

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re: : Chapter 11

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EXIDE TECHNOLOGIES, : Case No. 13-11482 (KJC)

:

Debtor.¹ :

: **Obj. Due: May 21, 2014 at 4:00 p.m. (Eastern)**

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**THIRD MONTHLY FEE APPLICATION OF
ERM CONSULTING & ENGINEERING INC. FOR
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT
OF EXPENSES AS ENVIRONMENTAL CONSULTANT TO THE DEBTOR FOR THE
PERIOD FROM MARCH 1, 2014 THROUGH MARCH 31, 2014**

Name of Applicant: ERM Consulting & Engineering Inc.

Authorized to Provide Professional Services to: Exide Technologies

Date of Retention: February 19, 2014, *nunc pro tunc* to January 6, 2014

Period for Which Compensation and Reimbursement is Sought: March 1, 2014 through March 31, 2014

Amount of Compensation Sought as Actual, Reasonable and Necessary: \$27,397.00 (80% of \$34,246.25)

Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary: \$1,507.46

This is a(n): x monthly ___ interim ___ final application.

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

Prior Applications:

Date Filed	Docket Number	Period Covered	Fees Requested	Expenses Requested	Fees Paid	Expenses Paid
3/4/2014	1503	1/6/2014-1/31/2014	\$72,648.20 (80% of \$90,810.25)	\$4,305.69	\$72,648.20	\$4,305.69
3/31/2014	1616	2/1/2014-2/28/2014	\$2,322.40 (80% of \$2,903)	\$190.91	pending	pending

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COMPENSATION BY PROFESSIONAL FOR THE PERIOD
MARCH 1, 2014 THROUGH MARCH 31, 2014

Professional	Rate	Hours	Total Fees
PRINCIPAL			
Carla Weinpahl	\$266.00	24.5	\$6517.00
Steven Schwartz	\$280.00	2	\$560.00
James A Perazzo	\$321.00	9	\$2889.00
Joseph Tarsavage	\$237.00	15.5	\$3673.50
Maureen C Leahy	\$259.00	15.00	\$3885.00
John R Markey	\$268.00	4	\$1072.00
SENIOR CONSULTANT			
Sandy Thompson	\$255.00	29	\$7395.00
Nils Thompson	\$217.00	20.75	\$4502.75
SENIOR ASSOCIATE			
Chris Cunningham	\$174.00	2	\$348.00
ASSOCIATE			
Martine Fontaine	\$130.00	4	\$520.00
Margot R. Scheuren	\$152.00	0.5	\$76.00
Heather Adams	\$145.00	5	\$725.00
Adria Reimer	\$151.00	8.50	\$1283.50
Maureen McHugh	\$120.00	0.25	\$30.00
SUPPORT STAFF			
Taronn Gilbert Evans	\$86.00	4.5	\$387.00
Tom Lordan	\$88.00	1	\$88.00
Matthew Stein	\$90.00	1	\$90.00
Constance E. Griffiths	\$77.00	1.5	\$115.50
Stephanie Vizquete	\$89.00	1	\$89.00
Totals:		149	\$ 34,246.25

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EXPENSE SUMMARY
MARCH 1, 2014 THROUGH MARCH 31, 2014

Expense Category	Service Provider (if applicable)	Total Expenses
Document Shipping	Fed Ex	\$17.46
Computer Use Charges		\$1490.00
Total		\$ 1,507.46

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In re:	:	Chapter 11
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EXIDE TECHNOLOGIES,	:	Case No. 13-11482 (KJC)
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ERM CONSULTING & ENGINEERING INC. FOR
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT
OF EXPENSES AS ENVIRONMENTAL CONSULTANT TO THE DEBTOR FOR THE
PERIOD FROM MARCH 1, 2014 THROUGH MARCH 31, 2014**

ERM Consulting & Engineering Inc. (“Applicant”), environmental consultant to the above-captioned debtor and debtor-in-possession (“Exide” or the “Debtor”), respectfully submits this monthly fee application (the “Application”) to this Court, pursuant to 11 U.S.C. § 331 and Rule 2016 of the Local Rules for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), for approval of compensation for professional services rendered as environmental consultant to the Debtor in the amount of \$27,397.00 (80% of \$34,246.25) together with reimbursement for actual and necessary expenses incurred in the amount of \$1,507.46 for the period commencing March 1, 2014 through and including March 31, 2014 (the “Fee Period”). In support of this Application, the Applicant represents as follows:

FACTUAL BACKGROUND

1. 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”).

