

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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In re: : Chapter 11  
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EXIDE TECHNOLOGIES, : Case No. 13-11482 (KJC)  
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Debtor.<sup>1</sup> : Related Docket No. 1480, 1564  
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**ORDER SUSTAINING DEBTOR’S (NON-SUBSTANTIVE) FIFTH OMNIBUS  
OBJECTION PURSUANT TO BANKRUPTCY CODE SECTION 502(b),  
BANKRUPTCY RULE 3007, AND LOCAL RULE 3007-1 TO  
CERTAIN (I) AMENDED AND SUPERSEDED CLAIMS,  
(II) DUPLICATE CLAIMS, (III) DUPLICATE BONDHOLDER CLAIMS,  
AND (IV) NO DOCUMENTATION CLAIMS**

Upon the Debtor’s (Non-Substantive) Fifth Omnibus Objection Pursuant To  
Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain (I)  
Amended And Superseded Claims, (II) Duplicate Claims, (III) Duplicate Bondholder Claims,  
and (IV) No Documentation Claims (the “Objection”),<sup>2</sup> and it appearing that notice of the  
Objection was good and sufficient upon the particular circumstances and that no other or further  
notice need be given; and this Court having considered the Objection, the claims listed on  
Exhibits A, B, C, and D attached hereto, and any responses thereto; and upon the Declaration of  
Holden Bixler in Support of the Debtor’s (Non-Substantive) Fifth Omnibus Objection Pursuant  
To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain  
(I) Amended And Superseded Claims, (II) Duplicate Claims, and (III) Duplicate Bondholder

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

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

Claims, and (IV) No Documentation Claims; and upon the record herein; and after due deliberation thereon and good and sufficient cause appearing therefor; it is hereby

ORDERED, ADJUDGED, AND DECREED that:

1. The relief requested in the Objection is GRANTED, as set forth herein.
2. The Amended Claims listed on Exhibit A in the column titled “Amended Claim to be Disallowed” are disallowed because they are superseded and amended by the Claims in the column titled “Remaining Claim Number” (collectively, the “Remaining Claims”), which Remaining Claims shall remain on Exide’s general claims register subject to the Debtor’s right to further object as set forth herein.
3. All information included on and all documentation filed in support of any Amended Claim shall be treated as having been filed in support of and included in the corresponding Remaining Claim.
4. The Duplicate Claims listed on Exhibit B in the column titled “Duplicate Claim to be Disallowed” are disallowed.
5. The Duplicate Bondholder Claims listed on Exhibit C in the column titled “Duplicate Claim to be Disallowed” are disallowed.
6. 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.

7. 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.

8. The No Documentation Claims listed on Exhibit D in the column titled "Claim Number" are disallowed.

9. 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.

10. 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, C, and D 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.

11. 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.

12. 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.

13. 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.

14. 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: March 20, 2014  
Wilmington, Delaware

  
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THE HONORABLE KEVIN J. CAREY  
UNITED STATES BANKRUPTCY JUDGE

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

	REMAINING CLAIM NUMBER	AMENDED CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	3800	3514	Undetermined*	Amended and superseded by later filed Proof of Claim.
NAME OF CLAIMANT				
	ALAMILLO, ELIZABETH 8933 TOPE AVE SOUTH GATE, CA 90280-2644			
2	3306	3298	\$33,761.00	Amended and superseded by later filed Proof of Claim.
COMMONWEALTH OF PENNSYLVANIA, DEPT OF ENVTL PROT C/O PA DEP OFFICE OF CHIEF COUNSEL ATTN BETH LISS SHUMAN SOUTHCENTRAL REGIONAL OFFICE 909 ELMERTON AVE HARRISBURG, PA 17110-8200				
3	3444	3307	\$2,694,913.00	Amended and superseded by later filed Proof of Claim.
COMMONWEALTH OF PENNSYLVANIA, DEPT OF ENVTL PROT C/O PA DEP OFFICE OF CHIEF COUNSEL ATTN MARTIN SIEGEL SOUTHCENTRAL REGIONAL OFFICE 909 ELMERTON AVE HARRISBURG, PA 17110-8200				
4	3868	1923	\$12,475.00	Amended and superseded by later filed Proof of Claim.
HERNANDEZ, HERLINDA 9609 BOWMAN AVE SOUTH GATE, CA 90280-5027				
5	3859	3796	\$5,000,000.00	Amended and superseded by later filed Proof of Claim.
HERNANDEZ, ZACK C/O DANA B TASCHE 2029 CENTURY PARK E STE 1400 LOS ANGELES, CA 90067				
6	2905	2148	\$366,188.70	Amended and superseded by later filed Proof of Claim.
LUJAN, JORGE 1626 DOVER CIRCLE SALINA, KS 67401				
7	3430	2637	\$138,045.34*	Amended and superseded by later filed Proof of Claim.
POENG, HOUNG E 271 MARGARET AVE LOS ANGELES, CA 90022-2226				
8	3437	2446	Undetermined*	Amended and superseded by later filed Proof of Claim.
RUH, GLORIA E 5514 PUEBLO CT COMMERCE, CA 90040-1530				

