

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> : **Hrg. Date: December 11, 2014 10:00 a.m. (Eastern)**  
 : **Obj. Due: November 24, 2014 at 4:00 p.m. (Eastern)**  
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**DEBTOR’S (SUBSTANTIVE) FOURTEENTH 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**

**(“FOURTEENTH 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

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<sup>1</sup> 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) Fourteenth 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).<sup>2</sup>

10. To date, approximately 3,900 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 twelve omnibus claims objections to Claims. After hearing these omnibus claims objections, this Court disallowed and expunged approximately 530 Claims asserting more than \$4.858 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

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<sup>2</sup> 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 November 24, 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 **December 11, 2014 at 10:00 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 **November 24, 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, November 24, 2014 at 4:00 p.m. (Eastern)**.

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 **December 11, 2014 at 10:00 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.

*[Remainder of page intentionally left blank.]*

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  
November 10, 2014

SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP

/s/ Kristhy M. Peguero  
Anthony W. Clark (I.D. No. 2051)  
Kristhy M. Peguero (I.D. No. 4903)  
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- and -

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Fax: (312) 407-0411

*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.<sup>1</sup> : **Hrg. Date: December 11, 2014 at 10:00 a.m. (Eastern)**  
: **Obj. Due: November 24, 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) Fourteenth 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”)**.<sup>2</sup>

**PLEASE TAKE FURTHER NOTICE** that responses to the Objection, if any, must be filed on or before **November 24, 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 November 24, 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;

<sup>1</sup> 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.

<sup>2</sup> 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 DECEMBER 11, 2014 AT 10:00 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  
November 10, 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. <sup>1</sup>	:	
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**DECLARATION OF HOLDEN BIXLER IN SUPPORT OF DEBTOR’S  
(SUBSTANTIVE) FOURTEENTH 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.<sup>2</sup> I have read the Debtor’s (Substantive) Fourteenth 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.

<sup>1</sup> 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.

<sup>2</sup> 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 November 10, 2014

/s/ Holden Bixler

Holden Bixler

**Proposed Order**

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.<sup>1</sup> : **Related Docket No. \_\_\_\_\_**  
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**ORDER SUSTAINING DEBTOR’S (SUBSTANTIVE) FOURTEENTH 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) Fourteenth 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”),<sup>2</sup> 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) Fourteenth 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

<sup>1</sup> 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.

<sup>2</sup> 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

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THE HONORABLE KEVIN J. CAREY  
UNITED STATES BANKRUPTCY JUDGE

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

NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
HAGEN BATTERIE AG IM THIERGARTEN 1 D-63654 BÜDINGEN GERMANY	2491	Undetermined*	No liability exists on the Debtor's books and records.
STEFAN STUBING C/O DEUTSCHE EXIDE GMBH INDUSTRIESTRASSE GERMANY 63652	2492	Undetermined*	No liability exists on the Debtor's books and records.
<b>TOTAL</b>		<b>\$0.00*</b>	

\* Plus unliquidated and/or undetermined amounts



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

	<b>NAME OF CLAIMANT</b>	<b>CLAIM NUMBER</b>	<b>CLAIM CLASSIFICATION STATUS</b>	<b>CLAIM AMOUNT</b>	<b>MODIFIED CLASSIFICATION</b>	<b>MODIFIED CLAIM AMOUNT</b>	<b>REASON FOR RECLASSIFICATION</b>
1	A-RENTAL SERVICE CORPORATION - POB 2375 PO BOX 2375 MUNCIE, IN 47307-0375	1830	503(b)(9) Unsecured	\$3,722.13 \$17,292.14	503(b)(9) Unsecured	\$0.00 \$21,014.27	The Claimant provided a service not a good as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$21,014.27	Subtotal	\$21,014.27	
2	AIRGAS USA LLC C/O AIRGAS INC ATTN DAVE BOYLE 259 N RADNOR CHESTER RD RADNOR, PA 19087	910	503(b)(9) Unsecured	\$1,769.63 \$11,943.16	503(b)(9) Unsecured	\$1,546.05 \$12,166.74	
			Subtotal	\$13,712.79	Subtotal	\$13,712.79	
3	AIRGAS USA LLC - CENTRAL DIVISION ATTN LISA MENTON 110 W SEVENTH ST STE 1300 TULSA, OK 74119	696 (c)	503(b)(9) Unsecured	\$10,259.69 \$0.00	503(b)(9) Unsecured	\$10,048.07 \$211.62	Invoice numbers 9016025348, 9016167286, 9016253608, 9016253607, 9016465592 and 9016376335 include hazmat fees, fuel surcharges, delivery fees and product surcharges, in the aggregate amount of \$211.62, which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$10,259.69	Subtotal	\$10,259.69	
4	ANXE BUSINESS CORP 2000 TOWN CTR STE 2050 SOUTHFIELD, MI 48075	50 (a)	503(b)(9) Unsecured	\$7,007.00 \$52,321.27	503(b)(9) Unsecured	\$0.00 \$59,328.27	
			Subtotal	\$59,328.27	Subtotal	\$59,328.27	
5	HAVE POTTY WILL TRAVEL II RONNIE FLINT C/O RONNIE FLINT 213 ADA ST FORTESCUE, MO 64437	540 (a)	Priority Unsecured	\$980.89 \$0.00	Priority Unsecured	\$0.00 \$980.89	Claim for the Debtor's rental of portable toilets does not qualify for priority status under section 507(a)(7) of the bankruptcy code.
			Subtotal	\$980.89	Subtotal	\$980.89	