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

2. 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.

3. 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.

INTERIM COMPENSATION ORDER AND FEE EXAMINER ORDER

4. On July 10, 2013, the Court entered an Order Pursuant to Bankruptcy Code Sections 105(a) and 331 Establishing Interim Compensation Procedures [Docket No. 330] (the “Interim Compensation Order”), which sets forth the procedures for interim compensation and reimbursement of expenses for all professionals in this case.

5. In particular, the Interim Compensation Order provides that a Professional may file and serve a Monthly Fee Application on or after the twenty-fifth (25th) day of each month following the month for which compensation is sought. Provided that there are no objections to the Monthly Fee Application filed within twenty-one (21) days after the service of a Monthly Fee Application, the Professional may file a certificate of no objection with the Court, after which the Debtor is authorized to pay such Professional eighty percent (80%) of the fees and one-hundred percent (100%) of the expenses requested in such Monthly Fee Application. If an objection to the Monthly Fee Application is filed, then the Debtor is authorized to pay 80% of the fees and 100% of the expenses not subject to an objection.

6. Additionally, on January 28, 2014, the Court entered an Order Appointing Fee Examiner and Establishing Related Procedures For the Review of Professional Claims [Docket No. 1283] (the “Fee Examiner Order”), which appoints Robert J. Keach as the fee examiner in the Chapter 11 Case and sets forth certain additional procedures related to the

review of professional fee applications filed in accordance with the Interim Compensation Procedures Order.

BASIS FOR THE MONTHLY FEE APPLICATION

7. By this Application, Applicant seeks compensation for the services rendered and reimbursement of expenses incurred by Applicant as environmental consultant to the Debtor for the Fee Period. The amount of fees sought for services rendered during this period is \$27,397.00 (80% of \$34,246.25). Reimbursement of actual necessary expenses incurred by Applicant during the Fee Period in connection with these services is requested in the amount of \$1,507.46. A summary of time detail is attached hereto as Exhibit A, and an expense summary is attached hereto as Exhibit B.

8. The Debtor sought approval of this Court to retain Applicant as environmental consultant, pursuant to 11 U.S.C. §§ 327(a) and 328(a), by motion filed October 24, 2013 [Docket No. 1310]. Applicant's retention was approved by this Court by Order dated February 19, 2014, *nunc pro tunc* to January 6, 2014 [Docket No. 1414] (the "Order"). The Order authorized Applicant to be compensated for services rendered and to be reimbursed for actual and necessary out-of-pocket expenses.

9. Applicant has received no payment and no promises of payment from any source for services rendered in this Chapter 11 Case. There is no agreement between Applicant and any other party for the sharing of compensation to be received for the services rendered by Applicant in this Chapter 11 Case. All professional and paraprofessional services for which compensation is sought herein were rendered solely for or on behalf of the Debtor in this case.

EXPENSES INCURRED BY APPLICANT

10. Applicant has incurred out-of-pocket expenses in the amount of \$1,342.46 in connection with its services rendered to the Debtor during the Fee Period. These expenses were incurred for items not included in Applicant's fees, including, but not limited to, document

delivery charges and computer charges (including, but not limited to, network usage fees, access to regulatory databases, and software costs). Applicant submits that all such expenses are necessary and actual expenses for the performance of its services in this case, and further submits that many of such expenses were necessitated by the time constraints under which Applicant's professionals and staff have operated in this case.

