

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)  
 :  
 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)**  
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**REORGANIZED DEBTOR’S (SUBSTANTIVE) SEVENTEENTH 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  
 (“SEVENTEENTH 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) Seventeenth Omnibus

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<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.

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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).

## 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

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<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.exidrestructuringinfo.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

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*Counsel for the Reorganized Debtor*

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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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)**  
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**NOTICE OF OBJECTION**

**PLEASE TAKE NOTICE** that the reorganized debtor (“New Exide” or the “Reorganized Debtor”) has filed the attached **Reorganized Debtor’s (Substantive) Seventeenth 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

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*Counsel for the Reorganized Debtor*



**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  
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EXIDE TECHNOLOGIES, : Case No. 13-11482 (KJC)  
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Reorganized Debtor.<sup>1</sup> :   
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**DECLARATION OF HOLDEN BIXLER IN SUPPORT OF REORGANIZED DEBTOR’S  
(SUBSTANTIVE) SEVENTEENTH 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) Seventeenth 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) SEVENTEENTH  
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) Seventeenth 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) Seventeenth 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

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THE HONORABLE KEVIN J. CAREY  
UNITED STATES BANKRUPTCY JUDGE

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

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	ANGSTADT, RALPH T 1793 TANGLEWOOD RD ORWIGSBURG, PA 17961-9527	1067	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	BROWN, LARRY 688 MARLBOROUGH DR SUMTER, SC 29154	2050	\$54,870.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
3	CARTER, NATHAN 126 THELMA DR SUMTER, SC 29150	2049	\$16,605.79*	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	FOWLER II, HAYWARD C 410 GUNSTON HALL DR ALPHARETTA, GA 30004-7504	1836	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	HAMER, MARY 84 N UNION ST LAMBERTVILLE, NJ 08530-2002	977	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	HAMILL, CHARLES 4021 LEFFLER RD ROSEVILLE, OH 43777-9586	1182	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.
7	HAMMEL, JO ANN 9579 N AUBURN PT DUNNELLO, FL 34434-3731	2773	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.
8	HAMPTON, ALBERTUS 7730 SHINE LN PINEWOOD, SC 29125-9585	2056	\$23,868.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
9	HAMPTON, CHARLIE 7765 SHINE LN PINEWOOD, SC 29125-9586	2048	\$13,581.42*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
10	HAMPTON, EARNEST 7770 SHINE LN PINEWOOD, SC 29125-9585	2037	\$28,599.61*	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)  
SEVENTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION  
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
11	HAMPTON, JAMES 2910 ERVIN LN SUMTER, SC 29154-8600	2052	\$29,242.08*	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	HANCOCK SR, RALPH 909 OLIVE ST LEAVENWORTH, KS 66048-2480	2653	\$77,263.36	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	HANCOCK, GEORGE PO BOX 801 MOUNT HOLLY, NJ 08060-0801	1557	\$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.
14	HAND, PERCY PO BOX 773 BURLINGTON, IA 52601-0773	1312	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.
15	HANSON, EVERETT 1513 HOLLY DR E HUGO, MN 55038-8755	2679	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	HARBAUGH, ROBERT 20365 390TH STREET BOX 122 EDGEWOOD, IA 52042	2467	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	HARDWICK, ROBERT 1500 W JEFFERY ST KANKAKEE, IL 60901-8219	1161	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	HARPER, SHIRLEY 115 BICKMAN LANE FLORENCE, MS 39073	1317	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	HARRIS, JO 204 PARROTT ST MOUNT VERNON, OH 43050-4524	1687	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.
20	HARRISON, GLENDA 5004 MCCrackEN RD HERNANDO, MS 38632-8886	1261	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)  
SEVENTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION  
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
21	HART, LINDA 614 WHITE ROCK RD GREENWOOD, AR 72936-8250	2241	\$264,000.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
