

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: July 2, 2014 at 11:00 a.m. (Eastern)**

: **Obj. Due: June 16, 2014 at 4:00 p.m. (Eastern)**

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DEBTOR’S (SUBSTANTIVE) NINTH OMNIBUS OBJECTION PURSUANT TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY RULE 3007, AND LOCAL RULE 3007-1 TO CERTAIN (I) NO LIABILITY CLAIMS, (II) MISCLASSIFIED CLAIMS, AND (III) REDUCE AND ALLOW CLAIMS (“NINTH OMNIBUS CLAIMS OBJECTION”)

The debtor and debtor in possession in the above-captioned case (“Exide” or the “Debtor”), hereby files this omnibus objection (the “Objection”) to certain claims (the “Disputed Claims”) filed against the Debtor, and listed on Exhibits A, B, and C to the proposed form of order (the “Proposed Order”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 3007-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and respectfully requests entry of an order in substantially the form of the Proposed Order filed concurrently herewith: (i) disallowing and expunging the proofs of claim listed on Exhibit A to the Proposed Order; (ii) adjusting the priorities of the proofs of claim listed on Exhibit B to the Proposed Order; and (iii) reducing and allowing the proofs of claim listed on Exhibit C to the Proposed Order. In support of the Objection, the Debtor relies on the Declaration of Holden

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.

Bixler in Support of the Debtor's (Substantive) Ninth Omnibus Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain (I) No Liability Claims, (II) Misclassified Claims, and (III) Reduce and Allow Claims attached hereto as Exhibit 1. In further support of the Objection, the Debtor respectfully represents:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider the Objection under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue of the case and the Objection in this District is proper under 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested herein are Bankruptcy Code section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1.

3. Pursuant to Local Rule 9013-1(f), the Debtor consents to the entry of a final judgment or order with respect to the Objection if it is determined that this Court would lack Article III jurisdiction to enter such final order or judgment absent the consent of the parties.

BACKGROUND

A. The Chapter 11 Case

4. On June 10, 2013 (the "Petition Date"), the Debtor commenced a case by filing a petition for relief under chapter 11 of the Bankruptcy Code (the "Chapter 11 Case").

5. The Debtor continues to operate its business and manage its property as debtor and debtor in possession pursuant to Bankruptcy Code sections 1107(a) and 1108.

6. On June 18, 2013, the United States Trustee for the District of Delaware (the "U.S. Trustee") appointed an Official Committee of Unsecured Creditors (the "Creditors' Committee") in the Chapter 11 Case pursuant to Bankruptcy Code section 1102. No trustee has been appointed in the Chapter 11 Case.

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

B. Bar Dates and Proofs of Claim

8. On June 11, 2013, this Court entered an order appointing GCG, Inc. (“GCG”) as the claims and noticing agent pursuant to the Order Authorizing Employment And Retention Of GCG, Inc. As Claims And Noticing Agent, Pursuant To 28 U.S.C. § 156(c), 11 U.S.C. § 105(a) And Fed. R. Bankr. P. 2002 And Del. Bankr. L.R. 2002-1(F) *Nunc Pro Tunc* To The Petition Date (Docket No. 76). GCG is authorized to maintain (i) all proofs of claim filed against the Debtor and (ii) an official claims register by docketing all proofs of claim in a claims database containing, inter alia, information regarding the name and address of each claimant, the date the proof of claim was received by GCG, the claim number assigned to the proof of claim, and the asserted amount and classification of the claim.

9. On September 13, 2013, this Court entered the Order (I) Establishing Deadlines For (A) Submitting Proofs Of Claim And (B) Requests For Payment Under Bankruptcy Code Section 503(b)(9), (II) Approving The Form And Manner For Submitting Such Proofs Of Claim And Requests For Payment, And (III) Approving Notice Thereof (Docket No. 696) (the “Bar Date Order”). Pursuant to the Bar Date Order, all persons or entities who wished to assert claims against the Debtor’s estate were required to file a proof of claim against the Debtor in the Chapter 11 Case by no later than October 31, 2013 at 5:00 p.m. (Eastern) (the “General Bar Date”). The General Bar Date applied to any person, other than governmental units, holding a claim (other than a personal injury claim related to the Debtor’s Vernon facility) against the Debtor allegedly owing as of the Petition Date, including claims under Bankruptcy Code section 503(b)(9), or any person with an alleged claim or expense claimed to have allegedly arisen prior to the Petition Date. Any governmental unit seeking to file a claim against the Debtor was

required to do so by no later than December 9, 2013 at 5:00 p.m. (Eastern). Any person seeking to file a personal injury claim related to the Debtor's Vernon facility was required to do so no later than January 31, 2014 at 5:00 p.m. (Eastern).²

10. To date, approximately 3,892 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 eight 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 479 Claims asserting more than \$4.9 billion in liquidated liabilities (plus unliquidated amounts).

11. The Debtor and its advisors are comprehensively reviewing and reconciling all Claims. Moreover, in the ordinary course of business, the Debtor maintains books and records (the "Books and Records") that reflect, among other things, the Debtor's liabilities and the amounts thereof owed to its creditors. The Debtor is also comparing the Claims asserted in the Proofs of Claims to its Books and Records to determine the validity of the asserted claims.

12. This reconciliation process includes identifying particular categories of Claims that may be targeted for disallowance and expungement, reduction and allowance, reassignment, or reclassification. To reduce the number of Claims, and to avoid possible double recovery, or otherwise improper recovery by Claimants, the Debtor anticipates filing several omnibus objections.

² See Supplemental Order (I) Extending The Claims Bar Date Solely With Respect To Personal Injury Claims Relating To The Debtor's Vernon California Facility, (II) Approving The Form And Manner For Submitting Such Proofs Of Claim, And (III) Approving Notice Thereof, entered Oct. 24, 2013 (Docket No. 956).

RELIEF REQUESTED

13. By the Objection, the Debtor respectfully seeks entry of an order pursuant to Bankruptcy Code section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1: (a) disallowing and expunging the Claims set forth on Exhibit A attached to the Proposed Order; (b) adjusting the priorities of the Claims set forth on Exhibit B attached to the Proposed Order; and (c) reducing and allowing each of the Claims set forth on Exhibit C to the Proposed Order.