NOTICE

11. Notice of this Motion has been provided to: (i) the Debtor, Exide Technologies, 13000 Deerfield Parkway, Building 200, Milton, Georgia 30004, Attn: Phillip A. Damaska; (ii) counsel to the agent under the debtor in possession financing, Davis, Polk & Wardwell LLP, 450 Lexington Avenue, New York, New York 10017, Attn: Damian S. Schaible, Esq.; Richards, Layton & Finger, P.A., One Rodney Square, 920 North King Street, Wilmington, Delaware 19801, Attn: Mark D. Collins, Esq.; (iii) counsel to the agent for the Debtor's prepetition secured lenders, Greenberg Traurig, LLP, 3333 Piedmont Road NE, Suite 2500, Atlanta, Georgia 30305, Attn: David B. Kurzweil, Esq.; 1007 N. Orange St., Suite 1200, Wilmington, Delaware 19801, Attn: Dennis A. Meloro, Esq.; (iv) the indenture trustee for the Debtor's secured bond issuances, Wells Fargo Bank, N.A., 150 East 42nd Street, 40th Floor, New York, New York 10017, Attn: James R. Lewis; Foley & Lardner LLP, 321 North Clark Street, Suite 2800, Chicago, Illinois 60654, Attn: Mark F. Hebbeln, Esq.; (v) the indenture trustee for the Debtor's unsecured bond issuances, U.S. Bank Corporate Trust Services, Global Corporate Trust Services, 60 Livingston Ave., EP-MN-WSID, St. Paul, Minnesota 55107, Attn: Cindy Woodward; (vi) counsel to the unofficial committee of senior secured noteholders, Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019, Attn: Alice Belisle Eaton, Esq.; Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 King Street, Wilmington, Delaware 19801, Attn: Pauline K. Morgan, Esq.; (vii) the Office of the United States Trustee for the District of Delaware, Office of the United States Trustee, Room

2207, Lockbox 35,844 North King Street, Wilmington, Delaware 19801, Attn: Mark Kenney, Esq.; (viii) counsel to the Creditors' Committee Lowenstein Sandler LLP, 65 Livingston Avenue, Roseland, New Jersey 07068, Attn: Sharon L. Levine, Esq. and Morris, Nichols, Arsht & Tunnell LLP, 1201 N Market Street, Suite 1600, Wilmington Delaware 19801, Attn: Robert J. Dehney, Esq.; and (ix) the fee examiner, Robert J. Keach, Esq., Bernstein, Shur, Sawyer & Nelson, P.A., 100 Middle Street, P.O. Box 9729, Portland, Maine 04104-5029.

NO PRIOR REQUEST

12. No previous motion for the relief requested herein has been made to this or any other Court.

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CONCLUSION

13. WHEREFORE, the Applicant respectfully requests approval and payment of (a) monthly compensation for professional services rendered as environmental consultant for the Debtor in the sum of \$27,397.00 for eighty percent (80%) of the fees incurred during the Application Period; (b) reimbursement of actual and necessary expenses incurred in the sum of \$1,507.46; and (c) such other and further relief as is just and proper.

Dated: New York, New York
April 30, 2014

A handwritten signature in black ink, appearing to read 'Carla Weinpahl', is written over a light gray grid background.

Carla Weinpahl
Partner

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FOR THE DISTRICT OF DELAWARE

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In re: : Chapter 11

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ERM CONSULTING & ENGINEERING, INC. FOR COMPENSATION FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES AS ENVIRONMENTAL
CONSULTANT TO THE DEBTOR FOR THE PERIOD FROM
MARCH 1, 2014 THROUGH MARCH 31, 2014**

PLEASE TAKE NOTICE that the debtor and debtor in possession in the above-captioned bankruptcy case (the “Debtor”) filed today the attached Third Monthly Fee Application Of ERM Consulting & Engineering, Inc. For Compensation For Services Rendered And Reimbursement Of Expenses As Environmental Consultant To The Debtor For The Period From March 1, 2014 Through March 31, 2014 (the “Application”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Application or the relief requested therein must be made in writing, filed with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”), 824 Market Street, Wilmington, Delaware 19801, and served so as to be received by the following parties no later than **May 21, 2014 at 4:00 p.m. (Eastern)**:

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

(i) the Debtor, Exide Technologies, 13000 Deerfield Parkway, Building 200, Milton, Georgia 30004, Attn: Phillip A. Damaska (fax: 678-566-9188);

