

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.¹ : **Hrg. Date: July 1, 2015 at 10:00 a.m. (Eastern)**
: **Obj. Due: June 12, 2015 at 4:00 p.m. (Eastern)**
:
----- x

**REORGANIZED DEBTOR’S (SUBSTANTIVE) EIGHTEENTH OMNIBUS
OBJECTION PURSUANT TO BANKRUPTCY CODE SECTION 502(b),
BANKRUPTCY RULE 3007, AND LOCAL RULE 3007-1 TO CERTAIN (A) NO
LIABILITY EMPLOYEE OR RETIREE CLAIMS, (B) MISCLASSIFIED CLAIMS,
(C) PREVIOUSLY DISCHARGED CLAIMS, AND (D) NO LIABILITY CLAIMS**

(“EIGHTEENTH OMNIBUS CLAIMS OBJECTION”)

The reorganized debtor in the above-captioned case (“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 (the “Debtor”), and listed on Exhibits A, B, C, and D to the proposed form of order (the “Proposed Order”), pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 3007-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and respectfully requests entry of an order in substantially the form of the Proposed Order filed concurrently herewith: (i) disallowing and expunging the proofs of claim listed on Exhibit A to the Proposed Order; (ii) adjusting the priorities of the proofs of claim listed on Exhibit B to the Proposed

¹ 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.

Order; (iii) disallowing and expunging the proofs of claim listed on Exhibit C to the Proposed Order; and (iv) disallowing and expunging the proofs of claim listed on Exhibit D 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) Eighteenth Omnibus Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain (A) No Liability Employee or Retiree Claims, (B) Misclassified Claims, (C) Previously Discharged Claims, and (D) No Liability 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).²

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.

² 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 (i) disallowing and expunging the proofs of claim listed on Exhibit A to the Proposed Order; (ii) adjusting the priorities of the proofs of claim listed on Exhibit B to the Proposed Order; (iii) disallowing and expunging the proofs of claim listed on Exhibit C to the Proposed Order; and (iv) disallowing and expunging the proofs of claim listed on Exhibit D 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.”³ 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.”⁴

³ Plan, Art. 6.16(c).

⁴ Plan, Art. 6.16(c).

18. In addition, Claims related to the Pension Plan (as defined in the 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 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.

B. Misclassified Claims

20. The Disputed Claims identified on Exhibit B to the Proposed Order (the "Misclassified Claims") are Claims that assert an administrative, secured, or priority claim, but

which should be reclassified as set forth on Exhibit B as indicated in the column titled “Modified Classification” because the Claimants have failed to provide evidence, and the Reorganized Debtor is not aware of any facts, to support the administrative, secured, or priority claim status as asserted. Failure to reclassify the Misclassified Claims could result in the relevant Claimants receiving a better recovery than other similarly situated creditors, even though such recovery is not warranted. Accordingly, the Reorganized Debtor requests entry of an order reclassifying the Misclassified Claims as set forth on Exhibit B as indicated in the column titled “Modified Classification” on Exhibit B to the Proposed Order.

C. Previously Discharged Claims

21. The Disputed Claims identified on Exhibit C to the Proposed Order (the “Previously Discharged Claims”) are Claims that were previously satisfied, discharged, and released in full during the Debtor’s predecessor’s prior chapter 11 case (the “2002 Chapter 11 Case”).⁵ Indeed, on April 21, 2004, this Court entered a confirmation order approving the Debtor’s predecessor’s plan of reorganization, which provides in pertinent part:

Except as otherwise provided in the Plan or this Confirmation Order: (a) the rights afforded under the Plan and the treatment of all Claims and Equity Interests under the Plan, shall be in exchange for and in complete satisfaction, discharge and release of all liens, Claims and Equity Interests of any nature whatsoever, including any interest accrued on Claims from and after the Petition Date, against any Debtor or any of its assets or properties, (b) on the Effective Date, all such liens on, Claims against, and Equity interests in any Debtor shall be satisfied, discharged, and released in full and (c) all Persons and Entities shall be precluded from asserting against the Debtors, the Reorganized Debtors, their successors, assets, or properties, any other or further liens, Claims or Equity Interests based upon any act or omission, transaction or

⁵ On April 15, 2002, Exide, together with certain of its U.S. subsidiaries, filed voluntary petitions for reorganization under chapter 11. The Debtor, along with the Official Committee of Unsecured Creditors, filed a Joint Plan of Reorganization (the “2002 Plan”) with this Court on February 27, 2004 and, on April 21, 2004, this Court confirmed the 2002 Plan, which became effective on May 5, 2004. On March 28, 2014, this Court entered an order closing the 2002 Chapter 11 Case (Case No. 02-11125) (Docket No. 6837).

other activity of any kind or nature that occurred prior to the Confirmation Date.⁶

22. Accordingly, failure to disallow and expunge the Previously Discharged Claims may result in Claimants receiving an unwarranted recovery from the Reorganized Debtor's estate as these Claims have already been released and discharged in connection with the 2002 Chapter 11 Case. As a result, the Reorganized Debtor requests entry of an order disallowing and expunging the Previously Discharged Claims listed on Exhibit C to the Proposed Order.

D. No Liability Claims

23. The Disputed Claims identified on Exhibit D to the Proposed Order (the "No Liability Claims") are Claims that are not reflected in the Books and Records. The Reorganized Debtor has reviewed the Books and Records and determined that the Debtor and the Reorganized Debtor are not liable for the No Liability Claims for the reasons set forth in the column titled "Reason for Disallowance" on Exhibit D to the Proposed Order. Moreover, the No Liability Claims fail to allege any damages or facts necessary to support a compensable claim and, thus, Claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the No Liability Claims and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim. Accordingly, the Reorganized Debtor requests that each of the No Liability Claims be disallowed and expunged in its entirety.

