

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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 In re: : Chapter 11
 :
 EXIDE TECHNOLOGIES, : Case No. 13-11482 (KJC)
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 Debtor.¹ : **Hrg. Date: October 14, 2014 at 11:00 a.m. (Eastern)**
 : **Obj. Due: September 26, 2014 at 4:00 p.m. (Eastern)**
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DEBTOR’S (SUBSTANTIVE) TWELFTH 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
(“TWELFTH 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) Twelfth 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 3,964 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 ten omnibus claims objections to Claims. After hearing these omnibus claims objections, this Court disallowed and expunged approximately 487 Claims asserting more than \$4.8 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.

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

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 October 24, 2013 (Docket No. 956).

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 September 26, 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 **October 14, 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 **September 26, 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 September 26, 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 **October 14, 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
September 12, 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)
:
Debtor.¹ : **Hrg. Date: October 14, 2014 at 11:00 a.m. (Eastern)**
: **Obj. Due: September 26, 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) Twelfth 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 **September 26, 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 September 26, 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 OCTOBER 14, 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
September 12, 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
	:	
EXIDE TECHNOLOGIES,	:	Case No. 13-11482 (KJC)
	:	
Debtor. ¹	:	
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**DECLARATION OF HOLDEN BIXLER IN SUPPORT OF DEBTOR’S
(SUBSTANTIVE) TWELFTH 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) Twelfth 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 September 12, 2014

/s/ Holden Bixler

Holden Bixler

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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

**ORDER SUSTAINING DEBTOR’S (SUBSTANTIVE) TWELFTH 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) Twelfth 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) Twelfth 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)
TWELFTH OMNIBUS CLAIMS OBJECTION
EXHIBIT A - NO LIABILITY CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	BENNETT JONES LLP ATTN MARK SMYTH 3400 ONE FIRST CANADIAN PL PO BOX 130 TORONTO ON M5X 1A4 CANADA	519	Undetermined*	This is not a liability of the Debtor or any of its non-debtor subsidiaries or affiliates. The asserted invoice was satisfied 9/19/2013, by the non-debtor entity Exide Canada, on check number 159394.
2	EAST COAST INTERNATIONAL TRUCKS ATTN EDITH BOUCHER 100 URQUHART AVE MONCTON NB E1H 2R5 CANADA	2407	Undetermined*	This is not a liability of the Debtor or any of its non-debtor subsidiaries or affiliates.
3	EAST COAST INTERNATIONAL TRUCKS INC ATTN DARLENE STEELE, CREDIT MANAGER 100 URQUHART AVE MONCTON NB E1H 2R5 CANADA	1930	Undetermined*	This is not a liability of the Debtor or any of its non-debtor subsidiaries or affiliates.
4	GRAHAM BATTERY 544 PERSON ST FAYETEVILLE, NC 28301	716	\$116,889.02	This is not a liability of the Debtor or any of its non-debtor subsidiaries or affiliates.
5	GRAHAM BATTERY 544 PERSON ST FAYETTEVILLE, NC 28301-5868	715	\$52,369.94	This is not a liability of the Debtor or any of its non-debtor subsidiaries or affiliates.
6	HOUNG E POENG 271 MARGARET AVE LOS ANGELES, CA 90022-2226	3430	\$138,045.34	This is not a liability of the Debtor or any of its non-debtor subsidiaries or affiliates.
7	HOUNG E POENG 271 MARGARET AVE LOS ANGELES, CA 90022-2226	3897	\$138,045.34	This is not a liability of the Debtor or any of its non-debtor subsidiaries or affiliates.

* Plus unliquidated and/or undetermined amounts

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

NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
8 MARTIN PRODUCT SALES LLC ATTN CREDIT DEPARTMENT 4200 STONE RD KILGORE, TX 75662	575	\$37,025.67	Invoice numbers 8032033501 (\$10,138), 8032033601 (\$10,100) and 8032033701 (\$10,125), in the aggregate amount of \$30,363, were paid 3/20/2012 on check number 5272740. Invoice number 8032026501, asserted in the amount of \$2,771.43, was paid 3/20/2012, in the full amount of \$10,138, on check number 5272740. Invoice number 1234741001, asserted in the amount of \$3,891.24, was paid 6/6/2012, in the amount of \$4,467.72 based on the PO price plus freight, on check number 5293611.
9 MTU ONSITE ENERGY 100 POWER DR MANKATO, MN 56001	3883	\$1,352.65	This is not a liability of the Debtor or any of its non-debtor subsidiaries or affiliates. Credit invoices were issued to clear chargebacks from year 2011 resulting in a net zero balance due to the Claimant.
TOTAL		\$483,727.96*	

* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)
TWELFTH 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	61 SWAN ST OF BATAVIA ATTN RONALD VIELE 61 SWAN ST BATAVIA, NY 14020	450	503(b)(9) Unsecured	\$403.30 \$0.00	503(b)(9) Unsecured	\$0.00 \$403.30	The Claimant provided a service not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$403.30	Subtotal	\$403.30	
2	A & S LAWN SERVICE LLP 8218 HERMITAGE DR FORT SMITH, AR 72908	405	Priority Unsecured	\$3,300.00 \$0.00	Priority Unsecured	\$0.00 \$3,300.00	Claim for lawn service does not qualify for priority status under section 507(a)(1)(A) or 507(a)(1)(B) of the bankruptcy code.
			Subtotal	\$3,300.00	Subtotal	\$3,300.00	
3	AITCHISON RICHMOND SUPPLY CO 502 SYLVANIE ST SAINT JOSEPH, MO 64501-2124	2281	503(b)(9) Unsecured	\$16,781.55 \$0.00	503(b)(9) Unsecured	\$2,288.96 \$14,492.59	Invoice numbers 45481(\$94.11), 45772(\$385.07), 45813(\$98.28), 45898(\$131.9), 45948(\$183.57), 46020(\$462.61), 46069(\$4778.44), 46096(\$446.23), 46219(\$642.38), 46184(\$223.54), 46185(\$1119.65), 46512(\$476), 46511(\$829.22), 46549(\$96.81), 46755(\$1881.3), 46866(\$1162.17), 46867(\$126.45), 46868(\$127.98), 46960(\$603.62) and 46680(\$602.12), in the aggregate amount of \$14,471.45, are for goods and freight charges provided prior to the 503(b)(9) period.
			Subtotal	\$16,781.55	Subtotal	\$16,781.55	Invoice number 47149 includes a freight charge in the amount of \$21.14 which is not a good as required by section 503(b)(9) of the bankruptcy code.
4	C & W LEASING CORP - ABILENE PO BOX 929 ABILENE, TX 79604-0929	2247	503(b)(9) Unsecured	\$1,604.63 \$5,284.98	503(b)(9) Unsecured	\$71.40 \$6,818.21	Invoice numbers C23645 and C23794 are for monthly rental charges which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$6,889.61	Subtotal	\$6,889.61	Invoice number CM111472 includes a labor repair charge, in the amount of \$172.50, which is not a good as required by section 503(b)(9) of the bankruptcy code.

* Plus unliquidated and/or undetermined amounts

(a) Claim previous filed on the Third Notice of Satisfaction - Exhibit B for Partially Satisfied Claim

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

**EXIDE TECHNOLOGIES 13-11482 (KJC)
TWELFTH 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
5	CINTAS 7700 BENT BRANCH DR STE 130 IRVING, TX 75063	71(a)	503(b)(9)	\$9,959.23	503(b)(9)	\$1,198.60	Invoice numbers 417100881 (\$538.83), 417101231 (\$533.61), 417101477 (\$535.15), 417101705 (\$651.39), 417102004 (\$545.96), 417102303 (\$620.40), 417102569 (\$569.34), 417102826 (\$437.82), 417103400 (\$549.66), 417103602 (\$569.46), 417103866 (\$653.77), 417104139 (\$553.25), 417104428 (\$552.80) and 417104649 (\$745.01) are for goods received prior to the 503(b)(9) period. Invoice number 417105012, includes service charges and taxes in the aggregate amount of \$53.19 which are not goods as required by section 5093(b)(9) of the bankruptcy code. Invoice number 417105264, includes service charges and taxes in the aggregate amount of \$57.99 which are not goods as required by section 5093(b)(9) of the bankruptcy code.
			Unsecured	\$0.00	Unsecured	\$8,760.63	
		Subtotal	\$9,959.23	Subtotal	\$9,959.23		
6	CMI INTERNATIONAL INC ATTN JOHN CONNOR 4080 MCGINNIS FERRY RD STE 301 ALPHARETTA, GA 30005 TRANSFERRED TO: CONTRARIAN FUNDS, LLC ATTN ALISA MUMOLA 411 WEST PUTNAM AVE, STE 425 GREENWICH, CT 06830	621(b)	503(b)(9)	\$41,000.00	503(b)(9)	\$0.00	The Claimant provided a service not a good as required by section 503(b)(9) of the bankruptcy code.
			Unsecured	\$0.00	Unsecured	\$41,000.00	
		Subtotal	\$41,000.00	Subtotal	\$41,000.00		
7	COKINOS ENERGY CORP - HOUSTON 5718 WESTHEIMER RD STE 900 HOUSTON, TX 77057-5757	2251	503(b)(9)	\$132,349.35	503(b)(9)	\$65,356.88	Invoice number 40567 asserts all gas charges for the period of 5/1/2013 to 5/31/2013 as 503(b)(9) claims. The invoice should be partially reclassified to reflect the first 20 days, for a total of \$66,958.08, to be reclassified as general unsecured. The remainder of \$36,826.94 falls within the 503(b)(9) period. Invoice #40566 asserts \$34.39 for sales tax which is not entitled to 503(b)(9) treatment.
			Unsecured	\$0.00	Unsecured	\$66,992.47	
		Subtotal	\$132,349.35	Subtotal	\$132,349.35		

* Plus unliquidated and/or undetermined amounts

(a) Claim previous filed on the Third Notice of Satisfaction – Exhibit B for Partially Satisfied Claim