(ii) counsel to the Debtor, Skadden, Arps, Slate, Meagher & Flom LLP, Four Times Square, New York, New York 10036, Attn: Kenneth S. Ziman, Esq. (ken.ziman@skadden.com) and J. Eric Ivester, Esq. (eric.ivester@skadden.com) and One Rodney Square, P.O. Box 636, Wilmington, Delaware 19899-0636, Attn: Anthony W. Clark, Esq. (anthony.clark@skadden.com) and 155 N. Wacker Drive, Chicago, Illinois 60606-1720, Attn: James J. Mazza, Jr. (james.mazza@skadden.com);

(iii) counsel to the agent under the debtor in possession financing, Davis, Polk & Wardwell LLP, 450 Lexington Avenue, New York, New York 10017, Attn: Damian S. Schaible, Esq. (damian.schaible@davispolk.com) and Richards, Layton & Finger, P.A., One Rodney Square, 920 North King Street, Wilmington, Delaware 19801, Attn: Mark D. Collins, Esq. (collins@rlf.com);

(iv) counsel to the agent for the Debtor's prepetition secured lenders, Greenberg Traurig, LLP, 3333 Piedmont Road NE, Suite 2500, Atlanta, Georgia 30305, Attn: David B. Kurzweil, Esq. (kurzweild@gtlaw.com) and 1007 N. Orange St., Suite 1200, Wilmington, Delaware 19801, Attn: Dennis A. Meloro, Esq. (melorod@gtlaw.com);

(v) the indenture trustee for the Debtor's secured bond issuances, Wells Fargo Bank, N.A., 150 East 42nd Street, 40th Floor, New York, New York 10017, Attn: James R. Lewis and Foley & Lardner LLP, 321 North Clark Street, Suite 2800, Chicago, Illinois 60654, Attn: Mark F. Hebbeln, Esq. (mhebbeln@foley.com);

(vi) the indenture trustee for the Debtor's unsecured bond issuances, U.S. Bank National Association, Global Corporate Trust Services, 60 Livingston Ave., EP-MN-WS1D, St. Paul, Minnesota 55107, Attn: Cindy Woodward (cindy.woodward@usbank.com) and Arent Fox LLP, 1675 Broadway, New York, New York 10019, Attn: Andrew Silfen, Esq. (andrew.silfen@arentfox.com);

(vii) counsel to the unofficial committee of senior secured noteholders, Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019, Attn: Alice Belisle Eaton, Esq. (aeaton@paulweiss.com) and Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 King Street, Wilmington, Delaware 19801, Attn: Pauline K. Morgan, Esq. (pmorgan@ycst.com);

(viii) the Office of the United States Trustee for the District of Delaware, Office of the United States Trustee, Room 2207, Lockbox 35, 844 North King Street, Wilmington, Delaware 19801, Attn: Mark S. Kenney, Esq. (fax 302-573-6497);

(ix) counsel to the official committee of unsecured creditors, Lowenstein Sandler LLP, 65 Livingston Avenue, Roseland, New Jersey 07068, Attn: Kenneth A. Rosen, Esq. (krosen@lowenstein.com) and Sharon L. Levine, Esq. (slevine@lowenstein.com) and 1251

Avenue of the Americas, New York, New York 10020, Attn: Gerald C. Bender, Esq. (gbender@lowenstein.com) and Morris, Nichols, Arsht & Tunnell LLP, 1201 North Market Street, Suite 1600, Wilmington, Delaware 19801, Attn: Robert J. Dehney, Esq. (rdehney@mnat.com); and

(x) the fee examiner, Robert J. Keach, Esq., Bernstein, Shur, Sawyer & Nelson, P.A., 100 Middle Street, P.O. Box 9729, Portland, Maine 04104-5029 (rkeach@bernsteinshur.com).

PLEASE TAKE FURTHER NOTICE that if an objection is properly filed and served in accordance with the above procedures, a hearing on the Application will be held at a time and date to be determined before the Honorable Kevin J. Carey, United States Bankruptcy Judge for the District of Delaware, in the United States Bankruptcy Court for the District of Delaware, 5th Floor, Courtroom 5, 824 North Market Street, Wilmington, Delaware 19801 (“Hearing”). Only objections made in writing and timely filed and received will be considered by the Court at such Hearing.

