

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.¹ : **Hrg. Date: April 1, 2014 at 10:00 a.m. (Eastern)**

: **Obj. Due: March 14, 2014 at 4:00 p.m. (Eastern)**

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DEBTOR’S (SUBSTANTIVE) SIXTH OMNIBUS OBJECTION PURSUANT TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY RULE 3007, AND LOCAL RULE 3007-1 TO CERTAIN (I) PREVIOUSLY DISALLOWED CLAIM, (II) MISCLASSIFIED CLAIMS, AND (III) REDUCE AND ALLOW CLAIMS

(“SIXTH OMNIBUS CLAIMS OBJECTION”)

The debtor and debtor in possession in the above-captioned case (“Exide” or the “Debtor”), hereby files this omnibus objection (the “Objection”) to certain claims (the “Disputed Claims”) filed against the Debtor, and listed on Exhibits A, B, and C 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: (i) disallowing and expunging the proofs of claim listed on Exhibit A to the Proposed Order, (ii) adjusting the priorities of the proofs of claim listed on Exhibit B to the Proposed Order, and (iii) reducing and allowing the proofs of claim listed on Exhibit C to the Proposed Order. In support of the Objection, the Debtor relies on the

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.

Declaration of Holden Bixler in Support of the Debtor's (Substantive) Sixth Omnibus Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain (I) Previously Disallowed Claim, (II) Misclassified Claims, and (III) Reduce and Allow 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 Local Rule 9013-1(f), 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 has been appointed in the Chapter 11 Case.

7. On August 9, 2013, the Debtor filed its schedules of assets and liabilities and statements of financial affairs (Docket No. 498) (the “Schedules”).

B. Bar Dates and Proofs of Claim

8. 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.

9. 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 allegedly owing as of the Petition Date, including claims under Bankruptcy Code section 503(b)(9), or any person with an alleged claim or expense claimed 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 was required to do so no later than January 31, 2014 at 5:00 p.m. (Eastern).²

10. To date, approximately 3,875 proofs of claim (the "Claims," and the persons or entities filing such Claims, the "Claimants") have been filed in the Chapter 11 Case. Since the Petition Date, the Debtor has filed 4 omnibus Claims objections to Claims asserting prepetition liabilities. After hearing these omnibus Claims objections to Claims asserting prepetition liabilities, this Court disallowed and expunged approximately 411 Claims asserting more than \$2.6 billion in liquidated liabilities (plus unliquidated amounts).

11. 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.

12. 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.

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. 956).

RELIEF REQUESTED

13. 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 (a) disallowing and expunging the Claims set forth on Exhibit A attached to the Proposed Order, (b) adjusting the priorities of the Claims set forth on Exhibit B attached to the Proposed Order, and (c) reducing and allowing each of the Claims set forth on Exhibit C to the Proposed Order.

OBJECTION TO CLAIMS

A. Previously Disallowed Claim

14. The Previously Disallowed Claim identified on Exhibit A to the Proposed Order (the "Previously Disallowed Claim") is proof of claim number 343 ("Claim 343") filed on behalf of the putative class in an action that had been pending in the Superior Court of the State of California, County of Los Angeles (the "State Court"), styled Hernandez v. Exide Technologies, Case No. BC506901 (the "Action") against the Debtor seeking \$115 million in damages for personal injuries and property damage allegedly caused by the Debtor's alleged toxic emission(s). In connection with Claim 343, Zach Hernandez, in his individual capacity and as the purported representative of persons similarly situated (the "Movant"), filed a motion (the "Motion")³ for an order (i) authorizing a class proof of claim, (ii) certifying a class, and (iii) lifting the automatic stay to adjudicate Exide's purported liability in connection with the alleged injuries and damages underlying Claim 343. On September 30, 2013, this Court entered the Hernandez Order,⁴ which denied each of the Movant's requests, including filing a class proof of

³ See Motion by Zach Hernandez, in His Individual Capacity as Representative of Persons Similarly Situated, for an Order: (I) Authorizing Class Proof of Claim and Certifying Class; and (II) Granting Relief from Stay Pursuant to 11 U.S.C. § 362 (Docket No. 451).

⁴ Order Denying Motion by Zach Hernandez, in His Individual Capacity as Representative of Persons Similarly Situated, for an Order: (I) Authorizing Class Proof of Claim and Certifying Class; and (II) Granting Relief from Stay Pursuant to 11 U.S.C. § 362 (Docket No. 788) (the "Hernandez Order").

claim and the certification of a class. Accordingly, the Previously Disallowed Claim should be expunged.

15. Failure to disallow and expunge the Previously Disallowed Claim may result in the Movant receiving an unwarranted recovery from the Debtor's estate. Accordingly, the Debtor requests entry of an order disallowing and expunging the Previously Disallowed Claim listed on Exhibit A to the Proposed Order.

B. Misclassified Claims

16. The Disputed Claims identified on Exhibit B to the Proposed Order (the "Misclassified Claims") are Claims that assert an administrative, secured, or priority claim, but which should be reclassified as set forth on Exhibit B as indicated in the column titled "Reclassified Class" because the Claimants have failed to provide evidence, and the Debtor is not aware of any facts, to support the administrative, secured, or priority claim status as asserted.

17. Failure to reclassify the Misclassified Claims could result in the relevant Claimants receiving a better recovery than other similarly situated creditors, even though such recovery is not warranted. Accordingly, the Debtor requests entry of an order reclassifying the Misclassified Claims as set forth on Exhibit B as indicated in the column titled "Reclassified Class" on Exhibit B to the Proposed Order.

C. Reduce and Allow Claims

18. With respect to the Disputed Claims listed on Exhibit C to the Proposed Order (the "Reduce and Allow Claims"), the Debtor objects to the Reduce and Allow Claims pursuant to Bankruptcy Code section 502(b)(1) because such claims are filed for amounts that differ from the amounts reflected on the Debtor's Books and Records. In evaluating the Reduce and Allow Claims, the Debtor has thoroughly reviewed its Books and Records and the filed proofs of claim, as well as the supporting documentation provided by each Claimant, and has determined that the

amount of each claim is overstated for the reasons set forth in the column titled “Reason for Modification” on Exhibit C to the Proposed Order. Accordingly, the Debtor objects to the Reduce and Allow Claims and requests that the Reduce and Allow Claims be reduced and allowed in the amounts set forth on Exhibit C to the Proposed Order.

