

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

----- X  
:   
In re: : Chapter 11  
:   
EXIDE TECHNOLOGIES, : Case No. 13-11482 (KJC)  
:   
Reorganized Debtor.<sup>1</sup> : Hrg. Date: June 23, 2015 at 10:00 a.m. (Eastern)  
: Obj. Due: May 15, 2015 at 4:00 p.m. (Eastern)  
:   
----- X

**REORGANIZED DEBTOR’S (SUBSTANTIVE) SIXTEENTH OMNIBUS OBJECTION  
PURSUANT TO BANKRUPTCY CODE SECTION 502(b),  
BANKRUPTCY RULE 3007, AND LOCAL RULE 3007-1  
TO CERTAIN NO LIABILITY EMPLOYEE OR RETIREE CLAIMS  
(“SIXTEENTH OMNIBUS CLAIMS OBJECTION”)**

The reorganized debtor in the above-captioned case (“New Exide” or the “Reorganized Debtor”), hereby files this omnibus objection (the “Objection”) to certain claims (the “Disputed Claims”) filed against the former debtor and debtor in possession in the above-captioned case (“Old Exide” or the “Debtor”), and listed on Exhibit A 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 disallowing and expunging the proofs of claim listed on Exhibit A to the Proposed Order. In support of the Objection, the Reorganized Debtor relies on the Declaration of Holden Bixler in Support of the Reorganized Debtor’s (Substantive) Sixteenth Omnibus

---

<sup>1</sup> The last four digits of the Reorganized Debtor’s taxpayer identification number are 2730. The Reorganized Debtor’s corporate headquarters are located at 13000 Deerfield Parkway, Building 200, Milton, Georgia 30004.

Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain No Liability Employee or Retiree Claims attached hereto as Exhibit 1. In further support of the Objection, the Reorganized 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 Reorganized 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 continued 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").

8. On February 4, 2015, this Court entered an Order (A) Approving the Adequacy of the Debtor's Disclosure Statement with Respect to the Plan of Reorganization of Exide Technologies; (B) Approving Solicitation and Notice Procedures with Respect to Confirmation of the Debtor's Proposed Plan of Reorganization; (C) Approving the Form of Various Ballots and Notices in Connection Therewith; and (D) Scheduling Certain Dates with Respect Thereto (Docket No. 3092) (the "Solicitation Procedures Order"). The Solicitation Procedures Order, among other things, (a) approved the adequacy of the Second Amended Disclosure Statement With Respect to the Second Amended Plan of Reorganization of Exide Technologies (Docket No. 3095) (the "Disclosure Statement") and (b) authorized Exide to solicit acceptances or rejections of the Fourth Amended Plan of Reorganization of Exide Technologies (the "Plan").

9. On March 27, 2015, the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court") entered the Findings of Fact, Conclusions of Law and Order Confirming Fourth Amended Plan of Reorganization of Exide Technologies (Docket No. 3423) (the "Confirmation Order"), which, among other things, confirmed the Plan.

10. On April 30, 2015, the Debtor substantially consummated the Plan (the "Effective Date"). The Reorganized Debtor has emerged from chapter 11 as Exide Technologies. Pursuant to Article 15.8 of the Plan, the Creditors' Committee was dissolved on the Effective Date and Peter Kravitz of Province Inc. was appointed as GUC Trust Trustee (as defined in the Plan). Pursuant to the Plan, the Reorganized Debtor may object to any Claims filed in the Chapter 11 Case. In addition, under the Plan, the GUC Trust Trustee also has authority to object to certain Claims filed in the Chapter 11 Case.

**B. Bar Dates and Proofs of Claim**

11. On June 11, 2013, this Court entered an order appointing GCG, Inc. (n/k/a Garden City Group, LLC) ("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.

12. 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>

13. To date, approximately 4,000 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 fifteen omnibus claims objections to Claims. After hearing these omnibus claims objections, this Court disallowed and expunged approximately 535 Claims asserting more than \$4.9 billion in liquidated liabilities (plus unliquidated amounts).

14. The Reorganized Debtor and its advisors are comprehensively reviewing and reconciling all Claims. Moreover, in the ordinary course of business, the Reorganized Debtor maintains books and records (the "Books and Records") that reflect, among other things, the Debtor's or the Reorganized Debtor's, as applicable, liabilities and the amounts thereof owed to its creditors. The Reorganized Debtor is also comparing the Claims asserted in the Proofs of Claims to the Books and Records to determine the validity of the asserted claims.

15. 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 Reorganized Debtor anticipates filing several omnibus objections.

---

<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).

## RELIEF REQUESTED

16. By the Objection, the Reorganized Debtor respectfully seeks entry of an order pursuant to Bankruptcy Code section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 disallowing and expunging the Claims set forth on Exhibit A attached to the Proposed Order.