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**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO
THE APPLICATION ARE TIMELY FILED AND RECEIVED IN ACCORDANCE
WITH THE ABOVE PROCEDURES, THE RELIEF REQUESTED IN THE
APPLICATION MAY BE GRANTED WITHOUT FURTHER NOTICE OR HEARING.**

Dated: Wilmington, Delaware
April 30, 2014

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

/s/ Kristhy M. Peguero

Anthony W. Clark (I.D. No. 2051)
Kristhy M. Peguero (I.D. No. 4903)
One Rodney Square
P.O. Box 636
Wilmington, Delaware 19899-0636
Telephone: (302) 651-3000
Fax: (302) 651-3001

- and -

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

- and -

James J. Mazza, Jr.
155 N. Wacker Dr.
Chicago, Illinois 60606
Telephone: (312) 407-0700
Fax: (312) 407-0411

Counsel for Debtor and Debtor in Possession

EXHIBIT A

Employee Name	Date	Hours	Rate	Amount	Comments
Adria Reimer	3/10/2014	0.50	151.00	75.50	Coordinate scanning of Tampa, FL and Memphis, TN documents, load documents onto FTP site
Adria Reimer	3/12/2014	2.00	151.00	302.00	Retrieve Columbus documents from FTP and begin review
Adria Reimer	3/14/2014	1.00	151.00	151.00	review of available information for Columbus site
Adria Reimer	3/17/2014	1.50	151.00	226.50	review available reports and documents and environmental assessment for Columbus site
Adria Reimer	3/18/2014	0.50	151.00	75.50	assisted N. Thompson with analysis of Columbus site.
Adria Reimer	3/19/2014	1.00	151.00	151.00	Review and update documents provided by Exide
Adria Reimer	3/27/2014	2.00	151.00	302.00	Complete additional analysis regarding idle asset properties.
Carla Weinpahl	3/2/2014	0.50	266.00	133.00	Review of fee application
Carla Weinpahl	3/3/2014	2.00	266.00	532.00	Review and finalization of fee application
Carla Weinpahl	3/4/2014	1.00	266.00	266.00	Fee application finalization
Carla Weinpahl	3/11/2014	0.50	266.00	133.00	Coordination for review of Columbus and Reading sites
Carla Weinpahl	3/12/2014	2.00	266.00	532.00	Call with Skadden, communication with teams on Columbus and Reading sites and posting of documents
Carla Weinpahl	3/17/2014	1.00	266.00	266.00	Review of Columbia and Reading information
Carla Weinpahl	3/18/2014	2.00	266.00	532.00	Discussions with teams on Columbus and Reading sites
Carla Weinpahl	3/19/2014	1.00	266.00	266.00	Review of Columbia and Reading information
Carla Weinpahl	3/25/2014	0.50	266.00	133.00	Fee application review
Carla Weinpahl	3/26/2014	2.00	266.00	532.00	Call with Skadden. Site analysis and site estimates and preparation for conference calls
Carla Weinpahl	3/27/2014	2.00	266.00	532.00	Site analysis and preparation for conference calls
Carla Weinpahl	3/28/2014	6.00	266.00	1,596.00	Site analysis and preparation for conference calls
Carla Weinpahl	3/31/2014	4.00	266.00	1,064.00	prep for and attendance on external consultant call
Chris Cunningham	3/3/2014	2.00	174.00	348.00	Support on site analysis
Constance E. Griffiths	3/10/2014	1.50	77.00	115.50	Scanning Documents for Tampa 1 hr and for Memphis TN .5 hrs.
Heather Adams	3/7/2014	2.00	145.00	290.00	FTP document management
Heather Adams	3/11/2014	2.00	145.00	290.00	QAQC of Site Summary Spreadsheet.
Heather Adams	3/12/2014	1.00	145.00	145.00	QAQC of Site Summary Spreadsheet.
James A Perazzo	3/26/2014	2.00	321.00	642.00	conf call with client in prep for secured creditors call.
James A Perazzo	3/27/2014	2.00	321.00	642.00	Commence preparation of outline for calls with external consultants
James A Perazzo	3/28/2014	2.00	321.00	642.00	Preparation for calls with external consultants
James A Perazzo	3/31/2014	3.00	321.00	963.00	Prep for consultants call . Discussion with CW and ST.
John R Markey	3/27/2014	3.00	268.00	804.00	Review Frankfort report and update projections
John R Markey	3/28/2014	1.00	268.00	268.00	Update analysis
Joseph Tarsavage	3/5/2014	0.50	237.00	118.50	Analysis of Browns Battery, Price Battery, Reading off-site, and Reading Smelter sites.
Joseph Tarsavage	3/12/2014	2.00	237.00	474.00	Analysis of Browns Battery, Price Battery, Reading off-site, and Reading Smelter sites.
Joseph Tarsavage	3/13/2014	3.00	237.00	711.00	Analysis of Browns Battery, Price Battery, Reading off-site, and Reading Smelter sites.
Joseph Tarsavage	3/14/2014	4.00	237.00	948.00	Analysis of Browns Battery, Price Battery, Reading off-site, and Reading Smelter sites.
Joseph Tarsavage	3/17/2014	3.00	237.00	711.00	Complete analysis for Browns Battery, Price Battery, Reading off-site, and Reading Smelter sites.
Joseph Tarsavage	3/27/2014	3.00	237.00	711.00	Complete analysis for Browns Battery, Price Battery, Reading off-site, and Reading Smelter sites.
Margot R. Scheuren	3/3/2014	0.50	152.00	76.00	Invoice preparation
Martine Fontaine	3/6/2014	4.00	130.00	520.00	Preparing reviewed documents list for ftp to share with third parties.
Matthew Stein	3/3/2014	1.00	90.00	90.00	Invoice preparation
Maureen C Leahy	3/18/2014	1.00	259.00	259.00	One idle asset evaluation
Maureen C Leahy	3/26/2014	2.00	259.00	518.00	Additional environmental assessment efforts
Maureen C Leahy	3/27/2014	2.25	259.00	582.75	Additional environmental assessment efforts
Maureen C Leahy	3/28/2014	5.25	259.00	1,359.75	Additional environmental assessment efforts
Maureen C Leahy	3/31/2014	4.50	259.00	1,165.50	Conference call; additional evaluation of sites.
Maureen McHugh	3/10/2014	0.25	120.00	30.00	Document management (hard copies from Skadden)
Nils Thompson	3/14/2014	1.50	217.00	325.50	Columbus, GA: Discussions w/ consultant & analysis.
Nils Thompson	3/17/2014	7.50	217.00	1,627.50	Columbus, GA: Research, discussions w/ consultant & analysis

