

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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 In re: : Chapter 11
 :
 EXIDE TECHNOLOGIES, : Case No. 13-11482 (KJC)
 :
 Reorganized Debtor.¹ : **Hrg. Date: September 17, 2015 at 4:00 p.m. (Eastern)**
 : **Obj. Due: August 14, 2015 at 4:00 p.m. (Eastern)**
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**REORGANIZED DEBTOR’S (SUBSTANTIVE) TWENTY-FIRST OMNIBUS
 OBJECTION PURSUANT TO BANKRUPTCY CODE SECTION 502(b),
 BANKRUPTCY RULE 3007, AND LOCAL RULE 3007-1 TO CERTAIN (A)
 MISCLASSIFIED CLAIMS, (B) REDUCE AND ALLOW CLAIMS, (C) PREVIOUSLY
DISCHARGED CLAIMS, AND (D) NO LIABILITY CLAIMS**

(“TWENTY-FIRST 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) adjusting the priorities of the proofs of claim listed on Exhibit A to the Proposed Order; (ii) reducing and allowing the proofs of claim listed on Exhibit B to the Proposed Order;

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.

(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) Twenty-First Omnibus Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain (A) Misclassified Claims, (B) Reduce and Allow 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 and/or Reorganized Debtor has filed twenty omnibus claims objections to Claims. After hearing these omnibus claims objections, this Court disallowed and expunged approximately 1,314 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

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).

otherwise improper recovery by Claimants, the Reorganized Debtor anticipates filing several omnibus objections.

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) adjusting the priorities of the proofs of claim listed on Exhibit A to the Proposed Order; (ii) reducing and allowing 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. Misclassified Claims

17. The Disputed Claims identified on Exhibit A 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 A 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 A as indicated in the column titled “Modified Classification” on Exhibit A to the Proposed Order.

B. Reduce and Allow Claims

18. With respect to the Disputed Claims identified on Exhibit B to the Proposed Order (the “Reduce and Allow Claims”), the Reorganized Debtor objects to the Reduce and

Allow Claims pursuant to Bankruptcy Code section 502(b)(1) because such claims are filed for amounts that differ from the amounts reflected on the Books and Records. In evaluating the Reduce and Allow Claims, the Reorganized Debtor has thoroughly reviewed the Books and Records and the filed proofs of claim, as well as the supporting documentation provided by each Claimant, and has determined that the amount of each claim is overstated for the reasons set forth in the column titled “Reason for Modification” on Exhibit B to the Proposed Order. Accordingly, the Reorganized Debtor objects to the Reduce and Allow Claims and requests that the Reduce and Allow Claims be reduced and allowed in the amounts set forth on Exhibit B to the Proposed Order.

C. Previously Discharged Claims

19. 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”).³ 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

³ 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).

successors, assets, or properties, any other or further liens, Claims or Equity Interests based upon any act or omission, transaction or other activity of any kind or nature that occurred prior to the Confirmation Date.⁴

20. 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

21. 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

22. Bankruptcy Code section 502(b) provides in pertinent part that:

⁴ 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 court, after notice and a hearing, shall determine the amount of [a] claim in lawful currency of the United States as of the date of the filing of the petition, and shall allow such claim in such amount, except to the extent that . . . such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law for a reason other than because such claim is contingent or unmatured.

11 U.S.C. § 502(b)(1).

23. 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.

24. The Reorganized Debtor has met its burden in refuting the legal sufficiency of the Disputed Claims and has demonstrated that (a) the Claimants who filed the Misclassified Claims are not entitled to the priority or administrative expense claim status asserted in the Misclassified Claims; (b) the Reduce and Allow Claims should be reduced and allowed in the amount as indicated on Exhibit B to the Proposed Order; (c) the Previously Discharged Claims, No Liability Claims, and Contingent Contribution Claims should be disallowed and expunged.

25. 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) reclassifying each Misclassified Claim as set forth on Exhibit A attached to the Proposed Order, (ii) reducing and allowing each Reduce and Allow Claim as set forth on Exhibit B attached to the Proposed Order, (iii) disallowing and expunging each Previously Discharged Claims, No Liability Claims, and Contingent Contribution Claims listed on Exhibits C and D attached to the Proposed Order.

RESPONSES TO THE OBJECTION

26. 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 August 14, 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 **September 17, 2015 at 4:00 p.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.

27. Every Response must be filed on or before **August 14, 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, (iv) counsel to the Reorganized Debtor, Shaw Fishman Glantz & Towbin LLC, 321 N. Clark Street, Suite 800, Chicago, Illinois 60654, Attn: John Guzzardo, and (v) 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, August 14, 2015 at 4:00 p.m. (Eastern).**

28. 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.

29. 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 **September 17, 2015 at 4:00 p.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.

30. 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.

31. 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.

32. 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.**

33. 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 Disputed Claim.