(a) Claim previously filed on the Fourth Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

(b) Claim previously filed on the Fifth Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

**EXIDE TECHNOLOGIES 13-11482 (KJC)  
FOURTEENTH 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
6	INTERSTATE INDUSTRIAL INSTRUMENTATION INC ATTN TAMRA MALOUSEK 10424 J ST PO BOX 27310 OMAHA, NE 68127	1055	Secured	\$1,310.90	Secured	\$0.00	Claim does not support secured status under the bankruptcy code.
			Unsecured	\$0.00	Unsecured	\$1,310.90	
			Subtotal	\$1,310.90	Subtotal	\$1,310.90	
7	MAINTENANCE 51 - ARNPRIOR 35 MAPLE DRIVE ARNPRIOR ON K7S 3R8 CANADA	2257 (a)	503(b)(9)	\$199.88	503(b)(9)	\$176.88	Invoice numbers 0937, 0938, 0945 and 0933 assert sales taxes, in the aggregate amount of \$23.00, which is not a good as required by section 503(b)(9) of the bankruptcy code.
			Unsecured	\$4,965.53	Unsecured	\$4,988.53	
			Subtotal	\$5,165.41	Subtotal	\$5,165.41	
8	MCINTIRE BUILDING CENTER 108 W 7TH ST MOUND CITY, MO 64470	2654 (c)	503(b)(9)	\$2,092.02	503(b)(9)	\$1,913.02	Invoice numbers 565177, 565314, 564649, 565435 and 565315 include sales taxes, in the aggregate amount of \$159, which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Unsecured	\$12,299.87	Unsecured	\$12,478.87	
			Subtotal	\$14,391.89	Subtotal	\$14,391.89	

Invoice number 564649 includes a delivery charge, in the amount of \$20, which is not a good as required by section 503(b)(9) of the bankruptcy code.