\* Plus unliquidated and/or undetermined amounts

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

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	AMENDED CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
9	RUH, THOMAS J PO BOX 911434 LOS ANGELES, CA 90091-1238	3438	2443	Undetermined*	Amended and superseded by later filed Proof of Claim.
10	STATE OF MICHIGAN, DEPARTMENT OF TREASURY CADILLAC PL STE 10-200 3030 W GRAND BLVD DETROIT, MI 48202	3432	1928	\$47,177.70*	Amended and superseded by later filed Proof of Claim.
11	US DEPARTMENT OF LABOR - OSHA 2300 MAIN ST STE 168 KANSAS CITY, MO 64108	3347	3200	\$63,000.00	Amended and superseded by later filed Proof of Claim.
TOTAL				\$8,355,560.74*	

\* Plus unliquidated and/or undetermined amounts

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

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	ACTION BATTERY SERVICE INC 2529 MUNROE AVE S SAKATOON SK S7J 1S8 CANADA	3426	3425	\$4,595.72	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
2	ACTION BATTERY SERVICE INC 2529 MUNROE AVE S SAKATOON SK S7J 1S8 CANADA	3426	3427	\$4,595.72	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
3	ACTION BATTERY SERVICE INC 2529 MUNROE AVE S SAKATOON SK S7J 1S8 CANADA	3426	3428	\$4,595.72	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
4	ACTION BATTERY SERVICE INC. 2529 MUNROE AVE. SOUTH SAKATOON, SK S7J1S8 CANADA	3426	3429	\$4,595.72	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
5	DAVILA, ANTONIO C/O THE MANDELL LAW FIRM ATTN ROBERT MANDELL, ESQ 19400 BUSINESS CENTER DR STE 102 NORTHBRIDGE, CA 91324	2563	3410	\$10,000,000.00*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
6	DAVILA, RAMONA C/O THE MANDELL LAW FIRM ATTN ROBERT MANDELL, ESQ 19400 BUSINESS CENTER DR STE 102 NORTHBRIDGE, CA 91324	2565	3409	\$10,000,000.00*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.

\* Plus unliquidated and/or undetermined amounts

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

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
7	ENVIRONMENTAL PROTECTION DIVISION, DEPT OF NATURAL RESOURCES, STATE OF GA ATTN MS AMY MUSSLER, LEGAL AFFAIRS COORDINATOR RESPONSE AND REMEDIATION PROGRAM, GEORGIA EPD 2 MARTIN LUTHER KING JR DR STE 1054 EAST TOWER ATLANTA, GA 30334	3311	3326	\$9,400,446.00	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
8	ENVIRONMENTAL PROTECTION DIVISION, DEPT OF NATURAL RESOURCES, STATE OF GA ATTN MS KAREN HAYS, MGR STATIONARY SOURCE COMP AIR PROTECTION BRANCH, GEORGIA EPD 4244 INTERNATIONAL PKWY STE 120 ATLANTA, GA 30354-3906	3312	3325	\$27,000.00	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
9	GEORGIA DEPARTMENT OF NATURAL RESOURCES ENVIRONMENTAL PROTECTION DIVISION ATTN MS AMY MUSSLER RESPONSE AND REMEDIATION PROGRAM 2 MARTIN LUTHER KING JR DR STE 1054 EAST TOWER ATLANTA, GA 30334-9000	3313	3324	Undetermined*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
10	GEORGIA DEPARTMENT OF NATURAL RESOURCES ENVIRONMENTAL PROTECTION DIVISION ATTN MS AMY MUSSLER RESPONSE AND REMEDIATION PROGRAM 2 MARTIN LUTHER KING JR DR STE 1054 EAST TOWER ATLANTA, GA 30334-9000	3310	3323	Undetermined*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
11	GUDINO, OLIVER C/O LAW OFFICES OF STEVEN WOLFSON ATTN STEVEN WOLFSON 4766 PARK GRANADA BLVD STE 208 CALABASAS, CA 91302	3479	3567	\$10,000,000.00*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.