OBJECTION TO CLAIMS

A. No Liability Claims

14. The Disputed Claims identified on Exhibit A 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 A to the Proposed Order. Accordingly, the Debtor requests that each of the No Liability Claims be disallowed and expunged in its entirety.

B. Misclassified Claims

15. 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.

16. 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 “Modified Classification” on Exhibit B to the Proposed Order.

C. Reduce and Allow Claims

17. With respect to the Disputed Claims listed on Exhibit C to the Proposed Order (the “Reduce and Allow Claims”), the Debtor objects to the Reduce and Allow Claims pursuant to Bankruptcy Code section 502(b)(1) because such claims are filed for amounts that differ from the amounts reflected on the Debtor’s Books and Records. In evaluating the Reduce and Allow Claims, the Debtor has thoroughly reviewed its Books and Records and the filed proofs of claim, as well as the supporting documentation provided by each Claimant, and has determined that the amount of each claim is overstated for the reasons set forth in the column titled “Reason for Modification” on Exhibit C to the Proposed Order. Accordingly, the Debtor objects to the Reduce and Allow Claims and requests that the Reduce and Allow Claims be reduced and allowed in the amounts set forth on Exhibit C to the Proposed Order.

APPLICABLE AUTHORITY

18. 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).

19. 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.

20. The Debtor has met its burden in refuting the legal sufficiency of the Disputed Claims and has demonstrated that (a) the No Liability 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; and (c) the Reduce and Allow Claims should be reduced and allowed in the amount as indicated on Exhibit C to the Proposed Order.

21. 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 each No Liability Claim listed on Exhibit A attached to the Proposed Order, (ii) reclassifying each Misclassified Claim as set forth on Exhibit B attached to the Proposed Order, and (iii) reducing and allowing each Reduce and Allow Claim as set forth on Exhibit C attached to the Proposed Order.

RESPONSES TO THE OBJECTION

22. 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 June 16, 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 **July 2, 2014 at 11:00 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.

23. Every Response must be filed on or before **June 16, 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 the Response Deadline, 4:00 p.m. (Eastern) on June 16, 2014**.

24. 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.

25. 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 **July 2, 2014 at 11:00 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.

26. 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.

27. 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.

28. 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.**

29. **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 No Liability Claim, Misclassified Claim, and Reduce and Allow Claim.

RESERVATION OF RIGHTS

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

STATEMENT OF COMPLIANCE WITH LOCAL BANKRUPTCY RULE 3007-1

31. 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

32. 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

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

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

Dated: Wilmington, Delaware
June 2, 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: July 2, 2014 at 11:00 a.m. (Eastern)**
: **Obj. Due: June 16, 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) Ninth Omnibus Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain (I) No Liability Claims, (II) Misclassified Claims, and (III) Reduce and Allow Claims (the “Objection”)**.²

PLEASE TAKE FURTHER NOTICE that responses to the Objection, if any, must be filed on or before **June 16, 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 June 16, 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 JULY 2, 2014 at 11:00 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
June 2, 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) NINTH OMNIBUS OBJECTION PURSUANT
TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY RULE 3007,
AND LOCAL RULE 3007-1 TO CERTAIN (I) NO LIABILITY CLAIMS,
(II) MISCLASSIFIED CLAIMS, AND (III) REDUCE AND ALLOW CLAIMS**

I, Holden Bixler, pursuant to 28 U.S.C. § 1746, declare:

1. I am a Senior Director for Alvarez & Marsal (“A&M”). I am currently one of the restructuring advisors to the debtor and debtor in possession in the above-captioned case (“Exide” or the “Debtor”). In this capacity, I am one of the persons responsible for overseeing the claims reconciliation and objection process in the Debtor’s Chapter 11 Case.² I have read the Debtor’s (Substantive) Ninth Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 To Certain (I) No Liability Claims, (II) Misclassified Claims, and (III) Reduce and Allow Claims (the “Objection”), and am directly, or by and through my personnel or agents, familiar with the information contained therein, the proposed form of order (the “Proposed Order”), and the exhibits attached thereto.

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

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

2. Resources and time have been expended in reviewing and reconciling the proofs of claim filed or pending against the Debtor in this case. The Claims were carefully reviewed and analyzed in good faith utilizing due diligence by the appropriate personnel, including A&M personnel, company personnel, and the Debtor's Court-appointed claims and noticing agent, GCG, Inc. ("GCG"). These efforts resulted in the identification of the No Liability Claims, the Misclassified Claims, and the Reduce and Allow Claims, as defined in the Objection and identified respectively in Exhibits A, B, and C to the Proposed Order.

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

4. To my knowledge, the proofs of claim listed on Exhibit A 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 A 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.

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 “Modified Classification” column on Exhibit B to the Proposed Order.

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

I declare under penalty of perjury that the foregoing information is true and correct to the best of my knowledge, information and belief.

Executed on June 2, 2014

/s/ Holden Bixler

Holden Bixler

Proposed Order

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) NINTH OMNIBUS OBJECTION PURSUANT TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY RULE 3007, AND LOCAL RULE 3007-1 TO CERTAIN (I) NO LIABILITY CLAIMS, (II) MISCLASSIFIED CLAIMS, AND (III) REDUCE AND ALLOW CLAIMS

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

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

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

ORDERED, ADJUDGED, AND DECREED that:

1. The relief requested in the Objection is GRANTED, as set forth herein.
2. The No Liability 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 “Modified Classification.”
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 Classification” and “Modified Amount.”
5. The Debtor’s objection to each Claim addressed in the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each claim. Any stay of this Order pending appeal by any of the Claimants subject to this Order shall only apply to the contested matter which involves such Claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters covered hereby.
6. The Debtor shall retain and shall have the right to object in the future to any of the proofs of claim listed on Exhibits A, B, and C hereto on any additional grounds, and to seek to amend, modify, and/or supplement this Order as may be necessary. In addition, the Debtor’s rights are reserved to file future objections to Claims asserted in proofs of claim that have been or may subsequently be filed in the Chapter 11 Case, or Claims that may be listed on the Debtor’s schedules, on the grounds set forth herein or any other appropriate grounds that bankruptcy and non-bankruptcy law permits.

7. Nothing contained herein shall constitute, nor shall it be deemed to constitute, the allowance of any Claim asserted against the Debtor, including, but not limited to the Disputed Claims.

8. This Court shall retain jurisdiction over the Debtor and the Claimants whose Disputed Claims are subject to the Objection with respect to any matters related to or arising from the Objection or the implementation of this Order.