Nils Thompson	3/18/2014	3.25	217.00	705.25	Columbus, GA: Research, discussions w/ consultant & Exide, & analysis
Nils Thompson	3/18/2014	1.50	217.00	325.50	Columbus, GA: Two conf. calls w/in ERM.
Nils Thompson	3/19/2014	2.00	217.00	484.00	Columbus, GA: Research & analysis
Nils Thompson	3/19/2014	1.00	217.00	217.00	Columbus, GA: Conf. call w/in ERM.
Nils Thompson	3/27/2014	4.00	217.00	868.00	Prepared final analysis table.
Sandra Thompson	3/18/2014	2.00	255.00	510.00	Internal call to discuss Reading and Columbus sites and coordination of new information with Matt Love of Exide.
Sandra Thompson	3/19/2014	4.00	255.00	1,020.00	Internal team meeting to review and finalizing documentation draft and scheduling for upcoming meetings with Skadden.
Sandra Thompson	3/21/2014	2.00	255.00	510.00	invoicing
Sandra Thompson	3/26/2014	2.00	255.00	510.00	Call with Skadden and A&M on strategy for calls with consultants; follow-up internal call to plan additional analysis needed
Sandra Thompson	3/30/2014	5.00	255.00	1,275.00	Review of files and internal prep for call with consultants.
Sandra Thompson	3/31/2014	4.00	255.00	1,020.00	Internal call to prep for call with consultants and call with consultants
Sandra Thompson	3/11/2014	2.00	255.00	510.00	file management and scheduling of next steps, budget management
Sandra Thompson	3/12/2014	2.00	255.00	510.00	organization of staff to review Reading and Columbus smelters on short notice; call with Skadden on next steps including review and possible meeting with consultants.
Sandra Thompson	3/14/2014	1.00	255.00	255.00	Responding to team questions
Sandra Thompson	3/24/2014	3.00	255.00	765.00	February invoicing preparation
Sandra Thompson	3/27/2014	1.00	255.00	255.00	analysis and internal prep
Sandra Thompson	3/28/2014	1.00	255.00	255.00	budget and invoice management
Stephanie Vizuite	3/19/2014	1.00	89.00	89.00	graphics support
Steven Schwartz	3/3/2014	1.00	280.00	280.00	Review questions and Wheatly depo from Malone and prepare for scheduled conference call.
Steven Schwartz	3/26/2014	1.00	280.00	280.00	Conf Call with Counsel - planning for calls nxt week
Taronn Gilbert Evans	3/12/2014	4.50	86.00	387.00	Scanning project for Exide Technologies Columbus, GA
Tom Lordan	3/3/2014	1.00	88.00	88.00	One hour Scanning of Documents for Joe Tarsavage.
Total		149.00		34,246.25	