APPLICABLE AUTHORITY

19. 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).

20. When asserting a proof of claim against a bankrupt estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant. In re Allegheny Int’l. Inc., 954 F.2d 167,173 (3d Cir. 1992); Svenska Taendsticks Fabrik Aktiebolaget v. Irving Trust Co. (In re Int’l Match Corp.), 69 F. 2d 73, 76 (2d Cir. 1934) (finding that a proof of claim should at least allege facts from which legal liability can be seen to exist). Where the claimant alleges sufficient facts to support its claim, its claim is afforded prima facie validity. Allegheny, 954 F.2d at 173. A party wishing to dispute such a claim must produce evidence in sufficient force to negate the claim’s prima facie validity. Id. In practice, the objecting party must produce evidence that would refute at least one of the allegations essential to the claim’s legal sufficiency. Id. Once the objecting party produces such evidence, the burden shifts back to the claimant to prove the validity of his or her claim by a preponderance of the evidence. Id. The burden of persuasion is always on the claimant. Id.

21. The Debtor has met its burden in refuting the legal sufficiency of the Disputed Claims and has demonstrated that (a) the Claimants who filed the Misclassified Claims are not entitled to the priority or administrative expense claim status asserted in the Misclassified Claims; and (b) the Reduce and Allow Claims should be reduced and allowed in the amount as indicated on Exhibit B to the Proposed Order.

22. As asserted, the Disputed Claims 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 (i) disallowing and expunging the proofs of claim listed on Exhibit A attached to the Proposed Order, (ii) reclassifying each Misclassified Claim as set forth on Exhibit B attached to the Proposed Order, and (iii) reducing and allowing each Reduce and Allow Claim as set forth on Exhibit C attached to the Proposed Order.

RESPONSES TO THE OBJECTION

23. 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 March 14, 2014 (the “Response Deadline”). Claimants should locate their names and claims in the Objection, and carefully review the Proposed Order and the exhibits attached thereto. A Response must address each ground upon which the Debtor objects to a particular claim. A hearing (the “Hearing”) to consider the Debtor’s Objection shall be held on April 1, 2014 at 10:00 a.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.

24. Every Response must be filed on or before **March 14, 2014 at 4:00 p.m. (Eastern)** with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 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, 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 March 14, 2014** (the “Response Deadline”).

25. 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.

26. 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 April 1, 2014 at 10:00 a.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.

27. 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.

28. 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.

29. 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.**

30. 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 Misclassified Claim and/or Reduce and Allow Claim.

RESERVATION OF RIGHTS

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

STATEMENT OF COMPLIANCE WITH LOCAL BANKRUPTCY RULE 3007-1

32. 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 requests that any such requirement be waived.

FURTHER INFORMATION

33. 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

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

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

Dated: Wilmington, Delaware
February 28, 2014

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

/s/ Kristhy M. Peguero

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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)
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Debtor.¹ : **Hrg. Date: April 1, 2014 at 10:00 a.m. (Eastern)**
: **Obj. Due: March 14, 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 (Substantive) Sixth Omnibus Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain (I) Previously Disallowed Claim, (II) Misclassified Claims, And (III) Reduce and Allow Claims (the “Objection”)**.²

PLEASE TAKE FURTHER NOTICE that responses to the Objection, if any, must be filed on or before **March 14, 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 United States Trustee for the District of Delaware, Office of the United States Trustee, Room 2207, Lockbox 35, 844 North King Street, Wilmington, Delaware 19801, Attn: Mark S. Kenney, Esq. (fax 302-573-6497), (ii) the Debtor, Exide Technologies, 13000 Deerfield Parkway, Building 200, Milton, Georgia 30004, Attn: B. Holland Pritchard (fax: 678-566-9188), and (iii) counsel to the Debtor, Skadden, Arps, Slate, Meagher & Flom LLP, 155 N. Wacker Drive, Chicago, Illinois 60606-1720, Attn: James J. Mazza, Jr. (james.mazza@skadden.com) and Louis S. Chiappetta (louis.chiappetta@skadden.com), in each case so as to be received **no later than 4:00 p.m. (Eastern) on March 14, 2014**.

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.

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;
- (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 April 1, 2014 at 10:00 a.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.

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
February 28, 2014

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

/s/ Kristhy M. Peguero

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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

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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
(SUBSTANTIVE) SIXTH OMNIBUS OBJECTION PURSUANT
TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY RULE 3007,
AND LOCAL RULE 3007-1 TO CERTAIN (I) PREVIOUSLY DISALLOWED CLAIM,
(II) MISCLASSIFIED CLAIMS, AND (III) REDUCE AND ALLOW 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 (Substantive) Sixth Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 To Certain (I) Previously Disallowed Claim, (II) Misclassified Claims, and (III) Reduce and Allow Claims (the “Objection”), and am directly, or by and through my personnel or agents, familiar with the information contained therein, the proposed form of order (the “Proposed Order”), and the exhibits attached thereto.

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

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

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

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

4. To my knowledge, the Previously Disallowed Claim, identified in Exhibit A to the Proposed Order is proof of claim number 343 ("Claim 343") filed on behalf of the putative class in an action that had been pending in the Superior Court of the State of California, County of Los Angeles (the "State Court"), styled Hernandez v. Exide Technologies, Case No. BC506901 (the "Action") against the Debtor seeking \$115 million in damages for personal injuries and property damage caused by the Debtor's alleged toxic emission(s). The filing of the class proof of claim was denied by prior order of the Court and cannot state a colorable claim against the Debtor. If the Previously Disallowed Claim is not disallowed, the Claimant asserting such Claim may receive an unwarranted recovery from the Debtor's estate.