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

	<b>NAME OF CLAIMANT</b>	<b>CLAIM NUMBER</b>	<b>CLAIM CLASSIFICATION STATUS</b>	<b>CLAIM AMOUNT</b>	<b>MODIFIED CLASSIFICATION</b>	<b>MODIFIED CLAIM AMOUNT</b>	<b>REASON FOR RECLASSIFICATION</b>
9	MCMASTER-CARR SUPPLY COMPANY PO BOX 4355 CHICAGO, IL 60680	400 (b) (c)	503(b)(9) Unsecured	\$24,448.79 \$188,160.90	503(b)(9) Unsecured	\$23,841.90 \$188,767.79	Invoice numbers 52309812, 52309811, 52314496, 52399507, 52400377, 52400564, 52482936, 52544263, 52544502, 52544982, 52634177, 52634178, 52634778, 52634777, 52634672, 52721283, 52717431, 52717287, 52722656, 52633999, 52721281, 52716771, 52721282, 52815552, 52809945, 52814356, 52888383, 52888381, 52888382, 52890591, 52887905, 52983919, 52983916, 52978498, 52982938, 52979466, 52979467, 52983917, 52984085, 52979193, 53069354, 53064478, 53068887, 53069911, 53064605, 53069355, 53069237, 53069236, 53163094, 53162948, 53253434, 53252731, 53252286 include freight charges, in the aggregate amount of \$606.89, which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$212,609.69	Subtotal	\$212,609.69	
10	MILES CHEMICAL COMPANY INC 12801 RANGOON ST ARLETA, CA 91331	3272 (c)	503(b)(9) Unsecured	\$144,798.28 \$0.00	503(b)(9) Unsecured	\$0.00 \$144,798.28	
			Subtotal	\$144,798.28	Subtotal	\$144,798.28	
11	PRAXAIR, INC. ATTN: TRACEY BOUTOT, CREDIT MANAGER 39 OLD RIDGEBURY ROAD DANBURY, CT 06810-5113	821	503(b)(9) Unsecured	\$105,856.57 \$19,749.02	503(b)(9) Unsecured	\$102,885.31 \$22,720.28	Invoice numbers 15643535, 15661327, 15659393, 15643211, 15668262, 15550287, 15666810 and 15673357 include regulatory compliance charges, transportation charges, Kansas City power charges and sales tax, in the aggregate amount of \$2,971.26, which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$125,605.59	Subtotal	\$125,605.59	
12	PRECISION OPTICLE PC WENDY MANNERS 4521 17TH AVE COLUMBUS, GA 31904	1562	Secured	\$1,457.95	Secured Unsecured	\$0.00 \$1,457.95	The purchase of safety glasses does not qualify for secured status under the bankruptcy code.
					Subtotal	\$1,457.95	

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

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

	<b>NAME OF CLAIMANT</b>	<b>CLAIM NUMBER</b>	<b>CLAIM CLASSIFICATION STATUS</b>	<b>CLAIM AMOUNT</b>	<b>MODIFIED CLASSIFICATION</b>	<b>MODIFIED CLAIM AMOUNT</b>	<b>REASON FOR RECLASSIFICATION</b>
13	QUINN COMPANY 10006 ROSE HILLS RD CITY OF INDUSTRY, CA 90601	535	503(b)(9) Unsecured	\$292.50 \$577.50	503(b)(9) Unsecured	\$0.00 \$870.00	The goods related to the credit amount of \$292.50 on invoice number 17060742 were provided prior to the 503(b)(9) period.
			Subtotal	\$870.00	Subtotal	\$870.00	
14	SCALE SYSTEMS INC PO BOX 116733 ATLANTA, GA 30368-6733	2956 (c)	503(b)(9)	\$2,782.00	503(b)(9) Unsecured	\$1,053.00 \$1,729.00	
					Subtotal	\$2,782.00	
15	SELLERS EQUIPMENT INC PO BOX 1940 SALINA, KS 67402-1940	1269	503(b)(9) Unsecured	\$5,854.18 \$28,427.39	503(b)(9) Unsecured	\$666.62 \$33,614.95	Portions of invoice numbers IW106108, IW106122, IW106118 and IW106130, asserted as 503(b)(9) in the aggregate amount of \$5,187.56, are for goods provided prior to the 503(b)(9) period.
			Subtotal	\$34,281.57	Subtotal	\$34,281.57	
16	SOUTHERN CONTROLS INC PO BOX 210399 MONTGOMERY, AL 36121	677	503(b)(9) Unsecured	\$7,731.60 \$5,427.83	503(b)(9) Unsecured	\$7,666.35 \$5,493.08	Invoice numbers 501486200, 501484900, 501486201, 501486202 and 501485200 include freight charges, in the aggregate amount of \$65.25, which are not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$13,159.43	Subtotal	\$13,159.43	
	TRANSFERRED TO: BOWERY OPPORTUNITY FUND, L.P. ATTN VLADIMIR JELISAVCIC 1325 AVENUE OF THE AMERICAS, 28TH FLOOR NEW YORK, NY 10019						
17	SPF AMERICA TONY TOTH 5512 SOUTH 66TH STREET FORTSMITH, AR 72903	1410 (b) (c)	503(b)(9) Unsecured	\$349,296.24 \$1,683.64	503(b)(9) Unsecured	\$236,046.60 \$114,933.28	Invoice numbers 59770 (\$47,331.54), 59773 (\$388.44), 59783 (\$61,880.06), 59906 (\$333.54), 59907 (\$407.12), 59908 (\$1,674.20), 59910 (\$54.60), 59911 (\$102.36), 59913 (\$325.40), 59914 (\$407.12), 59965 (\$237.26) and 59966 (\$108.00) are for goods received prior to the 503(b)(9) period.
			Subtotal	\$350,979.88	Subtotal	\$350,979.88	

