

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: May 14, 2014 at 10:00 a.m. (Eastern)
 : Obj. Due: April 28, 2014 at 4:00 p.m. (Eastern)
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**DEBTOR’S (SUBSTANTIVE) EIGHTH OMNIBUS OBJECTION PURSUANT
TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY RULE 3007,
AND LOCAL RULE 3007-1 TO CERTAIN (I) PREVIOUSLY DISCHARGED CLAIMS,
(II) MISCLASSIFIED CLAIMS, (III) REDUCE AND ALLOW CLAIMS, AND (IV) NO
LIABILITY CLAIMS**

(“EIGHTH 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, C, and D to the proposed form of order (the “Proposed Order”), 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; (iii) reducing and allowing the proofs of claim listed on Exhibit C to 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.

Proposed Order; and (iv) disallowing and expunging the proofs of claim listed on Exhibit D to the Proposed Order. In support of the Objection, the Debtor relies on the Declaration of Holden Bixler in Support of the Debtor's (Substantive) Eighth Omnibus Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain (I) Previously Discharged Claims, (II) Misclassified Claims, (III) Reduce and Allow Claims, and (IV) No Liability 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 3,893 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 six 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 455 Claims asserting more than \$4.7 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; (c) reducing and allowing each of the Claims set forth on Exhibit C to the Proposed Order; and (d) disallowing and expunging the Claims set forth on Exhibit D attached to the Proposed Order.

OBJECTION TO CLAIMS

A. Previously Discharged Claims

14. The Disputed Claims identified on Exhibit A to the Proposed Order (the “Previously Discharged Claims”) are Claims that were previously satisfied, discharged, and released in full during the Debtor’s predecessor’s prior chapter 11 case (the “2002 Chapter 11 Case”).³ Indeed, on April 21, 2004, this Court entered a confirmation order approving the Debtor’s predecessor’s plan of reorganization, which provides in pertinent part:

Except as otherwise provided in the Plan or this Confirmation Order: (a) the rights afforded under the Plan and the treatment of all Claims and Equity Interests under the Plan, shall be in exchange for and in complete satisfaction, discharge and release of all liens , Claims and Equity Interests of any nature whatsoever, including any interest accrued on Claims from and after the Petition Date, against any Debtor or any of its assets or properties, (b) on the Effective Date, all such liens on, Claims against, and Equity interests in any Debtor shall be satisfied, discharged, and released in full and (c) all Persons and Entities shall be precluded from asserting against the Debtors, the Reorganized Debtors, their successors, assets, or properties, any other or further liens, Claims or Equity Interests based upon any act or omission, transaction or

³ On April 15, 2002, Exide, together with certain of its U.S. subsidiaries, filed voluntary petitions for reorganization under chapter 11. The Debtor, along with the Official Committee of Unsecured Creditors, filed a Joint Plan of Reorganization (the “Plan”) with this Court on February 27, 2004 and, on April 21, 2004, this Court confirmed the Plan, which became effective on May 5, 2004. More recently, on March 28, 2014, this Court entered an order closing the 2002 Chapter 11 Case (Case No. 02-11125) (Docket No. 6837).

other activity of any kind or nature that occurred prior to the Confirmation Date.⁴

15. Moreover, the Claimants listed on Exhibit A (the “Kirby Plaintiffs”), filed identical claims in the 2002 Chapter 11 Case and pursuant to a stipulation, specifically provided the following release:

In consideration of the foregoing, including the Aggregate Claim Allowance, the Alleged Claims and any claims that are or may be held, asserted, scheduled or filed by or on behalf of the Kirby Plaintiffs and LWCC in the chapter 11 case, including but not limited to the Proofs of Claim, are deemed resolved, released, and discharged, including without limitation, any claims for late fees, attorneys’ fees, penalties, interest, collection costs, expenses, fees or other charges.⁵

16. Accordingly, failure to disallow and expunge the Previously Discharged Claims may result in Claimants receiving an unwarranted recovery from the Debtor’s estate as these Claims have already been released and discharged in connection with the 2002 Chapter 11 Case. As a result, the Debtor requests entry of an order disallowing and expunging the Previously Discharged Claims listed on Exhibit A to the Proposed Order.

B. Misclassified Claims

17. 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 “Modified Classification” 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.

⁴ Findings of Fact, Conclusions of Law and Memorandum Order Relating to Confirmation of the Joint Plan of Reorganization of the Official Committee of Unsecured Creditors and the Debtors, entered April 21, 2004 (Case No. 02-11125) (Docket No. 4340).

⁵ Order Granting Exide’s Motion Pursuant to Fed. R. Bankr. P. 9019 For Entry of an Order Approving Stipulation With Kirby Plaintiffs and Louisiana Workers’ Compensation Corporation, entered April 30, 2013(Case No. 02-11125) (Docket No. 6813).

18. 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

19. 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.

D. No Liability Claims

20. The Disputed Claims identified on Exhibit D to the Proposed Order (the “No Liability Claims”) are Claims that are not reflected in the Debtor’s Books and Records. The Debtor has reviewed its Books and Records and determined that it is not liable for the No Liability Claims for the reasons set forth in the column titled “Reason for Disallowance” on Exhibit D to the Proposed Order. Accordingly, the Debtor requests that each of the No Liability Claims be disallowed and expunged in its entirety.

APPLICABLE AUTHORITY

21. 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).

22. 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.

23. The Debtor has met its burden in refuting the legal sufficiency of the Disputed Claims and has demonstrated that (a) the Previously Discharged Claims should be disallowed and expunged; (b) the Claimants who filed the Misclassified Claims are not entitled to the priority or administrative expense claim status asserted in the Misclassified Claims; (c) the

Reduce and Allow Claims should be reduced and allowed in the amount as indicated on Exhibit C to the Proposed Order; and (d) the No Liability Claims should be disallowed and expunged.

24. 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, (iii) reducing and allowing each Reduce and Allow Claim as set forth on Exhibit C attached to the Proposed Order, and (iv) disallowing and expunging the proofs of claim listed on Exhibit D attached to the Proposed Order.

RESPONSES TO THE OBJECTION

25. 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 April 28, 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 **May 14, 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.

26. Every Response must be filed on or before **April 28, 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 April 28, 2014** (the “Response Deadline”).

27. 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.

28. 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 **May 14, 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.

29. 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.

30. 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.

31. 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.**

32. 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 Previously Discharged Claim, Misclassified Claim, Reduce and Allow Claim, and/or No Liability Claim.

RESERVATION OF RIGHTS

33. 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, C, and D 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, C, and D to the Proposed Order on any other ground.

STATEMENT OF COMPLIANCE WITH LOCAL BANKRUPTCY RULE 3007-1

34. 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

35. 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

36. 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, C, and D 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
April 14, 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: May 14, 2014 at 10:00 a.m. (Eastern)**
: **Obj. Due: April 28, 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) Eighth Omnibus Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain (I) Previously Discharged Claims, (II) Misclassified Claims, (III) Reduce and Allow Claims, And (IV) No Liability Claims (the “Objection”)**.²

PLEASE TAKE FURTHER NOTICE that responses to the Objection, if any, must be filed on or before **April 28, 2014 at 4:00 p.m. (Eastern)** (the “**Response Deadline**”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801; and served upon (i) the Office of the U.S. Trustee, 844 North King Street, Room 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Mark Kenney, Esq., (ii) the Debtor, Exide Technologies, 13000 Deerfield Parkway, Suite 100, Milton, Georgia 30004, Attn: B. Holland Pritchard, and (iii) counsel to the Debtor, Skadden, Arps, Slate, Meagher & Flom LLP, 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 April 28, 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 MAY 14, 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
April 14, 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) EIGHTH OMNIBUS OBJECTION PURSUANT
TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY RULE 3007,
AND LOCAL RULE 3007-1 TO CERTAIN (I) PREVIOUSLY DISCHARGED CLAIMS,
(II) MISCLASSIFIED CLAIMS, (III) REDUCE AND ALLOW CLAIMS, AND (IV) NO
LIABILITY 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) Eighth Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 To Certain (I) Previously Discharged Claims, (II) Misclassified Claims, (III) Reduce and Allow Claims, and (IV) No Liability Claims (the “Objection”), and am directly, or by and through my personnel or agents, familiar with 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.

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

information contained therein, the proposed form of order (the "Proposed Order"), and the exhibits attached thereto.

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 Discharged Claims, the Misclassified Claims, the Reduce and Allow Claims, and the No Liability Claims, as defined in the Objection and identified respectively in Exhibits A, B, C, and D to the Proposed Order.

