

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) THIRD OMNIBUS OBJECTION
PURSUANT TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY
RULE 3007, AND LOCAL RULE 3007-1 TO CERTAIN DUPLICATE CLAIMS**

(“THIRD 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) Third Omnibus Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007,

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.

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).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 the Claims set forth on Exhibit A 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. 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”³ and the “Convertible Notes.”⁴ 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”) ⁵ 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

³ 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”).

⁴ 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”).

⁵ 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, 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”).

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 shall 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)
One Rodney Square
P.O. Box 636
Wilmington, Delaware 19899-0636
Telephone: (302) 651-3000
Fax: (302) 651-3001

– and –

Kenneth S. Ziman
J. Eric Ivester
Four Times Square
New York, New York 10036-6522
Telephone: (212) 735-3000
Fax: (212) 735-2000

– and –

James J Mazza, Jr.
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
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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) Third Omnibus Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain 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, 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;

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.

- (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)
One Rodney Square
P.O. Box 636
Wilmington, Delaware 19899-0636
Telephone: (302) 651-3000
Fax: (302) 651-3001

– and –

Kenneth S. Ziman
J. Eric Ivester
Four Times Square
New York, New York 10036-6522
Telephone: (212) 735-3000
Fax: (212) 735-2000

– and –

James J Mazza, Jr.
155 N. Wacker Dr.
Chicago, Illinois 60606
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)
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Debtor. ¹	:
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**DECLARATION OF HOLDEN BIXLER IN SUPPORT OF DEBTOR’S
(NON-SUBSTANTIVE) THIRD 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.² I have read the Debtor’s (Non-Substantive) Third 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.

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 Duplicate Claims as defined in the Objection and identified respectively 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.

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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
	:	
EXIDE TECHNOLOGIES,	:	Case No. 13-11482 (KJC)
	:	
Debtor. ¹	:	Related Docket No. _____
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**ORDER SUSTAINING DEBTOR’S (NON-SUBSTANTIVE)
THIRD 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) Third Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 to Certain 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 Exhibit A attached hereto, and any responses thereto; and upon the Declaration of Holden Bixler in Support of the Debtor’s (Non-Substantive) Third 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

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, 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

THE HONORABLE KEVIN J. CAREY
UNITED STATES BANKRUPTCY

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

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	ADELE M KELLEY R/O IRA PO BOX 27179 SAN DIEGO, CA 92198	2597	1640	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
2	ARNOLD BENSON TTEE RADIO CITY STATION BOX 1644 NEW YORK, NY 10101	2597	1788	Undetermined*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
3	BARBARA JAYNES IRA 380 PECAN DR SYLVA, NC 28779-6933	2597	1920	\$20,943.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
4	BARBARA R CARTER IRA 435 HOLLY HILL DR COLUMBUS, NC 28722	2597	1358	\$5,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
5	BONNIE L CONRAD IRA 2824 WOODBURY CIR ST GEORGE, UT 84790	2597	1901	\$6,322.69	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
6	BRIDGET C WITHERS TRAD IRA C/O BRIDGET C WITHERS 3982 E BROOKHAVEN DR NE ATLANTA, GA 30319-2861	2597	940	\$5,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
7	DAVID LINN WAGGY & SUE ANN WAGGY JT WROS 492 W VICTORIA ST BUCKHANNON, WV 26201-3812	2597	1303	\$20,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
8	DONALD R KELLEY CONV ROTH IRA E*TRADE CUSTODIAN C/O DONALD R KELLEY, TTEE 100 RIVERWOOD ESTATES BLVD FLORISSANT, MO 63031-8614	2597	1523	\$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)
THIRD OMNIBUS CLAIMS OBJECTION
EXHIBIT A -DUPLICATE CLAIMS**

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
9	FAGAN, JULIE M & WAXMAN, LLOYD H C/O LLOYD WAXMAN 440 TOP ROCK TRAIL KINTNERSVILLE, PA 18930	2597	2836	\$10,239.90	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
10	FORREST C CARR & EDITH M CARR JT TEN C/O FORREST C CARR 1729 INDIAN HILLS RD LEBANON, TN 37087	2597	2134	\$24,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
11	FRANKLIN N MEYER ESQ PC PROFIT SHARING PLAN 7 CAPE CT MILLBURN, NJ 7041	2597	1844	\$5,000.00*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
12	FRED & MARGARET C ROBERTS JT TEN 1272 ROBERTSVILLE RD PUNXSUTAWNEY, PA 15767	2597	1081	\$15,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
13	GIDVANI, KISHORE H & GIDVANI, ASHA K C/O KISHORE H GIDVANI 7000 VILLAGE PKWY #4 DUBLIN, CA 94568	2597	2918	\$5,000.00*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
14	H K MCILHENNY IRREV TR DTD 12/20/2009 C/O JOHN J KATSOCK TTEE 2215 YARDLEY RD YARDLEY, PA 19067	2597	2008	\$10,552.08	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
15	HARRY M CHILCOAT & SHIRLEY S CHILCOAT TRUST U/A DTD 10/10/2003 C/O S CHILCOAT & H CHILCOAT TRUSTEE 17792 LUTZ RD STEWARTSTOWN, PA 17363	2597	1937	\$20,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