APPLICABLE AUTHORITY

24. 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

⁶ Findings of Fact, Conclusions of Law and Memorandum Order Relating to Confirmation of the Joint Plan of Reorganization of the Official Committee of Unsecured Creditors and the Debtors, entered April 21, 2004 (Case No. 02-11125) (Docket No. 4340).

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).

25. 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.

26. The Reorganized Debtor has met its burden in refuting the legal sufficiency of the Disputed Claims and has demonstrated that (a) the No Liability Employee or Retiree Claims, Previously Discharged Claims, and No Liability Claims should be disallowed and expunged and (b) the Claimants who filed the Misclassified Claims are not entitled to the priority or administrative expense claim status asserted in the Misclassified Claims.

27. 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 (i) disallowing and expunging each No Liability Employee or Retiree Claim, Previously Discharged Claim, and No Liability Claim listed on Exhibits A, C, and D attached to the Proposed Order and (ii) reclassifying each Misclassified Claim as set forth on Exhibit B attached to the Proposed Order.

RESPONSES TO THE OBJECTION

28. 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 June 12, 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 **July 1, 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.

29. Every Response must be filed on or before **June 12, 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, June 12, 2015 at 4:00 p.m. (Eastern).**

30. 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.

31. 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 **July 1, 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.

32. 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.

33. 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.

34. 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.**

35. 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

36. 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 Exhibits A, B, C, and D

to the Proposed Order. Should one or more of the grounds for the Objection be dismissed or overruled, the Debtor reserves the right to object to any Disputed Claim listed on Exhibits A, B, C, and D to the Proposed Order on any other ground.

STATEMENT OF COMPLIANCE WITH LOCAL BANKRUPTCY RULE 3007-1

37. 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

38. 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

39. 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
May 29, 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.¹ : **Hrg. Date: July 1, 2015 at 10:00 a.m. (Eastern)**
 : **Obj. Due: June 12, 2015 at 4:00 p.m. (Eastern)**
 :
 ----- X

NOTICE OF OBJECTION

PLEASE TAKE NOTICE that the reorganized debtor (“Exide” or the “Reorganized Debtor”) has filed the attached **Reorganized Debtor’s (Substantive) Eighteenth Omnibus Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain (A) No Liability Employee or Retiree Claims, (B) Misclassified Claims, (C) Previously Discharged Claims, and (D) No Liability Claims (the “Objection”)**.²

PLEASE TAKE FURTHER NOTICE that responses to the Objection, if any, must be filed on or before **June 12, 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 June 12, 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

¹ 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.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

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.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE OBJECTION WILL BE HELD ON JULY 1, 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
May 29, 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.¹ :
 :
 ----- x

**DECLARATION OF HOLDEN BIXLER IN SUPPORT OF REORGANIZED DEBTOR’S
 (SUBSTANTIVE) EIGHTEENTH OMNIBUS OBJECTION PURSUANT
 TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY RULE 3007,
 AND LOCAL RULE 3007-1 TO CERTAIN (A) NO LIABILITY EMPLOYEE OR
 RETIREE CLAIMS, (B) MISCLASSIFIED CLAIMS,
 (C) PREVIOUSLY DISCHARGED CLAIMS, AND (D) NO LIABILITY 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 (“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 Chapter 11 Case.² I have read the Reorganized Debtor’s (Substantive) Eighteenth Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 To Certain (A) No Liability Employee or Retiree Claims, (B) Misclassified Claims, (C) Previously Discharged Claims, and (D) No Liability Claims (the “Objection”), and am directly, or by and through my personnel or agents,

¹ 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.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

familiar with the information contained therein, the proposed form of order (the “Proposed Order”), and the exhibits attached thereto.

2. Significant 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, the Misclassified Claims, the Previously Discharged Claims, and the No Liability Claims, as defined in the Objection and identified respectively in Exhibits A, B, C, and D to the Proposed Order.

3. The information contained in Exhibits A, B, C, and D to the Proposed Order are 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.

5. To my knowledge, the Misclassified Claims, identified in Exhibit B to the Proposed Order are proofs of claim that assert an administrative, secured, or priority claim, but

should be adjusted to general unsecured status because the Claimants have failed to provide any evidence to support an administrative, secured, or priority claim. I believe that failure to reclassify the Misclassified Claims could result in the relevant Claimants receiving a better recovery than other unsecured creditors, even though such recovery is not warranted. It is my understanding that following a review of the Books and Records, the Reorganized Debtor has determined that the Misclassified Claims should be reclassified as indicated in the “Modified Classification” column on Exhibit B to the Proposed Order.

6. To my knowledge, the Previously Discharged Claims, identified in Exhibit C to the Proposed Order are proofs of claim that were previously satisfied, discharged, and released in full by order of this Court in the Debtor’s previous chapter 11 case and therefore cannot state a colorable claim against the Debtor or the Reorganized Debtor. If the Previously Discharged Claims are not disallowed, the Claimants asserting such Claims may receive an unwarranted recovery from the Reorganized Debtor’s estate.