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

4. To my knowledge, the Previously Discharged Claims, identified in Exhibit A to the Proposed Order are proofs of claim that were previously satisfied, discharged, and released in full by order of this Court in the Debtor's previous chapter 11 case and therefore cannot state a colorable claim against the Debtor. If the Previously Discharged Claims are not disallowed, the Claimants asserting such Claims 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.

7. To my knowledge, the proofs of claim listed on Exhibit D to the Proposed Order are proofs of claims that are not reflected in the Debtor's Books and Records. It is my understanding that following a review of the Debtor's Books and Records, the Debtor has determined that it is not liable for the No Liability Claims for the reasons set forth in the column titled "Reason for Disallowance" on Exhibit D to the Proposed Order. If the No Liability Claims are not disallowed, the Claimants asserting such Claims may receive an unwarranted recovery from the Debtor's estate.

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 April 14, 2014

/s/ Holden Bixler
Holden Bixler

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

----- X
 In re: : Chapter 11
 :
 EXIDE TECHNOLOGIES, : Case No. 13-11482 (KJC)
 :
 Debtor.¹ :
 : **Related Docket No. _____**
 ----- X

ORDER SUSTAINING DEBTOR’S (SUBSTANTIVE) EIGHTH OMNIBUS OBJECTION PURSUANT TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY RULE 3007, AND LOCAL RULE 3007-1 TO CERTAIN (I) PREVIOUSLY DISCHARGED CLAIMS, (II) MISCLASSIFIED CLAIMS, (III) REDUCE AND ALLOW CLAIMS, AND (IV) NO LIABILITY CLAIMS

Upon the Debtor’s (Substantive) Eighth Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 to Certain (I) Previously Discharged Claims, (II) Misclassified Claims, (III) Reduce and Allow Claims, and (IV) No Liability 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, C, and D attached hereto, and any responses thereto; and upon the Declaration of Holden Bixler in Support of the Debtor’s (Substantive) Eighth Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 to Certain (I) Previously Discharged Claims, (II) Misclassified Claims, (III) Reduce and Allow Claims, and (IV) No

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.

Liability 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 Previously Discharged Claims listed on Exhibit A are hereby disallowed and expunged in their 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 No Liability Claims listed on Exhibit D attached hereto are hereby disallowed and expunged in their entirety as set forth in Exhibit D.
6. 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.
7. 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.

8. 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.

9. 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.

10. 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.

11. 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)
EIGHTH OMNIBUS CLAIMS OBJECTION
EXHIBIT A - PREVIOUSLY DISCHARGED CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	KERRY KIRBY, LORI KIRBY, HEIDI MAYEAUX AC KIRBY, HANNAH KIRBY & KERRY KIRBY, JR ATTN SCOTT FRUGE, MICHAEL PALMINTIER C/O DEGRAVELLES PALMINTIER HOLTHAUS & FR 618 MAIN STREET BATON ROUGE, LA 70801	2691	\$56,250.00	No liability exists on the Debtor's books and records. The liability asserted on the Proof of Claim was previously discharged in the Debtor's 2002 Bankruptcy Case.
2	KIRBY, A C SCOTT FRUGE, MICHAEL C. PALMINTIER, C/O DEGRAVELLES PALMINTIER HOLTHAUS & FRUGE LLP 618 MAIN STREET BATON ROUGE, LA 70801	2689	\$56,250.00	No liability exists on the Debtor's books and records. The liability asserted on the Proof of Claim was previously discharged in the Debtor's 2002 Bankruptcy Case.
3	KIRBY, HANNAH SCOTT FRUGE, MICHAEL C. PALMINTIER, C/O DEGRAVELLES PALMINTIER HOLTHAUS & FRUGE LLP 618 MAIN STREET BATON ROUGE, LA 70801	2690	\$56,250.00	No liability exists on the Debtor's books and records. The liability asserted on the Proof of Claim was previously discharged in the Debtor's 2002 Bankruptcy Case.
4	KIRBY, KERRY SCOTT FRUGE, MICHAEL C. PALMINTIER, C/O DEGRAVELLES PALMINTIER HOLTHAUS & FRUGE LLP 618 MAIN STREET BATON ROUGE, LA 70801	2686	\$1,776,750.00	No liability exists on the Debtor's books and records. The liability asserted on the Proof of Claim was previously discharged in the Debtor's 2002 Bankruptcy Case.
5	KIRBY, LORI SCOTT FRUGE, MICHAEL C. PALMINTIER, C/O DEGRAVELLES PALMINTIER HOLTHAUS & FRUGE LLP 618 MAIN STREET BATON ROUGE, LA 70801	2687	\$498,250.00	No liability exists on the Debtor's books and records. The liability asserted on the Proof of Claim was previously discharged in the Debtor's 2002 Bankruptcy Case.
6	MAYEAUX, HEIDI SCOTT FRUGE, MICHAEL C. PALMINTIER, C/O DEGRAVELLES PALMINTIER HOLTHAUS & FRUGE LLP 618 MAIN STREET BATON ROUGE, LA 70801	2688	\$56,250.00	No liability exists on the Debtor's books and records. The liability asserted on the Proof of Claim was previously discharged in the Debtor's 2002 Bankruptcy Case.
		TOTAL	\$2,500,000.00	

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

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
1	ACCESS TCA INC ATTN W RAHN, CONTROLLER ONE MAIN ST WHITINSVILLE, MA 01588	472 (a)	503(b)(9) Unsecured	\$2,878.50 \$29,146.70	503(b)(9) Unsecured	\$0.00 \$32,025.20	Invoice number 96419, in the amount of \$1,010, asserts outbound handling fees and services, which are not goods, as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$32,025.20	Subtotal	\$32,025.20	Invoice number 96442, in the amount of \$1,868.50, asserts inbound handling fees and transportation, which are not goods, as required by section 503(b)(9) of the bankruptcy code.
2	ADVANCE THERMAL CORPORATION C/O TRANSCO INC ATTN KRISTINE STROM 55 E JACKSON BLVD STE 2100 CHICAGO, IL 60604	587	503(b)(9) Unsecured	\$338.88 \$3,980.32	503(b)(9) Unsecured	\$240.00 \$4,079.20	Invoice number 2043174, in the amount of \$338.88, includes \$98.88 for freight which is not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$4,319.20	Subtotal	\$4,319.20	
3	AIR CAPITAL EQUIPMENT 806 E BOSTON ST WICHITA, KS 67211-3313	1398	503(b)(9) Unsecured	\$2,662.84 \$5,453.52	503(b)(9) Unsecured	\$192.00 \$7,924.36	Invoice number 116289, in the amount of \$144.84, includes \$9.84 for a freight charge which is not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$8,116.36	Subtotal	\$8,116.36	Invoice number 117480, in the amount of \$1,049 is for goods received prior to the 503(b)(9) period.
							Invoice number 117482 includes labor charges (\$572) and mileage (\$200) in the aggregate amount of \$772 which are not goods as required by section 503(b)(9) of the bankruptcy code.
							Invoice number 117481, in the amount of \$640, is for labor and mileage which are not goods as required by section 503(b)(9) of the bankruptcy code.

* Plus unliquidated and/or undetermined amounts

(a) Indicates that the filed claim amount, on the filed proof of claim, has been previously modified on Debtor's First Notice of Satisfaction for Partially Satisfied Claims