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

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

	<b>NAME OF CLAIMANT</b>	<b>CLAIM NUMBER</b>	<b>CLAIM CLASSIFICATION STATUS</b>	<b>CLAIM AMOUNT</b>	<b>MODIFIED CLASSIFICATION</b>	<b>MODIFIED CLAIM AMOUNT</b>	<b>REASON FOR RECLASSIFICATION</b>
18	STAR MECHANICAL SUPPLY CO INC ATTN CAROLYN FINCHER PO BOX 109 SPRINGDALE, AR 72765	332 (a)	503(b)(9) Unsecured	\$178.89 \$49.20	503(b)(9) Unsecured	\$0.00 \$228.09	Invoice number 3791864, in the amount of \$178.89, asserts goods received prior to the 503(b)(9) period.
			Subtotal	\$228.09	Subtotal	\$228.09	
19	SUPERIOR SIGNALS INC BOX 843214 KANSAS CITY, MO 64184	1463	503(b)(9) Unsecured	\$33,853.92 \$98,251.13	503(b)(9) Unsecured	\$33,608.05 \$98,497.00	
			Subtotal	\$132,105.05	Subtotal	\$132,105.05	
			<b>TOTAL</b>	<b>\$1,145,041.64</b>	<b>TOTAL</b>	<b>\$1,145,041.64</b>	

(a) Claim previously filed on the Fourth Notice of Satisfaction - Exhibit B for Partially Satisfied Claims  
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 (c) Claim also contained on the Exhibit C to the Fourteenth Omnibus Claims Objection to Reduce and Allow Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)  
FOURTEENTH 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 S P A C/O MOORE & VAN ALLEN PLLC ATTN LUIS M LLUBERAS 100 N TRYON ST STE 4700 CHARLOTTE, NC 28202	2262 (a)	503(b)(9) Unsecured  Subtotal	\$9,770.90* \$21,075.71*  \$30,846.61*	503(b)(9) Unsecured  Subtotal	\$9,770.90 \$21,075.71  \$30,846.61	The claim should be liquidated in the total amount of \$30,846.61.
2	AIRGAS USA LLC - CENTRAL DIVISION ATTN LISA MENTON 110 W SEVENTH ST STE 1300 TULSA, OK 74119	696 (c)	503(b)(9) Unsecured  Subtotal	\$10,048.07 \$211.62  \$10,259.69	503(b)(9) Unsecured  Subtotal	\$9,943.47 \$211.62  \$10,155.09	Invoice numbers 9909106215, 9016295704 and 9909106214 include sales taxes, in the aggregate amount of \$104.60, which should not be allowed for rental charges on those invoices.
3	AMERICAN ELECTRIC POWER 1 AEP WAY HURRICANE, WV 25526	1078	Unsecured	\$201,797.27	Unsecured	\$131,043.09	The pre-petition balance of account number 045-267-657-1-6, asserted in the amount of \$185,646.66, is also claimed, in part, on Proof of Claim number 2608 in the amount of \$67,273.71.  The pre-petition balance of account number 042-507-921-1-8, asserted in the amount of \$14,113.69, is also claimed, in part, on Proof of Claim number 2608 in the amount of \$2,989.94.  The pre-petition balance of account number 046-451-098-2-0, asserted in the amount of \$1,435.45, is also claimed, in part, on Proof of Claim number 2608 in the amount of \$490.53.
4	COMMAND TRANSPORTATION LLC C/O EULER HERMES NORTH AMERICA INSURANCE CO 800 RED BROOK BLVD OWINGS MILLS, MD 21117	395	Unsecured	\$267,131.06*	Unsecured	\$267,131.06	The claim should be liquidated at \$267,131.06 general unsecured.

