

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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 In re: : Chapter 11  
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 EXIDE TECHNOLOGIES, : Case No. 13-11482 (KJC)  
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 Debtor.<sup>1</sup> : **Related Docket No. 2227**  
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Hearing Date: September 22, 2014 at 11:00 a.m. (Eastern)  
Objection Date: September 17, 2014 at 4:00 p.m. (Eastern)

**NOTICE OF DEBTOR’S MOTION UNDER BANKRUPTCY CODE SECTIONS 105, 362 AND 363 AND BANKRUPTCY RULE 9019 FOR ENTRY OF AN ORDER (I) APPROVING SETTLEMENT; (II) GRANTING RELIEF FROM THE AUTOMATIC STAY TO THE EXTENT NECESSARY; AND (III) GRANTING RELATED RELIEF**

TO: (i) the Office of the United States 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) counsel to PCI; (viii) counsel to the Insurers; and (ix) all parties entitled to notice pursuant to Bankruptcy Rule 2002.

PLEASE TAKE NOTICE that on September 3, 2014, the debtor and debtor in possession in the above-captioned bankruptcy case (the “Debtor”), filed the *Debtor’s Motion Under Bankruptcy Code Sections 105, 362 and 363 and Bankruptcy Rule 9019 for Entry of an Order (I) Approving Settlement; (II) Granting Relief from the Automatic Stay to the Extent Necessary; and (III) Granting Related Relief* (the “Motion”) [Docket No. 2227]. A copy of the Motion was previously served upon you.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **September 22, 2014 at 11:00 a.m. (Eastern)** before the Honorable Kevin J. Carey, United

<sup>1</sup> 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.

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 (the "Hearing").

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion 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, 3rd Floor, Wilmington, Delaware 19801, and served so as to be received by the following parties no later than **September 17, 2014 at 4:00 p.m. (Eastern)**: (i) the Debtor, Exide Technologies, 13000 Deerfield Parkway, Building 200, Milton, Georgia 30004, Attn: Phillip A. Damaska; (ii) counsel to the Debtor, Skadden, Arps, Slate, Meagher & Flom LLP, Four Times Square, New York, New York 10036, Attn: Kenneth S. Ziman, Esq. and J. Eric Ivester, Esq. and One Rodney Square, P.O. Box 636, Wilmington, Delaware 19899-0636, Attn: Anthony W. Clark, Esq. and 155 North Wacker Drive, Chicago, Illinois 60606-1720, Attn: James J. Mazza, Jr., Esq.; (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. and Richards, Layton & Finger, P.A., One Rodney Square, 920 North King Street, Wilmington, Delaware 19801, Attn: Mark D. Collins, Esq.; (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. and 1007 North Orange Street, Suite 1200, Wilmington, Delaware 19801, Attn: Dennis A. Meloro, Esq.; (v) the indenture trustee for the Debtor's secured bond issuances, Wells Fargo Bank, N.A., 7000 Central Parkway NE, Suite 550, Atlanta, Georgia 30328, Attn: Corporate Trust Services - Exide Technologies; (vi) the indenture trustee for the Debtor's unsecured bond issuances, U.S. Bank National Association, Global Corporate Trust

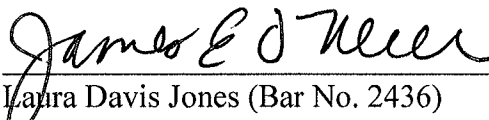
Services, 60 Livingston Avenue, EP-MN-WS1D, St. Paul, Minnesota 55107, Attn: Cindy Woodward; (vii) counsel to the unofficial committee of senior secured noteholders, Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019, Attn: Alice Eaton, Esq. and Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 King Street, Wilmington, Delaware 19801, Attn: Pauline K. Morgan, Esq.; (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.; (ix) special conflicts counsel to the Debtor, Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, P.O. Box 8705, Wilmington, Delaware 19899-8705 (Courier 19801), Attn: Laura Davis Jones, Esq.; and (x) counsel to the official committee of unsecured creditors, Lowenstein Sandler LLP, 65 Livingston Avenue, Roseland, New Jersey 07068, Attn: Kenneth A. Rosen, Esq. and Morris, Nichols, Arsht & Tunnell LLP, 1201 North Market Street, Suite 1600, Wilmington, Delaware 19801, Attn: Robert J. Dehney, Esq. Only objections made in writing and timely filed and received will be considered by the Bankruptcy Court at the Hearing.

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

Dated: September 5, 2014

PACHULSKI STANG ZIEHL & JONES LLP



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Laura Davis Jones (Bar No. 2436)  
James E. O'Neill (Bar No. 4042)  
919 North Market Street, 17th Floor  
P.O. Box 8705  
Wilmington, DE 19899-8705 (Courier 19801)  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400  
Email: ljones@pszjlaw.com  
joneill@pszjlaw.com

Special Conflicts Counsel for the Debtor and  
Debtor in Possession