9. The Debtor is authorized and empowered, to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

10. The Debtor's Claims and Noticing Agent, GCG, Inc., is hereby directed to serve this Order, including any relevant exhibits, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

Dated: _____, 2014
Wilmington, Delaware

THE HONORABLE KEVIN J. CAREY
UNITED STATES BANKRUPTCY JUDGE

**EXIDE TECHNOLOGIES 13-11482 (KJC)
NINTH OMNIBUS CLAIMS OBJECTION
EXHIBIT A - NO LIABILITY CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	ATMS, INC. 1523 CENTRAL PARK DR HURST, TX 76053-7401	1013	\$27,067.00	No liability exists on the Debtor's books and records.
2	DC GOV'T OFFICE OF TAX AND REVENUE PO BOX 37559 WASHINGTON, DC 20013	464	\$4,054.05	No liability exists on the Debtor's books and records.
3	FRANCHISE TAX BOARD BANKRUPTCY SECTION MS A340 PO BOX 2952 SACRAMENTO, CA 95812-2952	3304	\$800.00	The liability asserted on the Proof of Claim was offset by an existing credit.
4	STATE OF NEW JERSEY - DIVISION OF TAXATION BANKRUPTCY SECTION PO BOX 245 TRENTON, NJ 08695-0245	513	\$6,080.00	The liability asserted on the Proof of Claim was offset by an existing credit.
		TOTAL	\$38,001.05	

EXIDE TECHNOLOGIES 13-11482 (KJC)
 NINTH 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	ALL4 INC. 2393 KIMBERTON ROAD KIMBERTON, PA 19442	2248	503(b)(9)	\$2,459.50	503(b)(9)	\$0.00	Invoice numbers 13-5671 (\$1,467.50) and 13-5670 (\$992) assert labor charges which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Unsecured	\$6,984.85	Unsecured	\$9,444.35	
			Subtotal	\$9,444.35	Subtotal	\$9,444.35	
2	AVERY PARTNERS, INC. 1455 OLD ALABAMA ROAD, SUITE 160 ROSWELL, GA 30076	889	Priority	\$12,475.00	Priority	\$0.00	Claim for staffing services does not qualify for priority status under section 507(a)(4) of the bankruptcy code.
			Unsecured	\$29,172.00	Unsecured	\$41,647.00	
			Subtotal	\$41,647.00	Subtotal	\$41,647.00	
3	BDC INC MARYBETH STONE 436 ANGLUM ROAD HAZELWOOD, MO 63042	2223	503(b)(9)	\$10,933.51	503(b)(9)	\$1,755.01	Invoice numbers 2133039-IN, 2133255-IN and 2133588-IN include freight charges, in the aggregate amount of \$30.16, which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Unsecured	\$18,199.33	Unsecured	\$27,377.83	
			Subtotal	\$29,132.84	Subtotal	\$29,132.84	
	TRANSFERRED TO: TANNOR PARTNERS CREDIT FUND, LP ATTN ROBERT TANNOR 150 GRAND STREET, STE 401 WHITE PLAINS, NY 10601						Invoice number 2133175-IN includes labor and mileage charges, in the amount of \$629.50, which are not goods as required by section 503(b)(9) of the bankruptcy code.
							Invoice number 2133587-IN includes labor and mileage charges, in the amount of \$8,518.84, 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 Second Notice of Satisfaction for Partially Satisfied Claims

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

**EXIDE TECHNOLOGIES 13-11482 (KJC)
NINTH 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 BENTLEY TRUCK SERVICES 307 HERON DR LOGAN TWP, NJ 08085-1773	2704	503(b)(9)	\$4,463.86	503(b)(9)	\$0.00	Invoice number 650107, in the amount of \$4,180.18, asserts rental and mileage fees which are not goods as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$8,884.52	Unsecured	\$13,348.38	
		Subtotal	\$13,348.38	Subtotal	\$13,348.38	
Invoice number R56229, in the amount of \$283.68, asserts rental, environmental, fuel and mileage fees which are not goods as required by section 503(b)(9) of the bankruptcy code.						
5 BOSCHERT EQUIPMENT CO PO BOX 34793 1986 LINN ST NORTH KANSAS CITY, MO 64116	492	503(b)(9)	\$4,224.68	503(b)(9)	\$4,047.00	Invoice numbers 22114, 22113, 22133, 22131 and 22148 include shipping charges, in the aggregate amount of \$177.68, which are not goods as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$9,537.53	Unsecured	\$9,715.21	
		Subtotal	\$13,762.21	Subtotal	\$13,762.21	
TRANSFERRED TO: SIERRA LIQUIDITY FUND, LLC 2699 WHITE ROAD, SUITE 255 IRVINE, CA 92614						
6 BUTLER TOOL INC DENNIS GOGIN 4731 N 125 ST BUTLER, WI 53007	797 (b)	503(b)(9)	\$966.50	503(b)(9)	\$914.50	Invoice numbers 156744, 156905 and 157012, in the aggregate amount of \$966.50, assert goods and shipping charges which do not qualify for priority status under section 507(a)(1)(A) or 507(a)(1)(B).
		Priority	\$966.50	Priority	\$0.00	
		Unsecured	\$12,744.00	Unsecured	\$13,762.50	
		Subtotal	\$14,677.00	Subtotal	\$14,677.00	
Invoice numbers 156744, 156905 and 157012 include shipping charges, in the aggregate amount of \$52, which are not goods as required by section 503(b)(9) of the bankruptcy code.						