\* Plus unliquidated and/or undetermined amounts

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(c) Claim also contained on Exhibit B to the Fourteenth Omnibus Claims Objection for Misclassified Claims

(d) Claim previously ordered reclassified on the Sixth Omnibus Claims Objection – Exhibit B for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)  
FOURTEENTH 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
5	CONVOY SYSTEMS, LLC BRENDA MILLER 333 N. JAMES ST KANSAS CITY, KS 66118	1032 (d)	503(b)(9) Unsecured  Subtotal	\$0.00 \$180,569.19  \$180,569.19	503(b)(9) Unsecured  Subtotal	\$0.00 \$138,339.62  \$138,339.62	Invoice numbers 256492, 256643, 256669, 256694, 256712, 256741, 256796, 256822, 256839, 256862, 256925, 256990, 256991, 257060 and 257335, in the aggregate amount of \$42,229.57, are for post-petition services to be paid in the normal course.
6	ENGINEERED REFRACTORY SHAPES & SERVICES LLC C/O ICE MILLER LLP ATTN BEN T CAUGHEY ONE AMERICAN SQ STE 3100 INDIANAPOLIS, IN 46280	391 (a)	Unsecured	\$94,402.38*	Unsecured	\$94,402.38	The claim should be liquidated at \$94,402.38 general unsecured.
7	MACALLISTER MACHINERY CO INC PO BOX 660200 INDIANAPOLIS, IN 46266	58	Unsecured	\$140,094.56	Unsecured	\$138,938.26	Invoice numbers R66042109344, R66042109345, R66042110050, R66042110051, R6642109341, R6642109342, R6642109343, R6642110047, R6642110048 and R6642110049 assert sales taxes, in the aggregate amount of \$1,056.30, however the invoice amounts should be tax exempt.  Invoice number R6636935956, asserted in the amount of \$1,309, exists on the Debtor's books and records in the amount of \$1,209.
8	MCINTIRE BUILDING CENTER 108 W 7TH ST MOUND CITY, MO 64470	2654 (c)	503(b)(9) Unsecured  Subtotal	\$1,913.02 \$12,478.87  \$14,391.89	503(b)(9) Unsecured  Subtotal	\$1,913.02 \$11,647.27  \$13,560.29	There is a discrepancy of \$57.57 between the asserted unsecured amount on the Proof of Claim form and the total of the invoices contained within the supporting documentation.  Invoice numbers 561175 (\$478.61) and 561174 (\$270.54) were paid 4/14/2013 on check number 5372275.  Invoice number 560864, in the amount of \$24.88, was paid 4/12/2013 on check number 5369298.

\* Plus unliquidated and/or undetermined amounts

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(c) Claim also contained on Exhibit B to the Fourteenth Omnibus Claims Objection for Misclassified Claims

(d) Claim previously ordered reclassified on the Sixth Omnibus Claims Objection – Exhibit B for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)  
FOURTEENTH 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
9 MCMASTER-CARR SUPPLY COMPANY PO BOX 4355 CHICAGO, IL 60680	400 (b)(c)	503(b)(9)	\$23,841.90	503(b)(9)	\$22,016.74	Invoice numbers 48937534, in the amount of \$96.58, 51255002, in the amount of \$65.52, 52634779, in the amount of \$1,758.82, and 53252946, in the amount of \$66.34, do not exist on the Debtor's books and records.  There is a \$538.42 discrepancy on the asserted general unsecured claim amount.
		Unsecured	\$188,767.79	Unsecured	\$188,067.27	
		Subtotal	\$212,609.69	Subtotal	\$210,084.01	
10 MILES CHEMICAL COMPANY INC 12801 RANGOON ST ARLETA, CA 91331	3272 (c)	503(b)(9)	\$0.00	503(b)(9)	\$0.00	Invoice number 177491, asserted in the amount of \$6,742.50, exists on the Debtor's books and records in the amount of \$6,600.91. The invoice asserts 40,000 lbs. of material however the Debtor received \$39,160 lbs. In addition, the invoice was paid 2/1/2013 on ACH number 171831.
		Unsecured	\$144,798.28	Unsecured	\$138,055.78	
		Subtotal	\$144,798.28	Subtotal	\$138,055.78	
11 PASTOR, BEHLING & WHEELER, LLC 2201 DOUBLE CREEK DR STE 4004 ROUND ROCK, TX 78664-3843	909	Unsecured	\$175,873.70	Unsecured	\$104,334.74	Invoice numbers 175413, 175518 and 1819B9, in the aggregate amount of \$71,538.96, were paid 6/6/2013 on wire number 22366.