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

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

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
4	ALLIED TOYOTA LIFT 1640 ISLAND HOME AVE KNOXVILLE, TN 37920-1814	1569	503(b)(9) Unsecured	\$450.00 \$0.00	503(b)(9) Unsecured	\$0.00 \$450.00	The claimant asserts periodic maintenance charges which are not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$450.00	Subtotal	\$450.00	
5	AMERICAN CRANE & EQUIPMENT CORP. 531 OLD SWEDE RD DOUGLASSVILLE, PA 19518-1205	1206	503(b)(9) Unsecured	\$3,000.00 \$17,579.60	503(b)(9) Unsecured	\$0.00 \$20,579.60	Invoice number 48480, in the amount of \$3,000, is for a monthly inspection which is not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$20,579.60	Subtotal	\$20,579.60	
6	ASSOCIATED EQUIPMENT SALES CO LLC ATTN SHARLA DEAN 14535 W 96 TERR LENEXA, KS 66215	573	503(b)(9) Unsecured	\$4,246.26 \$750.36	503(b)(9) Unsecured	\$3,931.00 \$1,065.62	Invoice number 18719, in the amount of \$315.26, is for freight charges and goods received prior to the 503(b)(9) period.
			Subtotal	\$4,996.62	Subtotal	\$4,996.62	
7	BATTERY COUNCIL INTERNATIONAL 330 N WABASH AVE STE 2000 CHICAGO, IL 60611	727	503(b)(9) Unsecured	\$18,535.92 \$0.00	503(b)(9) Unsecured	\$0.00 \$18,535.92	Invoice numbers 3462 (\$7,449.46), 3482 (\$4,995) and 3539 (\$6,091.46) are for goods received prior to the 503(b)(9) period.
			Subtotal	\$18,535.92	Subtotal	\$18,535.92	
8	BATTERY EQUIPMENT SUPPLY CAROL FISHER 749 N HARVARD AVE VILLA PARK, IL 60181	783 (b)	503(b)(9) Priority Unsecured	\$1,623.71 \$1,623.71 \$0.00	503(b)(9) Priority Unsecured	\$0.00 \$0.00 \$3,247.42	Invoice number 2671, in the amount of \$1,623.71, is for freight charges and goods received prior to the 503(b)(9) period.
			Subtotal	\$3,247.42	Subtotal	\$3,247.42	Invoice number 2671, in the amount of \$1,623.71 asserted as priority, does not qualify for priority status under section 507(a)(7) of the bankruptcy code.
9	BG SALVAGE LLC 7141 HURSTVILLE RD MAQUOKETA, IA 52060	290	503(b)(9) Unsecured	\$4,476.40 \$0.00	503(b)(9) Unsecured	\$0.00 \$4,476.40	Spent Battery Pickup number 619378 is for goods received prior to the 503(b)(9) period.
			Subtotal	\$4,476.40	Subtotal	\$4,476.40	

* Plus unliquidated and/or undetermined amounts

(a) Indicates that the filed claim amount, on the filed proof of claim, has been previously modified on Debtor's First Notice of Satisfaction for Partially Satisfied Claims

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

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

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
10	BUBLITZ MATERIAL HANDLING 703 E 14TH AVE KANSAS CITY, MO 64116-3720	1711	503(b)(9) Unsecured	\$1,326.73 \$5,850.44	503(b)(9) Unsecured	\$1,226.95 \$5,950.22	Invoice number I45626, in the amount of \$1,326.73, includes \$99.78 for freight charges which is not a good as required by section 503(b)(9) of the bankruptcy code.
		Subtotal	\$7,177.17	Subtotal	\$7,177.17		
11	CALL ONE, INC PO BOX 9002 CAPE CANAVERAL, FL 32920	2961	503(b)(9) Unsecured	\$455.46 \$0.00	503(b)(9) Unsecured	\$214.66 \$240.80	
		Subtotal	\$455.46	Subtotal	\$455.46		
12	CAR CO RENTALS INC. / CAR CO NATIONAL LEASE BOBBIE SUE BEASLEY 2905 N. 32ND ST. FORT SMITH, AR 72904	1169	503(b)(9) Unsecured	\$2,186.34 \$14,991.58	503(b)(9) Unsecured	\$0.00 \$17,177.92	The claimant has provided a service, not a good as required by section 503(b)(9) of the bankruptcy code.
		Subtotal	\$17,177.92	Subtotal	\$17,177.92		
13	CO-EFFICIENT PRECISION ENGINEERING, INC. 105 SCHNEIDER ROAD, SUITE 118 OTTAWA ON K2K 1Y3 CANADA	2776	503(b)(9) Unsecured	\$2,615.00 \$0.00	503(b)(9) Unsecured	\$0.00 \$2,615.00	
		Subtotal	\$2,615.00	Subtotal	\$2,615.00		
14	CONTINENTAL ANALYTICAL SERVICES PO BOX 3737 SALINA, KS 67402-3737	878	503(b)(9) Unsecured	\$256.50 \$911.25	503(b)(9) Unsecured	\$0.00 \$1,167.75	The claimant provided a service, not a good as required by section 503(b)(9) of the bankruptcy code.
		Subtotal	\$1,167.75	Subtotal	\$1,167.75		

* Plus unliquidated and/or undetermined amounts

Page 3 of 14

(a) Indicates that the filed claim amount, on the filed proof of claim, has been previously modified on Debtor's First Notice of Satisfaction for Partially Satisfied Claims

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

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

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
15	CRAIG WELDING SUPPLY CO 5670 SANTA FE AVE. LOS ANGELES, CA 90058	819	503(b)(9) Unsecured	\$407.84 \$25,005.95	503(b)(9) Unsecured	\$140.00 \$25,273.79	Invoice number 294043, in the amount of \$216, is for cylinder rental charges which is not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$25,413.79	Subtotal	\$25,413.79	Invoice number 293985, in the amount of \$128.62, includes \$10.62 for sales tax and \$18 for delivery charges which are not goods as required by section 503(b)(9) of the bankruptcy code. Invoice number 293984, in the amount of \$128.62, includes \$5.22 for sales tax and \$18 for delivery charges which are not goods as required by section 503(b)(9) of the bankruptcy code.
16	CROWN EQUIPMENT CORPORATION ATTN RODNEY J HINDERS, ESQ 102 S WASHINGTON ST NEW BREMEN, OH 45869	76	503(b)(9) Unsecured	\$1,012.25 \$3,070.24	503(b)(9) Unsecured	\$177.85 \$3,904.64	Invoice number 124046133, in the amount of \$926.57, is for labor and parts which were received prior to the 503(b)(9) period.
			Subtotal	\$4,082.49	Subtotal	\$4,082.49	Invoice number 130087173, in the amount of \$484.85, includes tire press charges and tire disposal fees in the aggregate amount of \$39.50 which are services not goods as required by section 503(b)(9) of the bankruptcy code.
17	EAST TENNESSEE SCALE WORKS INC PO BOX 809 LENOIR CITY, TN 37771-0809	1572	503(b)(9) Unsecured	\$1,200.00 \$1,715.00	503(b)(9) Unsecured	\$0.00 \$2,915.00	Invoice number 17943, in the amount of \$1,200, is for a service not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$2,915.00	Subtotal	\$2,915.00	
18	ENVIROSAFE SERVICES OF OHIO INC 2300 COMPUTER AVE STE L61 WILLOW GROVE, PA 19090	121 (a)	503(b)(9) Priority Unsecured	\$15,402.02 \$4,811.71 \$36,816.68	503(b)(9) Priority Unsecured	\$0.00 \$0.00 \$57,030.41	As a component of the environmental services invoices, the claimant asserts state and local taxes as priority for which the claimant is not entitled to priority status under section 507 of the bankruptcy code. Invoice numbers 634881O (\$9,314.53) and 6349010O (\$6,087.49) are for services, not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$57,030.41	Subtotal	\$57,030.41	

* Plus unliquidated and/or undetermined amounts

(a) Indicates that the filed claim amount, on the filed proof of claim, has been previously modified on Debtor's First Notice of Satisfaction for Partially Satisfied Claims

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

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

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
19	EVANS ENTERPRISES INC PO BOX 6848 FORT SMITH, AR 72906	398	503(b)(9) Unsecured	\$908.00 \$2,244.00	503(b)(9) Unsecured	\$683.00 \$2,469.00	Invoice number 75667, in the amount of \$908, includes shipping and handling charges in the amount of \$225 which are not goods as required by section 503(b)(9) of the bankruptcy code.
		Subtotal	\$3,152.00	Subtotal	\$3,152.00		
20	FERGUSON PRODUCTION INC ATTN ROBIN M ELSASSER, OFFICE MGR 2130 INDUSTRIAL DR MCPERSON, KS 67460	680 (a)	503(b)(9) Unsecured	\$12,345.20 \$1,373.40	503(b)(9) Unsecured	\$1,371.60 \$12,347.00	
		Subtotal	\$13,718.60	Subtotal	\$13,718.60		
21	FLOIED FIRE EXTINGUISHERS CO. KIM SIMMONS 3050 LAMAR AVENUE MEMPHIS, TN 38114	946	503(b)(9) Unsecured	\$421.70 \$0.00	503(b)(9) Unsecured	\$0.00 \$421.70	The claimant has provided a service, not a good as required by section 503(b)(9) of the bankruptcy code.
		Subtotal	\$421.70	Subtotal	\$421.70		
22	FRANKIE'S GOLF CARTS 2011 N TAYLOR AVE GARDEN CITY, KS 67846	511	503(b)(9) Unsecured	\$1,968.40 \$0.00	503(b)(9) Unsecured	\$0.00 \$1,968.40	
		Subtotal	\$1,968.40	Subtotal	\$1,968.40		
23	GALGON HVAC & MECHANICAL SERVICE, INC 1800 MACARTHUR BLVD NW ATLANTA, GA 30318-2024	809	503(b)(9) Unsecured	\$8,135.35 \$0.00	503(b)(9) Unsecured	\$587.59 \$7,544.76	Invoice numbers 6787 (\$433) and 7100 (\$2,767.84), assert services and goods received prior to the 503(b)(9) period. Invoice numbers 7050 (\$830.17) and 7052 (\$985.75) for quarterly billing per planned maintenance program are services, not goods as required by section 503(b)(9) of the bankruptcy code. Invoice number 7067, in the amount of \$2,123 is for a service performed prior to the 503(b)(9) period, is not a good as required by section 503(b)(9) of the bankruptcy code. Invoice number 7142, in the amount of \$955.59, includes service/trip charges for a total of \$408 which are not goods as required by section 503(b)(9) of the bankruptcy code.
		Subtotal	\$8,135.35	Subtotal	\$8,132.35		