7. To my knowledge, the proofs of claim listed on Exhibit D to the Proposed Order are proofs of 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 Claims for the reasons set forth in the column titled “Reason for Disallowance” on Exhibit D to the Proposed Order. If the No Liability Claims are not disallowed, the Claimants asserting such Claims may receive an unwarranted recovery from the 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 May 29, 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.¹ : **Related Docket No. _____**
 :
 ----- X

**ORDER SUSTAINING REORGANIZED DEBTOR’S (SUBSTANTIVE) EIGHTEENTH
 OMNIBUS OBJECTION PURSUANT TO BANKRUPTCY CODE SECTION 502(b),
 BANKRUPTCY RULE 3007, AND LOCAL RULE 3007-1 TO CERTAIN
 (A) NO LIABILITY EMPLOYEE OR RETIREE CLAIMS,
 (B) MISCLASSIFIED CLAIMS, (C) PREVIOUSLY DISCHARGED CLAIMS,
AND (D) NO LIABILITY CLAIMS**

Upon the Reorganized Debtor’s (Substantive) Eighteenth Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 To Certain (A) No Liability Employee or Retiree Claims, (B) Misclassified Claims, (C) Previously Discharged Claims, and (D) No Liability Claims (the “Objection”),² and it appearing that notice of the Objection was good and sufficient upon the particular circumstances and that no other or further notice need be given; and this Court having considered the Objection, the claims listed on Exhibits A, B, C, and D attached hereto, and any responses thereto; and upon the Declaration of Holden Bixler in Support of the Reorganized Debtor’s (Substantive) Eighteenth Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 To Certain (A) No Liability Employee or Retiree Claims, (B) Misclassified Claims, (C)

¹ 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.

² Unless otherwise defined herein, capitalized terms used herein shall have the meanings ascribed to them in the Objection.

Previously Discharged Claims, and (D) No Liability Claims; and upon the record herein; and after due deliberation thereon and good and sufficient cause appearing therefor; it is hereby

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 Misclassified Claims listed on Exhibit B attached hereto are hereby reclassified as set forth in Exhibit B attached hereto under the heading “Modified Classification.”
4. The Previously Discharged Claims listed on Exhibit C are hereby disallowed and expunged in their entirety as set forth in Exhibit C.
5. The No Liability Claims listed on Exhibit D are hereby disallowed and expunged in their entirety as set forth in Exhibit D.
6. 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.
7. The Reorganized Debtor shall retain and shall have the right to object in the future to any of the proofs of claim listed on Exhibits A, B, C, and D 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.

8. 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.

9. 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.

10. 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.