\* Plus unliquidated and/or undetermined amounts

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**EXIDE TECHNOLOGIES 13-11482 (KJC)  
FOURTEENTH 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
12 PUROLATOR FREIGHT 1151 MARTIN GROVE RD REXDALE ON M9W 4W7 CANADA	295	Unsecured	\$58,554.53	Unsecured	\$162.61	The following invoice numbers, in the aggregate amount of \$58,391.92, do not exist on the Debtor's books and records; 8000785694, 8012937796, 8007813549, 868163163, 8018549611, 8018549652, 832193536, 832193551, 832193577, 832193593, 832193619, 832193635, 832193650, 832193676, 832193692, 832193734, 832193775, 832193791, 832193817, 832193833, 832193858, 832193874, 832193890, 8018275175, 832193932, 832193973, 832193999, 832194013, 832194039, 832194054, 832194070, 832194112, 85012224136, 832194138, 832194153, 832194179, 832194195, 832194211, 832194237, 832194252, 832194278, 832194294, 832194310, 832194336, 832194351, 832194377, 832194393, 832194419, 832194435, 832194450, 832194476, 832194492, 832194518, 832194534, 832194559, 832194575, 832194591, 8008616164, 8008616180, 8008616206, 8008616222, 8018251192, 8018252877, 8018244494, 8018244536, 8018244551, 8018244577, 8018244593, 8018244635, 8005686681, 8005686699, 8005686707, 8005686715, 8018244619, 8018244650, 867404568, 867404618, 8018244676, 867404667, 867404717, 867404766, 867404816, 867404865, 867404915, 867404964, 867405011, 867405110, 867405169, 867405219, 867405268, 867405318, 8017865950, 8017865976, 8017865992, 8017866016, 8018291578, 8018291594, 8018291636, 8005136828, 8017866057, 8017866073, 8017866099, 8017866115, 8017866131, 8017866156, 867405367, 8017865935, 865109177, 8017866172, 8017866198, 8017866214, 8017866230, 8017866255, 8017866271, 8017866297, 8017866313, 8017866339, 8017866354, 8017866370, 8017866396, 8017866438, 8017866453, 8017866479, 8017866495, 8017866511, 8017866552, 8017867758, 8006086360, 8017867733, 8018244437, 8017867774, 8017867790, 8017867816, 8017867832, 8017867873, 8017867899, 8017867915, 8017867857, 8017867931, 8017867956, 8017867998, 867405417, 8017867972, 8017868079, 8017868038, 8017868053, 8017868095, 8008486964 and 801786811.

\* Plus unliquidated and/or undetermined amounts

(a) Claim previously filed on the Fourth Notice of Satisfaction – Exhibit B for Partially Satisfied Claims

(b) Claim previously filed on the Fifth Notice of Satisfaction – Exhibit B for Partially Satisfied Claims

(c) Claim also contained on Exhibit B to the Fourteenth Omnibus Claims Objection for Misclassified Claims

(d) Claim previously ordered reclassified on the Sixth Omnibus Claims Objection – Exhibit B for Misclassified Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)  
FOURTEENTH 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
13	SCALE SYSTEMS INC PO BOX 116733 ATLANTA, GA 30368-6733	2956 (c)	503(b)(9) Unsecured	\$1,053.00 \$1,729.00	503(b)(9) Unsecured	\$975.00 \$1,729.00	Invoice number 7806246, asserted in the amount of \$1,053, includes freight and Muscogee sales taxes, in the aggregate amount of \$78, which do not exist on the Debtor's books and records.
		Subtotal	\$2,782.00	Subtotal	\$2,704.00		
14	SEALING DEVICES INC - LANCASTER 4400 WALDEN AVE LANCASTER, NY 14086-9716	3965	Unsecured	\$31,133.32	Unsecured	\$15,250.00	
15	SEMINOLE ENERGY SERVICES LLC C/O HALL ESTILL HARDWICK GABLE GOLDEN & NELSON PC ATTN STEVEN W SOULE 320 S BOSTON AVE STE 200 TULSA, OK 74103-3706	2270	503(b)(9) Unsecured	\$83,857.89* \$134,247.09*	503(b)(9) Unsecured	\$83,857.89 \$134,247.09	Claim should be liquidated at \$83,857.88 as 503(b)(9) and \$134,247.10 as unsecured for a total liquidated claim amount of \$218,104.98.
		Subtotal	\$218,104.98*	Subtotal	\$218,104.98		