22	HARVAN, CYRIL 79 LEGACY BLVD APT 100 SINKING SPG, PA 19608-2160	2190	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	HAYWARD, JERRY 18959 FM 1373 BREMONT, TX 76629-4563	2441	\$14,040.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
24	HEARD, SADIE 430 LIVINGSTON VERNON RD FLORA, MS 39071-9401	2327	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.
25	HENDRICKS, PATSY 22550 WELLS CREEK RD PHILOMATH, OR 97370-9109	2293	\$165,504.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
26	HERNDON, JEANNINE 6416 ORANGE COVE DR ORLANDO, FL 32819-4104	2474	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.
27	HIGGINS, JAMES 415 SHERIDAN ST ZANESVILLE, OH 43701-2530	1093	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	HILL, PAUL PO BOX 2142 GREER, SC 29652-2142	899	\$43,680.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
29	HOLDEN, LINDA 3241 CLEF LN LAKELAND, TN 38002-9718	2714	\$70,788.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
30	HOOVER, JAMES 1520 CHEVINGTON CIR ZANESVILLE, OH 43701-6979	1842	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)  
SEVENTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION  
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
31	HOUSTON, MONROE PO BOX 1017 BIG STONE GAP, VA 24219-0927	1343	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	HUFF, CARL 178 SPRING VALLEY CT SPRINGTOWN, TX 76082-7322	1825	\$67,737.60*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
33	HUMANICK, MICHAEL 1016 POPLAR ST COPLAY, PA 18037-1705	2480	\$75,000.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
34	HUMANICK, ROBERT 49 N 7TH ST COPLAY, PA 18037-1512	2833	\$75,000.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
35	HUTSON, EARL 1359B N7000W RD BONFIELD, IL 60913	2396	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	HYMAN, LAWRENCE 919 MEDORA DR GREER, SC 29650-4752	778	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.
37	JACKSON, ALVIS 107 FLOWERS ST WAXAHACHIE, TX 75165-4411	1712	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	JACKSON, MIKE 1504 BALFOUR RD WEST MEMPHIS, AR 72301-1814	1807	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	JAMES, PEGGY 1203 BONNIE LN MINDEN, LA 71055-2007	857	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.
40	JENKINS, JOHN 1114 WILLIAM ST HAMILTON, NJ 08610-5439	1462	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)  
SEVENTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION  
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
41	JENKINS, SUE 100 MILDRED CT RICHMOND, KY 40475-1323	2827	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	JOHNS, KEITH C/O WHITE MCCANN & STEWART PLLC PO BOX 578 WINCHESTER, KY 40392-0578	1906	\$21,000.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
43	JOHNSON JR, JAMES 25719 FIDRA AVE SORRENTO, FL 32776-8912	1773	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.
44	JOHNSON, FLOSSIE 924 SALTWOOD RD SUMTER, SC 29154-7275	2111	\$10,780.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
45	JOHNSON, KENNETH 2311 SILVERTHORNE DR DALLAS, TX 75287-5863	1699	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	JOHNSON, ROBERT 3275 N RESERVE ST STE D PMB 13 MISSOULA, MT 59808-1562	2774	\$24,484.80	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
47	JONES JR., WILLIE 9278 STRATMORE SHREVEPORT, LA 71129	911	\$8,000.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
48	JONES, GLADYS 2780 BONNELL DR SUMTER, SC 29154-4605	2508	\$18,167.88*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
49	JONES, LLOYD 7119 WAYCREST DR DALLAS, TX 75232-3927	1096	\$203,048.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
50	KAISER, TIM 510 MAPLE ST TIPTON, IN 46072-1521	1102	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)  
SEVENTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION  
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
51	KEEN, ZENA PO BOX 115 REDWOOD, MS 39156-0115	2660	\$70,000.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
52	KEITH, GREGORY 3206 ELM AVE BRIGHTON, IA 52540-9657	2319	\$7,487.65	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	KELLEY, CHARLOTTE 2121 GREENVILLE CIR SUMTER, SC 29154-6176	2051	\$35,184.73*	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	KIMBALL, RICHARD 2000 CAMBRIDGE AVE APT 153 WYOMISSING, PA 19610-2732	810	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	KLINE, JOETTA 1009 WHITNER RD READING, PA 19605-1052	1779	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	KRAIGER, JOHN 1111 WINDHORST RIDGE DR BRANDON, FL 33510-3119	992	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	KREBS, RONALD 2982 FRATTALONE LN LITTLE CANADA, MN 55117-4637	1190	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	KROEKER, CHERYL 4856 STATE HIGHWAY 84 UNIT 31 LONGVILLE, MN 56655-3366	1995	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.
59	KRUITHOF, RONALD 7025 QUINTARA DR NE COMSTOCK PARK, MI 49321-8383	2726	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.
60	KYLE, SYLVIA 9146 HILLMAN WAY DR BARTLETT, TN 38133-4179	1806	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)  
SEVENTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION  
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