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

**EXIDE TECHNOLOGIES 13-11482 (KJC)
TWELFTH 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
8	COMMERCIAL TIRE,IND TIRE DEALE 3366 LEONIS BLVD VERNON, CA 90058	979	Priority Unsecured	\$1,383.48 \$0.00	Priority Unsecured	\$0.00 \$1,383.48	Claim for refund due does not qualify for priority status under section 507(a)(7) of the bankruptcy code.
			Subtotal	\$1,383.48	Subtotal	\$1,383.48	
9	CRANE VEYOR CORP ERIKA MUNOZ 1524 N POTRERO AVE SOUTH EL MONTE, CA 91733	1517(b)	503(b)(9) Unsecured	\$13,321.41 \$14,242.62	503(b)(9) Unsecured	\$4,473.55 \$23,090.48	
			Subtotal	\$27,564.03	Subtotal	\$27,564.03	
10	E2 ENVIRONMENTAL INC 15375 BARRANCA PKWY B-203 IRVINE, CA 92618	355	503(b)(9) Unsecured	\$11,988.00 \$0.00	503(b)(9) Unsecured	\$0.00 \$11,988.00	The Claimant provided a service not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$11,988.00	Subtotal	\$11,988.00	
11	ENCORE ENERGY SERVICES INC 11807 Q ST STE 1 OMAHA, NE 68137	1128	503(b)(9) Unsecured	\$19,393.74 \$24,713.75	503(b)(9) Unsecured	\$18,124.99 \$25,982.50	
			Subtotal	\$44,107.49	Subtotal	\$44,107.49	
12	FASTENAL 2001 THEURER BLVD ATTN: JOHN MILEK, GENERAL COUNSEL WINONA, MN 55987-1500	1314	503(b)(9) Unsecured	\$6,073.16 \$59,793.47	503(b)(9) Unsecured	\$5,593.92 \$60,272.71	Invoice numbers INMUN128624, IAIN76602, IAIN76609, IAIN76550, IAIN76607, INMUN128485 and INMUN128742 include sales tax and shipping charges, in the aggregate amount of \$479.24, which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$65,866.63	Subtotal	\$65,866.63	
13	FRASIER TRANSPORT INC 8171 E EXECUTIVE AVE NAMPA, ID 83687	880(b)	503(b)(9) Unsecured	\$1,950.00 \$1,950.00	503(b)(9) Unsecured	\$0.00 \$3,900.00	
			Subtotal	\$3,900.00	Subtotal	\$3,900.00	

* Plus unliquidated and/or undetermined amounts

(a) Claim previous filed on the Third Notice of Satisfaction - Exhibit B for Partially Satisfied Claim

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

**EXIDE TECHNOLOGIES 13-11482 (KJC)
TWELFTH 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
14 IBT INC 9400 W 55TH ST MERRIAM, KS 66203 TRANSFERRED TO: BLACKWELL PARTNERS, LLC C/O DUMAC, INC. ATTN JANNINE LALL 280 SOUTH MANGUM STREET, SUITE 210 DURHAM, NC 27701-3675	607	503(b)(9)	\$14,972.09	503(b)(9)	\$14,613.04	Invoice numbers 6068668, 6063649, 6068669, 6071889, 6074916, 6073978, 6066738, 6070092, 6072862, 6073044, 6073045, 6068667, 6071165 and 6069767 include shipping charges, in the aggregate amount of \$359.05, which are not goods as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$49,199.22	Unsecured	\$49,558.27	
		Subtotal	\$64,171.31	Subtotal	\$64,171.31	
15 INDIANA OXYGEN CO. PO BOX 78588 INDIANAPOLIS, IN 46278-0588	1890(b)	503(b)(9)	\$16,840.95	503(b)(9)	\$4,638.05	The Claimant appears to have inadvertently reversed the 503(b)(9) and unsecured claim amounts. The asserted claim amounts should be \$4,826.53 as 503(b)(9) and \$16,840.95 as unsecured. Invoice numbers 1015538, 1017256, 1017756, 1019218, 1020266 and 1020281 assert diesel and hazmat surcharges, in the aggregate amount of \$39.48, which are not goods as required by section 503(b)(9) of the bankruptcy code. Invoice number 1017052, in the amount of \$94.44, is for repair service which is not a good as required by section 503(b)(9) of the bankruptcy code. Invoice number 8242652 asserts equipment rental charges, in the amount of \$54.56, which are not goods as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$4,826.53	Unsecured	\$17,029.43	
		Subtotal	\$21,667.48	Subtotal	\$21,667.48	
16 LAMPTON WELDING SUPPLY CO INC ATTN SUZAN SCHMITZ PO BOX 765 WICHITA, KS 67201	1594(b)	503(b)(9)	\$531.54	503(b)(9)	\$523.84	Invoice number 549232 includes a freight charge, in the amount of \$7.70, which is not a good as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$3,893.92	Unsecured	\$3,901.62	
		Subtotal	\$4,425.46	Subtotal	\$4,425.46	

* Plus unliquidated and/or undetermined amounts

(a) Claim previous filed on the Third Notice of Satisfaction - Exhibit B for Partially Satisfied Claim