## OBJECTION TO CLAIMS

### A. No Liability Employee or Retiree Claims

17. The Disputed Claims identified on Exhibit A to the Proposed Order (the “No Liability Employee or Retiree Claims”) are Claims that appear to be protective claims filed in the event that the Debtor terminated its pension or retiree benefit plans. The Debtor’s pension and retiree benefit plans were not affected by the Chapter 11 Case. In particular, as set forth in Article 6.16 of the Plan, the “Reorganized Debtor shall continue the Pension Plan in accordance with, and subject to, their terms, ERISA, and the Internal Revenue Code, and shall preserve all of their rights thereunder.”<sup>3</sup> In addition, “subject to the Reorganized Debtor’s rights, if any, under applicable non-bankruptcy law, unless otherwise ordered by the Bankruptcy Court, the Reorganized Debtor shall continue to pay all retiree benefits, as that term is defined in section 1114 of the Bankruptcy Code, at the level established pursuant to subsection (e)(1)(B) or (g) of section 1114 of the Bankruptcy Code, at any time prior to Confirmation, for the duration of the period the Debtor has obligated itself to provide such benefits.”<sup>4</sup>

18. In addition, Claims related to the Pension Plan are not enforceable against the Debtor or property of the Debtor for the purposes of Bankruptcy Code section 502(b)(1) because the Pension Plan is a separate legal entity distinct from the Debtor’s estate. See In re Springfield Furniture, Inc., 145 B.R. 520, 528 (Bankr. E.D. Va. 1992) (holding that defined benefit pension

---

<sup>3</sup> Plan, Art. 6.16(c).

<sup>4</sup> Plan, Art. 6.16(c).

plan and trust holding assets of plan are separate and distinct legal entities and thus “the assets of the Trust (and Plan) are not assets of the [d]ebtors’ bankruptcy estate”). Also, under the Employee Retirement Income Security Act of 1974, as amended (“ERISA”), 29 U.S.C. §§ 1301 et seq., even if the Pension Plan were terminated, which it has not been, the PBGC has the sole and total right to recover against employers for pension plan underfunding and participants have no right to make claims against their employers for benefits under terminated plans. See 29 U.S.C. § 1362; see also United Steelworkers of Amer. v. United Eng’g, Inc., 52 F.3d 1386, 1390 (6th Cir. 1995); Int’l Ass’n of Machinists & Aerospace Workers v. Rome Cable Corp., 810 F. Supp. 402 (N.D.N.Y. 1993); In re Adams Hard Facing Co., 129 B.R. 662 (W.D. Okla. 1991); In re Lineal Group, Inc., 226 B.R. 608 (Bankr. M.D. Tenn. 1998).

19. Moreover, to the extent that the No Liability Employee or Retiree Claims assert additional liabilities owed by the Debtor, such liabilities are not reflected in the Books and Records. The Reorganized Debtor has reviewed the Books and Records and determined that it is not liable for the No Liability Employee or Retiree Claims for the reasons set forth above and in the column titled “Reason for Disallowance” on Exhibit A to the Proposed Order. Accordingly, the Reorganized Debtor requests that each of the No Liability Employee or Retiree Claims be disallowed and expunged in its entirety.

#### **APPLICABLE AUTHORITY**

20. 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).

21. 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.

22. The Reorganized Debtor has met its burden in refuting the legal sufficiency of the Disputed Claims and has demonstrated that the No Liability Employee or Retiree Claims should be disallowed and expunged.

23. As asserted, the Disputed Claims are unenforceable against the Debtor or the Reorganized Debtor for the reasons set forth above. Therefore, pursuant to Bankruptcy Code sections 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1, the Reorganized Debtor respectfully requests that this Court enter an order disallowing and expunging each No Liability Claim listed on Exhibit A attached to the Proposed Order.

#### **RESPONSES TO THE OBJECTION**

24. 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 May 15, 2015** (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 Reorganized Debtor objects to a particular Claim. A hearing (the “Hearing”) to consider the Reorganized Debtor’s Objection shall be held on **June 23, 2015 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.

25. Every Response must be filed on or before **May 15, 2015 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 Reorganized Debtor, Exide Technologies, 13000 Deerfield Parkway, Suite 100, Milton, Georgia 30004, Attn: B. Holland Pritchard, (iii) counsel to the Reorganized Debtor, Skadden, Arps, Slate, Meagher & Flom LLP, 155 N. Wacker Drive, Chicago, Illinois 60606-1720, Attn: James J. Mazza, Jr. and Louis S. Chiappetta, and (iv) the GUC Trust Trustee, Peter S. Kravitz of Province, Inc., 9209 Canwood Street, Suite 210, Agoura Hills, CA 91301, each case so as to be received **no later than the Response Deadline, May 15, 2015 at 4:00 p.m. (Eastern)**.

26. 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 Reorganized Debtor should serve any reply to the Response, if different than the address(es) presented in the Claim.