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

**EXIDE TECHNOLOGIES 13-11482 (KJC)
NINTH 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
7 CALICO PRECISION MOLDING PO BOX 8006 FORT WAYNE, IN 46898-8006	864 (b)	503(b)(9)	\$109,654.48	503(b)(9)	\$19,655.94	Invoice numbers 18206 (\$3,465), 18198 (\$2,475), 18199 (\$3,300), 18189 (\$862.25), 18197 (\$5,832), 18220 (\$3,960), 18247 (\$3,960), 18256 (\$2,916), 18293 (\$2,916), 18301 (\$10,065), 18331 (\$3,645), 18320 (\$431.24), 18323 (\$2,916), 18341 (\$862.47) 15498 (\$1,524.40), 17846 (\$2,916) are for goods received prior to the 503(b)(9) period.
		Unsecured	\$0.00	Unsecured	\$89,998.54	
		Subtotal	\$109,654.48	Subtotal	\$109,654.48	
8 COLLABORCHAIN LLC 3101 HOWELL MILL RD NW UNIT 128 ATLANTA, GA 30327	502	Priority	\$5,361.69	Priority	\$0.00	Claim for services does not qualify for priority status under section 507(a)(4) of the bankruptcy code.
		Unsecured	\$0.00	Unsecured	\$5,361.69	
		Subtotal	\$5,361.69	Subtotal	\$5,361.69	
9 COMMUNICATION POWER SOLUTIONS/TEMPE 5869 S KYRENE RD STE 12 TEMPE, AZ 85283-5731	1022	503(b)(9)	\$550.00	503(b)(9)	\$453.00	Invoice number 15067, in the amount of \$550, includes \$97 in freight charges which is not a good as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$158.41	Unsecured	\$255.41	
		Subtotal	\$708.41	Subtotal	\$708.41	
10 CONESTOGA FUELS, INC. PO BOX 4665 1142 ELIZABETH AVE LANCASTER, PA 17604-4665	1061 (b)	503(b)(9)	\$1,074.45	503(b)(9)	\$954.45	Invoice number 133813 asserts fuel surcharges and a drum deposit, in the aggregate amount of \$120, which are not goods as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$2,718.80	Unsecured	\$2,838.80	
		Subtotal	\$3,793.25	Subtotal	\$3,793.25	
11 DOUGLAS WELDING & MACHINE INC ATTN LEEROY DOUGLAS 116 W MAIN KIPP-SALINA, KS 67401	38	Priority	\$10,800.00	Priority	\$0.00	Claim for labor, services and materials do not qualify for priority status under section 507(a) of the bankruptcy code.
		Unsecured	\$0.00	Unsecured	\$10,800.00	
		Subtotal	\$10,800.00	Subtotal	\$10,800.00	
12 E & M BUSINESS FORMS & PRINTING-ROSWELL PO BOX 767609 ROSWELL, GA 30076-7609	761	Secured	\$779.40	Secured	\$0.00	Claim for goods bought and sold does not qualify for secured status under the bankruptcy code.
		Unsecured	\$0.00	Unsecured	\$779.40	
		Subtotal	\$779.40	Subtotal	\$779.40	

* Plus unliquidated and/or undetermined amounts

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

**EXIDE TECHNOLOGIES 13-11482 (KJC)
NINTH 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
13	EDWARDS CHEMICAL INC. PO BOX 488 1504 ROSEPORT RD ELWOOD, KS 66024-0488	1154	503(b)(9) Unsecured	\$134.49 \$27,728.66	503(b)(9) Unsecured	\$126.02 \$27,737.13	Invoice number 14832A asserts taxes in the amount of \$8.47 which is not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$27,863.15	Subtotal	\$27,863.15	
14	ENGINEERED PLASTIC PRODUCTS PO BOX 196 269 MERCER STREET STIRLING, NJ 07980-0196	993	503(b)(9) Unsecured	\$5,028.85 \$49,469.67	503(b)(9) Unsecured	\$4,730.80 \$49,767.72	
			Subtotal	\$54,498.52	Subtotal	\$54,498.52	
15	ESCA TECH INC 3747 N BOOTH ST MILWAUKEE, WI 53212	318 (a)	503(b)(9) Unsecured	\$922.85 \$16,241.80	503(b)(9) Unsecured	\$815.00 \$16,349.65	Invoice number 36222, in the amount of \$922.85, asserts \$107.85 for freight charges which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$17,164.65	Subtotal	\$17,164.65	
16	FLEX EXECS MANAGEMENT SOLUTIONS-WILLOWBR ATTN NORA AUSTIN 645 EXECUTIVE DR WILLOWBROOK, IL 60527-5603	823	Priority Unsecured	\$12,475.00 \$3,792.50	Priority Unsecured	\$0.00 \$16,267.50	
			Subtotal	\$16,267.50	Subtotal	\$16,267.50	

* Plus unliquidated and/or undetermined amounts

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

EXIDE TECHNOLOGIES 13-11482 (KJC)
 NINTH 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
17 GELLCO CLOTHING & SHOES INC 4600 S ZERO FORT SMITH, AR 72903	390	503(b)(9)	\$5,569.80	503(b)(9)	\$1,450.55	The goods provided on the following invoice numbers were provided prior to the 503(b)(9) period: Invoice number 470339 in the amount of \$215.50; invoice number 470420 in the amount of \$94.95; invoice number 470573 in the amount of \$85.45; invoice number 470662 in the amount of \$109.20; invoice number 470673 in the amount of \$113.95; invoice number 470687 in the amount of \$123.45; invoice number 470736 in the amount of \$104.45; invoice number 470700 in the amount of \$113.95; invoice number 470784 in the amount of \$219.90; invoice number 470773 in the amount of \$85.45; invoice number 470761 in the amount of \$209.40; invoice number 470807 in the amount of \$208.90; invoice number 470858 in the amount of \$319.65; invoice number 470534 in the amount of \$104.45; invoice number 470827 in the amount of \$118.70; invoice number 470934 in the amount of \$255.00; invoice number 471021 in the amount of \$232.65; invoice number 471008 in the amount of \$234.45; invoice number 469563 in the amount of \$125.00; invoice number 470987 in the amount of \$113.95; invoice number 470955 in the amount of \$383.45; invoice number 471037 in the amount of \$248.60; invoice number 471062 in the amount of \$104.45; and invoice number 471071 in the amount of \$194.65.
		Unsecured	\$0.00	Unsecured	\$4,119.25	
		Subtotal	\$5,569.80	Subtotal	\$5,569.80	
TRANSFERRED TO: SIERRA LIQUIDITY FUND, LLC 2699 WHITE ROAD, SUITE 255 IRVINE, CA 92614						