61	LAMER, JOYCELENE 410 W 1ST ST MILTONVALE, KS 67466-5020	1345	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.
62	LANCASTER, CARRIE 344 WILDWOOD AVE SUMTER, SC 29154-5400	2509	\$28,896.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
63	LANDERMAN, THOMAS 7600 OLD TOWN RD MOUNT PERRY, OH 43760-9661	937	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	LAURY, YVONIA 5150 GINGER ST JACKSON, MS 39209-3129	2192	\$172.75*	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	LAWRENCE, BILLY 3426 WAX MYRTLE CIR ZELLWOOD, FL 32798-9708	2095	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.
66	LAYTON, JAMES 3509 N STATE ROAD 39 FRANKFORT, IN 46041-7459	1427	\$39,105.91	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	LEE, HOWARD 628 SCRANTON POCONO HWY COVINGTON TWP, PA 18444-7905	1323	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.
68	LEE, PEARL 464 OLD ENOCHS RD FLORENCE, MS 39073-9167	1538	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.
69	LEHTO, FREDERICK 4920 BELLMANN DR WEST BEND, WI 53095-9243	1348	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	LEVELLS, WILLIAM PO BOX 381321 DUNCANVILLE, TX 75138-1321	2594	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)  
SEVENTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION  
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
71	LINDEMAN, DAWN 6420 AUMSVILLE HWY SE SALEM, OR 97317-9115	1176	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	LOFQUIST, WILLIAM 2540 W CROWN KING DR TUCSON, AZ 85741-2566	1207	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.
73	LOPEZ, JUAN 5061 AMHURST LN THE COLONY, TX 75056-2522	825	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.
74	LOWERY, EDWARD 2905 HOMESTEAD RD SUMTER, SC 29153-7632	2055	\$19,539.07*	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	LUNNING, GAYLE 324 SE BINGHAM DR LEES SUMMIT, MO 64063-3405	1033	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	MACKLIN, HATTIE 1721 BROOKHOLLOW CIR JACKSON, MS 39212-2008	1648	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	MARSHALL, INEZ 7204 CLASSIC CIR SHREVEPORT, LA 71108-4712	1883	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	MARSHALL, MARJORIE 2830 WINEGARD DRIVE #79 BURLINGTON, IA 52601	1311	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.
79	MARTIN, LUKE 5 BON AIRE TER PITTSSTON, PA 18640-3202	2239	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	MARTINEZ, PETE 1722 MARIE LN IRVING, TX 75060-6801	2629	\$20,900.00	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)  
SEVENTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION  
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
81	MAYES, IRMA 163 SPRING HILL DR FLORENCE, MS 39073-8698	2342	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.
82	MAYEWSKI, BRUNO 8 OHARA DR PLANTATION LANDINGS HAINES CITY, FL 33844-9278	1058	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	MAYS, PATRICIA 227 E EGAN ST SHREVEPORT, LA 71101-5106	1848	\$66,000.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
84	MAYS, WILLIE 8802 NW CACHE RD APT 810 LAWTON, OK 73505-9657	1582	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.
85	MCBEE, WILLIE 304 WEST RD TRAVELERS REST, SC 29690-1729	2471	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	MCCLUNG, JOHN 683 ARCADIA DR SAINT PAUL, MN 55118-1801	1145	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	MCLENDON, CLARA 210 KITETOWN RD SEALE, AL 36875-5719	2304	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.
88	MCMILLIAN, FRED 4811 DUNCANVILLE RD APT 101 DALLAS, TX 75236-1864	1100	\$111,132.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
89	MEIER, RANDY 949 S SANTA FE AVE SALINA, KS 67401-5041	2108	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.
90	MILLER, ANNETTE 9840 HIGHWAY 15 S RIPLEY, MS 38663-2929	1717	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)  
SEVENTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION  
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
91	MILLER, HELEN 141 BARBARA AVE PAHRUMP, NV 89060-1788	1726	\$6,438.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
92	MILLER, SHERRY PO BOX 343 BIRCHWOOD, WI 54817-0343	1245	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	MILLER, SIDNEY 2914 SUNNYBROOK ST SHREVEPORT, LA 71108-3746	2464	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.
94	MIMS, PIERCE 305 BAGGETT CIR LAWRENCEVILLE, GA 30044-4233	1253	\$8,896.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
95	MITCHELL, BIRDIA 2020 ELDRIDGE PKWY APT 1003 HOUSTON, TX 77077-1898	2731	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	MONTANEZ, RUDY 9077 ROAD 238B TERRA BELLA, CA 93270	947	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	MOORE, VICKIE 4039 STABLE CREEK DR PERRYSBURG, OH 43551-6912	2709	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.
98	MOSES, EDITH PO BOX 3451 BARTLESVILLE, OK 74006-3451	1951	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.
99	MULLARKY, EDWARD 1127 EDGCUMBE RD SAINT PAUL, MN 55105-2831	2256	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	MYERS, THOMAS 141 BEULAH AVE ZANESVILLE, OH 43701-4004	754	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



