	\$5,431.25	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
76	HORNE, WILLIAM R & SANDRA W 875 HORNE HILL RD PULASKI, TN 38478	2597	1199	\$121,002.50	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
77	HUANG, MING-AN NO 3 ALY 42 LN 122 RUIGUANG RD NEIHU DIST TAIPEI CITY 114 TAIWAN (ROC) TAIWAN, PROVINCE OF CHINA	2597	1396	\$30,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
78	HUANG, MING-AN NO 3 ALY 42 LN 122 RUIGUANG RD NEIHU DIST TAIPEI CITY 114 TAIWAN (ROC) TAIWAN, PROVINCE OF CHINA	2597	1270	\$30,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
79	HUME, WILLIAM 1900 E GIRARD PL #501 ENGLEWOOD, CO 80113	2597	1550	Undetermined*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
80	IRWIN, ROBERT THOMAS 10326 DOLAN AVE DOWNEY, CA 90241	2597	1359	\$26,900.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
81	JULIUS, DOUGLAS P 1014 MT TABOR RD NEW ALBANY, IN 47150	2597	1243	\$1,806.42	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
82	JW INVEST PARTNERSHIP PO BOX 8157 FAYETTEVILLE, AR 72703-0003	2597	1615	\$25,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

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83	KAGAN, LAURENCE & LISA 16 NOEL LN JERICHO, NY 11753-1316	2597	334	\$5,153.33	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
84	KANITKAR, RAJAN 13228 STABLE BROOK WAY HERNDON, VA 20171	2597	1433	\$2,520.96	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
85	KAPLAN, ALVIN 10341 CROSSWIND RD BOCA RATON, FL 33498	2597	2069	Undetermined*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
86	KAPLAN, ALVIN 10341 CROSSWIND RD BOCA RATON, FL 33498	2597	1698	Undetermined*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
87	KEILERS, CHARLES H 2518 LINDENWOOD DR SAN ANGELO, TX 76904	2597	1107	\$9,152.51	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
88	KLINE, CARL 9418 BARKER RD WHITE PIGEON, MI 49099	2597	1352	\$40,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
89	KOPPEL, JACK S 9601 SUNRISE LAKES BLVD SUNRISE, FL 33322	2597	2196	\$14,602.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
90	KRASKA, KENNETH W 1812 BROKEN BEND DR WESTLAKE, TX 76262	2597	2630	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
91	KRAUS, HEINZ JOSEPH LAMBERTUSSTRASSE 23 ROMMERSKIRCHEN D-41569 GERMANY	2597	2933	\$12,408.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

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92	KRUKEMYER, TERRY R 16107 ST RT 199 PEMBERVILLE, OH 43450	2597	1520	\$58,000.00*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
93	KRYSZTOFORSKI, RICHARD 51 ALVERSON LOOP STATEN ISLAND, NY 10309-1748	2597	2823	\$9,285.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
94	LANKFORD, STEPHEN L 1822 PITTS RD RICHMOND, TX 77406	2597	1713	\$36,309.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
95	LAWRENCE, DONALD R PO BOX 174 ORELAND, PA 19075	2597	2670	\$285.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
96	LEWANDOWSKI JR, FRANK L 20700 NORTHOME ST SOUTHFIELD, MI 48076-5258	2597	1800	\$25,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
97	LEWELLYN, STEPHEN K 122 W CAMERON ST CULPEPER, VA 22701	2597	2840	\$1,745.38	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
98	LEWELLYN, STEPHEN K 122 W CAMERON ST CULPEPER, VA 22701	2597	2839	\$1,745.38	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
99	LOPCHINSKY, RICHARD A 302 E ROVEY AVE PHOENIX, AZ 85012	2597	1201	\$5,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
100	LUNDQUIST, JOHN W 4224 QUEEN AVE S MINNEAPOLIS, MN 55410	2597	2913	\$30,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