5. To my knowledge, the Misclassified Claims, identified in Exhibit B to the Proposed Order are proofs of claim that assert an administrative, secured, or priority claim, but should be adjusted to general unsecured status because the Claimants have failed to provide any evidence to support an administrative, secured, or priority claim. I believe that failure to reclassify the Misclassified Claims could result in the relevant Claimants receiving a better

recovery than other unsecured creditors, even though such recovery is not warranted. It is my understanding that following a review of the Debtor's Books and Records, the Debtor has determined that the Misclassified Claims should be reclassified as indicated in the "Reclassified Class" column on Exhibit B to the Proposed Order.

6. To my knowledge, the proofs of claim listed on Exhibit C to the Proposed Order should be properly allowed in a reduced amount due to the reasons set forth in the column titled "Reason for Modification" on Exhibit C to the Proposed Order. Failure to reduce the amount of the Reduce and Allow Claims could result in the Claimants that filed such proofs of claim receiving a better recovery than other creditors within the class.

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 February 28, 2014

/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)
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 Debtor.¹ : **Related Docket No. _____**
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ORDER SUSTAINING DEBTOR’S (SUBSTANTIVE) SIXTH OMNIBUS OBJECTION PURSUANT TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY RULE 3007, AND LOCAL RULE 3007-1 TO CERTAIN (I) PREVIOUSLY DISALLOWED CLAIM, (II) MISCLASSIFIED CLAIMS, AND (III) REDUCE AND ALLOW CLAIMS

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

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

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

ORDERED, ADJUDGED, AND DECREED that:

1. The relief requested in the Objection is GRANTED, as set forth herein.
2. The Previously Disallowed Claim listed on Exhibit A is hereby disallowed and expunged in its entirety as set forth in Exhibit A.
3. The Misclassified Claims listed on Exhibit B attached hereto are hereby reclassified as set forth in Exhibit B attached hereto under the heading “Reclassified Class.”
4. The Reduce and Allow Claims listed on Exhibit C attached hereto are hereby reduced and allowed in the amounts listed as set forth in Exhibit C attached hereto under the headings “Modified Class” and “Modified Amount.”
5. The Debtor’s objection to each Claim addressed in the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each claim. Any stay of this Order pending appeal by any of the Claimants subject to this Order shall only apply to the contested matter which involves such Claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters covered hereby.
6. The Debtor shall retain and shall have the right to object in the future to any of the proofs of claim listed on Exhibits A, B, and C 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: _____, 2014
Wilmington, Delaware

THE HONORABLE KEVIN J. CAREY
UNITED STATES BANKRUPTCY JUDGE

**EXIDE TECHNOLOGIES 13-11482 (KJC)
SIXTH OMNIBUS CLAIMS OBJECTION
EXHIBIT A - PREVIOUSLY DISALLOWED CLAIM**

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	PUTATIVE CLASS IN LASC CASE BC506901 C/O DANA B TASCHNER 2029 CENTURY PARK E STE 1400 LOS ANGELES, CA 90067	343	\$115,000,000.00	Pursuant to docket number 788, the claimant was denied the ability to file a class Proof of Claim.
		TOTAL	\$115,000,000.00	

**EXIDE TECHNOLOGIES 13-11482 (KJC)
SIXTH OMNIBUS CLAIMS OBJECTION
EXHIBIT B - MISCLASSIFIED CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION STATUS	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
1	A & R TELECOM - BELLFLOWER 9066 ROSECRANS AVE BELLFLOWER, CA 90706-2038	1079	503(b)(9) Unsecured	\$141.00 \$20,420.72	503(b)(9) Unsecured	\$130.00 \$20,431.72	Invoice number SIINV006023, in the amount of \$141, includes \$11 for freight charges which are not entitled to 503(b)(9) status.
			Subtotal	\$20,561.72	Subtotal	\$20,561.72	
2	ADAIR PRINTING COMPANY INC 7850 SECOND ST DEXTER, MI 48130	40	503(b)(9) Unsecured	\$12,288.45 \$0.00	503(b)(9) Unsecured	\$0.00 \$12,288.45	The goods provided on invoice number 16602, in the amount of \$11,082.58, were delivered prior to the 503(b)(9) period. Invoice number 16558, in the amount \$1,205.87, is for freight charges, which is not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$12,288.45	Subtotal	\$12,288.45	
3	AIR ANALYSIS LLC T/A SGF CONSULTING SERVICES ATTN STEPHEN SCHELL 189 HAUSMAN RD LENHARTSVILLE, PA 19534	648	503(b)(9) Unsecured	\$5,800.00 \$0.00	503(b)(9) Unsecured	\$0.00 \$5,800.00	Invoice numbers 13-33 (\$2,000), 13-23 (\$1,800) and 13-43 (\$2,000) assert services provided prior to the 503(b)(9) period.
			Subtotal	\$5,800.00	Subtotal	\$5,800.00	
4	ARJO WIGGINS USA INC 1200 HIGH RIDGE RD - 2ND FL STAMFORD, CT 06905	392	503(b)(9) Unsecured	\$82,183.64 \$121,630.50	503(b)(9) Unsecured	\$0.00 \$203,814.14	Invoice number 40852 in the amount of \$425 is for a freight surcharge which does not constitute a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$203,814.14	Subtotal	\$203,814.14	The goods delivered on invoice number 40850, in the amount of \$81,758.64, were received by the debtor prior to the 503(b)(9) period.
5	ASCENT MOTION INDUSTRIES INC PO BOX 6005 MARIETTA, GA 30065	296	503(b)(9) Unsecured	\$7,211.39 \$4,319.63	503(b)(9) Unsecured	\$7,056.00 \$4,475.02	Invoice numbers 0194, 0198 and 0199 include shipping charges, in the aggregate amount of \$155.39, which do not qualify as a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$11,531.02	Subtotal	\$11,531.02	
	TRANSFERRER TO: CRT SPECIAL INVESTMENTS LLC ATTN JOSEPH E. SARACHEK 262 HARBOR DRIVE STAMFORD, CT 06902						