11. 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)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	ARNOLD, MATHEW 931 LEWIS ST BRISTOL, VA 24201-2424	1649	\$13,431.20	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
2	BOLGER, SUZANNE C/O CHERYL BERGIAN LAW OFFICE PO BOX 2152 FARGO, ND 58108-2152	2730	\$2,000.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
3	CREASY, BERTHA PO BOX 145 NEW PROVIDENCE, PA 17560-0145	2510	\$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.
4	DINKINS, ZONA 2606 LAKE WADE CT ORLANDO, FL 32806-4600	1226	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	FLYNT, RODNEY R C/O RICHARD L HANNA 500 S TAYLOR LB 222 AMARILLO, TX 79101	2284	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	HAVEN, SCOTT L PO BOX 818 JEFFERSON, OR 97352-0818	1903	\$149,932.80	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
7	HENDRICKS, WILLIAM 3530 NW EAGLE VIEW DR ALBANY, OR 97321-9336	2086	\$101,046.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
8	LUCKETT, WILLIAM C/O DANIEL M SORRICK, ESQ PO BOX 109 BRANDON, MS 39043	3198	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	MCNAIR, EZRA C/O CARRIE MCNAIR PO BOX 94 GEORGETOWN, MS 39078	1353	\$23,000.00	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)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
10	MURPHY, F 6230 N 33RD AVE UNIT 135 PHOENIX, AZ 85017-1452	862	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	PEARSON, MELVIN 116 RICE ST GREENVILLE, SC 29605-2029	2182	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	RAWLINS, ROBERT C/O WHITE MCCANN & STEWART PLLC PO BOX 578 WINCHESTER, KY 40392-0578	1914	\$23,000.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
13	RHODUS, ROGER C/O WHITE MCCANN & STEWART PLLC PO BOX 578 WINCHESTER, KY 40392-0578	1917	\$22,000.00	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	RICHARDS, BRIAN 725 CARMALT ST SCRANTON, PA 18519-1404	2401	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	RICHARDS, DONALD 23559 HOLLY CIR LEWES, DE 19958-3323	1486	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	RICKMAN, LANE 9812 LA RITA PL RIVERVIEW, FL 33569-5567	1668	\$33,600.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
17	RIDDLEBARGER, BARBARA 32 POPLAR DR ZANESVILLE, OH 43701-6322	2250	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	RIGGINS, WELTON 3823 MUNGER AVE DALLAS, TX 75204-4248	2420	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)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
19	RODDEN, LUCILLE #7 RESPLANDOR LOOP HOT SPRINGS VILLAGE, AR 71909	1389	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	ROMAN, EMMA 2129 S CLINTON AVE TRENTON, NJ 08610-5924	1148	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	ROSS, JAMES 2720 MAYFAIR CT WHITE BEAR LAKE, MN 55110-4945	1824	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	ROSS, OCTAVIAN 2809 MOJAVE DR DALLAS, TX 75241-6418	2105	\$144,522.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
23	RYAN, GEORGE 918 GRAND AVE LEAVENWORTH, KS 66048-3002	2290	\$107,933.54	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
24	RYMOND, RICHARD 6136 RUNNYMEADE DR CANTON, MI 48187-2842	2343	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	SALVATORE, ELIZABETH 35 MAINE AVE WHITING, NJ 08759-1449	802	\$189.05*	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	SAMUEL, MAE 335 RAINBOW DR SUMTER, SC 29154-5374	2431	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	SCHIFANO, SALVATORE PO BOX 3618 TRENTON, NJ 08629-0618	2406	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	SCHMIDT, BERNARD 14423 E SUZANNE DE FORTUNA DR YUMA, AZ 85367-7556	985	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)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
29	SCHMITT, ROBERT 1644 CHARTWELL DR DAYTON, OH 45459-1462	1233	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.
30	SCHRADE, WALLACE 9246 DUNBAR KNOLL CIR N MINNEAPOLIS, MN 55443-1750	2149	\$84,160.09*	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	SEAMAN, DONA J. 2414 MODENA CT PEARLAND, TX 77581-1100	1085	\$25,962.88	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
32	SEBER, KENNETH 1105 S BROADWAY ST LEAVENWORTH, KS 66048-3115	2338	\$148,666.92	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	SEBER, ROBERT 19921 SPRINGDALE RD LEAVENWORTH, KS 66048-7624	2364	\$32,199.00	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	SEIFERT, DAVID 139 GRANDE BLVD SINKING SPRING, PA 19608-9348	2754	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	SHAFER, MATTIE 27644 PARKWAY RD EASTON, MD 21601-7200	1438	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	SHERRILL, RELDA 27008 W TONOPAH DR BUCKEYE, AZ 85396-6929	1778	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	SHORT, WINFRED C/O WHITE MCCANN & STEWART PLLC PO BOX 578 WINCHESTER, KY 40392-0578	1915	\$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.
38	SHUEY, DAVID 1118 MAIDENCREEK RD FLEETWOOD, PA 19522-8699	1742	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)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
39	SIBOLD, LINDA 2000 NW 62ND ST KANSAS CITY, MO 64151-2375	2311	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	SIEDE, ADOLPH 1194 SHERREN ST W ROSEVILLE, MN 55113-4331	1559	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.
41	SINGLETON, WILLIAM 611 VZ COUNTY ROAD 3828 WILLS POINT, TX 75169-6639	1125	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	SINNK, CHESTER 62 HOOVER CT BOYERTOWN, PA 19512-1707	2211	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	SMITH, CHARLES 100 VICKSBURG CT OCEAN SPRINGS, MS 39564-5934	1294	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	SMITH, RODNEY 404 FORD DR PETAL, MS 39465-2726	2337	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	SMITH, ROSANA 1113 25TH ST FORT MADISON, IA 52627-3922	1453	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	SOWERS, RICHARD PO BOX 212 FRANKFORT, IN 46041-0212	1381	\$51,308.92	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	SPIEGELBERG, BERNARD N 112 W 20905 MEQUON GERMANTOWN, WI 53022	1561	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	SPIVEY, NORMA 408 MORRISON AVE HOT SPRINGS, AR 71901-6829	1646	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)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
49	SPRINGFIELD, CHESTER 333 N INDUSTRIAL AVE KANKAKEE, IL 60901-2650	1812	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	SPURGEON, MARK 1533 NE SOUTH NEBERGALL LOOP ALBANY, OR 97321-1572	2225	\$24,067.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
51	STADALMAN, RICHARD 705 SAVANNAH ST MOUND CITY, MO 64470-1134	1143	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	STAMATIS, CATHY 8833 KERR-ROSEMARK RD ROSEMARK, TN 38053	2171	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	STANEFSKI, EUGENE 6240 BOXMAN AVE INVER GROVE HEIGHTS, MN 55076-5502	2012	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.
54	STANTON, JANET 559 ANN ST FRANKFORT, IN 46041-3418	1895	\$55,434.33	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	STARKEY, JOHN 5480 4TH ST ROSEVILLE, OH 43777-9501	2459	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	STEPHENSON, RUBY 172 N JACKSON AVE BRADLEY, IL 60915-1826	1475	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	STORY, LINDA 1002 BELT ST JONESBORO, AR 72401-2123	2520	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	SWEET, RICHARD 2031 SE 74TH AVE HILLSBORO, OR 97123-6504	1247	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)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
59	SYKES, JOHNNIE 7167 E ILLINOIS ST SAINT ANNE, IL 60964-5204	2701	\$175,550.40	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	SZEMBORSKI, RUTH 500 SYCAMORE LN APT 107 WOODSTOCK, GA 30188-7320	2308	\$1,270.32	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
61	SZWAST, JOHN 10 EVERGREEN LN HAMILTON SQUARE, NJ 08690-3114	1084	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	THOMAS, JOHNNY 418 LOVE ST SUMTER, SC 29150-6226	1501	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	THOMAS, RICHARD PO BOX 124 RAMSEUR, NC 27316-0124	1745	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	THOMPSON, FRED 5417 BLUE RIDGE BLVD RAYTOWN, MO 64133-2968	2071	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.
65	TIBEL, STEPHEN 170 MASON ST EXETER, PA 18643-1928	1499	\$17,491.20*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
66	TILLIE, RONALD 1191 BILLUPS RD PINEWOOD, SC 29125	2045	\$18,706.80*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
67	TIPTON, DICK 222 S 3RD ST RICHMOND, KY 40475-2104	1621	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	TOMLIN, JAMES 5130 JOE BILLY RD GABLE, SC 29051-9649	2041	\$14,245.06*	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)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
69	TORDOFF, WENDY 425 2ND ST OLYPHANT, PA 18447-1217	1016	\$5,000.00	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
70	TURNAGE, YVONNE 1234 GRADY AVE YAZOO CITY, MS 39194-3034	1229	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	UMILE, THOMAS 129 NORTHPOINT DR OLYPHANT, PA 18447-1762	2113	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	UNWIN, ARDITH 1926 CEDARWOOD PL ERIE, CO 80516-4044	1403	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	USELTON, BETTY 700 HARVARD AVENUE FT. SMITH, AR 72940	2159	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	VAN WERT, ALLEN 811 CENTER ST SCRANTON, PA 18512-1124	1404	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.
75	VANORT, MARGARET 5590 NORWICH PKWY APT 324 STILLWATER, MN 55082-4576	1803	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	VANWINKLE, SHARON 672 NELLIE BAKER RD MC KEE, KY 40447-8788	1949	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	WALTER, LARRY 2425 SE CRYSTAL LAKE DR CORVALLIS, OR 97333-2014	1509	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	WALTON, COLLEEN 7773 N STATE ROAD 38 SHERIDAN, IN 46069-8904	1333	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)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
79	WARREN, CHARLES 192 ECHO DR ELIZABETHTON, TN 37643-6165	981	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	WATERMAN, VERDEEN C/O LORETTA WATERMAN, EXECUTOR 31863 ECLIPSE RD ELKADER, IA 52043-8259	2466	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.
81	WATSON, EARNEST 523 LINCOLN DR TAYLORS, SC 29687-5732	2104	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	WAYNE, RICKY 712 GROVE RD ZANESVILLE, OH 43701-1333	1736	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	WEATHERLY, CHARLES 866 WHATLEY ST SUMTER, SC 29154-6042	2036	\$16,570.98*	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
84	WEATHERLY, JUANITA 866 WHATLEY ST SUMTER, SC 29154-6042	2035	\$10,927.35*	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	WEBB, C 3114 LINCOLN BLVD CLEVELAND HEIGHTS, OH 44118-2036	1073	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	WELCH, RONNIE 6521 FRYE RD REMBERT, SC 29128-8550	2821	\$36,862.56*	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	WELLS, WALTER 6101 N 59TH PL PARADISE VALLEY, AZ 85253-8010	2187	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	WERNER, LUTHER 400 HARVEST DR BLANDON, PA 19510-9585	1040	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)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
89	WESCOE, EVAN 3907 W WALNUT ST ALLENTOWN, PA 18104-5813	2316	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	WESTON, CONSTANCE 1022 DECATUR ST SUMTER, SC 29150-7418	2053	\$20,846.62*	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	WHITE, MARY 4766 OLD POPLAR RD JACKSON, MS 39212-5854	1554	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	WHITE, ROBERT 1124 PERENNIAL LN GOODE, VA 24556-2920	1971	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	WICKERT, THEODORE 3 ESTATES DR READING, PA 19606-9593	1041	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	WILLIAMS, LOUISE PO BOX 604 MULDROW, OK 74948-0604	959	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.
95	WILLOUGHBY, SAMUEL W C/O WHITE MCCANN & STEWART PLLC PO BOX 578 WINCHESTER, KY 40392-0578	1908	\$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.
96	WILSON, DANIEL 5616 COOPER CIR MERIDIAN, MS 39307-6651	1591	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	WIMBERLY, DENNIS 340 NE CREST ST UNIT 76 SUBLIMITY, OR 97385-9541	972	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	WITT, LORETTA 176 GRAY HAWK LN MC KEE, KY 40447-6021	2733	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)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT A - NO LIABILITY EMPLOYEE OR RETIREE CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
99	WOLF, MARY JO 6632 KNOX AVE S RICHFIELD, MN 55423-2161	776	\$198,302.40	As set forth in the Plan, the Reorganized Debtor shall continue the pension and retiree benefits. No liability exists on the Books and Records.
100	WORMUTH, ANNETTE 1630 FARR ST SCRANTON, PA 18504-1128	1935	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	YOUNCE, SONJA 5235 PROCTOR RD CASTRO VALLEY, CA 94546-1531	1328	\$34,567.50	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	YOUNG, STEPHEN 5202 SICKLE RD EMMAUS, PA 18049-4634	2830	\$77,928.00	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	ZIMMERMAN, THOMAS 905 W BARNER ST FRANKFORT, IN 46041-1376	1070	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.
	TOTAL		\$1,720,722.92*	