EXHIBIT B

	Employee Name	Date	Hours	Computer Rate	Computer Charge
Recovery Computer	Adria Reimer	3/10/2014	0.50	10.0000	5.00
Recovery Computer	Adria Reimer	3/12/2014	2.00	10.0000	20.00
Recovery Computer	Adria Reimer	3/14/2014	1.00	10.0000	10.00
Recovery Computer	Adria Reimer	3/17/2014	1.50	10.0000	15.00
Recovery Computer	Adria Reimer	3/18/2014	0.50	10.0000	5.00
Recovery Computer	Adria Reimer	3/19/2014	1.00	10.0000	10.00
Computer Costs	Adria Reimer	3/27/2014	2.00	10.0000	20.00
Computer Costs	Carla Weinpahl	3/2/2014	0.50	10.0000	5.00
Computer Costs	Carla Weinpahl	3/3/2014	2.00	10.0000	20.00
Computer Costs	Carla Weinpahl	3/4/2014	1.00	10.0000	10.00
Computer Costs	Carla Weinpahl	3/11/2014	0.50	10.0000	5.00
Computer Costs	Carla Weinpahl	3/12/2014	2.00	10.0000	20.00
Computer Costs	Carla Weinpahl	3/17/2014	1.00	10.0000	10.00
Computer Costs	Carla Weinpahl	3/18/2014	2.00	10.0000	20.00
Computer Costs	Carla Weinpahl	3/19/2014	1.00	10.0000	10.00
Computer Costs	Carla Weinpahl	3/25/2014	0.50	10.0000	5.00
Computer Costs	Carla Weinpahl	3/26/2014	2.00	10.0000	20.00
Computer Costs	Carla Weinpahl	3/27/2014	2.00	10.0000	20.00
Computer Costs	Carla Weinpahl	3/28/2014	6.00	10.0000	60.00
Recovery Computer	Carla Weinpahl	3/31/2014	4.00	10.0000	40.00
Recovery	Chris Cunningham	3/3/2014	2.00	10.0000	20.00
Recovery	Constance E. Griffiths	3/10/2014	1.50	10.0000	15.00
Recovery	Heather Adams	3/7/2014	2.00	10.0000	20.00
Computer Costs	Heather Adams	3/11/2014	2.00	10.0000	20.00
Computer Costs	Heather Adams	3/12/2014	1.00	10.0000	10.00
Computer Costs	James A Perazzo	3/26/2014	2.00	10.0000	20.00
Computer Costs	James A Perazzo	3/27/2014	2.00	10.0000	20.00
Computer Costs	James A Perazzo	3/28/2014	2.00	10.0000	20.00
Computer Costs	James A Perazzo	3/31/2014	3.00	10.0000	30.00
Computer Costs	John R Markey	3/27/2014	3.00	10.0000	30.00
Computer Costs	John R Markey	3/28/2014	1.00	10.0000	10.00
Computer Costs	Joseph Tarsavage	3/5/2014	0.50	10.0000	5.00
Computer Costs	Joseph Tarsavage	3/12/2014	2.00	10.0000	20.00
Computer Costs	Joseph Tarsavage	3/13/2014	3.00	10.0000	30.00
Computer Costs	Joseph Tarsavage	3/14/2014	4.00	10.0000	40.00
Computer Costs	Joseph Tarsavage	3/17/2014	3.00	10.0000	30.00
Computer Costs	Joseph Tarsavage	3/27/2014	3.00	10.0000	30.00
Computer Costs	Margot R. Scheuren	3/3/2014	0.50	10.0000	5.00