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

EXIDE TECHNOLOGIES 13-11482 (KJC)
TWELFTH 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 MEYER LABORATORY, INC. ATTN TERROY OLES 2401 W. JEFFERSON ST BLUE SPRINGS, MO 64015	765(b)	503(b)(9)	\$7,390.00	503(b)(9)	\$4,900.00	Invoice numbers 412053, 413098, 414377 and 416178 do not qualify for priority status under section 507 (a)(4) of the bankruptcy code.
		Priority	\$7,390.00	Priority	\$0.00	
		Unsecured	\$0.00	Unsecured	\$9,880.00	
		Subtotal	\$14,780.00	Subtotal	\$14,780.00	
						Invoice numbers 412053 (\$2,450), 413098 (\$2,450) and 414377 (\$40) assert goods received prior to the 503(b)(9) period.
18 MILE HIGH RIGGING INC 6400 E STAPLETON DR S UNIT C DENVER, CO 80216	488(b)	503(b)(9)	\$4,853.11	503(b)(9)	\$4,488.40	Invoice number FC 18, in the amount of \$364.71, for finance charges which are not goods as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$18,676.60	Unsecured	\$19,041.31	
		Subtotal	\$23,529.71	Subtotal	\$23,529.71	
19 OREGON FARMERS MUTUAL TELEPHONE CO PO BOX 227 OREGON, MO 64473-0227	1600(b)	503(b)(9)	\$681.89	503(b)(9)	\$0.00	Claim for telecommunication services does not constitute a good as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$0.00	Unsecured	\$681.89	
		Subtotal	\$681.89	Subtotal	\$681.89	
20 OXIDOR CORPORATION 1825 E PLANO PKWY STE 160 PLANO, TX 75074-8570	1532	503(b)(9)	\$14,424.50	503(b)(9)	\$0.00	The Claimant has provided a service not a good as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$0.00	Unsecured	\$14,424.50	
		Subtotal	\$14,424.50	Subtotal	\$14,424.50	

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(a) Claim previous filed on the Third Notice of Satisfaction - Exhibit B for Partially Satisfied Claim

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

EXIDE TECHNOLOGIES 13-11482 (KJC)
TWELFTH 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
21	PURE MARKETING GROUP CORPORATION-CUMMING 225 CURIE DR STE 1300 ALPHARETTA, GA 30005-4004	820(b)	503(b)(9)	\$3,820.11	503(b)(9)	\$3,555.45	Invoice number 121947AEX asserts a freight charge, in the amount of \$25.48, which is not a good as required by section 503(b)(9) of the bankruptcy code. Invoice number 132500EX asserts sales tax and freight charges, in the aggregate amount of \$35.66, which are not goods as required by section 503(b)(9) of the bankruptcy code. Invoice number 132491EX asserts set up and freight charges, in the aggregate amount of \$92.62, which are not goods as required by section 503(b)(9) of the bankruptcy code. Invoice number 132501EX asserts set up and freight charges, in the aggregate amount of \$97.08, which are not goods as required by section 503(b)(9) of the bankruptcy code. Invoice number 132474EX asserts a freight charge, in the amount of \$13.82, which is not a good as required by section 503(b)(9) of the bankruptcy code.
			Unsecured	\$61,361.87	Unsecured	\$61,626.53	
			Subtotal	\$65,181.98	Subtotal	\$65,181.98	
22	QUALTUM PATRICIA ALVARADO HIMALAYA 7301078216 SAN LUIS POSI, MEXICO	2272	Priority	\$6,768.33	Priority	\$0.00	Claim for staffing services does not qualify for priority status under section 507(a)(4) of the bankruptcy code.
			Unsecured	\$0.00	Unsecured	\$6,768.33	
			Subtotal	\$6,768.33	Subtotal	\$6,768.33	
23	QUEST DIAGNOSTICS INCORPORATED PO BOX 828669 PHILADELPHIA, PA 19182-8669	2601(b)	503(b)(9)	\$5,734.89	503(b)(9)	\$0.00	The Claimant provides no basis for a secured claim under the bankruptcy code. In addition, the Claimant provided services not goods as required by section 503(b)(9) of the bankruptcy code.
			Secured	\$5,734.89	Secured	\$0.00	
		Unsecured	\$84.08	Unsecured	\$11,553.86		
			Subtotal	\$11,553.86	Subtotal	\$11,553.86	
24	RAYMOND STORAGE CONCEPTS, INC. 4350 INDECO COURT CINCINNATI, OH 45241	998	503(b)(9)	\$0.00	503(b)(9)	\$0.00	Sales taxes, in the aggregate amount of \$982.58, due on account of goods rented, goods sold and services performed do not qualify for priority status under section 507(a)(8) of the bankruptcy code.
			Priority	\$982.58	Priority	\$0.00	
		Unsecured	\$4,263.18	Unsecured	\$5,245.76		
			Subtotal	\$5,245.76	Subtotal	\$5,245.76	

* Plus unliquidated and/or undetermined amounts

(a) Claim previous filed on the Third Notice of Satisfaction - Exhibit B for Partially Satisfied Claim