* Plus unliquidated and/or undetermined amounts

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

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

	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
24	GARBER SCALE COMPANY DOUG PEIFER 250 E OREGON RD STE 101 LITITZ, PA 17543	760 503(b)(9) Unsecured	\$129.60 \$590.00	503(b)(9) Unsecured	\$0.00 \$719.60	The claimant provided a service not a good as required by section 503(b)(9) of the bankruptcy code.
		Subtotal	\$719.60	Subtotal	\$719.60	
25	GENERAL MAINTENANCE ENTERPRISES INC 2340 WR LARSON RD SAN ANTONIO, TX 78209	226 503(b)(9) Unsecured	\$3,164.00 \$0.00	503(b)(9) Unsecured	\$0.00 \$3,164.00	Spent Battery Pickup number 126201, in the amount of \$3,164, is for goods received prior to the 503(b)(9) period.
		Subtotal	\$3,164.00	Subtotal	\$3,164.00	
26	GEORGIA AUTOMATION 440 GEES MILLS COURT CONYERS, GA 30208	1077 503(b)(9) Unsecured	\$5,122.90 \$0.00	503(b)(9) Unsecured	\$0.00 \$5,122.90	Invoice numbers 68769 (\$591.08), 68709 (\$654.71), 68749 (\$282.54), 69255 (\$781.03), 69294 (\$252.57), 69633 (\$241.35), 69475 (\$83.33), 68670 (\$703.03), 69100 (\$1,063.52) and 66404 (\$469.74) are for freight charges and goods provided prior to the 503(b)(9) period.
		Subtotal	\$5,122.90	Subtotal	\$5,122.90	
27	GRAPHIC ART (CAMBRID) 21-25 UNION LANE CAMBRIDGE CB4 1PR UNITED KINGDOM	2188 (b) 503(b)(9) Unsecured	Undetermined* Undetermined*	503(b)(9) Unsecured	\$0.00 Undetermined*	Invoice numbers 0120904 and 0120903, asserted in GBP currency, are for goods received prior to the 503(b)(9) period.
		Subtotal	\$0.00	Subtotal	Undetermined*	
28	HARRISON MACHINE SHOP & WELDING INC ATTN VANESSA HARRISON 806 S KANSAS AVE OLATHE, KS 66061	283 (a) 503(b)(9) Unsecured	\$6,910.00 \$10,351.64	503(b)(9) Unsecured	\$6,865.00 \$10,396.64	Invoice number 41795, in the amount of \$45, is for repair services, not a good as required by section 503(b)(9) of the bankruptcy code.
		Subtotal	\$17,261.64	Subtotal	\$17,261.64	
29	HAWK ELECTRONICS LTD MALT STREET, ACCRINGTON LANCASHIRE BB1 5DR UNITED KINGDOM	315 (b) 503(b)(9) Unsecured	Undetermined* Undetermined*	503(b)(9) Unsecured	\$0.00 Undetermined*	Invoices numbers 14438 (\$19,011.02 USD), 14439 (\$5,145.92 USD), 14440 (\$7,515.27 USD), 14442 (\$1,455.23 USD) and 14441 (\$23889.61 USD), asserted in GBP currency, are for goods received prior to the 503(b)(9) period.
		Subtotal	\$0.00	Subtotal	Undetermined*	
30	INTRAPACK INDUSTRIES TINA HARRISON 10650 MARKISON RD DALLAS, TX 75238	2624 (a) 503(b)(9) Unsecured	\$27,828.10 \$5,544.36	503(b)(9) Unsecured	\$23,806.10 \$9,566.36	The claimant failed to provide a detailed list of the 503(b)(9) invoices. Based on the Debtor's books and records, the 503(b)(9) amount is \$23,806.10 and the unsecured amount is \$9,566.36.
		Subtotal	\$33,372.46	Subtotal	\$33,372.46	

* Plus unliquidated and/or undetermined amounts

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

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

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
31	J J KELLER & ASSOCIATES INC PO BOX 548 NEENAH, WI 54957-0548	415	503(b)(9) Unsecured	\$2,023.66 \$22,390.13	503(b)(9) Unsecured	\$2,002.23 \$22,411.56	Invoice number 900615401A, in the amount of \$134,95, includes freight (\$8.95) and sales tax (\$12.58) in the aggregate amount of \$21.43 which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$24,413.79	Subtotal	\$24,413.79	
32	JMC SERVICES INC C/O JMC ELECTRIC 3407 MERRIAM DR OCERLAND PARK, KS 66203	31	503(b)(9) Unsecured	\$1,175.67 \$0.00	503(b)(9) Unsecured	\$125.67 \$1,050.00	
			Subtotal	\$1,175.67	Subtotal	\$1,175.67	
33	KEYSTONE LAB INC. - NEWTON 600 EAST 17TH STREET SOUTH NEWTON, IA 50208	2662	503(b)(9) Unsecured	\$1,626.75 \$422.60	503(b)(9) Unsecured	\$0.00 \$2,049.35	The claimant has provided a service, not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$2,049.35	Subtotal	\$2,049.35	
34	KOCH NATIONALEASE - MINNEAPOLIS SDS-12-2754 PO BOX 86 MINNEAPOLIS, MN 55486-2754	1518	503(b)(9) Unsecured	\$16,692.75 \$14,870.95	503(b)(9) Unsecured	\$0.00 \$31,563.70	
			Subtotal	\$31,563.70	Subtotal	\$31,563.70	
35	LAKEMAN AND SONS INC STEVEN LEE PO BOX 787 HOLDEN, ME 04429	2914 (b)	503(b)(9) Secured Unsecured	\$2,434.60 \$2,434.60 \$0.00	503(b)(9) Secured Unsecured	\$0.00 \$0.00 \$4,869.20	Invoice number 235165, in the amount of \$2,434.60, is for goods which were received prior to the 503(b)(9) period. In addition, the claimant provides no basis for a secured claim. The invoice should be reclassified to a general unsecured claim.
			Subtotal	\$4,869.20	Subtotal	\$4,869.20	
36	LEE, ERIC 21879 RUCKER DRIVE CUPERTINO, CA 95014	705	503(b)(9)	\$1,701.65	503(b)(9) Unsecured	\$0.00 \$1,701.65	