Computer Costs	Martine Fontaine	3/6/2014	4.00	10.0000	40.00
Recovery	Matthew Stein	3/3/2014	1.00	10.0000	10.00
Computer Costs	Maureen C Leahy	3/18/2014	1.00	10.0000	10.00
Computer Costs	Maureen C Leahy	3/26/2014	2.00	10.0000	20.00
Computer Costs	Maureen C Leahy	3/27/2014	2.25	10.0000	22.50
Computer Costs	Maureen C Leahy	3/28/2014	5.25	10.0000	52.50
Computer Costs	Maureen C Leahy	3/31/2014	4.50	10.0000	45.00
Computer Costs	Maureen McHugh	3/10/2014	0.25	10.0000	2.50
Recovery Computer	Nils Thompson	3/14/2014	1.50	10.0000	15.00
Recovery Computer	Nils Thompson	3/17/2014	7.50	10.0000	75.00
Recovery Computer	Nils Thompson	3/18/2014	3.25	10.0000	32.50
Recovery Computer	Nils Thompson	3/18/2014	1.50	10.0000	15.00
Recovery Computer	Nils Thompson	3/19/2014	2.00	10.0000	20.00
Recovery Computer	Nils Thompson	3/19/2014	1.00	10.0000	10.00
Recovery Computer	Nils Thompson	3/27/2014	4.00	10.0000	40.00
Recovery	Sandra Thompson	3/18/2014	2.00	10.0000	20.00
Recovery	Sandra Thompson	3/19/2014	4.00	10.0000	40.00
Recovery	Sandra Thompson	3/21/2014	2.00	10.0000	20.00
Recovery	Sandra Thompson	3/26/2014	2.00	10.0000	20.00
Recovery	Sandra Thompson	3/30/2014	5.00	10.0000	50.00
Recovery	Sandra Thompson	3/31/2014	4.00	10.0000	40.00
Recovery Computer	Sandra Thompson	3/11/2014	2.00	10.0000	20.00
Recovery Computer	Sandra Thompson	3/12/2014	2.00	10.0000	20.00
Computer Costs	Sandra Thompson	3/14/2014	1.00	10.0000	10.00
Computer Costs	Sandra Thompson	3/24/2014	3.00	10.0000	30.00
Computer Costs	Sandra Thompson	3/27/2014	1.00	10.0000	10.00
Computer Costs	Sandra Thompson	3/28/2014	1.00	10.0000	10.00
Computer Costs	Stephanie Vizquete	3/19/2014	1.00	10.0000	10.00
Computer Costs	Steven Schwartz	3/3/2014	1.00	10.0000	10.00
Computer Costs	Steven Schwartz	3/26/2014	1.00	10.0000	10.00
Computer Costs	Taronn Gilbert Evans	3/12/2014	4.50	10.0000	45.00
Computer Costs	Tom Lordan	3/3/2014	1.00	10.0000	10.00

Total Computer 149.00 1,490.00

Exide Technologies
ERM Summary of Expense charges
March 1, 2014 THROUGH March 31, 2014.

	Invoice No.	
FedEx	2-590-64931	\$17.46