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

**EXIDE TECHNOLOGIES 13-11482 (KJC)
TWELFTH 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
25 RETAIL INSIGHT LLC 12710 OAKDALE VIEW DR EDMOND, OK 73013	276(a)	503(b)(9)	\$131.40	503(b)(9)	\$0.00	Partial invoice number 102019, in the amount of \$131.40, is for services not goods as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$1,314.00	Unsecured	\$1,445.40	
		Subtotal	\$1,445.40	Subtotal	\$1,445.40	
26 SEMI-TRAILER SALES TROY NESS 3701 38TH STREET SOUTH SUITE A FARGO, ND 58104	872(b)	Priority	\$839.93	Priority	\$0.00	Claim for the Debtor's rental of storage trailers does not qualify for priority status under section 507(a)(7) of the bankruptcy code.
		Unsecured	\$0.00	Unsecured	\$839.93	
		Subtotal	\$839.93	Subtotal	\$839.93	
27 SIERRA LIQUIDITY FUND LLC - ASSIGNEE & ATT-IN-FACT FOR SUPERIOR ELECTRIC MOTOR SERVICE - ASSIGNOR 2699 WHITE RD STE 255 IRVINE, CA 92614	444	503(b)(9)	\$504.21	503(b)(9)	\$462.58	Invoice number 93287 includes sales tax, in the amount of 41.63, which is not a good as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$0.00	Unsecured	\$41.63	
		Subtotal	\$504.21	Subtotal	\$504.21	
28 SUMEEKO LTD 41400 EXECUTIVE DR HARRISON TWP, MI 48045	83(b)	503(b)(9)	\$65,880.00	503(b)(9)	\$42,660.00	Invoice numbers 130506028 (\$22,275), 130411026 (\$22,275) and 130606030 (\$21,330) for goods sold to the Debtor do not qualify for priority status under the bankruptcy code. Invoice numbers 130506028 (\$22,275) and 130411026 (\$22,275) were for goods received prior to the 503(b)(9) period.
		Priority	\$65,880.00	Priority	\$0.00	
		Unsecured	\$0.00	Unsecured	\$89,100.00	
		Subtotal	\$131,760.00	Subtotal	\$131,760.00	
29 SUPERIOR SERVICE CO., INC. 840 E MURDOCK ST WICHITA, KS 67214-3836	1237(b)	503(b)(9)	\$705.00	503(b)(9)	\$0.00	Invoice numbers 8024 and 8369 are for goods received prior to the 503(b)(9) period.
		Unsecured	\$0.00	Unsecured	\$705.00	
		Subtotal	\$705.00	Subtotal	\$705.00	
30 SYSTEM GROUP, THE C/O THE LAW OFFICE OF K. SMARTT ATTN: KEITH SMARTT P.O. BOX 869-B MCMINNVILLE, TN 37111	2843	503(b)(9)	\$33,153.97	503(b)(9)	\$0.00	The goods provided on invoice number 11172 were provided prior to the 503(b)(9) period.
		Unsecured	\$97,542.79	Unsecured	\$130,696.76	
		Subtotal	\$130,696.76	Subtotal	\$130,696.76	

* Plus unliquidated and/or undetermined amounts

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

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

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
31	WATSON MECHANICAL SERVICES INC 1743 DALLAS DR BATON ROUGE, LA 70806	495	503(b)(9) Unsecured	\$269.00 \$0.00	503(b)(9) Unsecured	\$0.00 \$269.00	The Claimant has provided a service not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$269.00	Subtotal	\$269.00	
			TOTAL	\$864,143.25	TOTAL	\$864,143.25	

* Plus unliquidated and/or undetermined amounts

(a) Claim previous filed on the Third Notice of Satisfaction - Exhibit B for Partially Satisfied Claim

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

**EXIDE TECHNOLOGIES 13-11482 (KJC)
TWELFTH 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	ACCUMA CORPORATION C/O MOORE & VAN ALLEN PLLC ATTN LUIS M LLUBERAS 100 N TRYON ST STE 4700 CHARLOTTE, NC 28202	2228	503(b)(9) Priority Unsecured Subtotal	\$264,913.13* Undetermined* \$521,822.67* \$786,735.80*	503(b)(9) Priority Unsecured Subtotal	\$264,913.13 \$0.00 \$518,947.67 \$783,860.80	Invoice number 59020, in the amount of \$2,875, was paid 3/3/2011 on check number 139117. The Claimant provides no support for priority classification. The amount of the claim should be liquidated at \$264,913.13 as 503(b)(9) and \$518,947.67 as unsecured.
2	ANDRIA BERKLEY 3201 LAUREL RUN AVENUE READING, PA 19605	1629	Unsecured	\$2,500.00*	Unsecured	\$2,500.00	Claim for school scholarship should be liquidated in the amount of a \$2,500 general unsecured claim.
3	BOARD OF PUBLIC UTILITIES 540 MINNESOTA AVE KANSAS CITY, KS 66101	1587	Unsecured	\$330,510.31	Unsecured	\$326,601.54	An additional asserted amount of \$3,908.77 does not exist on the Debtor's books and records.
4	CENTRIFUGAL CASTINGS ATTN DWYN VON BEREHY 136 E WALKER ST MILWAUKEE, WI 53204	93	503(b)(9) Unsecured Subtotal	\$1,961.37 \$9,672.51 \$11,633.88	503(b)(9) Unsecured Subtotal	\$1,961.37 \$9,202.10 \$11,163.47	Invoice number 9722 is duplicative of invoice number 9916 which was paid 3/23/2012 on wire number 17789239.
5	CMI INTERNATIONAL INC ATTN JOHN CONNOR 4080 MCGINNIS FERRY RD STE 301 ALPHARETTA, GA 30005	621 (a)	503(b)(9) Unsecured Subtotal	\$0.00 \$41,000.00 \$41,000.00	503(b)(9) Unsecured Subtotal	\$0.00 \$22,100.00 \$22,100.00	Invoice number 97010VCR includes a pre-petition credit, in the amount of \$6,900, which was not included within the Claimant's Proof of Claim.
	TRANSFERRED TO: CONTRARIAN FUNDS, LLC ATTN ALISA MUMOLA 411 WEST PUTNAM AVE, STE 425 GREENWICH, CT 06830						Invoice numbers 97085V (\$6,000), 97104V (\$2,000), 97106V (\$2,000) and 97124 (\$2,000), in the aggregate amount of \$12,000, do not exist on the Debtor's books and records.