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

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
16	HOLSCLAW JR, DR DOUGLAS S 42 LLANBERRIS RD BALA CYNWYD, PA 19004	2597	1449	\$42,898.71	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
17	HOOK ASSOCIATES 73223 RIBBONWOOD CT PALM DESERT, CA 92260	2597	1667	\$7,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
18	HORNE, SAM C & HORNE, SHERA B PO BOX 958 BANDERA, TX 78003	2597	298	\$3,571.56*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
19	IRA FBO JAMES D CHAMBERLAIN 1236 STALEY RD GRAND ISLAND, NY 14072	2597	1098	\$20,304.83	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
20	JAMES B DAVIS TRUST 6675 CHAMPION RD SHELBY, OH 44875	2597	1306	\$20,862.50	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
21	JAMES H ULLRICH REV TR C/O JAMES H ULLRICH TTEE 23201 SCOTCH PINE LN MACOMB, MI 48042	2597	2837	\$5,159.32	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
22	JAMES L PALM REVOCABLE LIVING TRUST C/O JAMES L PALM 10421 FIVE POINTS RD ORRVILLE, OH 44667	2597	1856	\$3,560.25	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
23	JAMES SIDNEY CRAIG LIVING TRUST 17400 CACHAGUA RD CARMEL VALLEY, CA 93924	2597	1682	\$5,154.87	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
24	JEANNE M SCHLOTZ IRA 23 MIGUEL ST SAN FRANCISCO, CA 94131	2597	1616	\$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)
THIRD OMNIBUS CLAIMS OBJECTION
EXHIBIT A -DUPLICATE CLAIMS**

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
25	JERRY JAYNES IRA 380 PECAN DR SYLVA, NC 28779-6933	2597	1921	\$16,110.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
26	JOHN B HOOK TRUST U/A 01-01-02 JOHN B HOOK TRUSTEE FBO JOHN B HOOK 73223 RIBBONWOOD CT PALM DESERT, CA 92260	2597	1666	\$15,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
27	JOHN J KATSOCK & VIVIAN M KATSOCK JT / WROS 2215 YARDLEY RD YARDLEY, PA 19067	2597	2007	\$21,983.50	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
28	JOSEPH M MCCABE III IRA C/O OREDIA W WESTBURY, POA 103 PECAN GROVE LN FT MOTTE, SC 29135-8871	2597	2213	\$33,071.70	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
29	KEITH STARRETT SELF EMPLOYED PENSION PLAN & TRUST C/O KEITH STARRETT TRUSTEE 701 N MAIN ST STE 228 HATTIESBURG, MS 39401	2597	1647	\$10,000.00*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
30	LEAH MITTELBERG IRREVOCABLE TRUST C/O KENNETH MITTELBERG TTEE 903 GERRY AVE LIDO BEACH, NY 11561-5216	2597	1982	\$2,949.50	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
31	LOUIS A & RUTH L TRIMARCO JT WROS 10161 TURNBERRY PL OAKTON, VA 22124	2597	1826	\$7,156.25	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
32	MICHAELS, DAVID C/F MICHAELS, JENNIFER C/O DAVID MICHAELS 22 GREENWAY TERR N MAHOPAC, NY 10541-1230	2597	1972	\$14,734.50	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

* Plus unliquidated and/or undetermined amounts

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

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
33	MILTON H LARSEN REV LVG TR C/O MILTON H LARSEN, TRUSTEE 1315 N WEST ST APT 13 WICHITA, KS 67203-1307	2597	2131	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
34	PAUL K RADER JT TEN 38 W ROSEVILLE RD LANCASTER, PA 17601	2597	1189	\$3,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
35	PICHON, HERBERT H & PICHON, CAROL A 209 N NORTH ST DANVILLE, IL 61832	2597	1332	\$8,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
36	REBECCA PETERSEN & BRAD J PETERSEN TRUSTEES OF THE REBECCA PETERSEN REVOCABLE LIVING TRUST C/O BRAD PETERSEN 2661 E RIDGEWOOD DR SPRINGFIELD, MO 65804	2597	1790	\$7,984.43	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
37	RICHARD KRYSZTOFORSKI IRA 51 ALVERSON LOOP STATEN ISLAND, NY 10309-1740	2597	2456	\$7,735.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
38	ROBERT & ADELE KELLY TRUST UAD 9/11/2002 C/O OF ROBERT & ADELE KELLY PO BOX 27179 SAN DIEGO, CA 92198	2597	1639	\$65,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
39	ROBERT A ZIMMERMAN, BETSY A ZIMMERMAN & ROBIN L MAURO UA 11-21-08, ROBERT A ZIMMERMANN & MIRIAM O ZIMMERMAN TRUST C/O BETSY A ZIMMERMAN, TRUSTEE 605 SHADY OAK CT MARS, PA 16046	2597	1637	\$68,370.87	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