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit C to the Sixth Omnibus Claims Objection to Reduce and Allow Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
SIXTH OMNIBUS CLAIMS OBJECTION
EXHIBIT B - MISCLASSIFIED CLAIMS**

NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION STATUS	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
6 ATLAS IRON & METAL CO ATTN GARY WEISENBERG 10019 S ALAMEDA ST LOS ANGELES, CA 90002	177(a)	503(b)(9)	\$11,030.82	503(b)(9)	\$0.00	The goods on invoice number 35503 (\$11,030.82) were delivered prior to the 503(b)(9) period. In addition, the tax portion of the invoice in the amount of \$910.80 is not entitled to priority as the claimant is not a governmental unit as required by section 507(a)(8) of the bankruptcy code.
		Priority	\$910.80	Priority	\$0.00	
		Unsecured	\$0.00	Unsecured	\$11,941.62	
		Subtotal	\$11,941.62	Subtotal	\$11,941.62	
7 BIG CHIEF INC ATTN DEBRA GILMAN 5150 BIG CHIEF DR CINCINNATI, OH 45227	752	503(b)(9)	\$3,036.36	503(b)(9)	\$0.00	Invoice numbers 5160051, 5160829, 5160632, 5163777 & 5165291, provided by the claimant, fall outside of the 503(b)(9) period.
		Unsecured	\$0.00	Unsecured	\$3,036.36	
		Subtotal	\$3,036.36	Subtotal	\$3,036.36	
8 CAL-CRAFT DESIGN INT 1615 RIVERVIEW DR., STE A SAN BERNARDINO, CA 92408	1534	503(b)(9)	\$6,073.01	503(b)(9)	\$5,948.55	Invoice number 985921, in the amount of \$3,135.34, includes \$60.54 in freight charges which are not entitled to 503(b)(9) status. Invoice number 985931, in the amount of \$2,562.75, includes \$46.75 in freight charges which are not entitled to 503(b)(9) status. Invoice number 985916, in the amount of \$374.92, includes \$17.17 in freight charges which are not entitled to 503(b)(9) status.
		Unsecured	\$77,643.20	Unsecured	\$77,767.66	
		Subtotal	\$83,716.21	Subtotal	\$83,716.21	
9 CBH TRUCKING CO INC 5615 US HWY 64 FARM, NM 87401	600	503(b)(9)	\$6,155.30	503(b)(9)	\$2,601.90	The goods on spent battery pickup numbers 127713 (\$1,621.34), 127722 (\$1,296.11) and 127725 (\$635.95) were delivered prior to the 503(b)(9) period.
		Unsecured	\$0.00	Unsecured	\$3,553.40	
		Subtotal	\$6,155.30	Subtotal	\$6,155.30	
10 CHEM STATION SOUTHEAST - COLUMBUS 3151 WILLIAMS ROAD COLUMBUS, GA 31909	1256	503(b)(9)	\$9,600.00	503(b)(9)	\$4,800.00	The goods provided on invoice number 8858, in the amount of \$4,800, were delivered prior to the 503(b)(9) period.
		Unsecured	\$10,680.00	Unsecured	\$15,480.00	
		Subtotal	\$20,280.00	Subtotal	\$20,280.00	

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit C to the Sixth Omnibus Claims Objection to Reduce and Allow Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
 SIXTH OMNIBUS CLAIMS OBJECTION
 EXHIBIT B - MISCLASSIFIED CLAIMS

NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION STATUS	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
11 CM SERVICES LLC PO BOX 116 PEWAUKEE, WI 53072-0116	1791	503(b)(9)	\$706.65	503(b)(9)	\$692.00	Invoice # 2220 contains \$14.65 for shipping charges which is not a good as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$0.00	Unsecured	\$14.65	
		Subtotal	\$706.65	Subtotal	\$706.65	
12 CONVOY SYSTEMS, LLC BRENDA MILLER 333 N. JAMES ST KANSAS CITY, KS 66118	1032	503(b)(9)	\$35,827.08	503(b)(9)	\$0.00	The claimant has provided a service, not a good, as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$144,742.11	Unsecured	\$180,569.19	
		Subtotal	\$180,569.19	Subtotal	\$180,569.19	
13 DELTA T CORPORATION DBA BIG ASS FAN COMPANY ATTN JEAN ARMS PO BOX 11307 LEXINGTON, KY 40575	440	503(b)(9)	\$7,662.70	503(b)(9)	\$0.00	Invoice number 148359, in the amount of \$7,662.70, asserts goods provided prior to the 503(b)(9) period.
		Unsecured	\$0.00	Unsecured	\$7,662.70	
		Subtotal	\$7,662.70	Subtotal	\$7,662.70	
14 EAGLE OXIDE SERVICES KATHRYN JACOBS 5605 W. 74TH ST. INDIANAPOLIS, IN 46278	1319	503(b)(9)	\$6,244.41	503(b)(9)	\$5,952.00	Invoice number 13069, in the amount of \$1,595.50, includes \$95.50 for freight charges which is not a good as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$34,737.96	Unsecured	\$35,030.37	
		Subtotal	\$40,982.37	Subtotal	\$40,982.37	
						Invoice number 13045, in the amount of \$4,648.91, includes \$196.91 for freight charges which is not a good as required by section 503(b)(9) of the bankruptcy code.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit C to the Sixth Omnibus Claims Objection to Reduce and Allow Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
 SIXTH OMNIBUS CLAIMS OBJECTION
 EXHIBIT B - MISCLASSIFIED CLAIMS

NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION STATUS	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
15 FAIR HARBOR CAPITAL LLC AS ASSIGNEE OF PENN-AIR & HYDRAULICS CORPORATION PO BOX 237037 NEW YORK, NY 10023	2381	503(b)(9)	\$1,543.82	503(b)(9)	\$1,345.19	Invoice number 986987-003 includes \$17.07 for freight charges which is not entitled to 503(b)(9) classification.
		Unsecured	\$3,910.81	Unsecured	\$4,109.44	
		Subtotal	\$5,454.63	Subtotal	\$5,454.63	Invoice number 987217-001 includes \$18.22 for freight charges which is not entitled to 503(b)(9) classification. Invoice number 987634-001 includes \$163.34 for freight charges which is not entitled to 503(b)(9) classification.
16 GILLOTT, IAN SUITE 400, L4, 1600 SEAPORT BLVD. REDWOOD CITY, CA 94063	1232	503(b)(9)	\$1,764.80	503(b)(9)	\$0.00	The claimant provided goods prior to the 503(b)(9) period.
		Unsecured	\$0.00	Unsecured	\$1,764.80	
		Subtotal	\$1,764.80	Subtotal	\$1,764.80	
17 HINDLE POWER INC 1075 ST JOHN STREET EASTON, PA 18042-6661 TRANSFERRED TO: TRC MASTER FUND LLC ATTN TERREL ROSS PO BOX 633 WOODMERE, NY 11598	2380	503(b)(9)	\$61,844.97	503(b)(9)	\$61,791.00	The following invoice numbers contain shipping charges which do not constitute a good as required by 503(b)(9) of the bankruptcy code; Invoice number 042818 - Shipping charges in the amount of \$14.44 Invoice number 042797 - Shipping charges in the amount of \$14.98 Invoice number 042722 - Shipping charges in the amount of \$14.78 Invoice number 042739 - Shipping charges in the amount of \$9.77
		Unsecured	\$61,957.36	Unsecured	\$62,011.33	
		Subtotal	\$123,802.33	Subtotal	\$123,802.33	

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit C to the Sixth Omnibus Claims Objection to Reduce and Allow Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
SIXTH OMNIBUS CLAIMS OBJECTION
EXHIBIT B - MISCLASSIFIED CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION STATUS	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
18	JACOBSON TRANSPORTATION COMPANY, INC. MARTY R. HOWARD 3811 DIXON STREET DES MOINES, IA 50313	1321	503(b)(9) Unsecured	\$30,130.21 \$101,043.55	503(b)(9) Unsecured	\$0.00 \$131,173.76	The claimant has provided a service, not a good, as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$131,173.76	Subtotal	\$131,173.76	
19	K A STEEL CHEMICALS - CHICAGO C/O JENNER & BLOCK ATTN MELISSA M HINDS 353 N CLARK ST CHICAGO, IL 60654-3456	2260(a)	503(b)(9) Unsecured	\$23,237.71* \$37,469.67*	503(b)(9) Unsecured	\$23,218.71* \$37,488.67*	
			Subtotal	\$60,707.38*	Subtotal	\$60,707.38*	
20	KELLY BOX & PACKAGING CORPORATION PO BOX 66852 INDIANAPOLIS, IN 46266-6852	2454	503(b)(9) Unsecured	\$3,788.67 \$0.00	503(b)(9) Unsecured	\$0.00 \$3,788.67	The goods on invoice numbers 347545 (\$1,908.05) and 349778 (\$1,880.62) were delivered prior to the 503(b)(9) period.
			Subtotal	\$3,788.67	Subtotal	\$3,788.67	
21	LESHER LEASING INC - LEBANON 2700 CUMBERLAND STREET LEBANON, PA 17042	2237	503(b)(9) Unsecured	\$730.38 \$747.95	503(b)(9) Unsecured	\$0.00 \$1,478.33	
			Subtotal	\$1,478.33	Subtotal	\$1,478.33	
22	LP PALLET 1455 E 3RD ST POMONA, CA 91766-2202	1787(a)	503(b)(9) Unsecured	\$5,632.25 \$5,632.25	503(b)(9) Unsecured	\$787.50 \$10,477.00	The goods provided on the following invoices were delivered prior to the 503(b)(9) period; 2290 (\$525), 2327 (\$378), 2347 (\$262.50), 2378 (\$295), 2387 (\$525), 2278 (\$393.75), 2305 (\$315), 2425 (\$525), 2438 (\$525), 2451 (\$520.25) and 2456 (\$580).
			Subtotal	\$11,264.50	Subtotal	\$11,264.50	
23	M-D METALS SCRAP & SALVAGE 8179 DECATUR CONEHATTA RD DECATUR, MS 39327	471	503(b)(9) Unsecured	\$8,608.60 \$0.00	503(b)(9) Unsecured	\$0.00 \$8,608.60	
			Subtotal	\$8,608.60	Subtotal	\$8,608.60	

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit C to the Sixth Omnibus Claims Objection to Reduce and Allow Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
SIXTH OMNIBUS CLAIMS OBJECTION
EXHIBIT B - MISCLASSIFIED CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION STATUS	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
24	META4 USA INC PO BOX 1031 ELLIJAY, GA 30540	301	503(b)(9) Unsecured	\$2,135.59 \$5,445.78	503(b)(9) Unsecured	\$0.00 \$7,581.37	Invoice Exide 06-01 in the amount of \$2,135.59, classified by the claimant as 503(b)(9), is for services, not goods, as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$7,581.37	Subtotal	\$7,581.37	
25	METAL MASTERS, INC.-J COFFEY METAL MASTE PO BOX 33001 INDIANAPOLIS, IN 46203-0001	884	503(b)(9) Unsecured	\$4,700.00 \$0.00	503(b)(9) Unsecured	\$0.00 \$4,700.00	
			Subtotal	\$4,700.00	Subtotal	\$4,700.00	
26	METRO METALS CORPORATION 2576 DOSWELL AVE ST PAUL, MN 55108	599	503(b)(9) Unsecured	\$24,192.45 \$27,960.87	503(b)(9) Unsecured	\$24,150.27 \$28,003.05	Based the debtors books and records, the calculated 503(b)(9) amount is \$24,150.27, not \$24,192.45 as asserted by the claimant.
			Subtotal	\$52,153.32	Subtotal	\$52,153.32	
27	MOTOR TECHNOLOGY INC 515 WILLOW SPRINGS LN YORK, PA 17406	449	503(b)(9) Unsecured	\$4,903.00 \$6,537.28	503(b)(9) Unsecured	\$4,890.00 \$6,550.28	
			Subtotal	\$11,440.28	Subtotal	\$11,440.28	
28	P. FERNICOLA INC. LIZ FERNICOLA 257 ELM ST. NEWARK, NJ 07105	740	503(b)(9) Unsecured	\$5,775.00 \$0.00	503(b)(9) Unsecured	\$0.00 \$5,775.00	Invoice number 51587, in the amount of \$5,775, is for goods delivered prior to the 503(b)(9) period.
			Subtotal	\$5,775.00	Subtotal	\$5,775.00	