* Plus unliquidated and/or undetermined amounts

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

**EXIDE TECHNOLOGIES 13-11482 (KJC)
NINTH 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
18	GOFF INDUSTRIAL ELECTRIC INC PO BOX 158 DYER, AR 72935	722	Priority Unsecured	\$1,200.00 \$0.00	Priority Unsecured	\$0.00 \$1,200.00	Claim for electrical work performed does not qualify for priority status under section 507(a) of the bankruptcy code.
			Subtotal	\$1,200.00	Subtotal	\$1,200.00	
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19	HARRIS MACHINE & TOOL INC 158 WARE RD PHENIX CITY, AL 36869	22 (b)	503(b)(9) Priority Unsecured	\$1,295.00 \$8,586.00 \$0.00	503(b)(9) Priority Unsecured	\$1,295.00 \$0.00 \$8,586.00	Claim for manufacturing machine parts and tooling does not qualify for priority status under section 507 (a) of the bankruptcy code.
			Subtotal	\$9,881.00	Subtotal	\$9,881.00	
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20	IMKO & DIVERSIFIED STAFFING PO BOX 4040 OMAHA, NE 68104	838	Priority Unsecured	\$1,557.68 \$0.00	Priority Unsecured	\$0.00 \$1,557.68	Claim for staffing services does not qualify for priority status under section 507 (a) (4) of the bankruptcy code.
			Subtotal	\$1,557.68	Subtotal	\$1,557.68	
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21	IMR INC. 808 QUAIL RIDGE DR WESTMONT, IL 60559-6149	1010	503(b)(9) Unsecured	\$18,750.00 \$0.00	503(b)(9) Unsecured	\$0.00 \$18,750.00	Invoice number 13-20937, in the amount of \$18,750, asserts annual subscription fees which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$18,750.00	Subtotal	\$18,750.00	
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22	INBATEC GMBH KONRAD ADENAUER RING 40 58135 HAGEN GERMANY	1326 (b)	503(b)(9) Priority Secured Unsecured	\$1,133.61* \$1,133.61* \$1,133.61* Undetermined*	503(b)(9) Priority Secured Unsecured	\$0.00 \$0.00 \$0.00 \$3,400.83*	Invoice numbers RE13010A, RE13081A and RE13092A are for goods received prior to the 503(b)(9) period. Invoice numbers RE13010A, RE13081A and RE13092A do not qualify for priority status under section 507(a)(7) of the bankruptcy code. Invoice numbers RE13010A, RE13081A and RE13092A do not qualify for secured status under the bankruptcy code.
			Subtotal	\$3,400.83*	Subtotal	\$3,400.83*	
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* Plus unliquidated and/or undetermined amounts

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

**EXIDE TECHNOLOGIES 13-11482 (KJC)
NINTH 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
23	J W MOBILE SHREDDING C/O J W OUTFITTERS INC 3102 OAKCLIFF INDUSTRIAL ST ATLANTA, GA 30340	461 (b)	503(b)(9) Priority Unsecured	\$135.00 \$1,080.00 \$0.00	503(b)(9) Priority Unsecured	\$0.00 \$0.00 \$1,215.00	Invoice number 24772, in the amount of \$135, is for a service not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$1,215.00	Subtotal	\$1,215.00	Invoice numbers 24015 (\$135), 24177 (\$135), 24297 (\$135), 24405 (\$135), 24538 (\$135), 24662 (\$135) and 24772 (\$135), 23848 (\$135) asserted as priority, do not qualify for priority status under sections 507(a)(1)(A) or 507(a)(1)(B) of the bankruptcy code.
24	K&R PLASTICS C/O RUGGERO LAW FIRM PC ATTN PETER RUGGERO 1411 W AVE STE 200 AUSTIN, TX 78701	422	Secured Unsecured	\$15,620.00 \$6,782.04	Secured Unsecured	\$0.00 \$22,402.04	Claim asserts invoice number 14157, in the amount of \$15,620, as reclamation and secured status however there is no basis for secured status under the bankruptcy code.
			Subtotal	\$22,402.04	Subtotal	\$22,402.04	Bankruptcy Code section 546(c) explicitly states that the rights of a seller of goods are "subject to the prior rights of a holder of a security interest in such goods or the proceeds thereof." 11 U.S.C § 546(c)(1). Because the goods sought to be reclaimed are subject to a prior security interest, such goods are not entitled to reclamation priority.
25	LAWSON PRODUCTS INC 8770 W BRYN MAWR CHICAGO, IL 60631	101	503(b)(9) Unsecured	\$6,305.22 \$0.00	503(b)(9) Unsecured	\$6,100.85 \$204.37	Invoice numbers 9301682732 and 9301707761 assert freight charges, in the aggregate amount of \$204.37, which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$6,305.22	Subtotal	\$6,305.22	
26	LOFTON INDUSTRIAL SERVICES 9414 INTERLINE AVE BATON ROUGE, LA 70809	336 (b)	Priority Unsecured	\$57,519.09 \$0.00	Priority Unsecured	\$0.00 \$57,519.09	Claim for staffing services does not qualify for priority status under section 507(a)(4) of the bankruptcy code.
			Subtotal	\$57,519.09	Subtotal	\$57,519.09	

* Plus unliquidated and/or undetermined amounts

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**EXIDE TECHNOLOGIES 13-11482 (KJC)
NINTH 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
27	LOFTON SECURITY SERVICE 9414 INTERLINE AVE BATON ROUGE, LA 70809	626	Priority Unsecured	\$31,571.40 \$0.00	Priority Unsecured	\$0.00 \$31,571.40	Claim for staffing services does not qualify for priority status under section 507(a)(4) of the bankruptcy code.
			Subtotal	\$31,571.40	Subtotal	\$31,571.40	
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28	MANLEY'S RECYCLING INC 503 MILL ST MIDDLEPORT, OH 45760	1	Priority Unsecured	\$6,886.80 \$0.00	Priority Unsecured	\$0.00 \$6,886.80	Claim for spent batteries sold does not qualify for priority status under section 507(a) of the bankruptcy code.
			Subtotal	\$6,886.80	Subtotal	\$6,886.80	
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29	MARVIN HARRIS JR./TREESAVER INC. 4591 SYCAMORE RD COLDWATER, MS 38618-5525	827	Priority Unsecured	\$3,122.73 \$0.00	Priority Unsecured	\$0.00 \$3,122.73	Claim for spent batteries sold does not qualify for priority status under section 507(a) of the bankruptcy code.
			Subtotal	\$3,122.73	Subtotal	\$3,122.73	
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30	MAX ENVIRONMENTAL TECHNOLOGIES ELLEN YOCHUS 1815 WASHINGTON ROAD PITTSBURGH, PA 15241	999	503(b)(9) Unsecured	\$10,098.62 \$26,848.84	503(b)(9) Unsecured	\$0.00 \$36,947.46	The claimant provided a service not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$36,947.46	Subtotal	\$36,947.46	
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31	MEIER SALVAGE INC. 5400 HIGHWAY 75 N SIOUX CITY, IA 51108-8745 TRANSFERRED TO: LIQUIDITY SOLUTIONS, INC. ONE UNIVERSITY PLAZA STE 312 HACKENSACK, NJ 07601	1467	Priority Unsecured	\$1,061.48 \$0.00	Priority Unsecured	\$0.00 \$1,061.48	Claim for spent batteries sold does not qualify for priority status under section 507(a) of the bankruptcy code.
			Subtotal	\$1,061.48	Subtotal	\$1,061.48	
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32	MIDTOWN PLUMBING INC ATTN LAURA L VERDI 8234 S GARFIELD AVE BELL GARDENS, CA 90201	1327	503(b)(9) Unsecured	\$532.88 \$15,592.17	503(b)(9) Unsecured	\$71.45 \$16,053.60	Invoice number 118272, in the amount of \$532.88, asserts \$461.43 for tax, services and labor which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$16,125.05	Subtotal	\$16,125.05	