* Plus unliquidated and/or undetermined amounts

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EXIDE TECHNOLOGIES 13-11482 (KJC)
TWELFTH 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
6	CRANE VEYOR CORP ERIKA MUNOZ 1524 N POTRERO AVE SOUTH EL MONTE, CA 91733	1517(a)	503(b)(9) Unsecured	\$4,473.55 \$23,090.48	503(b)(9) Unsecured	\$4,473.55 \$19,711.86	Invoice number 19336, in the amount of \$1,730, was paid 4/17/2013 on check number 5371210.
			Subtotal	\$27,564.03	Subtotal	\$24,185.41	Interest charges in the amount of \$1,648.62 do not exist on the Debtor's books and records.
7	ELECTRICAL SAFETY AUTHORITY- PETERBOROUGH 400 SHELDON DRIVE, UNIT 1 CAMBRIDGE ON N1T 2H9 CANADA	1931	Unsecured	Undetermined*	Unsecured	\$2,076.70	Invoice number 93298490, in the amount of \$618.68 CAD, is not the Debtor's liability. The invoice numbers on the Proof of Claim were asserted in Canadian Dollars. Based on the Debtor's books and records, the general unsecured amount owed to the Claimant is \$2,076.70 USD.
8	FRASIER TRANSPORT INC 8171 E EXECUTIVE AVE NAMPA, ID 83687	880(a)	503(b)(9) Unsecured	\$0.00 \$3,900.00	503(b)(9) Unsecured	\$0.00 \$1,950.00	Invoice number 153560, in the amount of \$1,950, was duplicated as both 503(b)(9) and general unsecured classifications. The allowed claim amount should be \$1,950 general unsecured.
			Subtotal	\$3,900.00	Subtotal	\$1,950.00	
9	INDIANA OXYGEN CO. PO BOX 78588 INDIANAPOLIS, IN 46278-0588	1890(a)	503(b)(9) Unsecured	\$4,638.05 \$17,029.43	503(b)(9) Unsecured	\$4,598.85 \$16,723.69	The asserted claim amount contains a discrepancy in the amount of \$39.20.
			Subtotal	\$21,667.48	Subtotal	\$21,322.54	Invoice number 1004160, in the amount of \$307.94, is duplicated within the Proof of Claim.
10	INTERCALL INC ATTN MELODY LOHR 7171 MERCY RD STE 200 OMAHA, NE 68106	329	Unsecured	\$222,686.24	Unsecured	\$212,940.37	The Debtor has bifurcated invoice number 1742069598, in the asserted pre-petition amount of \$57,437.46, as \$47,691.59 pre-petition.

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**EXIDE TECHNOLOGIES 13-11482 (KJC)
TWELFTH 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	INTERNATIONAL LEAD ASSOCIATION C/O BAKER & HOSTETLER LLP ATTN CHRISTOPHER J GIAIMO 1050 CONNECTICUT AVE NW STE 1100 WASHINGTON, DC 20036	1028	Unsecured	\$117,150.66	Unsecured	\$18,344.90	The Debtor cancelled the subscription on January 3, 2013. Invoice numbers 342, 343, 344, 350, 351 and 354, in the aggregate amount of \$98,805.76, are for subscription fees asserted after the date of cancellation.
12	INTERSTATE BATTERIES RECYCLING LLC FKA INTERSTATE BATTERIES RECYCLING INC 12770 MERIT DRIVE SUITE 400 DALLAS, TX 75251	1318	Unsecured	\$55,792.80	Unsecured	\$55,637.40	<p>Invoice number 289129-001, asserted in the amount of \$18,597.60, exists on the Debtor's books and records, based on the Debtor's receipt weight, in the amount of \$18,543.</p> <p>Invoice number 289130-001, asserted in the amount of \$18,597.60, exists on the Debtor's books and records, based on the Debtor's receipt weight, in the amount of \$18,543.</p> <p>Invoice number 325307-001, asserted in the amount of \$18,597.60, exists on the Debtor's books and records, based on the Debtor's receipt weight, in the amount of \$18,551.40.</p>
13	KIRK NATIONALEASE CO C/O FAULKNER GARMHAUSEN KEISTER & SHENK ATTN MICHAEL A STAUDT 100 S MAIN AVE STE 300 SIDNEY, OH 45365	1777	Unsecured	\$66,230.20	Unsecured	\$33,463.88	<p>Repair estimates, in the aggregate amount of \$31,614.97, do not exist on the Debtor's books and records.</p> <p>An outstanding claim balance of \$1,151.35 does not exist on the Debtor's books and records.</p>