* Plus unliquidated and/or undetermined amounts

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**EXIDE TECHNOLOGIES 13-11482 (KJC)
SIXTH OMNIBUS CLAIMS OBJECTION
EXHIBIT B - MISCLASSIFIED CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION STATUS	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
29	PALLET ONE OF NORTH CAROLINA INC ATTN ACCOUNTS RECEIVABLE 2340 IKE BROOKS RD SILER CITY, NC 27344	2842	503(b)(9) Unsecured	\$43,533.18 \$0.00	503(b)(9) Unsecured	\$6,132.00 \$37,401.18	Invoice numbers 400297 (\$4,958.80), 404927 (\$5,719.56), 407120 (\$6,278.42), 408938 (\$6,815.52), 409899 (\$6,807.84), 406876 (\$6,145.20) were for goods, freight and fuel charges provided prior to the 503(b)(9) period. Invoice number 410994, in the amount \$6,807.84, includes freight (\$480) and fuel charges (\$195.84) which are not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$43,533.18	Subtotal	\$43,533.18	
30	PERFECTION GROUP INC ATTN MARY ANN STRALEY 2649 COMMERCE BLVD CINCINNATI, OH 45241	517	503(b)(9) Unsecured	\$7,367.00 \$26,251.93	503(b)(9) Unsecured	\$0.00 \$33,618.93	
			Subtotal	\$33,618.93	Subtotal	\$33,618.93	The charges on invoice number KNX2048P, in the amount of \$7,387, were for services, not a good as required by section 503(b)(9) of the bankruptcy code.
31	PINNACLE LOGISTICS ATTN: DEEDEE HOLDERBY PO BOX 180714 FORT SMITH, AR 72918	2359	503(b)(9)	\$91,954.17	503(b)(9) Unsecured	\$0.00 \$91,954.17	The claimant has provided a service, not a good, as required by section 503(b)(9) of the bankruptcy code.
					Subtotal	\$91,954.17	
32	PREMIER MAGNESIA ATTN JOANNE AMELANG 300 BARR HARBOR DR SUITE 250 WEST CONSHOHOCKEN, PA 19428	741	503(b)(9) Unsecured	\$16,500.00 \$0.00	503(b)(9) Unsecured	\$0.00 \$16,500.00	The goods on invoice numbers 508103 (\$8,250) and 508104 (\$8,250) were delivered prior to the 503(b)(9) period.
			Subtotal	\$16,500.00	Subtotal	\$16,500.00	

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit C to the Sixth Omnibus Claims Objection to Reduce and Allow Claims

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**EXIDE TECHNOLOGIES 13-11482 (KJC)
SIXTH OMNIBUS CLAIMS OBJECTION
EXHIBIT B - MISCLASSIFIED CLAIMS**

NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION STATUS	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
33 PROCHEM INC. 5100 ENTERPRISE DRIVE ELLISTON, VA 24087	1992(a)	503(b)(9)	\$8,908.50	503(b)(9)	\$0.00	Invoice number 21327, in the amount of \$4,314.50, is for goods delivered prior to the 503(b)(9) period. Invoice number 21191, in the amount of \$279.50, is for goods delivered prior to the 503(b)(9) period. Invoice number 21647, in the amount of \$4,314.50, is for goods delivered prior to the 503(b)(9) period.
		Unsecured	\$59.69	Unsecured	\$8,968.19	
		Subtotal	\$8,968.19	Subtotal	\$8,968.19	
34 R.M. BOGGS CO, INC. PO BOX 1487 IOWA CITY, IA 52244-1487	997	503(b)(9)	\$3,706.41	503(b)(9)	\$239.84	The goods related to the following invoices were provided prior to the 503(b)(9) period therefore should be reclassified to unsecured; Invoice number 19020 in the amount of \$241.58; Invoice number 19209 in the amount of \$70.32; Invoice number 19225 in the amount of \$1,163.15; Invoice number 19224 in the amount of \$1,448.48; and Invoice number 19310 in the amount of \$447.85. Invoice number 19492, in the amount of \$295.03, contains freight charges (\$38.40 and sales tax (\$16.79) which do not constitute a good as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$0.00	Unsecured	\$3,466.57	
		Subtotal	\$3,706.41	Subtotal	\$3,706.41	
35 REBAS-TOYOTA OF LA 12907 IMPERIAL HIGHWAY SANTA FE SPRINGS, CA 90670	1503	503(b)(9)	\$423.00	503(b)(9)	\$369.20	Invoice number S0061497 includes sales tax, in the amount of \$33.23, and freight charges, in the amount of \$20.97, which do not constitute a good as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$842.11	Unsecured	\$895.91	
		Subtotal	\$1,265.11	Subtotal	\$1,265.11	

* Plus unliquidated and/or undetermined amounts

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**EXIDE TECHNOLOGIES 13-11482 (KJC)
SIXTH OMNIBUS CLAIMS OBJECTION
EXHIBIT B - MISCLASSIFIED CLAIMS**

NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION STATUS	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
36 RIVER BEND INDUSTRIES RON EMBREE 3730 WHEELER AVE FORT SMITH, AR 72901	1624	503(b)(9)	\$25,368.55	503(b)(9)	\$1,763.22	The goods on invoice numbers RF17170 (\$1,404.51), RF17224 (\$1,179.84), RF17267 (\$1,538.64), RF17315 (\$1,146), RF17374 (\$2,126.21), RF17434 (\$3,838.41), RF17559 (\$2,138.27), RF17705 (\$592.80), RF17532 (\$1,461.93), RF17368 (\$499.15) and RF17601 (\$7,679.57) were delivered prior to the 503(b)(9) period.
		Unsecured	\$0.00	Unsecured	\$23,605.33	
		Subtotal	\$25,368.55	Subtotal	\$25,368.55	
37 SANCHEM INCORPORATED 1600 S CANAL ST CHICAGO, IL 60616-1106	1014	503(b)(9)	\$14,771.29	503(b)(9)	\$0.00	Invoice numbers 45071 (\$1,659.50), 45082 (\$10,978) and 45065 (\$2,133.79) were for goods received prior to the 503(b)(9) period.
		Unsecured	\$0.00	Unsecured	\$14,771.29	
		Subtotal	\$14,771.29	Subtotal	\$14,771.29	
38 STRATUS BUILDING SOLUTIONS 10530 VICTORY BLVD NORTH HOLLYWOOD, CA 91606	469(a)	503(b)(9)	\$5,200.00	503(b)(9)	\$0.00	Invoice number 819705, in the amount of \$5,200, is for janitorial services, not a good as required by section 503(b)(9) of the bankruptcy code. In addition, invoice number 819705 provides no basis for secured or priority claim status.
		Priority	\$5,200.00	Priority	\$0.00	
		Secured	\$5,200.00	Secured	\$0.00	
		Unsecured	\$0.00	Unsecured	\$15,600.00	
		Subtotal	\$15,600.00	Subtotal	\$15,600.00	
39 STRATUS BUILDING SOLUTIONS 10530 VICTORY BLVD NORTH HOLLYWOOD, CA 91606	317	503(b)(9)	\$4,660.00	503(b)(9)	\$0.00	Invoice numbers 818489 (\$4,000), 81857 (\$125) and 818779 (\$535) are for services, not goods as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$0.00	Unsecured	\$4,660.00	
		Subtotal	\$4,660.00	Subtotal	\$4,660.00	
40 STRIVE LOGISTICS LLC PO BOX 88266 CHICAGO, IL 60680	1893	503(b)(9)	\$31,674.39	503(b)(9)	\$0.00	The claimant has provided a service, not a good, as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$77,793.90	Unsecured	\$109,468.29	
		Subtotal	\$109,468.29	Subtotal	\$109,468.29	

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit C to the Sixth Omnibus Claims Objection to Reduce and Allow Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
SIXTH OMNIBUS CLAIMS OBJECTION
EXHIBIT B - MISCLASSIFIED CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION STATUS	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
41	SUMMERS HARDWARE & SUPPLY CO 400 BUFFALO ST PO BOX 210 JOHNSON CITY, TN 37605-0210	611	503(b)(9) Unsecured	\$8,687.07 \$0.00	503(b)(9) Unsecured	\$75.73 \$8,611.34	Invoice numbers 8664002, 8664001, 8664001, 7913201, 8308700, 8328400, 8196400, 8308800, 8379600, 8333100, 8395300, 8369200, 8437200, 8437200, 8328401, 8430500, 8421200, 8527400, 8476800, 8664000, 8658300, 8203400, 8707500, 8707501, 8773400, 8707503, 8791600, 8868200, 9003900, 9006500, 8707502, 9240700 and 9240700 in the total amount of \$8,611.34 are for materials, tax and freight provided prior to the 503(b)(9) period. The invoices should be reclassified to general unsecured.
			Subtotal	\$8,687.07	Subtotal	\$8,687.07	
42	TANDEM LOGISTICS INC 2911 AW GRIMES BLVD STE 400 PFLUGERVILLE, TX 78660	806	503(b)(9) Unsecured	\$7,869.57	503(b)(9) Unsecured	\$0.00 \$7,869.57	
			Subtotal		Subtotal	\$7,869.57	
43	UNIVAR USA INC ATTN CHERI JAMES 17425 NE UNION HILL RD REDMOND, WA 98052	640(a)	503(b)(9) Unsecured	\$8,522.06 \$8,522.06	503(b)(9) Unsecured	\$8,370.22 \$8,673.90	Invoice number LA890760, in the amount of \$1,179.84, includes \$91.84 for sales tax and \$60 for a fuel surcharge neither are considered a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$17,044.12	Subtotal	\$17,044.12	
44	UNIVERSAL MACHINE & TOOL - KINGSPORT 1913 BROOKSIDE LN KINGSPORT, TN 37660-6634	1654	503(b)(9) Unsecured	\$6,413.68 \$0.00	503(b)(9) Unsecured	\$0.00 \$6,413.68	The materials and delivery charges on invoice numbers 201300106 (\$662.78), 201300148 (\$1,235.10), 201300332 (\$664.40), 201300352 (\$625), 201300359 (\$1,259.40) and 201300354 (\$1,967.00) were provided prior to the 503(b)(9) period.
			Subtotal	\$6,413.68	Subtotal	\$6,413.68	
45	W L GORE & ASSOCIATES INC ATTN LEGAL DEPT 551 PAPER MILL RD NEWARK, DE 19711	2525	503(b)(9) Unsecured	\$30,281.02 \$128,496.38	503(b)(9) Unsecured	\$0.00 \$158,777.40	Invoice number 35447044 in the amount of \$30,281.02 falls outside of the 503(b)(9) period. In addition, the invoice includes freight and sales tax which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$158,777.40	Subtotal	\$158,777.40	