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**EXIDE TECHNOLOGIES 13-11482 (KJC)
NINTH 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
33	MOVEMENT SEARCH LLC ATTN DOUGLAS SCOTT 20 W WASHINGTON STE 14 CLARKSTON, MI 48346	597	503(b)(9) Unsecured	\$19,800.00 \$25,882.50	503(b)(9) Unsecured	\$0.00 \$45,682.50	The claimant provided a service not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$45,682.50	Subtotal	\$45,682.50	
34	NORFALCO INC ATTN DOUGLAS CODISPOTI 6000 LOMBARDO CTR STE 650 SEVEN HILLS, OH 44133	496	503(b)(9) Unsecured	\$101,938.96 \$16,481.41	503(b)(9) Unsecured	\$96,829.79 \$21,590.58	
			Subtotal	\$118,420.37	Subtotal	\$118,420.37	
	PARTIALLY TRANSFERRED TO: TANNOR PARTNERS CREDIT FUND, LP ATTN ROBERT TANNOR 150 GRAND STREET, STE 401 WHITE PLAINS, NY 10601						
35	POWER TECHNOLOGY SYSTEMS C/O 1430865 ONTARIO INC 24 STEELE ROAD RR 3 SHANTY BAY ONTARIO CANADA L0L 2L0	245	503(b)(9) Unsecured	\$5,958.74 \$0.00	503(b)(9) Unsecured	\$405.00 \$5,553.74	Invoice numbers 22145, 22156, 22537, 22556, 22560, 22561, 22564, 22565, 22566, 22567, 22575, 22576, 22577, 22578, 22579 and 22582, the aggregate amount of \$5,105.02, are for repair services, fuel, travel and tax charges received prior to the 503(b)(9) period. Invoice numbers 22591, 22595 and 22596 include service repairs, fuel, travel and tax charges, in the aggregate amount of \$448.72, which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$5,958.74	Subtotal	\$5,958.74	

* Plus unliquidated and/or undetermined amounts

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

EXIDE TECHNOLOGIES 13-11482 (KJC)
 NINTH 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
36	QUICK CABLE CORP 3700 QUICK DR FRANKSVILLE, WI 53126	214	503(b)(9) Unsecured	\$631.42 \$3,847.14	503(b)(9) Unsecured	\$556.00 \$3,922.56	Invoice number 507880 asserts freight charges, in the amount of \$75.42, which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$4,478.56	Subtotal	\$4,478.56	
	PARTIALLY TRANSFERRED TO: FAIR HARBOR CAPITAL, LLC ANSONIA FINANCE STATION PO BOX 237037 NEW YORK, NY 10023						
37	R & W DEVELOPMENT & LOGISTICS, INC. 410 STATE ROUTE 136 E CALHOUN, KY 42327-9620	870	503(b)(9) Priority Unsecured	\$67.90 \$1,878.70 \$0.00	503(b)(9) Priority Unsecured	\$0.00 \$0.00 \$1,946.60	Invoice number 1445, in the amount of \$67.90, asserts warehouse and shipping charges which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$1,946.60	Subtotal	\$1,946.60	Invoice numbers 1390 (\$1,302.10), 1427 (\$151.40) and 1409 (\$425.20), in the aggregate amount of \$1,878.70, assert warehousing, shipping and handling charges which do not qualify for priority status under sections 507(a)(1)(A) or 507(a)(1)(B).
38	SHOETERIA D/B/A L&M FOOTWEAR INC. 2345 S ATLANTIC BLVD COMMERCE, CA 90040-1257	1548	503(b)(9) Unsecured	\$6,238.52 \$0.00	503(b)(9) Unsecured	\$132.42 \$6,106.10	Invoice numbers 70072 (\$135), 70218 (\$132.42), 70300 (\$257.61), 70386 (\$745.74), 70498 (\$240.32), 70545 (\$252.71), 70612 (\$147.14), 70843 (\$132.42), 70967 (\$127.52), 70970 (\$132.42), 70972 (\$127.52), 70969 (\$127.52), 70974 (\$135), 70973 (\$127.52), 70971 (\$132.42), 70975 (\$127.52), 70968 (\$135), 71140 (\$158.76), 71139 (\$135), 71142 (\$132.42), 71141 (\$135), 71269 (\$531.14), 71803 (\$135), 71804 (\$157.67), 71801 (\$128.1), 71802 (\$135), 71392 (\$118.25), 71393 (\$135), 71394 (\$133.03), 71396 (\$158.76), 71397 (\$162.6), 71398 (\$108.39), 71399 (\$158.76), 71400 (\$135), 71395 (\$132.42) are for goods received prior to the 503(b)(9) period.
			Subtotal	\$6,238.52	Subtotal	\$6,238.52	