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	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
101	MYHRER, PHYLLIS 5324 152ND LN NW RAMSEY, MN 55303-6401	1815	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	NAMECHE, LARRY 205 GOLFVIEW DR PLAINWELL, MI 49080-9118	757	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.
103	NAMIRANIAN, TAHMURAS 5969 EDINBURGH DR PLANO, TX 75093-4798	1838	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	NARDELLI, GERALDINE 114 SWARTZ ST DUNMORE, PA 18512-1951	1228	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	NELSON, DALE 27628 QUE AVE LINDSTROM, MN 55045-9085	2324	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.
106	NOLAN, ROBERT PO BOX 723 HIAWASSEE, GA 30546-0723	2655	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	NOVOTNY, ROBERT 1853 OXFORD ST N SAINT PAUL, MN 55113-6513	1136	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	NUNEZ, RAMON 3301 GREEN ST STEGER, IL 60475-1028	1798	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.
109	O'MALLEY, BERNARD 681 S TANNER AVE KANKAKEE, IL 60901-3143	2349	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	OLIVER, DEBORAH 830 PARKER BLVD WEAVER, AL 36277-4028	1388	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

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SEVENTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION  
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
111	ORPNECK, MICHAEL 1961 SKIPPACK PIKE BLUE BELL, PA 19422-1310	2429	\$219,345.82	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	ORTOSKI, STANLEY 591 LAFAYETTE BLVD SHEFFIELD LAKE, OH 44054-1420	755	\$13,688.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
113	PALMER, CHARLES 1415 COURTLAND DR COLUMBIA, TN 38401-5281	1725	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	PALMER, JAMES 691 ARDMORE LN NAPLES, FL 34108-8563	1183	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	PAPP, JOHN 6403 AYLESWORTH DR CLEVELAND, OH 44130-3104	2370	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	PARDEW, ELAINE PO BOX 22 DALLAS, OR 97338-0022	1957	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	PARKE, LINDA 6594 S. FRONT NINE DR GOLD CANYON, AZ 85118	982	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.
118	PARKS, KASSIA C/O WHITE MCCANN & STEWART PLLC PO BOX 578 WINCHESTER, KY 40392-0578	1909	\$24,500.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
119	PATNAUDE, MARVIN 1917 W STATE ROUTE 113 KANKAKEE, IL 60901-7410	1827	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.
120	PATTON, LLOYD 19 PATTON RD HOLLANDALE, MS 38748-9757	2019	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