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

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
37	LIFT TRUCK LEASE & SERVICE INC DBA A D LIFT TRUCK ATTN S M GULP 5434 NATURAL BRIDGE AVE ST LOUIS, MO 63120	700	503(b)(9) Unsecured	\$113.15 \$0.00	503(b)(9) Unsecured	\$44.26 \$68.89	Invoice number P52523, in the amount of \$113.15, includes period service charges, fuel surcharge, shop supplies and sales taxes in the amount of \$68.89 which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$113.15	Subtotal	\$113.15	
38	LIQUITECH INC 13520 W 107TH ST LENEXA, KS 66215	122	503(b)(9) Unsecured	\$4,314.39 \$11,574.74	503(b)(9) Unsecured	\$4,218.86 \$11,670.27	
			Subtotal	\$15,889.13	Subtotal	\$15,889.13	
39	MATRIX CABLE SOLUTIONS ATTN ANNETTE DESPRES PO BOX 432 AMERY, WI 54001	310	503(b)(9) Unsecured	\$3,842.12 \$5,094.56	503(b)(9) Unsecured	\$3,742.20 \$5,194.48	Invoice number 2738 includes \$99.92 for freight charges which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$8,936.68	Subtotal	\$8,936.68	
40	MCMAHON SALVAGE LLC 18862 139TH ST MAQUOKETA, IA 52060	291	503(b)(9) Unsecured	\$843.60 \$0.00	503(b)(9) Unsecured	\$0.00 \$843.60	
			Subtotal	\$843.60	Subtotal	\$843.60	
41	MCTEL CO INC 11841 SW KERNS RD STEWARTSVILLE, MO 64490	43	503(b)(9) Unsecured	\$959.60 \$0.00	503(b)(9) Unsecured	\$275.00 \$684.60	Invoice number 32033, in the amount of \$959.60, includes \$684.60 for time and expenses which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$959.60	Subtotal	\$959.60	
42	MID-STATES SUPPLY COMPANY INC ATTN KATRINA CROUCH 1716 GUINOTTE AVE KANSAS CITY, MO 64120	72	503(b)(9) Unsecured	\$2,352.41 \$2,109.61	503(b)(9) Unsecured	\$2,318.92 \$2,143.10	
			Subtotal	\$4,462.02	Subtotal	\$4,462.02	

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EIGHTH OMNIBUS CLAIMS OBJECTION
EXHIBIT B - MISCLASSIFIED CLAIMS**

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43	MONTGOMERY COMMUNICATIONS 222 W 6TH ST JUNCTION CITY, KS 66441	473	503(b)(9) Unsecured	\$433.44 \$284.45	503(b)(9) Unsecured	\$0.00 \$717.89	The claimant provided a service, not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$717.89	Subtotal	\$717.89	
44	NCB COMMODITIES INC PO BOX 3338 3340 CONCORD RD YORK, PA 17402	47	503(b)(9) Unsecured	\$105,425.46 \$0.00	503(b)(9) Unsecured	\$0.00 \$105,425.46	Invoice numbers 235198 (\$17,281.50), 235199 (\$17,789.90), 235200 (\$16,040.02), 235201 (\$1,610.70), 235202 (\$11,955.60), 235203 (\$5,616), 235302 (\$11,599.72), 235303 (\$5,938.92) and 235941 (\$17,593.10) are for goods received prior to the 503(b)(9) period.
			Subtotal	\$105,425.46	Subtotal	\$105,425.46	
45	NORMAN P MOELLER UNIVERSAL INSTRUMENT CO 315 W COLFAX STREET PALATINE, IL 60067	1969	503(b)(9) Unsecured	\$2,645.88 \$0.00	503(b)(9) Unsecured	\$2,400.00 \$245.88	Invoice number 59958, in the amount of \$2,645.88, includes tax (\$216) and freight (\$29.88) which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$2,645.88	Subtotal	\$2,645.88	
	TRANSFERRED TO: SONAR CREDIT PARTNERS II, LLC ATTN MICHAEL GOLDBERG 200 BUSINESS PARK DR, STE 201 ARMONK, NY 10504						
46	OAK LEAF AUTO SALVAGE 4208 OAK LEAF ROAD RHINELANDER, WI 54501	286	503(b)(9) Unsecured	\$3,421.80 \$0.00	503(b)(9) Unsecured	\$2,097.00 \$1,324.80	Invoice number 124018, in the amount of \$1,324.80, is for goods received prior to the 503(b)(9) period.
			Subtotal	\$3,421.80	Subtotal	\$3,421.80	
47	PACWEST SECURITY SERVICE ISSAM BASHAWATY 3303 HARBOR BLVD SUITE A103 COSTA MESA, CA 92626	1210 (b)	503(b)(9) Priority Unsecured	\$64,236.48 \$64,236.48 \$0.00	503(b)(9) Priority Unsecured	\$0.00 \$0.00 \$128,472.96	The invoices asserted as 503(b)(9) status are for services, not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$128,472.96	Subtotal	\$128,472.96	The invoices asserted as priority status are not entitled to priority under sections 507(a)(4), 507(a)(5) and 507(a)(8) of the bankruptcy code.
48	PENA'S DISPOSAL INC 12094 AVE 408 OROSI, CA 93647	2872	503(b)(9) Unsecured	\$2,972.00 \$0.00	503(b)(9) Unsecured	\$1,634.40 \$1,337.60	Invoice number 234024, in the amount of \$1,337.60, is for goods received prior to the 503(b)(9) period.
			Subtotal	\$2,972.00	Subtotal	\$2,972.00	

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EIGHTH OMNIBUS CLAIMS OBJECTION
EXHIBIT B - MISCLASSIFIED CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
49	ROCK'S TELECOM SERVICES FKA PARRISH COMMUNICATIONS PO BOX 8582 COLUMBUS, GA 31908-8582	151	503(b)(9) Unsecured	\$432.62 \$560.00	503(b)(9) Unsecured	\$417.12 \$575.50	Invoice number 20134350, in the amount of \$552.12, includes visit, labor and shipping charges, in the aggregate amount of \$135, which are not goods as required by section 503(b)(9) of the bankruptcy code.
		Subtotal	\$992.62	Subtotal	\$992.62		
50	S J DALTON INC DBA DALTON & CO 1901 W KILGORE AVE MUNCIE, IN 47304	601	503(b)(9) Unsecured	\$2,787.25 \$12,514.64	503(b)(9) Unsecured	\$2,604.90 \$12,696.99	
		Subtotal	\$15,301.89	Subtotal	\$15,301.89		
51	SANDLER BROS 4131 WHITESIDE ST LOS ANGELES, CA 90063-1618	1961	503(b)(9) Unsecured	\$661.60 \$0.00	503(b)(9) Unsecured	\$0.00 \$661.60	Invoice number 173948IN, in the amount of \$661.60, is for goods received prior to the 503(b)(9) period.
		Subtotal	\$661.60	Subtotal	\$661.60		
52	SEAGATE PLASTICS COMPANY C/O KILPATRICK & ASSOCIATES P C 903 N OPDYKE RD STE C AUBURN HILLS, MI 48326	2405 (a)	503(b)(9) Unsecured	\$66,330.68 \$0.00	503(b)(9) Unsecured	\$66,104.55 \$226.13	Invoice numbers 213585, 63417, 213586 and 63516 include freight charges, in the aggregate amount of \$226.13 which are not goods as required by section 503(b)(9) of the bankruptcy code.
		Subtotal	\$66,330.68	Subtotal	\$66,330.68		
53	SEIBEL MODERN MFG & WELDING CORP C/O HODGSON RUSS LLP ATTN CRAIG T LUTTERBEIN, ESQ 140 PEARL ST, STE 100 BUFFALO, NY 14202	725 (a)	503(b)(9) Unsecured	\$195,033.55 \$494,182.53	503(b)(9) Unsecured	\$195,009.55 \$494,206.53	Invoice number 18523, in the amount of \$24, is for freight/shipping charges which are not goods as required by section 503(b)(9) of the bankruptcy code.
		Subtotal	\$689,216.08	Subtotal	\$689,216.08		
54	SHARP BUSINESS SYSTEMS WAS/DOCUTEAM DEPT 1212 PO BOX 121212 DALLAS, TX 75312-1212	2222 (b)	503(b)(9) Unsecured	\$251.69 \$0.00	503(b)(9) Unsecured	\$0.00 \$251.69	The claimant has provided a service, not a good as required by section 503(b)(9) of the bankruptcy code.
		Subtotal	\$251.69	Subtotal	\$251.69		