27. Timely Response Required; Hearing: If a Response is properly and timely filed and served in accordance with the above procedures, the Reorganized 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 **June 23, 2015 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.

28. 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.

29. Adjournment of Hearing: The Reorganized Debtor reserves the right to adjourn the Hearing on any Claim included in the Objection. In the event that the Reorganized 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.

30. 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 Reorganized Debtor will present to this Court an appropriate order **without further notice to the Claimant.**

31. **Separate Contested Matter:** Each of the Disputed Claims and the Reorganized Debtor's objections thereto, as asserted in the Objection, constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. The Reorganized 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 Pension Claim.

#### **RESERVATION OF RIGHTS**

32. The Reorganized 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 Exhibit A 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 Exhibit A to the Proposed Order on any other ground.

#### **STATEMENT OF COMPLIANCE WITH LOCAL BANKRUPTCY RULE 3007-1**

33. 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 Reorganized Debtor believes such deviations are not material and respectfully requests that any such requirement be waived.

#### **FURTHER INFORMATION**

34. Questions about or requests for additional information about the Objection should be directed to the Reorganized 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 Reorganized 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**

35. The Reorganized 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) the GUC Trust Trustee, Peter S. Kravitz of Province, Inc., 9209 Canwood Street, Suite 210, Agoura Hills, CA 91301; (vii) all parties entitled to notice pursuant to Bankruptcy Rule 2002; and (viii) each of the Claimants identified on Exhibit A to the Proposed Order.

*[Remainder of page intentionally left blank.]*

WHEREFORE, the Reorganized Debtor respectfully requests that this Court enter the Proposed Order attached hereto: (a) granting the relief requested herein; and (b) granting to the Reorganized Debtor such other and further relief as this Court may deem just and proper.

Dated: Wilmington, Delaware  
April 30, 2015

SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP

/s/ Dain A. De Souza

Anthony W. Clark (I.D. No. 2051)  
Dain A. De Souza (I.D. No. 5737)  
One Rodney Square  
P.O. Box 636  
Wilmington, Delaware 19899-0636  
Telephone: (302) 651-3000  
Fax: (302) 651-3001

- and -

Kenneth S. Ziman  
J. Eric Ivester  
Four Times Square  
New York, New York 10036-6522  
Telephone: (212) 735-3000  
Fax: (212) 735-2000

- and -

Albert L. Hogan III  
James J. Mazza, Jr.  
155 N. Wacker Dr.  
Chicago, Illinois 60606  
Telephone: (312) 407-0700  
Fax: (312) 407-0411

*Counsel for the Reorganized Debtor*

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

----- X  
:   
In re: : Chapter 11  
:   
EXIDE TECHNOLOGIES, : Case No. 13-11482 (KJC)  
:   
Reorganized Debtor.<sup>1</sup> : **Hrg. Date: June 23, 2015 at 10:00 a.m. (Eastern)**  
: **Obj. Due: May 15, 2015 at 4:00 p.m. (Eastern)**  
:   
----- X

**NOTICE OF OBJECTION**

**PLEASE TAKE NOTICE** that the reorganized debtor (“New Exide” or the “Reorganized Debtor”) has filed the attached **Reorganized Debtor’s (Substantive) Sixteenth Omnibus Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain No Liability Employee or Retiree Claims (the “Objection”)**.<sup>2</sup>

**PLEASE TAKE FURTHER NOTICE** that responses to the Objection, if any, must be filed on or before **May 15, 2015 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 Reorganized Debtor, Exide Technologies, 13000 Deerfield Parkway, Suite 100, Milton, Georgia 30004, Attn: B. Holland Pritchard, (iii) counsel to the Reorganized Debtor, Skadden, Arps, Slate, Meagher & Flom LLP, 155 N. Wacker Drive, Chicago, Illinois 60606-1720, Attn: James J. Mazza, Jr. and Louis S. Chiappetta, and (iv) GUC Trust Trustee, Peter S. Kravitz of Province, Inc., 9209 Canwood Street, Suite 210, Agoura Hills, CA 91301 in each case so as to be received **no later than 4:00 p.m. (Eastern) on May 15, 2015**.

**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 Reorganized 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 Reorganized 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 **June 23, 2015 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  
April 30, 2015

SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP

/s/ Dain A. De Souza

Anthony W. Clark (I.D. No. 2051)  
Dain A. De Souza (I.D. No. 5737)  
One Rodney Square  
P.O. Box 636  
Wilmington, Delaware 19899-0636  
Telephone: (302) 651-3000  
Fax: (302) 651-3001

- and -

Kenneth S. Ziman  
J. Eric Ivester  
Four Times Square  
New York, New York 10036-6522  
Telephone: (212) 735-3000  
Fax: (212) 735-2000

- and -

Albert L. Hogan III  
James J. Mazza, Jr.  
155 N. Wacker Dr.  
Chicago, Illinois 60606  
Telephone: (312) 407-0700  
Fax: (312) 407-0411