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SEVENTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION  
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
121	PEACE, THOMAS 1213 1/2 N 7TH ST APT B LANSING, KS 66043-1183	1506	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	PEET, DELMAR 1318 POCALLA DR MANNING, SC 29102-4673	2046	\$41,025.60*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
123	PETROWSKY, OLGA 1213 S 10TH ST ALLENTOWN, PA 18103-3905	1859	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	PHILLIPS, ROGER 15126 SPRINGWOOD DR FRISCO, TX 75035-6876	2096	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	PIERCE II, DELMER 4100 RIDGECREST TRL CARROLLTON, TX 75007-1626	2083	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.
126	PIERCE, LINDA 4100 RIDGECREST TRL CARROLLTON, TX 75007-1626	2322	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.
127	PITMAN, RONALD 3308 MELBOURNE ROAD SOUTH DR INDIANAPOLIS, IN 46228-2789	1056	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.
128	PLATT, BRIAN 1101 MYRTLE AVE FRANKFORT, IN 46041-1051	1429	\$24,244.54	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
129	PLENGE, BETTY 111 CEDAR RIDGE LN CONWAY, SC 29526-8916	2054	\$7,036.13*	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	PONTRELLA, FRANCES 643 HILLCREST AVE MORRISVILLE, PA 19067-2212	2180	\$59.38*	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

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EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
131	POOLE, MARTHA 7180 BLACK OAK DR WALLS, MS 38680-9385	1184	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	PORTER, JEAN 1823 FIREFLY RD MANCHESTER, IA 52057-8806	2031	\$41,184.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
133	PREVOT, HENRY 3002 CINNAMON BAY CIR NAPLES, FL 34119-8684	1178	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.
134	PRICE, BARBARA 1725 CHEROKEE ST LEAVENWORTH, KS 66048-2232	2200	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	PRIEBE, DONALD 6501 WOODLAKE DR APT 705 MINNEAPOLIS, MN 55423-1395	1445	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	PRITCHARD, BEVERLY 31 IVY CHASE NE ATLANTA, GA 30342-4500	2765	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	RAMIREZ, MARIO 15703 RAGLEY ST HACIENDA HEIGHTS, CA 91745-2749	1721	\$35,046.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
138	RAO, VARANASI 513 AVENIDA DEL VERDOR SAN CLEMENTE, CA 92672-2451	1521	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.
139	RAWLS, JOHN 6466 BAIN BLVD KEITHVILLE, LA 71047-7913	2317	\$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.
140	REED, BILLY 614 HILLTOP CIRCLE CHANDLER, TX 75758	2199	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

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	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
141	RODGERS, JOAN 1782 NORTH PARKWAY MEMPHIS, TN 38112	1552	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	ROSE, R C 145 TRAYLOR RD IRVINE, KY 40336-7380	1304	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.
143	RUSSELL, LONNIE C/O WHITE MCCANN & STEWART PLLC PO BOX 578 WINCHESTER, KY 40392-0578	1911	\$16,000.00	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	SATHRA, RALPH 52 RED RIDGE RD LEVITTOWN, PA 19056	2418	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.
145	SAYLOR, MARY ROSE C/O APPEL & YOST LLP ATTN ERIK D SPURLIN 33 N DUKE ST LANCASTER, PA 17602	2403	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.
146	SMITH, PHILLIP C/O WHITE MCCANN & STEWART PLLC PO BOX 578 WINCHESTER, KY 40392-0578	1910	\$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.
147	TUSSEY, NARCIS 3937 KY HWY 2002 MCKEE, KY 40447	1549	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	WALKER, RAY S 8409 SAINT GEORGE LN LOUISVILLE, KY 40220-3840	897	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.
149	WARNOCK, JOHNNY 1406 S FARGO ST MULDROW, OK 74948	1657	\$13,804.00	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

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 EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
150	WOLLOVER, MICHAEL L 1 HILLCREST AVE APT 309 MORRISVILLE, PA 19067	2288	\$34,440.00*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
		<b>TOTAL</b>	<b>\$2,314,386.12*</b>	

\* Plus unliquidated and/or undetermined amounts