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

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
55	SHIELDS ELECTRONICS SUPPLY INC PO BOX 1388 BRISTOL, VA 24203-1388	2157	503(b)(9) Unsecured	\$88.90 \$0.00	503(b)(9) Unsecured	\$0.00 \$88.90	Invoice numbers BP128244 (\$33.95) and BP128005 (\$54.95) are for goods which were received prior to the 503(b)(9) period.
			Subtotal	\$88.90	Subtotal	\$88.90	
56	SIERRA LIQUIDITY FUND LLC - ASIGNEE & ATT-IN-FACT FOR JAMES H LAAS CO INC - ASSIGNOR 2699 WHITE RD STE 255 IRVINE, CA 92614	341 (a)	503(b)(9) Unsecured	\$1,608.58 \$103.75	503(b)(9) Unsecured	\$1,503.34 \$208.99	Invoice numbers 119076402, 119076402, 119115501, 119102101, 119124901, 119124902, 119124903 and 119115502 include sales tax, in the aggregate amount of \$105.24, which is not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$1,712.33	Subtotal	\$1,712.33	
57	SIERRA LIQUIDITY FUND LLC - ASSIGNEE & ATT-IN-FACT FOR TED JOHNSON PROPANE - ASSIGNOR 2699 WHITE RD STE 255 IRVINE, CA 92614	1286	503(b)(9) Unsecured	\$1,146.25 \$0.00	503(b)(9) Unsecured	\$1,051.97 \$94.68	Invoice number 0011828-IN, in the amount of \$137.91, includes \$11.39 for sales tax which is not a good as required by section 503(b)(9) of the bankruptcy code. Invoice number 0011890-IN, in the amount of \$1,008.74, includes \$83.29 for sales tax which is not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$1,146.25	Subtotal	\$1,146.65	
58	SIERRA LIQUIDITY FUND LLC - ASSIGNEE & ATT-IN-FACT FOR MECHANICAL EQUIPMENT - ASSIGNOR 2699 WHITE RD - STE 255 IRVINE, CA 92614	340	503(b)(9) Unsecured	\$1,573.06 \$44.59	503(b)(9) Unsecured	\$1,448.40 \$169.25	Invoice number 40369 includes sales tax in the amount of \$124.66 which is not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$1,617.65	Subtotal	\$1,617.65	
59	SIERRA LIQUIDITY FUND LLC - ASSIGNEE & ATT-IN-FACT FOR FIVE STAR FOOD SERVICE - ASSIGNOR 2699 WHITE RD - STE 255 IRVINE, CA 92614	339	503(b)(9) Unsecured	\$1,630.80 \$0.00	503(b)(9) Unsecured	\$1,510.00 \$120.80	Invoice numbers 52274, 52275, 52278, 52280 and 805323 include sales tax, in the aggregate amount of \$120.80, which is not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$1,630.80	Subtotal	\$1,630.80	
60	SIERRA LIQUIDITY FUND LLC - ASSIGNEE & ATT-IN-FACT FOR TRI-STATE FIRE EXTINGUISHER - ASSIGNOR 2699 WHITE RD STE 255 IRVINE, CA 92614	631	503(b)(9) Unsecured	\$311.37 \$0.00	503(b)(9) Unsecured	\$285.00 \$26.37	Invoice number 13282, in the amount of \$311.37, includes \$26.37 for tax which is not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$311.37	Subtotal	\$311.37	

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	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION	
61	SIERRA LIQUIDITY FUND LLC - ASSIGNEE & ATT-IN-FACT FOR THE PHONE CONNECTION - ASSIGNOR 2699 WHITE RD STE 255 IRVINE, CA 92614	410	503(b)(9) Unsecured	\$378.70 \$0.00	503(b)(9) Unsecured	\$350.00 \$28.70	Invoice number 59382, in the amount of \$378.70, includes \$28.70 for tax which is not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$378.70	Subtotal	\$378.70	
62	SIERRA LIQUIDITY FUND LLC - ASSIGNEE & ATT-IN-FACT FOR CARL'S AUTO ELECTRIC - ASSIGNOR 2699 WHITE RD STE 255 IRVINE, CA 92614	632	503(b)(9) Unsecured	\$397.69 \$0.00	503(b)(9) Unsecured	\$364.85 \$32.84	Invoice number 27511, the amount of \$397.69, includes \$32.84 for state tax which is not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$397.69	Subtotal	\$397.69	
63	SIERRA LIQUIDITY FUND LLC - ASSIGNEE & ATT-IN-FACT FOR ROGAN INC - ASSIGNOR 2699 WHITE RD STE 255 IRVINE, CA 92614	619	503(b)(9) Unsecured	\$408.74 \$0.00	503(b)(9) Unsecured	\$382.00 \$26.74	Invoice number 63849, in the amount of \$408.74, includes \$26.74 for tax which is not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$408.74	Subtotal	\$408.74	
64	SOUTHERN PLUMBING COMPANY PO BOX 48180 ATLANTA, GA 30362-1180	831	503(b)(9) Unsecured	\$339.27 \$986.78	503(b)(9) Unsecured	\$41.77 \$1,284.28	Invoice number 13456-0531, in the amount of \$339.27, includes charges for labor, truck expense, overhead and fee, in the aggregate amount of \$297.50, which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$1,326.05	Subtotal	\$1,326.05	
65	SOUTHWESTERN ELECTRICAL CO INC 1638 E FIRST ST WICHITA, KS 67214	29 (a)	503(b)(9) Unsecured	\$108,790.36 \$22,351.00	503(b)(9) Unsecured	\$69,468.36 \$61,673.00	Invoice numbers 18188-1FREVISSED, 18187-1FREVISSED, 18149-1FINAL, 18216-1, 18193-1FINAL, 18148-1FINAL, 18173-1FINAL and 18123-1 Final include charges for labor, in the aggregate amount of \$38,506, which is not a good as required by section 503(b)(9) of the bankruptcy code. Invoice numbers 18166-1 (\$476.00) and 18085-1 (\$340.00), in the aggregate amount of \$816.00, include charges for labor which is not a good as required by section 503(b)(9).
			Subtotal	\$131,141.36	Subtotal	\$131,141.36	

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EIGHTH OMNIBUS CLAIMS OBJECTION
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66	TEMP STAFF INC 962 NORTH ST JACKSON, MS 39202-2614	2859	Priority	\$5,441.95	Priority Unsecured	\$0.00 \$5,441.95	Claim for staffing services does not qualify for priority status under section 507(a)(4) of the bankruptcy code.
					Subtotal	\$5,441.95	
67	THE BRASS EXCHANGE LLC ATTN MR HAKIM SATTERFIELD 189 COBB PKWY N STE A-8 MARIETTA, GA 20062	289 (b)	503(b)(9) Unsecured	\$7,378.54 \$0.00	503(b)(9) Unsecured	\$987.80 \$6,390.74	Invoice numbers 625862 (\$4,460.66), 625865 (\$972.66) and 625867 (\$957.42) are for goods received prior to the 503(b)(9) period.
			Subtotal	\$7,378.54	Subtotal	\$7,378.54	
68	THE M & M ASSOCIATES 5115 KESTER AVE #306 SHERMAN OAKS, CA 91403	467	503(b)(9) Unsecured	\$289.79 \$0.00	503(b)(9) Unsecured	\$0.00 \$289.79	Invoice numbers 725 (\$68.34), 737 (\$119.45) and 740 (\$102) are for goods received prior to the 503(b)(9) period.
			Subtotal	\$289.79	Subtotal	\$289.79	
69	TOTAL HEALTH AND SAFETY PO BOX 1127 TUCKER, GA 30085-1127 TRANSFERRED TO: SIERRA LIQUIDITY FUND, LLC 2699 WHITE ROAD, SUITE 255 IRVINE, CA 92614	1076	503(b)(9) Unsecured	\$2,026.19 \$0.00	503(b)(9) Unsecured	\$164.32 \$1,861.87	Invoice numbers 59291 (\$504.36), 59292 (\$76.84), 59293 (\$47.43), 59414 (\$363.63), 59145 (\$371.94), 59531 (\$75.31), 59509 (\$342.87) and 59532 (\$79.49) are for goods received prior to the 503(b)(9) period.
			Subtotal	\$2,026.19	Subtotal	\$2,026.19	
70	TWO RIVERS VENDING CORPORATION INC ATTN CHRISTINE D WEIDMAN 2137 LINDEN DR SALINA, KS 67401	676	503(b)(9) Unsecured	\$4,026.99 \$8,206.27	503(b)(9) Unsecured	\$3,753.16 \$8,480.10	Invoice number 5669, in the amount of \$50.68, includes \$3.40 for tax charges which are not goods as required by section 503(b)(9) of the bankruptcy code. Invoice number 13947, in the amount of \$3,868.17, includes \$263.17 for tax charges which are not goods as required by section 503(b)(9) of the bankruptcy code. Invoice number 5671, in the amount of \$39.19, includes \$2.63 for tax charges which are not goods as required by section 503(b)(9) of the bankruptcy code. Invoice number 5670, in the amount of \$68.95, includes \$4.63 for tax charges which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$12,233.26	Subtotal	\$12,233.26	

