

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

**FILED**  
2014 SEP 24 AM 10:24

CLERK  
US BANKRUPTCY COURT  
DISTRICT OF DELAWARE

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

**RESPONSE OF CLAIMANT JAMES CANNON, JR., CLAIM #1993, TO DEBTOR’S (NON-SUBSTANTIVE) ELEVENTH OMNIBUS OBJECTION**

In response to the Debtor’s (Non-Substantive) Eleventh Omnibus Objection, filed September 12, 2014, (Doc. 2260), claimant James Cannon, Jr., 215 O. C. Kitchens Drive, Florence, MS 39073-7996, Claim Number 1993 (identifier 9535), would state that he is a former employee of Gould Natural Battery (“GNB”), which was purchased by Exide in 2000, and is entitled to all appropriate pension plan benefits of the Pension Plan sponsored by Exide. In Exide Technologies Motion for Interim and Final Orders of June 10, 2013, (Doc. 5) is stated that:

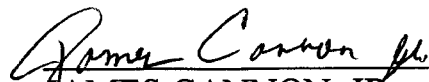
**44. Retirement Benefits.** (a) **Pension Plan:** The Debtor sponsors one defined benefit pension plan (the “Pension Plan”), covering virtually all of the Debtor’s active and former Employees, active and former Canadian Employees, former employees of Gould National Battery, which was purchased by Exide in 2000, and hourly Union Employees covered by certain CBAs. The Pension Plan is closed to new entrants, and benefits under the Pension

Plan are frozen for all participants.

Claimant has no accurate method or information from years ago to calculate the exact amount of pension plan benefits and recoverable contributions to which he is entitled, as it is believed that information is in the possession and control of Exide.

Accordingly, the Debtor's objection to the claim for "insufficient documentation" should be denied, and Claimant does not waive any right he has or may have to any and all benefits or recoverable contributions under the Pension Plan.

Respectfully submitted, this the 23 day of September, 2014.



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JAMES CANNON, JR.  
Claim #1993 (identifier 9535)  
215 O. C. Kitchens Drive  
Florence, MS 39073-7996

**CERTIFICATE OF SERVICE**


I, James Cannon, Jr., do hereby certify that I have served by Federal Express, a true and correct copy of the above and foregoing Response of Claimant James Cannon, Jr., Claim #1993, to Debtor's (Non-Substantive) Eleventh Omnibus Objection to the following:

United States Bankruptcy Court  
for the District of Delaware  
824 Market Street, 3rd Floor  
Wilmington, Delaware 19801

Office of the U.S. Trustee  
Attn: Mark Kenney, Esq.  
844 North King Street  
Room 2207, Lockbox 35,  
Wilmington, Delaware 19801

Exide Technologies  
Attn: B. Holland Pritchard  
13000 Deerfield Parkway, Suite 100  
Milton, Georgia 30004

Skadden, Arps, Slate, Meagher & Flom LLP  
Attn: James J. Mazza, Jr. and Louis S.  
Chiappetta  
155 N. Wacker Drive  
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\_\_\_\_\_  
JAMES CANNON, JR.  
Claim #1993 (identifier 9535)

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