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**EXIDE TECHNOLOGIES 13-11482 (KJC)
TWELFTH 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
14	LAMPTON WELDING SUPPLY CO INC ATTN SUZAN SCHMITZ PO BOX 765 WICHITA, KS 67201	1594(a)	503(b)(9) Unsecured	\$523.84 \$3,901.62	503(b)(9) Unsecured	\$523.86 \$3,756.46	Late fees, in the aggregate amount of \$145.16, do not exist on the Debtor's books and records.
			Subtotal	\$4,425.46	Subtotal	\$4,280.32	
15	MEYER LABORATORY, INC. ATTN TERROY OLES 2401 W. JEFFERSON ST BLUE SPRINGS, MO 64015	765(a)	503(b)(9) Priority Unsecured	\$4,900.00 \$0.00 \$9,880.00	503(b)(9) Priority Unsecured	\$2,450.00 \$0.00 \$4,940.00	
			Subtotal	\$14,780.00	Subtotal	\$7,390.00	
16	MILE HIGH RIGGING INC 6400 E STAPLETON DR S UNIT C DENVER, CO 80216	488(a)	503(b)(9) Unsecured	\$4,488.40 \$19,041.31	503(b)(9) Unsecured	\$4,488.40 \$18,676.60	Invoice number FC 18, asserted in the amount of \$364.71, does not exist on the Debtor's books and records.
			Subtotal	\$23,529.71	Subtotal	\$23,165.00	
17	OREGON FARMERS MUTUAL TELEPHONE CO PO BOX 227 OREGON, MO 64473-0227	1600(a)	503(b)(9) Unsecured	\$0.00 \$681.89	503(b)(9) Unsecured	\$0.00 \$245.71	
			Subtotal	\$681.89	Subtotal	\$245.71	
18	PURE MARKETING GROUP CORPORATION-CUMMING 225 CURIE DR STE 1300 ALPHARETTA, GA 30005-4004	820(a)	503(b)(9) Unsecured	\$3,555.45 \$61,626.53	503(b)(9) Unsecured	\$3,555.55 \$61,277.43	Invoice number 122133EX was partially paid, in the amount of \$349, in July of 2012 via an American Express Card.
			Subtotal	\$65,181.98	Subtotal	\$64,832.98	
19	QUEST DIAGNOSTICS INCORPORATED PO BOX 828669 PHILADELPHIA, PA 19182-8669	2601(a)	503(b)(9) Secured Unsecured	\$0.00 \$0.00 \$11,553.86	503(b)(9) Secured Unsecured	\$0.00 \$0.00 \$5,734.89	
			Subtotal	\$11,553.86	Subtotal	\$5,734.89	

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**EXIDE TECHNOLOGIES 13-11482 (KJC)
TWELFTH 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
20	QUINN COMPANY JASON POSIN 10006 ROSE HILLS RD. CITY OF INDUSTRY, CA 90601	890	Unsecured	\$25,063.30	Unsecured	\$24,369.75	Invoice numbers FINA180452 and FINA 181547, in the aggregate amount of \$693.55, do not exist on the Debtor's books and records.
21	ROSENDAHL MASCHINEN GMBH ATTN: RICHARD JONACH OR LEGAL DEPARTMENT SCHACHEN 57 A-8212 PISCHELSDORF, AUSTRIA	1660	Unsecured	\$47,453.00	Unsecured	\$46,859.73	Invoice number 91012107, in the amount of \$593.27, was paid 5/3/2013 on check number 5375146.
22	SEAGATE PLASTICS COMPANY 1110 DISHER DR WATERVILLE, OH 43566	1164	Unsecured	\$164,145.73	Unsecured	\$95,035.62	Invoice numbers 213561, 63385, 63438, 63440, 63439, 213573, 63456, 213585, 63417, 213586, 63517, 63516, 213598, 63533, 63559, 63560, 63558, 63561, 63452, 63575, 63612, 63613 and 66314, in the aggregate amount of \$66,857.45, are duplicative of the invoices contained on Proof of Claim number 2405.
23	SEMI-TRAILER SALES TROY NESS 3701 38TH STREET SOUTH SUITE A FARGO, ND 58104	872(a)	Priority Unsecured	\$0.00 \$839.93	Priority Unsecured	\$0.00 \$787.50	Finance charges, in the aggregate amount of \$52.43, do not exist on the Debtor's books and records.
			Subtotal	\$839.93	Subtotal	\$787.50	
24	SIERRA LIQUIDITY FUND LLC - ASSIGNEE & ATT-IN-FACT FOR WIRTZ MANUFACTURING - ASSIGNOR 19772 MACARTHUR BLVD STE 200 IRVINE, CA 92612-2405	303(b)	503(b)(9) Unsecured	\$6,438.00 \$374.67	503(b)(9) Unsecured	\$6,438.00 \$0.00	The original Claimant, Wirtz Manufacturing (Wirtz), signed a Trade Agreement with the Debtor in which Wirtz agreed not to file a bankruptcy claim other than a 503(b)(9) claim. The unsecured portion of this claim should be reduced to \$0.
			Subtotal	\$6,812.67	Subtotal	\$6,438.00	