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**EXIDE TECHNOLOGIES 13-11482 (KJC)
NINTH 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
39	SHORT'S LAWN & LANDSCAPE 6717 W CR 500 N MUNCIE, IN 47304	1298	503(b)(9) Unsecured	\$10,325.00 \$0.00	503(b)(9) Unsecured	\$0.00 \$10,325.00	The claimant provided a service not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$10,325.00	Subtotal	\$10,325.00	
40	STANION WHOLESALE ELECTRIC CO INC C/O MORRIS LAING EVANS BROCK & KENNEDY CHTD ATTN KARL R SWARTZ 300 N MEAD STE 200 WICHITA, KS 67202	1267	503(b)(9) Unsecured	\$4,442.09 \$58,410.71	503(b)(9) Unsecured	\$4,379.00 \$58,473.80	Invoice numbers 341264001, 339667400 and 342020401 include freight charges, in the aggregate amount of \$63.09, which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$62,852.80	Subtotal	\$62,852.80	
41	SUNBELT ELECTRIC ATTN HELEN 6265 SAN FERNANDO RD GLENDALE, CA 91201	565 (b)	503(b)(9) Secured	\$50,188.00 \$50,188.00	503(b)(9) Secured	\$0.00 \$100,376.00	The claimant provided a service not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$100,376.00	Subtotal	\$100,376.00	
42	TESTAMERICA LABORATORIES INC 4101 SHUFFEL ST NW NORTH CANTON, OH 44720	493	503(b)(9) Unsecured	\$6,272.45 \$327.50	503(b)(9) Unsecured	\$0.00 \$6,599.95	Invoice numbers 64069397 (\$1,800.75), 31103346 (\$560), 46198495 (\$1,011.25), 46199345 (\$1,763), 64069728 (\$1,067) and 31103139 (\$70.45), in the aggregate amount of \$6,272.45, assert service and shipping charges which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$6,599.95	Subtotal	\$6,599.95	

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**EXIDE TECHNOLOGIES 13-11482 (KJC)
NINTH 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
43	THE SPENCER TURBINE COMPANY MONIQUE DONN 600 DAY HILL RD WINDSOR, CT 06095	2681	503(b)(9) Unsecured	\$3,335.06 \$9,027.88	503(b)(9) Unsecured	\$0.00 \$0.00	Invoice numbers ARI181337 and ARI181180 include taxes, in the aggregate amount of \$43.76, which are not goods as required by section 503(b)(9) of the bankruptcy code. Invoice numbers ARI181337, ARI181180 and ARI181467 include shipping charges, in the aggregate amount of \$114.21, which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$12,362.94	Subtotal	\$0.00	
44	US PUMPS 15919 PHOEBE AVE LA MIRADA, CA 90670	148	Secured Unsecured	\$6,573.29 \$0.00	Secured Unsecured	\$0.00 \$6,573.29	Claim for goods provided to the Debtor is not entitled to secured status under the bankruptcy code.
			Subtotal	\$6,573.29	Subtotal	\$6,573.29	
45	VORTEX DOORS ATTN MICHELLE CRECELIUS 3198-M AIRPORT LOOP DR COSTA MESA, CA 92626-3407	448	503(b)(9) Unsecured	\$1,388.00 \$12,438.32	503(b)(9) Unsecured	\$0.00 \$13,826.32	The claimant provided a service not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$13,826.32	Subtotal	\$13,826.32	
46	XPECTIT INC ATTN KIM MOBLEY PO BOX 1308 LAGRANGE, GA 30241	3424	503(b)(9) Unsecured	\$865.33 \$5,950.95	503(b)(9) Unsecured	\$740.00 \$6,076.28	Invoice number 17993 includes tax, in the amount of \$56.61, and shipping charges, in the amount of \$68.72 which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$6,816.28	Subtotal	\$6,816.28	

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

EXIDE TECHNOLOGIES 13-11482 (KJC)
 NINTH 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
47	ZINK SAFETY EQUIPMENT COMPANY PO BOX 14398 LENEXA, KS 66285-4398	1172	503(b)(9) Unsecured	\$1,218.01 \$17,560.29	503(b)(9) Unsecured	\$1,091.00 \$17,687.30	Invoice numbers 193386, 193420, 193478, 193631, 193770 and 193769 assert taxes, in the aggregate amount of \$73.37, which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$18,778.30	Subtotal	\$18,778.30	
			TOTAL	\$1,013,654.58*	TOTAL	\$1,013,654.58*	Invoice numbers 193386, 193420, 193478, 193770 and 193769 assert freight charges, in the aggregate amount of \$53.64, which are not goods as required by section 503(b)(9) of the bankruptcy code.

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

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

	NAME OF CLAIMANT	CLAIM NUMBER	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION
1	AMERICAN NATIONAL RECYCLING 15157 MANOR RD MONKTON, MD 21111	1277	Unsecured	\$1,377.60	Unsecured	\$1,355.87	Invoice number AR105088961 exists on the Debtor's books and records in the amount of \$1,355.87.
2	BUTLER TOOL INC DENNIS GOGIN 4731 N 125 ST BUTLER, WI 53007	797 (a)	503(b)(9) Priority Unsecured	\$914.50 \$0.00 \$13,762.50	503(b)(9) Priority Unsecured	\$914.50 \$0.00 \$13,667.50	The claimant duplicated invoice numbers 156744, 156905 & 157012, in the aggregate amount of \$966.50.
			Subtotal	\$14,677.00	Subtotal	\$14,582.00	The claim asserts an additional \$95 on the total claim amount which is a mathematical error. The total allowed amount of the claim should be \$14,582.
3	CALICO PRECISION MOLDING PO BOX 8006 FORT WAYNE, IN 46898-8006	864 (a)	503(b)(9) Unsecured	\$19,655.94 \$89,998.54	503(b)(9) Unsecured	\$19,655.94 \$85,558.14	Invoice number 17846, in the amount of \$2,916, was paid 3/6/2013 on check number 5362884.
			Subtotal	\$109,654.48	Subtotal	\$105,214.08	Invoice number 15498, in the amount of \$1,524.40, was paid 4/3/2012 on check number 5274955.
4	CONESTOGA FUELS, INC. PO BOX 4665 1142 ELIZABETH AVE LANCASTER, PA 17604-4665	1061 (a)	503(b)(9) Unsecured	\$954.45 \$2,838.80	503(b)(9) Unsecured	\$954.45 \$2,741.65	Finance charges in the aggregated amount of \$97.15 do not exist on the Debtor's books and records.
			Subtotal	\$3,793.25	Subtotal	\$3,696.10	
5	HARRIS MACHINE & TOOL INC 158 WARE RD PHENIX CITY, AL 36869	22 (a)	503(b)(9) Priority Unsecured	\$1,295.00 \$0.00 \$8,586.00	503(b)(9) Priority Unsecured	\$1,295.00 \$0.00 \$6,546.00	Invoice numbers 9466, 9452, 9467 and 9468, in the aggregate amount of \$1,295, were asserted as both 503(b)(9) and priority.
			Subtotal	\$9,881.00	Subtotal	\$7,841.00	Pre-petition credit memo number 8366CR, in the amount of \$745, should be applied to the unsecured claim amount.