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101	MCCABE III, JOSEPH M C/O OREDIA W WESTBURY, POA 103 PECAN GROVE LN FT MOTTE, SC 29135-8871	2597	2212	\$17,596.80	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
102	MCCORMICK, HENRY THOMAS 621 VALLEY GREEN TRACE MARIETTA, GA 30068-2567	2597	1568	\$20,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
103	MCCORMICK, JACKIE B 621 VALLEY GREEN TRACE MARIETTA, GA 30068-2567	2597	1567	\$20,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
104	MCGUIRE, DENIS C/O SCOTIAMCLEOD 650 W GEORGIA ST STE 1100 VANCOUVER, BC V6B 4N9 CANADA	2597	2140	\$100,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
105	MESSER, BRENDA M WALTER WENDT TR FBO HI JOLLY GIFT SHOP PENSION PLAN PSP FBO BRENDA M MESSER 856 N BARKLEY MESA, AZ 85203-5717	2597	1634	\$16,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
106	MEYER, LYNN C 15 OHIO ST LAKE HOPATCONG, NJ 07849	2597	2748	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
107	MICHAELS, DAVID & LYNN ATTN DAVID MICHAELS 22 GREENWAY TERR N MAHOPAC, NY 10541-1230	2597	1973	\$19,899.60	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
108	MIELKE MOTOR COMPANY INC 3364 SUNSET BEACH LN SUAMICO, WI 54173-8257	2597	1805	\$2,302.01	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

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109	MILLER, GIRARD C 1603 ARCH BAY DR NEWPORT BEACH, CA 92660	2597	1613	\$44,600.00*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
110	MILLS JR, JOSEPH L 3826 CHALLEDON RD JARRETTSVILLE, MD 21084	2597	371	\$14,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
111	MILLS JR, JOSEPH L 3826 CHALLEDON RD JARRETTSVILLE, MD 21084	2597	1655	\$7,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
112	MONTHLY MEETING OF FRIENDS OF PHILADELPHIA ATTN ELIOT INGRAM, CLERK FINANCE COMMITTEE 320 ARCH ST PHILADELPHIA, PA 19106	2353	2755	\$87,995.00	Claim is duplicative of Debt Claim filed by US Bank, N.A.
113	MYERS, JAMES W (J WILLIAM MYERS) 1883 STACY WAY UPLAND, CA 91784	2597	1743	\$50,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
114	NAMISLO, ROBERT A 2775 NW 49TH AVE #106 OCALA, FL 34482-6212	2597	2005	\$4,453.29	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
115	NIEKRASH, RITA E 19 JUNIPER LANE W HARTFORD, CT 06117	2597	2447	\$17,269.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
116	NIKAS, YVONNE 36 S THROOP PKWY CHICAGO, IL 60607	2597	1975	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
117	O'CONNELL, JOHN J & TERESA G C/O MORGAN STANLEY ATTN THE HOLLYWOOD GROUP 1200 MT KEMBLE AVE 2ND FL MORRISTOWN, NJ 07960	2597	1566	\$19,430.83	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

\* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)  
SECOND OMNIBUS CLAIMS OBJECTION  
EXHIBIT A -DUPLICATE CLAIMS**

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
118	OBERST, KERRY 1112 CUSTER CT NORTH PLATTE, NE 69101	2597	1363	\$4,445.63	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
119	PADWA, ALLEN R 87 COMMODORE RD WORCESTER, MA 01602-2726	2597	866	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
120	PALLADINO, ANTONELLA C/O ROBERT PALLADINO 2225 ESPLANADE AVE BRONX, NY 10469-5405	2597	2173	\$33,765.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
121	PALLADINO, ROBERT & ANTONELLA ATTN ROBERT PALLADINO 2225 ESPLANADE AVE BRONX, NY 10469-5405	2597	2172	\$27,878.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
122	PATEL, GAUTAM R 4801 - 24TH ST DICKINSON, TX 77539	2597	2220	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
123	PICHON, HERBERT H 209 N NORTH ST DANVILLE, IL 61832	2597	1331	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
124	POSEY, ROBERT W 3389 BATTLEFIELD MEMORIAL HWY BEREA, KY 40403	2597	1231	\$21,954.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
125	RACK, CHARLES J 454 NE 93RD ST MIAMI SHORES, FL 33138	2597	3221	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

\* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)  
SECOND OMNIBUS CLAIMS OBJECTION  
EXHIBIT A -DUPLICATE CLAIMS**