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit C to the Sixth Omnibus Claims Objection to Reduce and Allow Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
SIXTH OMNIBUS CLAIMS OBJECTION
EXHIBIT B - MISCLASSIFIED CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION STATUS	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
46	WILLIAMS PATENT CRUSHER AND PULVERIZER CO INC 813 MONTGOMERY ST LOUIS, MO 63102	596	503(b)(9) Unsecured	\$22,044.40 \$0.00	503(b)(9) Unsecured	\$0.00 \$22,044.40	The goods on invoice number 98723, in the amount of \$22,044.40, were delivered prior to the 503(b)(9) period. The invoice includes freight (\$288) and sales tax (\$1,796.40) charges which do not constitute a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$22,044.40	Subtotal	\$22,044.40	
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47	WISE EL SANTO COMPANY INCORPORATED PO BOX 8360 SAINT LOUIS, MO 63132-0360	1338	503(b)(9) Unsecured	\$5,329.51 \$34,748.67	503(b)(9) Unsecured	\$4,980.84 \$35,097.34	Invoice numbers 1028011, 1028517, 1028877, 1028888 and 1029196 include sales tax, in the aggregate amount of \$348.67, which is not a good as require by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$40,078.18	Subtotal	\$40,078.18	
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		TOTAL		\$1,669,067.24*	TOTAL	\$1,669,067.24*	

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit C to the Sixth Omnibus Claims Objection to Reduce and Allow Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
SIXTH OMNIBUS CLAIMS OBJECTION
EXHIBIT C - REDUCE AND ALLOW CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASS	MODIFIED AMOUNT	REASON FOR MODIFICATION
1	ATLAS IRON & METAL CO ATTN GARY WEISENBERG 10019 S ALAMEDA ST LOS ANGELES, CA 90002	177(a)	503(b)(9) Priority Unsecured	\$11,030.82 \$910.80 \$0.00	503(b)(9) Priority Unsecured	\$0.00 \$0.00 \$11,030.82	The total amount owed on invoice number 35503 is \$11,030.82.
			Subtotal	\$11,941.62	Subtotal	\$11,030.82	
2	EVANS ENTERPRISES INC PO BOX 6848 FORT SMITH, AR 72906	398	503(b)(9) Unsecured	\$908.00 \$2,244.00	503(b)(9) Unsecured	\$0.00 \$2,244.00	The goods on invoice number 75667, in the amount of \$908, were never received by the Debtor.
			Subtotal	\$3,152.00	Subtotal	\$2,244.00	
3	K A STEEL CHEMICALS - CHICAGO C/O JENNER & BLOCK ATTN MELISSA M HINDS 353 N CLARK ST CHICAGO, IL 60654-3456	2260(a)	503(b)(9) Unsecured	\$23,237.71* \$37,469.67*	503(b)(9) Unsecured	\$23,218.71 \$37,488.67	The claimant asserts any and all other amounts owed. However, the Debtor's records show that the pre-petition amount should be liquidated at \$60,707.38.
			Subtotal	\$60,707.38*	Subtotal	\$60,707.38	
4	LP PALLET 1455 E 3RD ST POMONA, CA 91766-2202	1787(a)	503(b)(9) Unsecured	\$5,632.25 \$5,632.25	503(b)(9) Unsecured	\$787.50 \$4,844.75	The Debtor's books and records indicate that the pre-petition payable is equal to \$5,632.25.
			Subtotal	\$11,264.50	Subtotal	\$5,632.25	
5	PROCHEM INC. 5100 ENTERPRISE DRIVE ELLISTON, VA 24087	1992(a)	503(b)(9) Unsecured	\$8,908.50 \$59.69	503(b)(9) Unsecured	\$0.00 \$8,908.50	The following finance charges do not exist in the Debtor's books and records; FC #2 for \$15.03, FC #4 for \$14.89, FC #6 for \$15.13 and FC #8 for \$14.64.
			Subtotal	\$8,968.19	Subtotal	\$8,908.50	
6	STRATUS BUILDING SOLUTIONS 10530 VICTORY BLVD NORTH HOLLYWOOD, CA 91606	469(a)	503(b)(9) Priority Secured Unsecured	\$5,200.00 \$5,200.00 \$5,200.00 \$0.00	503(b)(9) Priority Secured Unsecured	\$0.00 \$0.00 \$0.00 \$5,200.00	The claimant duplicates the same invoice number 819705 across 3 claim classes. The total allowed amount should be \$5,200 general unsecured.
			Subtotal	\$15,600.00	Subtotal	\$5,200.00	

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit B to the Sixth Omnibus Claims Objection for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
SIXTH OMNIBUS CLAIMS OBJECTION
EXHIBIT C - REDUCE AND ALLOW CLAIMS**

	CLAIM NUMBER	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASS	MODIFIED AMOUNT	REASON FOR MODIFICATION	
7	TRIUMVIRATE ENVIRONMENTAL INC POSTERNAK BLANKSTEIN & LUND LLP ATTN DAVID J. REIR 800 BOYLSTON STREET BOSTON, MA 02199-8004	2271	503(b)(9) Unsecured	\$78,146.22 \$23,807.19	503(b)(9) Unsecured	\$0.00 \$23,807.19	Invoice numbers 124419, 619791 and 619807 in the total amount of \$78, 146.22 were transferred to Corre Opportunities Fund on POC 567. The invoices were ordered allowed as a 503(b)(9) administrative expense claim on Docket number 659.
		Subtotal	\$101,953.41	Subtotal	\$23,807.19		
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8	UNIVAR USA INC ATTN CHERI JAMES 17425 NE UNION HILL RD REDMOND, WA 98052	640(a)	503(b)(9) Unsecured	\$8,522.06 \$8,522.06	503(b)(9) Unsecured	\$8,370.22 \$151.84	The claimant has asserted the following two invoices as both 503(b)(9) and general unsecured; Invoice number LA890760 in the amount of \$1,239.84 and Invoice number AL798331 in the amount of \$7,282.22. The total allowed amount should be \$8,522.06.
		Subtotal	\$17,044.12	Subtotal	\$8,522.06		
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		TOTAL	\$230,631.22*	TOTAL	\$126,052.20		

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit B to the Sixth Omnibus Claims Objection for Misclassified Claims