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71	UNIQUE SANITATION CO INC 45 DALE ST WEST BABYLON, NY 11704	167	503(b)(9) Unsecured	\$549.36 \$0.00	503(b)(9) Unsecured	\$0.00 \$549.36	The claimant has provided a service, not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$549.36	Subtotal	\$549.36	
72	UNITED PROCESS CONTROL 324 COURTYARD DR HILLSBOROUGH, NJ 08844-4253	2177	503(b)(9) Unsecured	\$1,640.00 \$4,920.00	503(b)(9) Unsecured	\$0.00 \$6,560.00	The claimant provided a service, not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$6,560.00	Subtotal	\$6,560.00	
73	WEIS FIRE & SAFETY EQUIP. CO. INC. PO BOX 3467 SALINA, KS 67402-3467	1175	503(b)(9) Unsecured	\$1,551.56 \$382.07	503(b)(9) Unsecured	\$0.00 \$1,933.63	The claimant provided a service, not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$1,933.63	Subtotal	\$1,933.63	
74	ZEB MACHINE CO INC 5805 LEESPORT AVE READING, PA 19605	323	503(b)(9) Unsecured	\$181.13 \$0.00	503(b)(9) Unsecured	\$0.00 \$181.13	Invoice number 6434, in the amount of \$181.13, is for goods received prior to the 503(b)(9) period.
			Subtotal	\$181.13	Subtotal	\$181.13	
			TOTAL	\$1,591,960.14*	TOTAL	\$1,591,960.14*	

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**EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTH 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	BATTERY EQUIPMENT SUPPLY CAROL FISHER 749 N HARVARD AVE VILLA PARK, IL 60181	783 (a)	503(b)(9) Priority Unsecured	\$0.00 \$0.00 \$3,247.42	503(b)(9) Priority Unsecured	\$0.00 \$0.00 \$1,623.71	The claimant duplicated the asserted amount of \$1,623.71 on invoice number 2671. The allowed amount of the claim should be \$1,623.71.
			Subtotal	\$3,247.42	Subtotal	\$1,623.71	
2	BOLIN AUTO & TRUCK PARTS INC PO BOX 3275 1211 SOUTH 10TH SAINT JOSEPH, MO 64503-0275	2208	503(b)(9) Unsecured	\$1,558.47 \$2,747.30	503(b)(9) Unsecured	\$1,558.47 \$1,188.83	Invoice numbers 349962 (\$375.06), 350121 (\$110.40) and 3504190 (\$1,073.01) were asserted as both 503(b)(9) and unsecured. The total unsecured amount should be \$1,188.83.
			Subtotal	\$4,305.77	Subtotal	\$2,747.30	
3	CHEMSOLV INC,-ROANOKE PO BOX 13847 ROANOKE, VA 24037-3847	1458	503(b)(9) Unsecured	\$915.00 \$5,497.00	503(b)(9) Unsecured	\$915.00 \$4,582.00	Invoice numbers 398304 (\$610) and 398303 (\$305) were paid 2/7/2013 on check number 5353859.
			Subtotal	\$6,412.00	Subtotal	\$5,497.00	
4	CIMCO RESOURCES 1616 WINDSOR RD LOVES PARK, IL 61111	3222	Unsecured	\$41,852.76	Unsecured	\$29,124.72	The Debtor's books and records indicate that the total amount owed on the invoices asserted by the claimant is \$29,124.72.
5	FAIR HARBOR CAPITAL LLC AS ASSIGNEE OF DELRAY SCRAPE RECYCLING LLC PO BOX 237037 NEW YORK, NY 10023	2772	503(b)(9)	\$2,069.86	503(b)(9)	\$2,005.62	The amount asserted (\$2,069.86) by the claimant on Spent Battery Pickup number 137262 does not match the receiving weight on the Debtor's books and records. The open amount on the Debtor's books and records is \$2,005.62.
6	FAIR HARBOR CAPITAL LLC AS ASSIGNEE OF TOWN OF SANDWICH PO BOX 237037 NEW YORK, NY 10023	2384	503(b)(9)	\$924.00	503(b)(9)	\$777.00	The claimant asserts Spent Battery Pickup number 29021, in the amount of \$924, which does not match the receiving weight on the Debtor's books and records. The open amount on the Debtor's books and records is \$777.

* Plus unliquidated and/or undetermined amounts

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

**EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTH OMNIBUS CLAIMS OBJECTION
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	NAME OF CLAIMANT	CLAIM NUMBER	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASS	MODIFIED AMOUNT	REASON FOR MODIFICATION
7	FIVE STAR FOOD SERVICE 1001 LONGLEY PL LAGRANGE, GA 30240	1278	Unsecured	\$4,854.80	Unsecured	\$4,344.80	Pre-petition credit memo numbers 19040400413E, in the amount of \$280, and 1904040113EX, in the amount of \$230, were not included within the claimant's supporting documentation.
8	GRAPHIC ART (CAMBRID) 21-25 UNION LANE CAMBRIDGE CB4 1PR UNITED KINGDOM	2188 (a)	503(b)(9) Unsecured	\$0.00	503(b)(9) Unsecured	\$0.00 \$1,917.41	The claimant asserts invoice numbers 0120904 and 0120903 in Great Britain Pounds. Invoice numbers 0120904 and 0120903 should be liquidated at \$833.66 USD and \$1,083.75 USD, respectively.
			Subtotal	Undetermined*	Subtotal	\$1,917.41	
9	HAWK ELECTRONICS LTD MALT STREET, ACCRINGTON LANCASHIRE BB1 5DR UNITED KINGDOM	315 (a)	503(b)(9) Unsecured	\$0.00	503(b)(9) Unsecured	\$0.00 \$57,017.05	The claimant asserted the claim in Great Britain Pounds. The Debtor has reconciled the claim and determined that the pre-petition general unsecured amount is \$57,017.05 USD.
			Subtotal	Undetermined*	Subtotal	\$57,017.05	

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**EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTH 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
10	HAYWARD AUTO SALVAGE INC. W 281 - E. RIVER RD. HAYWARD, WI 54843	1670	503(b)(9) Unsecured	\$1,645.78 \$7,251.92	503(b)(9) Unsecured	\$1,560.24 \$7,131.92	The amount (\$1,573.96) asserted by the claimant on Spent Battery Pickup number 121569 does not match the receiving weight on the Debtor's books and records. The amount on the Debtor's books and records for Spent Battery Pickup number 121569 is \$1,570.16.
			Subtotal	\$8,897.70	Subtotal	\$8,692.16	
							The amount (\$1,582.70) asserted by the claimant on Spent Battery Pickup number 121809 does not match the receiving weight on the Debtor's books and records. The amount on the Debtor's books and records for Spent Battery Pickup number 121809 is \$1,466.50.
							The amount (\$1,645.78) asserted by the claimant on Spent Battery Pickup number 121576 does not match the receiving weight on the Debtor's books and records. The amount on the Debtor's books and records for Spent Battery Pickup number 121576 is \$1,560.24.
11	L & L SCRAP METALS RECYCLING INC 128 TEXAS RD GALLIPOLIS, OH 45631	125	503(b)(9) Unsecured	\$3,959.98 \$4,593.04	503(b)(9) Unsecured	\$3,959.98 \$4,567.84	The Debtor's books and records indicate that the correct amount on invoice number 234246, is \$3,532.
			Subtotal	\$8,553.02	Subtotal	\$8,527.82	
12	LAKEMAN AND SONS INC STEVEN LEE PO BOX 787 HOLDEN, ME 04429	2914 (a)	503(b)(9) Secured Unsecured	\$0.00 \$0.00 \$4,869.20	503(b)(9) Secured Unsecured	\$0.00 \$0.00 \$2,434.60	Due to a discrepancy on the face of the Proof of Claim, the total filed amount is overstated. The Proof of Claim should be modified to \$2,434.60 general unsecured.
			Subtotal	\$4,869.20	Subtotal	\$2,434.60	