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

			ASSERTED			
NAME OF CLAIMANT	CLAIM NUMBER	ASSERTED CLAIM CLASSIFICATION	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION
6 HEXACOMB CORPORATION ATTN STEVE GRANT 1111 W JEFFERSON ST BOISE, ID 83702	1383	503(b)(9)	\$29,623.96	503(b)(9)	\$29,623.96	Invoice number 57406, asserted in the amount of \$2,926.56, reflects a shipped quantity in the amount of 2,184. However the Debtor received a quantity of 2,106. Therefore, the amount reflected on the Debtor's books and records is \$2,822.04.
		Unsecured	\$192,317.56	Unsecured	\$192,213.04	
		Subtotal	\$221,941.52	Subtotal	\$221,837.00	
7 INBATEC GMBH KONRAD ADENAUER RING 40 58135 HAGEN GERMANY	1326 (a)	503(b)(9)	\$0.00	503(b)(9)	\$0.00	The claimant asserted invoice numbers RE13010A, RE13081A and RE13092A across 3 claim classifications. The total claim amount should be \$1,133.61 general unsecured.
		Priority	\$0.00	Priority	\$0.00	
		Secured	\$0.00	Secured	\$0.00	
		Unsecured	\$3,400.83*	Unsecured	\$1,133.61	
Subtotal		\$3,400.83*	Subtotal	\$1,133.61		
8 J W MOBILE SHREDDING C/O J W OUTFITTERS INC 3102 OAKCLIFF INDUSTRIAL ST ATLANTA, GA 30340	461 (a)	503(b)(9)	\$0.00	503(b)(9)	\$0.00	Invoice number 23848, in the amount of \$135, was paid 4/2/2013 on check number 5365645. Invoice number 24772, in the amount of \$135, was duplicated across priorities. The total amount of the allowed claim should be \$945.
		Priority	\$0.00	Priority	\$0.00	
		Unsecured	\$1,215.00	Unsecured	\$945.00	
Subtotal		\$1,215.00	Subtotal	\$945.00		
9 LOFTON INDUSTRIAL SERVICES 9414 INTERLINE AVE BATON ROUGE, LA 70809	336 (a)	Priority	\$0.00	Priority	\$0.00	The Debtor's records indicate a credit of \$69.30 on pre-petition invoice number 40003132.
		Unsecured	\$57,519.09	Unsecured	\$57,449.79	
		Subtotal	\$57,519.09	Subtotal	\$57,449.79	
10 OLYMPIC FOREST PRODUCTS CO 2200 CARNEGIE AVE CLEVELAND, OH 44115	34	503(b)(9)	\$34,819.70	503(b)(9)	\$34,819.70	Item numbers EXKC25X157/8PLY (\$142.50) and EXKC25X77/8PLY (\$77.50) on invoice number 147475, in the aggregate amount of \$220, were not received by the Debtor.
		Unsecured	\$115,300.66	Unsecured	\$115,080.66	
		Subtotal	\$150,120.36	Subtotal	\$149,900.36	

* Plus unliquidated and/or undetermined amounts

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

NAME OF CLAIMANT	CLAIM NUMBER	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION
11 POLYMER MOLDING INC 1655 WEST 20 ST ERIE, PA 16502	306	503(b)(9)	\$10,907.50	503(b)(9)	\$10,907.50	A discrepancy on the face of the Proof of Claim led to invoice numbers 174812 (\$1,182), 174813 (\$4,938.10) and 174935 (\$4,787.40) being asserted as both 503(b)(9) and unsecured. The unsecured portion of Proof of Claim should be modified to \$20,087.35 for a total claim amount of \$30,994.85.
		Unsecured	\$30,994.85	Unsecured	\$20,087.35	
		Subtotal	\$41,902.35	Subtotal	\$30,994.85	
12 POLYMER MOLDING INC 1655 WEST 20 ST ERIE, PA 16502	314	503(b)(9)	\$1,669.46	503(b)(9)	\$1,669.46	Invoice number 172447, in the amount of \$65.93, was paid 6/6/2013 on ACH number 176841. Invoice numbers 174605 (\$71.78), 174548 (\$221.85), 174606 (\$395.57), 174934 (\$460.13) and 174979 (\$520.13) were asserted as both 503(b)(9) and unsecured. The invoices should be removed from the general unsecured total.
		Unsecured	\$2,912.55	Unsecured	\$1,177.16	
		Subtotal	\$4,582.01	Subtotal	\$2,846.62	
13 SETCO - SOUTHEAST TIRE INC- IDABEL PO BOX 809 IDABEL, OK 74745-0809	917	Secured	Undetermin	Secured	\$0.00	The Debtor's books and record do not reflect a secured amount owed to the claimant. The liquidated claim amount should be \$390.00 general unsecured.
		Unsecured	ed*	Unsecured	\$390.00	
		Subtotal	\$390.00*	Subtotal	\$390.00	
			\$390.00			
14 SETCO INC. SHARON BIRDSONG PO BOX 809 IDABEL, OK 74745	918	Secured	Undetermin	Secured	\$0.00	The Debtor's books and record do not reflect a secured amount owed to the claimant. The liquidated claim amount should be \$16,075.44 general unsecured.
		Unsecured	ed*	Unsecured	\$16,075.44	
		Subtotal	\$16,075.44*	Subtotal	\$16,075.44	
			\$16,075.44			
15 SUNBELT ELECTRIC ATTN HELEN 6265 SAN FERNANDO RD GLENDALE, CA 91201	565 (a)	503(b)(9)	\$0.00	503(b)(9)	\$0.00	The claimant duplicated the asserted amount of \$50,188 on invoice numbers PB110891 and PB110892. The allowed amount of the claim should be \$50,188.
		Secured	\$100,376.00	Secured	\$50,188.00	
		Subtotal	\$100,376.00	Subtotal	\$50,188.00	
		TOTAL	\$736,905.93*	TOTAL	\$664,449.72	

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