

May 3, 2015

United States Bankruptcy Court for the District of Delaware

Case no. 13-11482 (KJC) Chapter 11 In re: Exide Technologies, Reorganized Debtor

FILED

MAY 13 2015 8:56

Response to:

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")

CLERK  
US BANKRUPTCY COURT  
DISTRICT OF DELAWARE

Claimant and the only authorized person to reconcile, settle, or otherwise resolve this claim:

Roger D. Coddington  
1520 38<sup>th</sup> Ave SE  
Albany, Oregon 97322

Phone: 541-967-8099

Fax: I don't have a fax number and I can't be legally required to have one, as I can be contacted by mail, phone or email.

Email: rdcoddington@aol.com

Claim Number: 1656

Total Claim Amount: \$21,302.40 (120 months times \$177.52 monthly benefit)

Description of basis for the amount of the claim:

I was a Terminated Vested Participant in Evanite Fiber Corporations Employees' Retirement Plan. I have included copies of letters addressed to me that include the following statements:

April 23, 1991 from JoEllen E. Ebner, Senior Personnel Administrator, Evanite Fiber Corporation. "Specifically, you are entitled to a monthly benefit of \$177.52 commencing at your normal retirement date of November 30, 2022 and payable on a ten (10) year certain and continuous annuity basis."

February 28, 1992 from Brenna J. Gregory, Benefits Specialist, Evanite Fiber Corporation. "Specifically, you are entitled to a monthly benefit of \$177.52 commencing at your normal retirement date of December 1, 2022 and payable on a ten (10) year certain and continuous annuity basis."

October 13, 1992 from Thomas W. Hunston, Vice President, Evanite Fiber Corporation, To Dear Current or Future Pensioner. "I am writing to inform you of a recently announce change in the Evanite Fiber Corporation Employees' Retirement Plan. It is important that you know this change does not affect the pension benefit which you are entitled to receive."

I am retaining the original copies of these documents in case I need to take further legal action, which I am prepared to do if necessary. These documents are proof positive that I have legitimate claim for \$21,302.40, as a Terminated Vested Participant in Evanite Fiber Corporations Employees' Retirement Plan. I have no control over the lack of records by the Reorganized Debtor.

Roger D. Coddington  
Claimant



Post Office Box E

Corvallis, Oregon

97339-0598

FAX: 503/753-0388

Telephone: 503/753-1211

Telex: 151041 Evanite UD



April 23, 1991

LETTER TO TERMINATED VESTED PARTICIPANT

Dear Roger Coddington:

Under the terms of the Evanite Fiber Corporation Employees' Retirement Plan, you are classified as a terminated vested participant eligible for a deferred retirement benefit. Specifically, you are entitled to a monthly benefit of \$177.52 commencing at your normal retirement date of November 30, 2022 and payable on a ten (10) year certain and continuous annuity basis.

In lieu of a ten (10) year certain and continuous annuity, you may elect to receive your monthly payments on an actuarially-reduced basis under a joint and survivor annuity or under a certain and continuous annuity. Furthermore, you may elect to receive your monthly payments, also on a reduced basis, as early as age 55.

If you should die before payments commence, your spouse, if any, will be entitled to receive a death benefit calculated as if you had elected to receive payments under a 50% joint and survivor annuity form as of the first day of the month following your earliest possible retirement age had you not died. This benefit is payable only if you have been married for at least one year.

About three months prior to the date you wish to commence receiving benefit payments, you should contact us for a more detailed explanation of the optional forms of payment available to you. At that time, you will also receive an Application for Commencement of Benefit Payments.

If you have any questions at any time about your rights under the plan, feel free to contact us. Please keep us informed of any change in your address.

A handwritten signature in cursive script, appearing to read 'JoEllen E. Ebner', with a long horizontal flourish extending to the right.

JoEllen E. Ebner  
Senior Personnel Administrator

bjg/pensform 0071B

Post Office Box E  
Corvallis, Oregon 97339-0598

Telephone: (503) 753-1211  
Telex: 9102505667 Evanite UD  
FAX: (503) 753-0388



February 28, 1992

LETTER TO TERMINATED VESTED PARTICIPANT

Dear Roger Coddington:

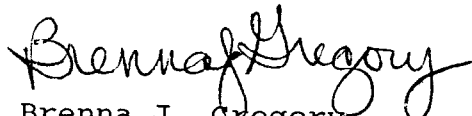
Under the terms of the Evanite Fiber Corporation Employees' Retirement Plan, you are classified as a terminated vested participant eligible for a deferred retirement benefit. Specifically, you are entitled to a monthly benefit of \$177.52 commencing at your normal retirement date of December 1, 2022 and payable on a ten (10) year certain and continuous annuity basis.

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About three months prior to the date you wish to commence receiving benefit payments, you should contact us for a more detailed explanation of the optional forms of payment available to you. At that time, you will also receive an Application for Commencement of Benefit Payments.

If you have any questions at any time about your rights under the plan, feel free to contact us. Please keep us informed of any change in your address.

  
Brenna J. Gregory  
Benefits Specialist

bjg/pensform 0071B

1000 Abernathy Road, N.E.

Suite 1150

Atlanta, Georgia 30328

Telephone: (404) 668-8088

FAX: (404) 668-8801



October 13, 1992

DEAR CURRENT OR FUTURE PENSIONER:

I am writing to inform you of a recently announced change in the Evanite Fiber Corporation Employees' Retirement Plan. It is important that you know that this change does not affect the pension benefit which you are entitled to receive.

Effective October 31, 1992, the company will freeze all pension benefits for the Salaried and Non-Union Hourly employees and make contributions to a 401(k) plan instead. This change will not affect any benefits earned prior to that date and will not affect the benefit which any former employee may be entitled to receive.

Please be aware that the Pension Plan remains in existence. The Trustee and Custodian, Nations Bank, will continue to hold the assets for the plan and will continue to make the monthly pension benefit payments to retirees. Evanite Fiber Corporation will continue to be responsible for making contributions to the plan to insure that adequate funding exists to pay the earned benefits. In addition, the plan is covered by the Pension Benefit Guaranty Corporation, a government agency that insures pension benefits.

I hope that this information is clear and avoids any concerns you may have about your pension benefits. Please write to me at Evanite Fiber Corporation, 1000 Abernathy Road, Suite 1100, Atlanta, Georgia 30328 if you have any questions about this letter.

Sincerely,

A handwritten signature in cursive script that reads 'Thomas W. Hunston'.

Thomas W. Hunston  
Vice President