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

			ASSERTED			
NAME OF CLAIMANT	CLAIM NUMBER	ASSERTED CLAIM CLASSIFICATION	CLAIM AMOUNT	MODIFIED CLASS	MODIFIED AMOUNT	REASON FOR MODIFICATION
13 LKQ OF NEVADA #1725 IN C/O LKQ CORPORATION 655 GRASSMERE PARK DRIVE NASHVILLE, TN 37211	1748	503(b)(9)	\$1,800.00	503(b)(9)	\$1,685.24	The Debtor's records indicate that the correct amount on invoice number 48277625 is \$1,685.24 based on the Debtor's receiving weight.
		Unsecured	\$3,600.00	Unsecured	\$3,600.00	
		Subtotal	\$5,400.00	Subtotal	\$5,285.24	
14 LONE STAR INDUSTRIES INC DBA BUZZI UNICEM USA ATTN DAVID F HOWELL 10401 N MERIDIAN ST STE 400 INDIANAPOLIS, IN 46290	2062	503(b)(9)	\$6,242.26	503(b)(9)	\$6,190.50	The amount (\$3,153.69) asserted by the claimant on invoice number 90838299 does not match the receipt weight on the Debtor's books and records. The amount on the Debtor's books and records for invoice number 90838299 is \$3,127.54.
		Unsecured	\$12,412.15	Unsecured	\$12,385.90	
		Subtotal	\$18,654.41	Subtotal	\$18,576.40	
						The amount (\$3,006.56) asserted by the claimant on invoice number 90841325 does not match the receipt weight on the Debtor's books and records. The amount on the Debtor's books and records for invoice number 90841325 is \$2,981.63.
						The amount (\$3,235.70) asserted by the claimant on invoice number 90842629 does not match the receipt weight on the Debtor's books and records. The amount on the Debtor's books and records for invoice number 90842629 is \$3,208.87.
15 PACWEST SECURITY SERVICE ISSAM BASHAWATY 3303 HARBOR BLVD SUITE A103 COSTA MESA, CA 92626	1210 (a)	503(b)(9)	\$0.00	503(b)(9)	\$0.00	The claimant double counts the invoice amount of \$64,236.48 as both 503(b)(9) and priority classifications for a total of \$128,472.96. The total amount of the claim should be \$64,236.48 general unsecured.
		Priority	\$0.00	Priority	\$0.00	
		Unsecured	\$128,472.96	Unsecured	\$64,236.48	
		Subtotal	\$128,472.96	Subtotal	\$64,236.48	

* Plus unliquidated and/or undetermined amounts

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

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

			ASSERTED				
NAME OF CLAIMANT	CLAIM NUMBER	ASSERTED CLAIM CLASSIFICATION	CLAIM AMOUNT	MODIFIED CLASS	MODIFIED AMOUNT	REASON FOR MODIFICATION	
16 RHINE AUTO INC W5695 GARTON RD PLYMOUTH, WI 53073	199	503(b)(9) Unsecured	\$1,742.00 \$1,586.75	503(b)(9) Unsecured	\$1,544.00 \$1,586.75	The amount (\$1,560) asserted by the claimant for invoice number 236725 does not match the receiving weight on the Debtor's books and records. The amount on the Debtor's books and records for invoice number 236725 is \$1,380.	
		Subtotal	\$3,328.75	Subtotal	\$3,130.75		
							The amount (\$156) asserted by the claimant for invoice number 236726 does not match the receiving weight on the Debtor's books and records. The amount on the Debtor's books and records for invoice number 236726 is \$138.
17 ROUTE 51 AUTO & TRUCK PARTS LLC C/O WATSON MUNDORFF BROOK & SEPIC LLP ATTN TIMOTHY J WITT, ESQ 720 VANDERBILT RD CONNELLSVILLE, PA 15425	30	503(b)(9) Unsecured	\$5,301.49 \$14,850.40	503(b)(9) Unsecured	\$5,301.49 \$14,050.40	The amount (\$3,924.80) asserted by the claimant for invoice number 234022 does not match the receiving weight on the Debtor's books and records. The amount on the Debtor's books and records for invoice number 234022 is \$3,124.80.	
		Subtotal	\$20,151.89	Subtotal	\$19,351.89		
18 SHARP BUSINESS SYSTEMS WAS/DOCUTEAM DEPT 1212 PO BOX 121212 DALLAS, TX 75312-1212	2222 (a)	503(b)(9) Unsecured	\$0.00 \$251.69	503(b)(9) Unsecured	\$0.00 \$178.86	Invoice number AR222049, in the amount of \$72.83, was paid 1/14/2012 on check number 5249583.	
		Subtotal	\$251.69	Subtotal	\$178.86		
19 SIERRA LIQUIDITY FUND LLC - ASSIGNEE & ATT-IN-FACT FOR MARK GRAY ENTERPRISES DBA J TOPYS - ASSIGNOR 2699 WHITE RD STE 255 IRVINE, CA 92614	1287	503(b)(9)	\$1,102.00	503(b)(9)	\$1,086.00	The amount (\$1,102) asserted by the claimant on invoice number MGE-35 does not match the receiving weight on the Debtor's books and records. The amount on the Debtor's books and records for invoice number MGE-35 is \$1,086.	

* Plus unliquidated and/or undetermined amounts

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

**EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTH 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
20	TANNOR PARTNERS CREDIT FUND LP AS ASSIGNEE FOR PAUL F FEDERLINE & SON 150 GRAND ST STE 401 WHITE PLAINS, NY 10601	748	503(b)(9)	\$7,740.70	503(b)(9)	\$6,690.00	The amount asserted by the claimant for invoice number 236495 does not match the receiving weight on the Debtor's books and records. The amount on the Debtor's books and records for invoice number 236495 is \$3,702.
21	THE BRASS EXCHANGE LLC ATTN MR HAKIM SATTERFIELD 189 COBB PKWY N STE A-8 MARIETTA, GA 20062	289 (a)	503(b)(9) Unsecured	\$987.80 \$6,390.74	503(b)(9) Unsecured	\$845.91 \$5,473.24	The amount (\$4,460.66) asserted by the claimant for invoice number 625862 does not match the receiving weight on the Debtor's books and records. The amount on the Debtor's books and records for invoice number 625862 is \$3,820.21.
			Subtotal	\$7,378.54	Subtotal	\$6,319.15	The amount (\$972,66) asserted by the claimant for invoice number 625865 does not match the receiving weight on the Debtor's books and records. The amount on the Debtor's books and records for invoice number 625865 is \$833.04.
							The amount (\$957.42) asserted by the claimant for invoice number 625867, does not match the receiving weight on the Debtor's books and records. The amount of the Debtor's books and records for invoice number 625867 is \$819.99.
							The amount (\$987.80) asserted by the claimant for invoice number 625872 does not match the receiving weight on the Debtor's books and records. The amount of on the Debtor's books and records for invoice number 625872 is \$845.91

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EXIDE TECHNOLOGIES 13-11482 (KJC)
 EIGHTH 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
22	TRADE CENTER AUTO 2236 HWY 6 & 50 GRAND JUNCTION, CO 81505	446	Unsecured	\$4,696.08	Unsecured	\$3,702.78	Invoice number 127739, in the amount of \$993.30, was transferred to Sierra Liquidity Fund, LLC on docket number 536.
	TRANSFERRED TO: LIQUIDITY SOLUTIONS, INC. ONE UNIVERSITY PLAZA STE 312 HACKENSACK, NJ 07601						
			TOTAL	\$283,163.55*	TOTAL	\$253,266.74	

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**EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTH OMNIBUS CLAIMS OBJECTION
EXHIBIT D - NO LIABILITY CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	BEARINGS & DRIVES INC PO BOX 116733 ATLANTA, GA 30368-6733	2955	\$957.00	No liability exists on the Debtor's books and records. Invoice number 8177471, in the amount of \$1,200, is offset by the credit on invoice number 8137919, in the amount of \$2,157.
2	MISSOURI DEPARTMENT OF REVENUE ATTN YOLANDA CALVIN, LEGAL AIDE PO BOX 475 JEFFERSON CITY, MO 65105	3262	\$31.54	No liability exists on the Debtor's books and records. The Debtor does not pay Use Tax to this jurisdiction.
3	SC DEPARTMENT OF REVENUE PO BOX 12265 COLUMBIA, SC 29211	425	\$32.28	No liability exists on the Debtor's books and records. The Claimant asserts Liquor Tax for which Debtor is not liable.
4	SIERRA LIQUIDITY FUND LLC - ASSIGNEE & ATT-IN-FACT FOR A-1 BATTERY SHOP - ASSIGNOR 2699 WHITE RD STE 255 IRVINE, CA 92614	302	\$4,059.51	No liability exists on the Debtor's books and records. The Claimant has filed an invalid claim transfer which was objected to, by A-1 Battery Shop, on Docket Number 664.
5	TJOSVOLD EQUIPMENT 5352 285TH AVE GRANITE FALLS, MN 56241-1600	1115	\$5,339.42	No liability exists on the Debtor's books and records. Claimant has provided supporting detail which indicates a debtor unrelated to the Debtor in this bankruptcy case.
6	V. H. HOLMES & SONS 752 BIG CREEK RD RICHLANDS, VA 24641	2675	\$27,297.80	No liability exists on the Debtor's books and records.
		TOTAL	\$58,240.17	