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	NAME OF CLAIMANT	CLAIM NUMBER	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION
25	SUMEEKO LTD 41400 EXECUTIVE DR HARRISON TWP, MI 48045	83(a)	503(b)(9) Priority Unsecured	\$42,660.00 \$0.00 \$89,100.00	503(b)(9) Priority Unsecured	\$21,330.00 \$0.00 \$44,550.00	The Claimant asserted duplicate invoices across priority and 503(b)(9) claim classifications. The total claim amount should be \$65,880.
			Subtotal	\$131,760.00	Subtotal	\$65,880.00	
26	SUN RECYCLING 2380 COLLEGE AVE DAVIE, FL 33317	346	503(b)(9)	\$6,379.81	503(b)(9)	\$5,638.22	The asserted amount for core returns is incorrect and should be adjusted per the Debtor's receipt weight.
	TRANSFERRED TO: TANNOR PARTNERS CREDIT FUND, LP ATTN ROBERT TANNOR 150 GRAND STREET, STE 401 WHITE PLAINS, NY 10601						
27	SUPERIOR SERVICE CO., INC. 840 E MURDOCK ST WICHITA, KS 67214-3836	1237(a)	503(b)(9) Unsecured	\$0.00 \$705.00	503(b)(9) Unsecured	\$0.00 \$527.50	The claimed amount should be allowed at \$527.50 general unsecured.
			Subtotal	\$705.00	Subtotal	\$527.50	
28	TBM CONSULTING GROUP INC. 4400 BEN FRANKLIN BLVD. DURHAM, NC 27704	850	Unsecured	\$568,765.41	Unsecured	\$293,765.41	Invoice numbers 126046 (\$137,500) and 126241 (\$137,500), in the aggregate amount of \$275,000, assert services which were not performed by the Claimant. No liability exists on the Debtor's books and records for invoice numbers 126046 (\$137,500) and 126241 (\$137,500).

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29	TELTECH COMMUNICATIONS PO BOX 3040 EAGLE, CO 81631	2645	Unsecured	\$63,793.12	Unsecured	\$58,493.98	<p>The amount (\$13,950) asserted by the Claimant on invoice number 50081, does not match the receipt weight on the Debtor's books and records. The amount on the Debtor's books and records for invoice number 50081 is \$11,609.50.</p> <p>The amount (\$13,950) asserted by the Claimant on invoice number 50082, does not match the receipt weight on the Debtor's books and records. The amount on the Debtor's books and records for invoice number 50082 is \$11,114.12.</p> <p>The amount (\$8,635.36) asserted by the Claimant on invoice number 50083, does not match the receipt weight on the Debtor's books and records. The amount on the Debtor's books and records for invoice number 50083 is \$8,512.60.</p>
30	UNION PACIFIC RAILROAD COMPANY ATTN MARY ANN KILGORE 1400 DOUGLAS ST STOP 1580 OMAHA, NE 68179	2854	Unsecured	\$26,604.15	Unsecured	\$26,455.00	Finance charges, in the amount of \$149.15, do not exist on the Debtor's books and records.

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31	YINGKOU ZHONGJIE SHIDA SEPARATOR CO LTD ATTN GEORGE WONG LUNAN DEVELOPMENT ZONE YINGKOU LIAONING CHINA	Unsecured	\$50,794.79	Unsecured	\$41,640.20	<p>Invoice number ZJ-USAEXIDE201101, asserted in the amount of \$22,011.43, is based on the quantity contained on the purchase order. However, the Claimant short shipped the goods which reduced the invoiced amount to \$21,304.84 reflecting the correct quantity received by the Debtor.</p> <p>Invoice number ZJ-USAEXIDE201201, asserted in the amount of \$23,741.52, is based on the quantity contained on the purchase order. However, the Claimant short shipped the goods which reduced the invoiced amount to \$22,412.53 reflecting the correct quantity received by the Debtor.</p> <p>Invoice number ZJ-USAEXIDE201101, asserted in the amount of \$5,041.84, is based on the quantity contained on the purchase order. However, the Claimant short shipped the goods which reduced the invoiced amount to \$4,671.99 reflecting the correct quantity received by the Debtor.</p> <p>The Claimant failed to include pre-petition credit memos issued on invoice ZJ-USAEXIDE201101 in the aggregate amount of \$6,749.16.</p>
TOTAL			\$2,900,641.21*	TOTAL	\$2,287,686.82	

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