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

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
40	ROBERT L KELLY R/O IRA PO BOX 27179 SAN DIEGO, CA 92198	2597	1638	\$102,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
41	ROBERT T LURVEY TRUST C/O ROBERT T LURVEY TTEE 7618 ALSTON CT UNIVERSITY PARK, FL 34201	2597	2822	\$4,323.33	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
42	RONALD BLANKA BURGO TRUST 27864 INVITATION DR MENIFEE, CA 92585	2597	2658	\$10,000.00*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
43	SMITH, UTLEY W 729 FOX HILLS DR SUN CITY CENTER, FL 33573	2597	1048	\$1,605.32	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
44	SOLIMINE, STEPHEN 28289 JENEVA WAY BONITA SPRINGS, FL 34135	2597	1542	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
45	SONABEND, SOL 3701 NE 200 ST AVENTURA, FL 33180	2597	2926	\$15,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
46	STAMMER, DANIEL 7838 LA MIRADA DR BOCA RATON, FL 33433	2597	1142	\$50,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
47	STEFFEN, DANIEL G 5229 CHASE OAKS DR SARASOTA, FL 34241	2597	1135	\$1,423.88	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
48	STONE, ALEXANDER 8968 LANGHORNE RD ESMONT, VA 22937	2597	1719	\$13,560.62	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

* Plus unliquidated and/or undetermined amounts

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

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
49	SULLIVAN MARGARET M IRREV TR DTD 06/06/1996 C/O JOHN J KATSOCK TTEE 2215 YARDLEY RD YARDLEY, PA 19067	2597	2006	\$10,552.08	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
50	SULLIVAN, EILEEN G 220-55 46TH AVE APT 12-C BAYSIDE, NY 11361-3663	2597	2985	\$78,211.70	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
51	SWARTZ, MARGARET W 304 ROSLYN RD RICHMOND, VA 23226	2597	3228	\$4,817.26	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
52	SWARTZ, W BRUCE 304 ROSLYN RD RICHMOND, VA 23226	2597	3229	\$2,156.25	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
53	TALLER, ILDA MONETTE 1175 YORK AVE APT 2N NEW YORK, NY 10065	2597	1575	\$18,434.50	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
54	THE BERNARD ETRA FAMILY TRUST C/O MR BERNARD ETRA 8120 MUIRHEAD CIR BOYNTON BEACH, FL 33472-5061	2597	1967	\$4,616.13	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
55	THE HUDMAN A HOO & QUIRINA H HOO REVOCABLE TRUST C/O HUDMAN & QUIRINA HOO CO TTEES 2030 TERRAZZO LN NAPLES, FL 34104-0826	2597	1853	\$15,242.40	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
56	THE MCKENZIE FAMILY TRUST 4550 E WILD COYOTE TRL TUCSON, AZ 85739	2597	1344	\$10,000.00*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

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

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
57	THE RICHARD T GORDON TRUST C/O RICHARD T GORDON 554 BRICKSTONE DR DELAWARE, OH 43015	2597	1855	\$11,811.00*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
58	THE RUTH H YORK BYPASS TRUST C/O RALPH D YORK, TTEE 1711 KINGSBURY DR NASHVILLE, TN 37215	2597	1112	\$9,728.46	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
59	THE TRUSLER TRUST DTD 08-10-92 C/O ROBERT A TRUSLER, TRUSTEE 1992 ST JAMES PL PRESCOTT, AZ 86301	2597	1588	\$5,849.47	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
60	THOMAS, DONAL C 1433 WHITECAP LN WACONIA, MN 55387	2597	2912	\$30,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
61	THOMAS, WILLIAM H 2114 TOWNLINE RD WAUSAU, WI 54403	2597	1387	\$5,143.75	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
62	TRANES, FRANK 51 BROOKWOOD DR WESTFORT, MA 02790	2597	1781	\$29,896.28	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
63	TREADWAY, JOHN C 3258 TRINITY MILL CIR DACULA, GA 30019	2597	1119	\$5,216.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
64	TREXLER, VIRGINIA & KENNETH C/O VIRGINIA TREXLER 6804 TREVOR DR BROWNS SUMMIT, NC 27214-9831	2597	1977	\$18,210.30	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