*Counsel for the Reorganized Debtor*



**EXHIBIT 1**

**Declaration of 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)  
 :  
 Reorganized Debtor.<sup>1</sup> :  
 :  
 ----- X

**DECLARATION OF HOLDEN BIXLER IN SUPPORT OF REORGANIZED DEBTOR’S  
(SUBSTANTIVE) SIXTEENTH OMNIBUS OBJECTION PURSUANT  
TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY RULE 3007,  
AND LOCAL RULE 3007-1 TO CERTAIN NO LIABILITY EMPLOYEE OR RETIREE  
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 reorganized debtor in the above-captioned case (“New Exide” or the “Reorganized 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 Reorganized Debtor’s (Substantive) Sixteenth Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 To Certain No Liability Employee or Retiree 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 Reorganized Debtor’s taxpayer identification number are 2730. The Reorganized 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 or Reorganized Debtor, as applicable, 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. (k/n/a Garden City Group, LLC) ("GCG"). These efforts resulted in the identification of the No Liability Employee or Retiree Claims, as defined in the Objection and identified respectively in Exhibit A to the Proposed Order.

3. The information contained in Exhibit A 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 employee or retiree benefit related claims that are not reflected in the Books and Records. It is my understanding that following a review of the Books and Records, the Reorganized Debtor has determined that it is not liable for the No Liability Employee or Retiree Claims for the reasons set forth in the column titled "Reason for Disallowance" on Exhibit A to the Proposed Order. If the No Liability Employee or Retiree Claims are not disallowed, the Claimants asserting such Claims may receive an unwarranted recovery from the Reorganized Debtor's estate.

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 April 30, 2015

/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)  
 :  
 Reorganized Debtor.<sup>1</sup> : **Related Docket No.** \_\_\_\_\_  
 :  
 ----- X

**ORDER SUSTAINING REORGANIZED DEBTOR’S (SUBSTANTIVE) SIXTEENTH  
OMNIBUS OBJECTION PURSUANT TO BANKRUPTCY CODE SECTION 502(b),  
BANKRUPTCY RULE 3007, AND LOCAL RULE 3007-1  
TO CERTAIN NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

Upon the Reorganized Debtor’s (Substantive) Sixteenth Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 to Certain No Liability Employee or Retiree 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 Exhibit A attached hereto, and any responses thereto; and upon the Declaration of Holden Bixler in Support of the Reorganized Debtor’s (Substantive) Sixteenth Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 to Certain No Liability Employee or Retiree 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 Reorganized Debtor’s taxpayer identification number are 2730. The Reorganized 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 Employee or Retiree Claims listed on Exhibit A are hereby disallowed and expunged in their entirety as set forth in Exhibit A.
3. The Reorganized 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.
4. The Reorganized Debtor shall retain and shall have the right to object in the future to any of the proofs of claim listed on Exhibit A hereto on any additional grounds, and to seek to amend, modify, and/or supplement this Order as may be necessary. In addition, the Reorganized 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 Schedules, on the grounds set forth herein or any other appropriate grounds that bankruptcy and non-bankruptcy law permits.
5. Nothing contained herein shall constitute, nor shall it be deemed to constitute, the allowance of any Claim asserted against the Debtor or Reorganized Debtor, including, but not limited to the Disputed Claims.
6. This Court shall retain jurisdiction over the Debtor, the Reorganized 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.

7. The Reorganized 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.

8. The Reorganized Debtor's Claims and Noticing Agent, Garden City Group, LLC, 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: \_\_\_\_\_, 2015  
Wilmington, Delaware

---

THE HONORABLE KEVIN J. CAREY  
UNITED STATES BANKRUPTCY JUDGE

**EXIDE TECHNOLOGIES 13-11482 (KJC)**  
**SIXTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION**  
**EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	ACKELSON, SHARON 1545 DAUPHIN AVE READING, PA 19610-2117	1574	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
2	ACUNA, LEOPOLDO 104 CATHY ANN DR READING, PA 19606-2409	2156	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
3	AGEE, KENNETH 20 FRIARTUCK RD GREENVILLE, SC 29607-2808	2217	\$45,800.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
4	AINSWORTH, HENRY 451 FOSTER RD FLORENCE, MS 39073-9018	2326	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
5	ANDERSON, DAVID 5372B SOUTH ROUTE 52 & 45 CHEBANSE, IL 60922	1083	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
6	ANDERSON, LUCILLE 15 LAURA CT QUARRYVILLE, PA 17566-9666	2110	\$14,274.96	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
7	AUGST, STEPHEN 5680 OTTER VIEW TRL WHITE BEAR LAKE, MN 55110-2295	1158	\$13,942.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
8	BAKER, ELSIE C/O NIKOLAUS & HOHENADEL LLP ATTN BARRY SOLODKY, ESQ 212 N QUEEN ST LANCASTER, PA 17603	1152	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
9	BAKER, WILLIE 7915 HAWK CREST LN ORLANDO, FL 32818-1230	2678	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.

\* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)**  
**SIXTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION**  
**EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
10	BALL, PATRICIA 117 PINE PARK DR FLORENCE, MS 39073-9498	2328	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
11	BEARDSLEY, EARL 1119 METROPOLITAN AVE LEAVENWORTH, KS 66048-1250	2345	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
12	BEARDSLEY, EARL 1119 METROPOLITAN AVE LEAVENWORTH, KS 66048-1250	2346	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
13	BECKETT, ANNE 2861 BALLYNTYNE RD S SALEM, OR 97302-9615	1769	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
14	BELLENIR, LINA 16301 E JACKLIN DR FOUNTAIN HILLS, AZ 85268-5609	869	\$50,000.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
15	BERNAS, RONALD 185 YOCOM RD DOUGLASSVILLE, PA 19518-9361	2784	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
16	BIBEAU, RICHARD 945 ELLEN CT NEWPORT, MN 55055-1530	2229	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
17	BICKFORD, SHERMAN 4343 HARRINGTON DR ZANESVILLE, OH 43701-6051	759	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
18	BISIGNANI, ETHEL 828 CEDAR AVE SCRANTON, PA 18505	2402	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
19	BOODMAN, JEFFREY 2175 DALKE RIDGE DR NW SALEM, OR 97304-4830	1702	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.

\* Plus unliquidated and/or undetermined amounts



**EXIDE TECHNOLOGIES 13-11482 (KJC)**  
**SIXTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION**  
**EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
20	BOSSIER, COYLE PO BOX 160 CONVERSE, LA 71419-0160	1382	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
21	BOWYER, SANDRA 8604 E CANAL LN PERU, IN 46970-9450	1435	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
22	BRADLEY, RENDA PO BOX 1944 KANKAKEE, IL 60901-1944	1828	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
23	BRASK, KAY 3415 200TH ST W FARMINGTON, MN 55024-9708	2132	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
24	BREHEIM, ERNEST 1841 N MORELAND AVE INDIANAPOLIS, IN 46222-4827	1954	\$7,643.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
25	BREWER, DANNY 1302 AP CARTER HWY HILTONS, VA 24258-6099	1845	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
26	BREWER, THOMAS 2255 STONE RD MANNING, SC 29102-4559	2047	\$60,129.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
27	BRIDGES, LEROY 1211 ALDENWOOD DR DALLAS, TX 75232-4201	1047	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
28	BRINKMANN, SUSAN 445 SUMMIT AVE HORSHAM, PA 19044-3138	784	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
29	BRISLIN, GEORGE 103 HAVERHILL RD AMESBURY, MA 01913-2107	1813	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.

\* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)**  
**SIXTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION**  
**EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
30	BRITAIN, FRANK 2430 8TH AVE SE ALBANY, OR 97322-5019	2121	\$51,480.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
31	BRONSON, DANIEL 179 S MAIN ST MANHEIM, PA 17545-1601	1141	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
32	BROOKS, SHIRLEY 692 W PARK DR KANKAKEE, IL 60901-2923	1811	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
33	BROWDER, LEAMON 3806 CLEVELAND ST SHREVEPORT, LA 71109-7322	2289	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
34	BROWN, JAMES 4715 ELON RD MONROE, VA 24574-2962	1334	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
35	BRUCE, JAMES 2105 MAPLE HILL ST ZANESVILLE, OH 43701-2030	730	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
36	BRUNSON, VERNICE 130 MAIL BOX LN LYNCHBURG, SC 29080-8419	2039	\$21,056.98*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
37	BUNNELL, ANN 2210 KIRST CT SCRANTON, PA 18505-1644	1905	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
38	BURKHOLDER, BARBARA 4655 VICTORIA ST N APT 318 SHOREVIEW, MN 55126-5894	2680	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
39	BURLON, LURELEEN 123 TONEY AVE ERWIN, TN 37650-1861	2707	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.

\* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)**  
**SIXTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION**  
**EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
40	BURNS, DONALD C/O WHITE MCCANN & STEWART PLLC PO BOX 578 WINCHESTER, KY 40392-0578	1918	\$20,000.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
41	BURTNETT, LAWRENCE 9215 HOOP POLE RD ROSEVILLE, OH 43777-9555	2499	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
42	BUSHMAN, LINDA 3240 HANOVER DR LAFAYETTE, IN 47909-3852	1571	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
43	BUTZ, CAROL 374 DARTMOUTH CT BENSALEM, PA 19020-8204	863	\$54,441.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
44	CAMPBELL, PAUL PO BOX 386 BLOUNTVILLE, TN 37617-0386	1612	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
45	CAPISTRANT, STANLEY 5590 NORWICH PKWY APT 117 OAK PARK HEIGHTS, MN 55082-6495	1737	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
46	CARL, FARON C/O WHITE MCCANN & STEWART PLLC PO BOX 578 WINCHESTER, KY 40392-0578	1913	\$20,000.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
47	CARNEAL, ELSIE 113 EDELEN ST VINE GROVE, KY 40175-1511	2231	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
48	CATE, GEORGIA 2342 QUEEN AVE SW ALBANY, OR 97321-7526	1357	\$324,084.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.

\* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)**  
**SIXTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION**  
**EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
49	CAYABO, RIZALINO 41721 RD 136 PO BOX 481 OROSI, CA 93647	2738	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
50	CHAPMAN, MARVIN 15851 CRIPPLE CREEK DR TYLER, TX 75703-6952	1309	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
51	CHRISTENSEN, ARDEN 3180 TRUMAN DR SANTA CLARA, UT 84765-5351	950	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
52	CHRISTENSEN, CHARLES BOX 258 470 THIRD AVENUE SOUTH WILMINGTON, IL 60474	1428	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
53	CHRISTY, THOMAS 1609 33RD ST FORT MADISON, IA 52627-3510	1208	\$10,000.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
54	CLEMENT, DELORES 739 22ND AVE N SOUTH ST PAUL, MN 55075-1318	1235	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
55	CLIFFORD, WILLIAM 28301 187TH ST LEAVENWORTH, KS 66048-7633	1956	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
56	CLINKSCALE, EARNEST 6015 GRAND AVE OMAHA, NE 68104-2146	1436	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
57	CLINTON, LARRY PO BOX 864 MANZANITA, OR 97130-0864	812	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
58	CLITE, WAYNE 3233 REESE LN AZLE, TX 76020-1522	2824	\$128,376.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.

\* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)**  
**SIXTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION**  
**EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
59	CODDINGTON, ROGER 1520 38TH AVE SE ALBANY, OR 97322-6136	1656	\$21,302.40	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
60	COFFEY, MARY 726 MORAN MILL RD RICHMOND, KY 40475-9715	2089	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
61	COLEMAN, BETTY PO BOX 846 POCOLA, OK 74902-0846	2348	\$74,000.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
62	COLVIN, NORMA 2316 4TH AVE LEAVENWORTH, KS 66048-4428	1485	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
63	CONDE, SHIRLEY PO BOX 1796 GLENROCK, WY 82637-1796	1330	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
64	CONNER, CINDY 5606 RIDGEWAY DR ORLANDO, FL 32819	2445	\$33,000.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
65	CONNER, WILLARD 6080 NW 55TH AVE OCALA, FL 34482-2786	1052	\$33,000.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
66	COOPER, PHILIP 29095 DETROIT RD WESTLAKE, OH 44145-2012	1565	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
67	COSTANZA, MARY 519 S CHICAGO AVE KANKAKEE, IL 60901-5228	1068	\$148,111.20	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
68	COTTRELL, CHARLES 1108 MCKINLEY AVE FRANKFORT, IN 46041-1834	2485	\$95,264.20	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.

\* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)**  
**SIXTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION**  
**EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
69	COVEY, TONY 2635 COBHILL RD IRVINE, KY 40336-8659	1074	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
70	CRAIG, LINDER 261 E PETROS RD PEARL, MS 39208-8737	1402	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
71	CROCKETT, WILDA 8414 EVERETT WAY UNIT A ARVADA, CO 80005-2378	1473	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
72	CRUMP, LILLIE 6217 W LLOYD ST WAUWATOSA, WI 53213-2005	1683	\$8,297.93	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
73	CRUZ, FLORA 6123 PACIFIC BLVD SW ALBANY, OR 97321-3751	1138	\$282.81*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
74	CUMMINGS, MARY PO BOX 2231 SUMTER, SC 29151-2231	2507	\$18,427.97*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
75	CUMMINGS, ROY 2345 GREENTREE DR NE SALEM, OR 97305-2624	942	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
76	DAVIS, DAVID 2051 EVERGREEN DR SHREVEPORT, LA 71118-4709	1860	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
77	DAVIS, ETHEL 4371 DEEN ST SHREVEPORT, LA 71109-6816	1882	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
78	DAVIS, WILLIAM 17104 HARRIS LN SE JEFFERSON, OR 97352-9447	770	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.

\* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)**  
**SIXTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION**  
**EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
79	DAVIS-NEAL, ALICIA 880 SHERBURNE AVE SAINT PAUL, MN 55104-2603	2727	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
80	DAWSON, EVELYN 2515 HIGHWAY 261 N DALZELL, SC 29040-9099	2034	\$25,025.49*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
81	DAWSON, ISRA 2515 HIGHWAY 261 N DALZELL, SC 29040-9099	2044	\$19,394.24*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
82	DEL RIO, DIANA CHRISTINE PO BOX 584 BLODGETT, OR 97326-0584	1409	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
83	DELOACH, LEWIS 5050 N LEWIS AVE TULSA, OK 74130-1914	1356	\$2,201.54	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
84	DENBESTE, JAMES 3850 TIMBET DR SE SALEM, OR 97317-9582	1157	\$55,206.66*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
85	DODD, RANDY 1228 OAKRIDGE RD AZLE, TX 76020-1842	1430	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
86	DONAHUE, KENNETH PO BOX 26 ALBANY, OR 97321-7574	1137	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
87	DONOHOO, MARSHA 503 HAWTHORNE AVE FRANKFORT, IN 46041-1538	2101	\$23,959.74*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
88	DONOVAN, BILL PO BOX 310 INDEPENDENCE, OR 97351-0310	919	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.

\* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)**  
**SIXTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION**  
**EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
89	DORMINY, EDWARD 1326 MYRTLE ST SE #208 GAINESVILLE, GA 30501-4909	1170	\$98,287.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
90	DOUCET, ROY 1103 A MCVEIGH RD ARNAUDVILLE, LA 70512	1224	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
91	DRAEGER, LOIS 727 LARPENTEUR AVE E APT C MAPLEWOOD, MN 55117-2552	1983	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
92	DUBOSE, ALLAN 345 CRAIG CIR HIGHLAND VILLAGE, TX 75077	2259	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
93	DUFFY, FRANCIS 2392 NW 58TH TER OCALA, FL 34482-8914	743	\$8,625.17	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
94	DUMONTELE, NORMAN 210 S MAIN ST BOX 44 HERSCHER, IL 60941	736	\$50,413.44*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
95	DUNCAN, DIANA L 1760 MICHIGAN DR EVANSDALE, IA 50707-2040	2500	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
96	DUNIHUE, GARY 1119 KEATS AVE ORLANDO, FL 32809-6360	2114	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
97	ECKSTINE, DENNIS 10817 PARTRIDGE DR WAYNESBORO, PA 17268-9372	1772	\$40,351.48	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
98	EDWARDS, BEVERLEE 1277 VILDMARK DR SAINT PAUL, MN 55123-1833	892	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.

\* Plus unliquidated and/or undetermined amounts



**EXIDE TECHNOLOGIES 13-11482 (KJC)**  
**SIXTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION**  
**EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
99	EMBRY, DONALD 305 5TH ST RICHMOND, KY 40475-1339	2021	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
100	EMBRY, SIDONIA 305 5TH ST RICHMOND, KY 40475-1339	2022	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
101	ENOS, MR. 1505 4TH ST MONONGAHELA, PA 15063-1204	1835	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
102	ESCOBEDO, JUAN 8640 6TH ST FRISCO, TX 75034-5021	2117	\$25,000.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
103	FERGUSON, LOIS 641 TIMBERLAKE DR LYNCHBURG, VA 24502-6925	2023	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
104	FICKUS, SUSAN 1118 N IRVING AVE DUNMORE, PA 18510-1348	1560	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
105	FITZ, GLADYS 3006 MOJAVE DR DALLAS, TX 75241-6507	1846	\$141,522.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
106	FITZGERALD, CURTIS 33222 AIRLINE RD PAULS VALLEY, OK 73075-9068	1456	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
107	FITZPATRICK, EDWARD 864 96TH LN NE BLAINE, MN 55434-2501	1619	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
108	FLOOD, GEORGE 589 HILLDALE RD HOLTWOOD, PA 17532-9633	2029	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.

\* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)**  
**SIXTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION**  
**EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
109	FLYNN, ANN 4868 DERBY LN MACUNGIE, PA 18062-8318	1989	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
110	FRICTSCH, JAMES 120 MARGARET LN DALTON, PA 18414-8072	1322	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
111	FRONK, CHARLES 60 CEMETERY RD MOSCOW, PA 18444-6050	2330	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
112	GAINES, JOSEPH 717 N MAIN ST SUMTER, SC 29150-3521	2042	\$14,691.60*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
113	GALLASHAW, VICTORIA 2715 GALLISHAW DR DALZELL, SC 29040-8892	1857	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
114	GAROFALO, ALICIA 1816 SCHOOL RD CARROLLTON, TX 75006-7542	2226	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
115	GAYTON, FRANCES 2833 MILLER AVE SOUTH CHICAGO HEIGHTS, IL 60411-4763	1432	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
116	GIBSON, EVELYN 33677 MARYS RIVER ESTATES RD PHILOMATH, OR 97370-9021	1958	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
117	GIBSON, SARAH PO BOX 236 MAYSVILLE, SC 29104-0236	2038	\$29,857.77*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
118	GIESE, CORINNE 909 W EULA CT MILWAUKEE, WI 53209-6505	2838	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.

\* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)**  
**SIXTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION**  
**EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
119	GILLIARD, JOHN 4325 PATRIOT PKWY SUMTER, SC 29154-9772	2040	\$14,904.17*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
120	GOETZ, DOROTHY C/O KOPP MCKICHAN LLP ATTN MICHAEL J OLDS, ATTY 44 E MAIN ST PO BOX 253 PLATTEVILLE, WI 53818	2706	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
121	GRAMS, PAULINE 347 ZIDA ST FORT ATKINSON, WI 53538-2357	1144	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
122	GRASER, WILLIAM 1372 FRIEDENSBURG RD READING, PA 19606-1011	2668	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
123	GRAVES, LYNN 147 E FAIRFIELD DR CLAREMONT, CA 91711-1839	2002	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
124	GRAY JR, DONALD 715 OLD MEADOW GLN ALPHARETTA, GA 30022-5545	1160	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
125	GRAY, EDWINA 1505 S 10TH ST W APT 1 MISSOULA, MT 59801-3466	1399	\$4,677.58	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
126	GREEN, ANNIE 80 MICKENS ST SUMTER, SC 29150	2033	\$31,270.32*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
127	GREENLEES, RAYMOND 1150 LEE ROAD 250 SALEM, AL 36874-1373	1833	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.

\* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)**  
**SIXTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION**  
**EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
128	GREW, CLINTON 984 ESPANA AVE N KEIZER, OR 97303-6330	1266	\$22,456.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
129	GROEBNER, BARBARA 6196 27TH ST N OAKDALE, MN 55128-3510	1221	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
130	GROVES, B 3000 LAURA DR FLOYDS KNOBS, IN 47119-9471	1627	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
131	HAER, JAMES 205 E NODAWAY ST APT 1A OREGON, MO 64473-9698	1297	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
132	HAFER, ALAN 107 WOLF CREEK RD BERNVILLE, PA 19506-8691	2696	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
133	HALL, CHARLES 2109 DAKOTA ST LEAVENWORTH, KS 66048-1119	2449	\$74,413.97	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
134	HALLADAY, PAMELA 4565 VANADIUM BND CUMMING, GA 30040-8895	2390	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
135	HAMBY, HERBERT 43 W 5TH ST DRESDEN, OH 43821-9640	1130	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
136	HUNTER, ANNIE 120 E WHEELER CIR SALUDA, SC 29138-1220	1203	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
137	HYATT, BILLIE 216 CHOCTAW ARKOMA, OK 74901	1602	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.

\* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)**  
**SIXTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION**  
**EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
138	ISAACS, DARRELL C/O WHITE MCCANN & STEWART PLLC PO BOX 578 WINCHESTER, KY 40392-0578	1912	\$19,500.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
139	KISER, ALLEN 7545 MASON ST NE KEIZER, OR 97303	2846	\$63,305.59*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
140	KNOX, AZALEE W C/O WEISSENSTEIN LAW FIRM LLC ATTN A PAUL WEISSENSTEIN JR PO BOX 2446 SUMTER, SC 29151	2043	\$21,847.58*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
141	MCCOMSEY, DOROTHY C/O NIKOLAUS & HOHENADEL LLP ATTN BARRY SOLODKY, ESQ 212 N QUEEN ST LANCASTER, PA 17603	1153	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
142	MILLER, CARLENE C/O GREGORY E HOOVER LLC 3637 MEDINA RD STE 345 MEDINA, OH 44256	2482	\$25,973.76	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
143	PEARSON, DAVID C/O WHITE MCCANN & STEWART PLLC PO BOX 578 WINCHESTER, KY 40392-0578	1907	\$20,000.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
144	PENDERGRAPH, DONALD 2708 HWY 64 W APEX, NC 27502	1255	\$4,435.90	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
145	SAMPLES, BOBBY C/O WHITE MCCANN & STEWART PLLC PO BOX 578 WINCHESTER, KY 40392-0578	1916	\$20,000.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.

\* Plus unliquidated and/or undetermined amounts

**EXIDE TECHNOLOGIES 13-11482 (KJC)  
SIXTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION  
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
146	SAYLOR, H CLYDE AKA SAYLOR, CLYDE C/O APPEL & YOST LLP ATTN ERIK D SPURLIN 33 N DUKE ST LANCASTER, PA 17602	2360	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
147	STRAILMAN, ELISABETH 61 PARK ST CARBONDALE, PA 18407-2430	1400	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
148	TRAMEL, CHARLES 199 FOX MEADOWS RD BATESVILLE, MS 38606-7409	2526	\$46,017.51	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
149	WHITE, CLAYBOURNE A 6405 PANOLA RD PINEWOOD, SC 29125	2057	\$13,168.80*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
150	YURCHAK, ANN 511 DELAWARE AVE OLYPHANT, PA 18447-1620	2522	Undetermined*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
		<b>TOTAL</b>	<b>\$2,169,420.76*</b>	

\* Plus unliquidated and/or undetermined amounts