* Plus unliquidated and/or undetermined amounts

EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT B - MISCLASSIFIED CLAIMS

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
1	CHARVET NIGERIA LTD C/O THE KISS MIX DRINKS COMPANY ATTN ROBERT MILLAR OFFICE 3, MAPLE SUITE, GUARDIAN HOUSE, BOROUGH RD GODALMING SURREY GU7 2AE UNITED KINGDOM	624 (b)	Administrative Secured Unsecured Subtotal	Undetermined* \$200,290.19* Undetermined* \$200,290.19*	Administrative Secured Unsecured Subtotal	\$0.00 \$0.00 \$200,290.19* \$200,290.19*	The Claimant is not entitled to administrative or secured claim classifications under the bankruptcy code.
2	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2820 (a)(b)	Administrative Unsecured Subtotal	Undetermined* Undetermined* \$0.00*	Administrative Unsecured Subtotal	\$0.00 Undetermined* \$0.00*	The Claimant is not entitled to administrative priority status under the bankruptcy code.
3	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2807 (a)(b)	Administrative Unsecured Subtotal	Undetermined* Undetermined* \$0.00*	Administrative Unsecured Subtotal	\$0.00 Undetermined* \$0.00*	The Claimant is not entitled to administrative priority status under the bankruptcy code.
4	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2792 (a)(b)	Administrative Unsecured Subtotal	Undetermined* \$5,737.51* \$5,737.51*	Administrative Unsecured Subtotal	\$0.00 \$5,737.51* \$5,737.51*	The Claimant is not entitled to administrative priority under the bankruptcy code.
5	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2794 (a)(b)	Administrative Unsecured Subtotal	Undetermined* \$3,357.51* \$3,357.51*	Administrative Unsecured Subtotal	\$0.00 \$3,357.51* \$3,357.51*	The Claimant is not entitled to administrative priority status under the bankruptcy code.
6	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2790 (a)(b)	Administrative Unsecured Subtotal	Undetermined* \$51,322.62* \$51,322.62*	Administrative Unsecured Subtotal	\$0.00 \$51,322.62* \$51,322.62*	The Claimant is not entitled to administrative priority under the bankruptcy code.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit C for Previously Discharged Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit D for No Liability Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT B - MISCLASSIFIED CLAIMS

NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
7 GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2793 (a)(b)	Administrative	Undetermined*	Administrative	\$0.00	The Claimant is not entitled to administrative priority status under the bankruptcy code.
		Unsecured	Undetermined*	Unsecured	Undetermined*	
		Subtotal	\$0.00*	Subtotal	\$0.00*	
8 GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2796 (a)(b)	Administrative	Undetermined*	Administrative	\$0.00	The Claimant is not entitled to administrative priority or priority status under the bankruptcy code.
		Priority	Undetermined*	Priority	\$0.00	
		Unsecured	Undetermined*	Unsecured	Undetermined*	
		Subtotal	\$0.00*	Subtotal	\$0.00*	
9 GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2798 (a)(b)	Administrative	Undetermined*	Administrative	\$0.00	The Claimant is not entitled to administrative priority status under the bankruptcy code.
		Unsecured	Undetermined*	Unsecured	Undetermined*	
		Subtotal	\$0.00*	Subtotal	\$0.00*	
10 GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2803 (a)(b)	Administrative	Undetermined*	Administrative	\$0.00	The Claimant is not entitled to administrative priority status under the bankruptcy code.
		Unsecured	Undetermined*	Unsecured	Undetermined*	
		Subtotal	\$0.00*	Subtotal	\$0.00*	
11 GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2804 (a)(b)	Administrative	Undetermined*	Administrative	\$0.00	The Claimant is not entitled to administrative priority status under the bankruptcy code.
		Unsecured	Undetermined*	Unsecured	Undetermined*	
		Subtotal	\$0.00*	Subtotal	\$0.00*	
12 GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2805 (a)(b)	Administrative	Undetermined*	Administrative	\$0.00	The Claimant is not entitled to administrative priority status under the bankruptcy code.
		Unsecured	Undetermined*	Unsecured	Undetermined*	
		Subtotal	\$0.00*	Subtotal	\$0.00*	

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit C for Previously Discharged Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit D for No Liability Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT B - MISCLASSIFIED CLAIMS

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
13	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2806 (a)(b)	Administrative Unsecured	Undetermined* Undetermined*	Administrative Unsecured	\$0.00 Undetermined*	The Claimant is not entitled to administrative priority status under the bankruptcy code.
			Subtotal	\$0.00*	Subtotal	\$0.00*	
14	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2791 (a)(b)	Administrative Unsecured	Undetermined* \$529,953.96*	Administrative Unsecured	\$0.00 \$529,953.96*	The Claimant is not entitled to administrative priority under the bankruptcy code.
			Subtotal	\$529,953.96*	Subtotal	\$529,953.96*	
15	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2808 (a)(b)	Administrative Unsecured	Undetermined* Undetermined*	Administrative Unsecured	\$0.00 Undetermined*	The Claimant is not entitled to administrative priority status under the bankruptcy code.
			Subtotal	\$0.00*	Subtotal	\$0.00*	
16	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2809 (a)(b)	Administrative Unsecured	Undetermined* Undetermined*	Administrative Unsecured	\$0.00 Undetermined*	The Claimant is not entitled to administrative priority status under the bankruptcy code.
			Subtotal	\$0.00*	Subtotal	\$0.00*	
17	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2810 (a)(b)	Administrative Unsecured	Undetermined* Undetermined*	Administrative Unsecured	\$0.00 Undetermined*	The Claimant is not entitled to administrative priority status under the bankruptcy code.
			Subtotal	\$0.00*	Subtotal	\$0.00*	
18	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2811 (a)(b)	Administrative Unsecured	Undetermined* Undetermined*	Administrative Unsecured	\$0.00 Undetermined*	The Claimant is not entitled to administrative priority status under the bankruptcy code.
			Subtotal	\$0.00*	Subtotal	\$0.00*	

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit C for Previously Discharged Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit D for No Liability Claims

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

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
19	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2812 (a)(b)	Administrative Unsecured	Undetermined* Undetermined*	Administrative Unsecured	\$0.00 Undetermined*	The Claimant is not entitled to administrative priority status under the bankruptcy code.
			Subtotal	\$0.00*	Subtotal	\$0.00*	
20	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2813 (a)(b)	Administrative Unsecured	Undetermined* Undetermined*	Administrative Unsecured	\$0.00 Undetermined*	The Claimant is not entitled to administrative priority status under the bankruptcy code.
			Subtotal	\$0.00*	Subtotal	\$0.00*	
21	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2814 (a)(b)	Administrative Unsecured	Undetermined* Undetermined*	Administrative Unsecured	\$0.00 Undetermined*	The Claimant is not entitled to administrative priority status under the bankruptcy code.
			Subtotal	\$0.00*	Subtotal	\$0.00*	
22	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2815 (a)(b)	Administrative Unsecured	Undetermined* Undetermined*	Administrative Unsecured	\$0.00 Undetermined*	The Claimant is not entitled to administrative priority status under the bankruptcy code.
			Subtotal	\$0.00*	Subtotal	\$0.00*	
23	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2816 (a)(b)	Administrative Unsecured	Undetermined* Undetermined*	Administrative Unsecured	\$0.00 Undetermined*	The Claimant is not entitled to administrative priority status under the bankruptcy code.
			Subtotal	\$0.00*	Subtotal	\$0.00*	
24	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2817 (a)(b)	Administrative Unsecured	Undetermined* Undetermined*	Administrative Unsecured	\$0.00 Undetermined*	The Claimant is not entitled to administrative priority status under the bankruptcy code.
			Subtotal	\$0.00*	Subtotal	\$0.00*	