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

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
65	TRUNDLE, SUSAN C 2529 EDEN RIDGE LANE ACWORTH, GA 30101	2597	1584	\$5,949.47	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
66	VON ROESCHLAUB, REV W KURT 4 CORNWALL LN PORT WASHINGTON, NY 11050-1345	2597	2871	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
67	VENTO, FRANK P 45 W ADMIRAL WAY S DR CARMEL, IN 46032	2597	1978	\$5,916.76	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
68	VOLLEMAERE, ERIK 3638 E GARDEN DR PHOENIX, AZ 85028	2597	1589	\$5,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
69	VOLZ, DONALD H & KAY A 338 E SIDLEE ST THOUSAND OAKS, CA 91360	2597	1139	\$8,734.33	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
70	WALTZER, ADRIAN 16 SANDUSKY RD NEW CITY, NY 10956	2597	2875	\$20,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
71	WARREN, DAVID E 601 CANTEBURY FALLS CT CANTON, GA 30114	2597	1452	\$14,161.87	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
72	WATSON, WILLIAM R & WATSON, SHARON L 9 MAY APPLE WAY LANDRUM, SC 29356	2597	2189	\$5,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
73	WEINTHAL, NATALIE 360 E 72ND ST NEW YORK, NY 10021	2597	1617	Undetermined*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

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

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
74	WENDELL T EMBRY IRA ROLLOVER 4457 PARKWOOD SQ NICEVILLE, FL 32578	2597	1466	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
75	WENDT, WALTER WALTER WENDT TR FBO HI JOLLY GIFT SHOP PENSION PLAN PSP FBO WALTER WENDT 856 N BARKLEY MESA, AZ 85203-5717	2597	1635	\$60,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
76	WENDY P CLARK CREDIT SHELTER TRUST C/O MILTON O CLARK & CHERY F CLARK TTEES 116 FAIRVIEW AVE N APT 430 SEATTLE, WA 98109	2597	1691	\$9,295.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
77	WEON, JOHN J 2107 EDENVALE CIR KATY, TX 77450-6041	2597	1320	\$30,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
78	WIEGMANN, GENEVIEVE G PO BOX 44 CEDAR FALLS, IA 50613	2597	1593	\$1,794.12*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
79	WILLIAM ALLEN GOLDAPP JR IRA ROLLOVER C/O WILLIAM A GOLDAPP JR 206 COSTA BELLA DR AUSTIN, TX 78734	2597	1155	\$147,960.12	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
80	WILLIAM DEARMENT FAMILY LIMITED PARTNERSHIP C/O CHANNELLOCK INC 1306 S MAIN ST MEADVILLE, PA 16335	2597	1379	\$21,629.17	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
81	WILLIAMS, STEVEN A 4725 HAVANA AVE SW WYOMING, MI 49509	2597	1069	\$5,215.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

* Plus unliquidated and/or undetermined amounts

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

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
82	WILSON III, DR THOMAS W 5103 SE VERBENA PL HILLSBORO, OR 97123-8824	2597	1295	\$2,008.15	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
83	WIN, TIN 18255 WOOD EDGE LN RIVERSIDE, CA 92504	2597	1470	\$10,000.00*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
84	WITTE, ARLENE & WITTE, BERNARD 7500 KEPLER RD CANAL FULTON, OH 44614	2597	3257	\$10,000.00*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
85	WOLFGANG M SIGMUND & DAVID L MCKINNEY JT TEN C/O DAVID L MCKINNEY 6030 NW 24 LN GAINESVILLE, FL 32606	2597	1529	\$15,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
86	WOLTMAN, RONALD 3608 LOCKFORD CT THOUSAND OAKS, CA 91360	2597	1440	\$6,583.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
87	YAFCHAK, ROBERT 1080 PARK BLVD UNIT 617 SAN DIEGO, CA 92101	2597	798	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
88	YAFCHAK, ROBERT 1080 PARK BLVD UNIT 617 SAN DIEGO, CA 92101	2597	281	\$10,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
89	YARIAN, CARASEL 16506 E COSTILLA AVE FOXFIELD, CO 80016	2597	1355	\$15,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
90	YARIAN, HAROLD D 16506 E COSTILLA AVE FOXFIELD, CO 80016	2597	1378	\$25,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.

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

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
91	YODER, FRED T PO BOX 17269 FOUNTAIN HILLS, AZ 85269	2597	1821	\$2,088.27	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
92	ZEBROWSKI, JOSEPH A 4185 WATERFORD DR CENTER VALLEY, PA 18034	2597	2183	\$8,480.73	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
93	ZEBROWSKI, JOSEPH A 4185 WATERFORD DR CENTER VALLEY, PA 18034	2597	2184	\$4,389.58	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
94	ZIERHOFFER, CAROL 901 MALLARD CIR ARNOLD, MD 21012	2597	1140	\$2,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
TOTAL				\$1,525,669.76*	

* Plus unliquidated and/or undetermined amounts