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
126	REFF, CAROL 64 HERITAGE PT BLVD BARNEGAT, NJ 08005-3380	2597	1990	\$40,703.30	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
127	REICHERT, DALE C & MARIE B ATTN DALE C REICHERT 911 SANDSTONE DR NO PLATTE, NE 69101	2597	1362	\$100,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
128	REYNOLDS, ROBERT M 1800 BRIGADOONE LN FLORENCE, SC 29505	2597	1185	\$5,215.63	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
129	RICHMOND, CAROLYN 8705 GRAYWOOD DALLAS, TX 75243	2597	2959	\$9,019.60	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
130	RIGBY, ELWOOD B / RIGBY, RONALD E ATTN RONALD E RIGBY 9510 DELPHINIUM ST PROSPECT, KY 40059	2597	1437	\$11,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
131	RILEY DECEDANTS TRUST C/O RICHARD W RILEY 19 SATTERLEE STATEN ISLAND, NY 10307-1501	2597	1987	Undetermined*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
132	RILEY SURVIVORS TRUST C/O RICHARD W RILEY 19 SATTERLEE STATEN ISLAND, NY 10307-1501	2597	1986	\$22,509.80	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
133	ROBERTSON, JAMES L 15510 SIERRA SKIES DR HOUSTON, TX 77083	2597	1962	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

\* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)  
SECOND OMNIBUS CLAIMS OBJECTION  
EXHIBIT A -DUPLICATE CLAIMS**

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
134	ROGERS, RONALD 15250 PRESTONWOOD BLVD #341 DALLAS, TX 75248	2597	2929	\$2,889.60	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
135	ROLDAN, NORMA A 600 S CURSON AVE #403 LOS ANGELES, CA 90036	2597	1556	\$17,549.60*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
136	ROSENDALE, CAROLYN PO BOX 84003 BATON ROUGE, LA 70884	2597	1259	\$12,258.75	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
137	ROSENFELD, SOLOMON C/O LISA ROSENFELD 168 ALLERTON RD NEWTON, MA 2461	2597	2703	\$19,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
138	RUFFNER, LORI L 217 MANOR VIEW DR MANOR, PA 15665	2597	2263	\$90,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
139	SCHROEDER, JOHN 200 OCEAN AVE MASSAPEQUA, NY 11758-6511	2597	2170	\$4,428.90	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
140	SCHUPBACH, DAVID W 1732 LEIGHTON DR REYNOLDSBURG, OH 43068	2597	1234	\$6,223.75	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
141	SELLERS, MICHAEL PO BOX 420651 ATLANTA, GA 30342	2597	287	\$7,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
142	SHAPIRO, ANDREW I 4074 TREEBROOK DR HILLIARD, OH 43026	2597	2856	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

\* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)  
SECOND OMNIBUS CLAIMS OBJECTION  
EXHIBIT A -DUPLICATE CLAIMS**

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
143	SHAY, ROBERT J 2 WINGED FOOT MARTINEZ, GA 30907	2597	2292	\$25,000.00*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
144	SHEROGAN, JACK 130 SUNNYSIDE CT MILFORD, CT 06460	2597	1197	\$7,902.71	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
145	SHESTAKOFSKY, W D DOUGLAS & ALISON 4 JENNIFER CT NEW PALTZ, NY 12561-4310	2597	2175	\$16,506.60	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
146	SLIFKA, JOHN N34W23886 GRACE AVE PEWAUKEE, WI 53072	2597	2829	\$4,497.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
147	SMITH JR, HAROLD H 2023 E 230 S SPANISH FORK, UT 84660	2597	2350	\$2,000.00*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
148	SMITH, DAVID 2496 ANDERS RD THREE LAKES, WI 54562-9374	2597	787	\$15,250.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
149	SMITH, DAVID 2496 ANDERS RD THREE LAKES, WI 54562-9374	2597	288	\$15,250.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
150	SMITH, DAVID E 25438 OAK ALLEY LEESBURG, FL 34748	2597	1299	\$2,091.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
<b>TOTAL</b>				<b>\$3,171,472.36*</b>	

\* Plus unliquidated and/or undetermined amounts