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit C for Previously Discharged Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit D for No Liability Claims

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

NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
25 GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2819 (a)(b)	Administrative	Undetermined*	Administrative	\$0.00	The Claimant is not entitled to administrative priority status under the bankruptcy code.
		Unsecured	Undetermined*	Unsecured	Undetermined*	
	Subtotal	\$0.00*	Subtotal	\$0.00*		
26 JOHNSTON, CORY 540 OAK STREET AUMSVILLE, OR 87325	1793 (b)	Priority	\$50,000.00*	Priority	\$0.00	The Claimant is not entitled to priority status under the bankruptcy code.
				Unsecured	\$50,000.00*	
	Subtotal	\$50,000.00*	Subtotal	\$50,000.00*		
		TOTAL	\$840,661.79*	TOTAL	\$840,661.79*	

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit C for Previously Discharged Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit D for No Liability Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT C - PREVIOUSLY DISCHARGED CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	BKK JOINT DEFENSE GROUP C/O BINGHAM MCCUTCHEN LLP ATTN JAMES J DRAGNA ESQ 355 S GRAND AVE STE 4400 LOS ANGELES, CA 90071	2611 (b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
2	COMMONWEALTH OF PENNSYLVANIA DEPT OF ENVTL PROT C/O PA DEP OFFICE OF CHIEF COUNSEL ATTN MARTIN SIEGEL SOUTHCENTRAL REGIONAL OFFICE 909 ELMERTON AVE HARRISBURG, PA 17110-8200	3444 (b)	\$1,738,985.00	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
3	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2790 (a) (b)	\$51,322.62*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
4	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2791 (a) (b)	\$529,953.96*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
5	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2794 (a) (b)	\$3,357.51*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
6	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2796 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
7	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2798 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit B for Misclassified Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit D for No Liability Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT C - PREVIOUSLY DISCHARGED CLAIMS

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
8	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2804 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
9	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2793 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
10	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2792 (a)(b)	\$5,737.51*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
11	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2811 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
12	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2800 (b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
13	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2801 (b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
14	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2819 (a) (b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
15	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2803 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection – Exhibit B for Misclassified Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection – Exhibit D for No Liability Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT C - PREVIOUSLY DISCHARGED CLAIMS

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
16	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2805 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
17	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2806 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
18	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2807 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
19	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2808 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
20	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2809 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
21	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2810 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
22	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2812 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
23	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2813 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection – Exhibit B for Misclassified Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection – Exhibit D for No Liability Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT C - PREVIOUSLY DISCHARGED CLAIMS

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
24	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2814 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
25	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2815 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
26	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2816 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
27	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2817 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
28	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2799 (b)	\$7,028.44*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
29	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2820 (a)(b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
30	TEXTRON INC ATTN JAMIESON SCHIFF 40 WESTMINSTER ST PROVIDENCE, RI 02903	2146 (b)	Undetermined*	The liability asserted within the Proof of Claim was previously discharged in the 2002 bankruptcy case.
		TOTAL	\$2,336,385.04*	

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection – Exhibit B for Misclassified Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection – Exhibit D for No Liability Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT D - NO LIABILITY CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	ALDRIDGE, MARY C/O MICHAEL HARRY ATTY 1405 W CENTER GREENWOOD, AR 72936	2745	\$75,000.00	No liability exists on the books and records. The Claimant failed to exhaust appeal rights which are now time barred. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
2	BKK JOINT DEFENSE GROUP C/O BINGHAM MCCUTCHEN LLP ATTN JAMES J DRAGNA ESQ 355 S GRAND AVE STE 4400 LOS ANGELES, CA 90071	2611 (b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
3	CHARVET NIGERIA LTD C/O THE KISS MIX DRINKS COMPANY ATTN ROBERT MILLAR OFFICE 3, MAPLE SUITE, GUARDIAN HOUSE, BOROUGH RD GODALMING SURREY GU7 2AE UNITED KINGDOM	624 (a)	\$200,290.19*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
4	COMMONWEALTH OF PENNSYLVANIA DEPT OF ENVTL PROT C/O PA DEP OFFICE OF CHIEF COUNSEL ATTN MARTIN SIEGEL SOUTHCENTRAL REGIONAL OFFICE 909 ELMERTON AVE HARRISBURG, PA 17110-8200	3444 (b)	\$1,738,985.00	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit B for Misclassified Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit C Previously Discharged Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT D - NO LIABILITY CLAIMS

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
5	GEORGE, MICHAEL C/O COOK LAW GROUP LLC PO BOX 2415 GAINESVILLE, GA 30503-2415	2720	\$250,000.00*	No liability exists on the books and records. Asserted claim is a litigation claim for which no judgment has been rendered and for which the claimant cannot establish a claim under applicable law. The Reorganized Debtor denies all liability and incorporates all other defenses previously asserted in the underlying litigation or other proceedings. The Reorganized Debtor has further investigated the allegations in the asserted claim, as well as its applicable defenses, and has determined that the claimant fails to allege any damages or facts necessary to support a compensable claim and, thus, has no present right to payment under applicable federal and/or state law or regulation. The Reorganized Debtor reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
6	GIOVANNIELLO, STEPHEN C/O THE GUCCIARDO LAW FIRM, PLLC ATTN: THOMAS P. RAM, ESQ. 170 OLD COUNTRY RD STE 609 MINEOLA, NY 11501-4313	2845	\$1,000,000.00	No liability exists on the books and records. Asserted claim is a litigation claim for which no judgment has been rendered and for which the claimant cannot establish a claim under applicable law. The Reorganized Debtor denies all liability and incorporates all other defenses previously asserted in the underlying litigation or other proceedings. The Reorganized Debtor has further investigated the allegations in the asserted claim, as well as its applicable defenses, and has determined that the claimant fails to allege any damages or facts necessary to support a compensable claim and, thus, has no present right to payment under applicable federal and/or state law or regulation. The Reorganized Debtor reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit B for Misclassified Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit C Previously Discharged Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT D - NO LIABILITY CLAIMS