TRANSFERRED TO:  
TANNOR PARTNERS CREDIT  
FUND, LP  
ATTN ROBERT TANNOR  
150 GRAND STREET, STE 401  
WHITE PLAINS, NY 10601

\* Plus unliquidated and/or undetermined amounts

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FOURTEENTH OMNIBUS CLAIMS OBJECTION  
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	NAME OF CLAIMANT	CLAIM NUMBER	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION
16	SIMONS TRUCKING INC ATTN JUSTIN PHILIPP 920 SIMON DR FARLEY, IA 52046	2417	Unsecured	\$331,785.47	Unsecured	\$288,633.92	Invoice numbers 96399 (\$895.50), 96362 (\$888.75), 96802 (\$888.75), 97052 (\$592.50), 97689 (\$987.50), 97751 (\$938.13), 97846 (\$962.81), 97629 (\$888.75), 97775 (\$882), 98285 (\$882), 98173 (\$759.50), 97878 (\$514.50), 98232 (\$490), 98292 (\$882), 98293 (\$882), 98197 (\$882), 98910 (\$539), 99012 (\$637), 102224 (\$813.88), 102762 (\$287.25), 102920 (\$430.88), 103014 (\$285), 103015 (\$855), 103115 (\$522.50), 103298 (\$142.50), 104050 (\$855), 104634 (\$848.25), 105040 (\$654.50), 105760 (\$514.25), 106179 (\$280.50), 106432 (\$841.50), 106552 (\$467.50), 106503 (\$187), 106996 (\$794.75), 106989 (\$556.50), 107887 (\$255.06), 107934 (\$834.75), 107881 (\$742), 108216 (\$649.25), 107654 (\$834.75), 108349 (\$324.63), 108369 (\$612.15), 108468 (\$779.10), 108826 (\$445.20), 108952 (\$1,001.70), 108798 (\$1,001.70), 108670 (\$552), 108997 (\$993.60), 109820 (\$993.60), 110812 (\$3,195.78), 114085 (\$5,166.37), 116003 (\$953.10) and 170794 (\$87.38), in the aggregate amount of \$43,151.55, do not exist on the Debtor's books and records. The claimant was unable to provide copies of the invoices.
17	SPF AMERICA TONY TOTH 5512 SOUTH 66TH STREET FORTSMITH, AR 72903	1410 (b)(c)	503(b)(9) Unsecured	\$236,046.60 \$114,933.28	503(b)(9) Unsecured	\$236,024.10 \$114,933.28	Invoice number 59969 asserted by the Claimant in the amount of \$540 does not match the Debtor's record of \$517.50.
			Subtotal	\$350,979.88	Subtotal	\$350,957.38	
18	STRIVE LOGISTICS LLC PO BOX 88266 CHICAGO, IL 60680	1893 (d)	503(b)(9) Unsecured	\$0.00 \$109,468.29	503(b)(9) Unsecured	\$0.00 \$104,876.53	Invoice numbers 588240 (\$2,023.52) and 586518 (\$2,568.24) do not exist on the Debtor's books and records.
			Subtotal	\$109,468.29	Subtotal	\$104,876.53	

\* Plus unliquidated and/or undetermined amounts

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**EXIDE TECHNOLOGIES 13-11482 (KJC)  
FOURTEENTH 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
19	WHOLESALE ELECTRIC SUPPLY CO INC 803 S ROBISON RD TEXARKANA, TX 75501	126	503(b)(9) Unsecured	\$7,881.40	503(b)(9)	\$7,881.40	Invoice number S3429463.002, in the amount of \$3,420, was paid 10/10/2012 on check number 5324264.
				\$124,653.78	Unsecured	\$121,221.40	
			Subtotal	\$132,535.18	Subtotal	\$129,102.80	Invoice number S3338459.001, asserted in the amount of \$162.38, was credited in the amount of \$150. The credit should have included the freight charges in the amount of \$12.38. Those freight charges do not exist on the Debtor's books and records.
			TOTAL	\$2,708,117.97*	TOTAL	\$2,386,683.15	

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