\* Plus unliquidated and/or undetermined amounts



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

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
12	GUTIERREZ, JOSE LUIS C/O THE MANDELL LAW FIRM ATTN ROBERT MANDELL, ESQ 19400 BUSINESS CENTER DR STE 102 NORTHBRIDGE, CA 91324	2591	3403	\$10,000,000.00*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
13	HERNANDEZ RAMIREZ, MARCELO C/O LAW OFFICES OF STEVEN WOLFSON ATTN STEVEN WOLFSON 4766 PARK GRANADA BLVD STE 208 CALABASAS, CA 91302	3460	3561	\$10,000,000.00*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
14	HERNANDEZ, ROMAN 4913 E 60TH PL MAYWOOD, CA 90270	3640	3841	\$10,000.00*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
15	HERNANDEZ, SAUL C/O BROWN RUDNICK LLP ATTN WILLIAM R BALDIGA, ESQ SEVEN TIMES SQ NEW YORK, NY 10036	3060	3132	\$5,000,000.00	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
16	PEREZ, ANDY C/O LAW OFFICES OF STEVEN WOLFSON ATTN STEVEN WOLFSON 4766 PARK GRANADA BLVD STE 208 CALABASAS, CA 91302	3507	3560	\$10,000,000.00*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
17	PEREZ, COREY C/O LAW OFFICES OF STEVEN WOLFSON ATTN STEVEN WOLFSON 4766 PARK GRANADA BLVD STE 208 CALABASAS, CA 91302	3506	3559	\$10,000,000.00*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.

\* Plus unliquidated and/or undetermined amounts

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 FIFTH OMNIBUS CLAIMS OBJECTION  
 EXHIBIT B - DUPLICATE CLAIMS

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
18	PEREZ, LEILANI C/O LAW OFFICES OF STEVEN WOLFSON ATTN STEVEN WOLFSON 4766 PARK GRANADA BLVD STE 208 CALABASAS, CA 91302	3482	3562	\$10,000,000.00*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
19	RAMIREZ, CESAR C/O LAW OFFICES OF ROBERT R SHIRI, APC ATTN ROBERT R SHIRI, ESQ 501 SANTA MONICA BLVD STE 610 SANTA MONICA, CA 90401	3700	3703	Undetermined*	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
20	ROTEX TRUCK CENTER INC 11802 SARA RD LAREDO, TX 78045	891	3442	\$2,227.50	Proof of Claim is duplicative of Proof of Claim listed in column entitled Remaining Claim Number.
TOTAL				\$94,458,056.38*	

\* Plus unliquidated and/or undetermined amounts

EXIDE TECHNOLOGIES 13-11482 (KJC)  
 FIFTH OMNIBUS CLAIMS OBJECTION  
 EXHIBIT C -- DUPLICATE BONDHOLDER CLAIMS

	NAME OF CLAIMANT	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	HUNTER, THOMAS 12 ST ROY AVE VENINOR, NJ 08406	2597	1450	\$16,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
2	KAREN NEWBOLD SEP / IRA 1006 SYLVAN BLVD HENDERSONVILLE, NC 28791	2597	2931	\$8,732.45	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
3	LATVIAN RELIEF FUND OF AMERICA INC ATTN JOHN G BERZINS 8119 CADWALADER AVE ELKINS PARK, PA 19027	2597	1950	\$100,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
4	MCCONVILLE, DAVID 49 COUNTY ROAD AMHERST, NH 03031	2597	3300	\$7,000.00	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
5	MEHRA, DEEPAK 25 CHELSEA PARK PITTSFORD, NY 14534	2597	1370	\$2,310.18	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
6	PESKIN, RUTH 2894 W 8TH ST 4C BROOKLYN, NY 11224	2597	1786	Undetermined*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
7	PESKIN, STANLEY & PESKIN, RUTH 2894 W 8TH ST APT 4C BROOKLYN, NY 11224	2597	1785	Undetermined*	Claim is duplicative of Debt Claim filed by Wells Fargo Bank National Association.
TOTAL				\$134,042.63*	

\* Plus unliquidated and/or undetermined amounts

EXIDE TECHNOLOGIES 13-11482 (KJC)  
 FIFTH OMNIBUS CLAIMS OBJECTION  
 EXHIBIT D - INSUFFICIENT DOCUMENTATION CLAIMS

	NAME CLAIMANT	CLAIM NUMBER	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	CHATMAN, GREGORY 125 NORMAN RD MAGEE, MS 39111-2901	2946	\$15,000,000.00	Claim does not include sufficient documentation to ascertain the validity of the asserted claim amount.
2	DAVIS, FRANK 1760 WALDEN ST AURORA, CO 80017	3212	\$20,000,000.00	Claim does not include sufficient documentation to ascertain the validity of the asserted claim amount.
3	DAWKINS, HENRY 815 E 77TH ST LOS ANGELES, CA 90001-2816	3210	\$1,894,886,000.00*	Claim does not include sufficient documentation to ascertain the validity of the asserted claim amount.
4	MADEWELL METALS P.O. BOX 386 JONES, OK 73049	2867	Undetermined*	Claim does not include sufficient documentation to ascertain the validity of the asserted claim amount.
<b>TOTAL</b>			<b>\$1,929,886,000.00*</b>	

\* Plus unliquidated and/or undetermined amounts