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
7	GOUDY, MICHAEL PO BOX 3611 SALINA, KS 67402-3611	1342	Undetermined*	No liability exists on the books and records. The claim/case was resolved and settled on 12/18/2014. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
8	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2816 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
9	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2814 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
10	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2812 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit B for Misclassified Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit C Previously Discharged Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT D - NO LIABILITY CLAIMS

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
11	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2796 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
12	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2800 (b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
13	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2801 (b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
14	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2799 (b)	\$7,028.44*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit B for Misclassified Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit C Previously Discharged Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT D - NO LIABILITY CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
15	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2817 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
16	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2793 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
17	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2819 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
18	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2791 (a)(b)	\$529,953.96*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit B for Misclassified Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit C Previously Discharged Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT D - NO LIABILITY CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
19	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2813 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
20	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2815 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
21	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2790 (a)(b)	\$51,322.62*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
22	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2810 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit B for Misclassified Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit C Previously Discharged Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT D - NO LIABILITY CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
23	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2798 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
24	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2809 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
25	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2794 (a)(b)	\$3,357.51*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
26	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2806 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit B for Misclassified Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit C Previously Discharged Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT D - NO LIABILITY CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
27	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2803 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
28	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2804 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
29	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2805 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
30	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2792 (a)(b)	\$5,737.51*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit B for Misclassified Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit C Previously Discharged Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT D - NO LIABILITY CLAIMS

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
31	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2807 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
32	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2808 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
33	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2820 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
34	GOULD ELECTRONICS INC C/O TOM RICH 34929 CURTIS BLVD STE 100 EASTLAKE, OH 44095	2811 (a)(b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit B for Misclassified Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit C Previously Discharged Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT D - NO LIABILITY CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
35	JOHNSTON, CORY 540 OAK STREET AUMSVILLE, OR 87325	1793 (a)	\$50,000.00	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
36	LANZAFAME, STEVEN 414 HICKORY CT BLUFF CITY, TN 37618-3908	1051	Undetermined*	No liability exists on the books and records. The claim/case was resolved and settled on 12/18/2014. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
37	LAWLIS, JOAN JOAN W LAWLIS TRUST (INTERVIVOS) PO BOX 37 HOULTON, ME 04730-0037	2628	\$50,422.57	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit B for Misclassified Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit C Previously Discharged Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT D - NO LIABILITY CLAIMS

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
38	LIEUPO, CHARLES A C/O JACKSON W ADAMS PA 33 E ROBINSON ST STE 209 ORLANDO, FL 32801	3993	\$15,000.00*	No liability exists on the books and records. Asserted claim is a litigation claim for which no judgment has been rendered and for which the claimant cannot establish a claim under applicable law. The Reorganized Debtor denies all liability and incorporates all other defenses previously asserted in the underlying litigation or other proceedings. The Reorganized Debtor has further investigated the allegations in the asserted claim, as well as its applicable defenses, and has determined that the claimant fails to allege any damages or facts necessary to support a compensable claim and, thus, has no present right to payment under applicable federal and/or state law or regulation. The Reorganized Debtor reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
39	MILLER, EARNEST CHARLTON R. DEVAULT, JR. 102 BROAD STREET KINGSPORT, TN 37660	1636	\$650,000.00	No liability exists on the books and records. Asserted claim is a litigation claim for which no judgment has been rendered and for which the claimant cannot establish a claim under applicable law. The Reorganized Debtor denies all liability and incorporates all other defenses previously asserted in the underlying litigation or other proceedings. The Reorganized Debtor has further investigated the allegations in the asserted claim, as well as its applicable defenses, and has determined that the claimant fails to allege any damages or facts necessary to support a compensable claim and, thus, has no present right to payment under applicable federal and/or state law or regulation. The Reorganized Debtor reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit B for Misclassified Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit C Previously Discharged Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT D - NO LIABILITY CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
40	MOORE, JOHN PO BOX 106 PRINCETON, LA 71067-0106	2702	Undetermined*	No liability exists on the books and records. Asserted claim is a litigation claim for which no judgment has been rendered and for which the claimant cannot establish a claim under applicable law. The Reorganized Debtor denies all liability and incorporates all other defenses previously asserted in the underlying litigation or other proceedings. The Reorganized Debtor has further investigated the allegations in the asserted claim, as well as its applicable defenses, and has determined that the claimant fails to allege any damages or facts necessary to support a compensable claim and, thus, has no present right to payment under applicable federal and/or state law or regulation. The Reorganized Debtor reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
41	NUSSER, DENNIS MICHAEL J. MERRICK 150 N. MICHIGAN AVENUE, SUITE 800 CHICAGO, IL 60601	1927	\$70,000.00	No liability exists on the books and records. In addition, the Claimant is time barred from asserting a claim against the Reorganized Debtor. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
42	SHIPPEN, EUGENE R., M.D 1124 OLD MILL RD WYOMISSING, PA 19610-2526	2391	\$119,111.23	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit B for Misclassified Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit C Previously Discharged Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
EIGHTEENTH (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT D - NO LIABILITY CLAIMS**

NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
43 TEXTRON INC ATTN JAMIESON SCHIFF 40 WESTMINSTER ST PROVIDENCE, RI 02903	2146 (b)	Undetermined*	No liability exists on the books and records. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
TOTAL		\$4,816,209.03*	

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit B for Misclassified Claims

(b) Claim also contained on the Eighteenth Omnibus Claims Objection - Exhibit C Previously Discharged Claims