

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	:	Chapter 11
	:	Case No. 13-11482 (KJC)
EXIDE TECHNOLOGIES,	:	Hrg. Date: 9/3/14 at 10:00 a.m. (Eastern)
	:	Objection Deadline: 8/27/14
Debtor.	:	Related Docket No. <u>2001</u>

**AMENDED NOTICE OF MOTION OF THE AD HOC COMMITTEE
OF EQUITY SECURITY HOLDERS FOR AUTHORITY TO (i) SUBMIT
DOCUMENTS UNDER SEAL IN SUPPORT OF THE MOTION FOR AN
OFFICIAL EQUITY COMMITTEE, AND (ii) CONDUCT A CLOSED HEARING
ON SAID MOTION**

PLEASE TAKE NOTICE that the Ad Hoc Committee of Equity Security Holders¹ (the “**Ad Hoc Committee**”) has filed a motion with the Court seeking an order (i) authorizing the Ad Hoc Committee to submit certain unredacted documents under seal in support of the two motions pending before the Court for the appointment of an official committee of equity security holders, and (ii) directing that the hearing on said motions be closed off to the public so that testimony can be offered with respect to said documents (the “**Motion**”) [D.I. 2001].

PLEASE TAKE FURTHER NOTICE that the hearing on the Motion will be held on **September 3, 2014 at 10:00 a.m. (Eastern)** 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.

¹ To date, the Ad Hoc Committee consists of the following shareholders: Steward LLC, owner of 170,349 shares of the Debtor’s common stock; Alfred M. Shams, owner of 295,000 shares of the Debtor’s common stock; and Brennan Petar, owner of 75,312 shares of the Debtor’s common stock.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion or the relief requested therein must be made in writing and filed with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 North Market Street, Wilmington, Delaware 19801, no later than **August 27, 2014**.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion or the relief requested therein must also be mailed to the following address so as to be received no later than **August 27, 2014**:

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PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: July 28, 2014

KASEN & KASEN, P.C.

/s/ Jenny R. Kasen

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UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	:	Chapter 11
	:	
EXIDE TECHNOLOGIES,	:	Case No. 13-11482 (KJC)
	:	
Debtor.	:	
	:	
	:	

CERTIFICATE OF SERVICE

JENNY R. KASEN, of full age, hereby certifies as follows:

1. I am an associate at the firm Kasen & Kasen, P.C. (“**Kasen & Kasen**”).
2. Kasen & Kasen represents the Ad Hoc Committee of Equity Security Holders¹ (“**Equity Security Holders**”) in connection with the above-captioned bankruptcy case.
3. On July 28, 2014, I caused a copy of the following document(s) to be served on the parties identified on the attached service list and in the manner indicated thereon:

Motion of the Ad Hoc Committee of Equity Security Holders to (i) Submit Documents Under Seal in Support of the Motion for an Official Equity Committee, and (ii) Conduct a Closed Hearing on Said Motion [D.I. 2001]

I hereby certify that the foregoing statements made by me are true. I am aware that if any of said statements are willfully false, I am subject to punishment.

/s/ Jenny R. Kasen
JENNY R. KASEN, ESQUIRE

Dated: July 28, 2014

¹ To date, the ad hoc committee consists of the following shareholders: Steward LLC, owner of 170,349 shares of the Debtor’s common stock; Alfred M. Shams, owner of 295,000 shares of the Debtor’s common stock; and Brennan Petar, owner of 75,312 shares of the Debtor’s common stock.

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