RESERVATION OF RIGHTS

34. 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

35. 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

36. 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: Shaw Fishman Glantz & Towbin LLC, 321 N. Clark Street, Suite 800, Chicago, Illinois 60654 (Attn: John Guzzardo). 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

37. 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 Exhibits A, B, C, and D to the Proposed Order.

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.

[Remainder of page intentionally left blank.]

Dated: Wilmington, Delaware
July 31, 2015

/s/ Dain A. De Souza

Anthony W. Clark (I.D. No. 2051)
Dain A. De Souza (I.D. No. 5737)
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
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

- and -

John Guzzardo
SHAW FISHMAN GLANTZ & TOWBIN LLC
321 N. Clark Street, Suite 800
Chicago, IL 60654
Direct: (312) 276-1323
Direct Fax: (312) 980-3888
Main: (312) 541-0151

Counsel for the Reorganized Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re: : Chapter 11
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EXIDE TECHNOLOGIES, : Case No. 13-11482 (KJC)
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Reorganized Debtor.¹ : **Hrg. Date: September 17, 2015 at 4:00 p.m. (Eastern)**
: **Obj. Due: August 14, 2015 at 4:00 p.m. (Eastern)**
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NOTICE OF OBJECTION

PLEASE TAKE NOTICE that the reorganized debtor (“Exide” or the “Reorganized Debtor”) has filed the attached **Reorganized Debtor’s (Substantive) Twenty-First Omnibus Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain (A) Misclassified Claims, (B) Reduce and Allow 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 **August 14, 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, (iv) counsel to the Reorganized Debtor, Shaw Fishman Glantz & Towbin LLC, 321 N. Clark Street, Suite 800, Chicago, Illinois 60654, Attn: John Guzzardo, and (v) the 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 August 14, 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 September 17, 2015 at 4:00 p.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
July 31, 2015

/s/ Dain A. De Souza

Anthony W. Clark (I.D. No. 2051)
Dain A. De Souza (I.D. No. 5737)
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
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

- and -

John Guzzardo
SHAW FISHMAN GLANTZ & TOWBIN LLC
321 N. Clark Street, Suite 800
Chicago, IL 60654
Direct: (312) 276-1323
Direct Fax: (312) 980-3888
Main: (312) 541-0151

Counsel for the Reorganized Debtors

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) TWENTY-FIRST OMNIBUS OBJECTION PURSUANT TO
BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY RULE 3007, AND LOCAL
RULE 3007-1 TO CERTAIN (A) MISCLASSIFIED CLAIMS, (B) REDUCE AND
ALLOW 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 Debtor’s Chapter 11 Case.² I have read the Reorganized Debtor’s (Substantive) Twenty-First Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 To Certain (A) Misclassified Claims, (B) Reduce and Allow Claims, (C) Previously Discharged Claims, and (D) No Liability Claims (the “Objection”), and am directly, or by and through my personnel or

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.

agents, 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 Misclassified Claims, Reduce And Allow Claims, Previously Discharged Claims, and 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 Misclassified Claims, identified in Exhibit A 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 A to the Proposed Order.

5. To my knowledge, the proofs of claim listed on Exhibit B to the Proposed Order should be properly allowed in a reduced amount due to the reasons set forth in the column titled

“Reason for Modification” on Exhibit B to the Proposed Order. Failure to reduce the amount of the Reduce and Allow Claims could result in the Claimants that filed such proofs of claim receiving a better recovery than other creditors within the class.

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 July 31, 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) TWENTY-FIRST OMNIBUS OBJECTION PURSUANT TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY RULE 3007, AND LOCAL RULE 3007-1 TO CERTAIN (A) MISCLASSIFIED CLAIMS, (B) REDUCE AND ALLOW CLAIMS, (C) PREVIOUSLY DISCHARGED CLAIMS, AND (D) NO LIABILITY CLAIMS

Upon the Reorganized Debtor’s (Substantive) Twenty-First Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 To Certain (A) Misclassified Claims, (B) Reduce and Allow 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) Twenty-First Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 To Certain (A) Reduce and Allow Claims, (B) Misclassified Claims, (C) Previously

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.

Discharged Claims, and (D) No Liability Claim; 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 Misclassified Claims listed on Exhibit A attached hereto are hereby reclassified as set forth in Exhibit A attached hereto under the heading “Modified Classification.”
3. The Reduce and Allow Claims listed on Exhibit B attached hereto are hereby reduced and allowed in the amounts listed as set forth in Exhibit B attached hereto under the headings “Modified Classification” and “Modified Amount.”
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)
TWENTY-FIRST (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT A - MISCLASSIFIED CLAIMS

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
1	ELECTRIC CONVERSIONS ATTN GREGORY MCCREA 515 N 10TH ST SACRAMENTO, CA 95811	321	503(b)(9) Priority Unsecured	\$9,420.00 \$186,154.26 \$0.00	503(b)(9) Priority Unsecured	\$9,420.00 \$0.00 \$186,154.26	The goods sold to the Debtor do not qualify for priority status under section 507(a) of the bankruptcy code.
			Subtotal	\$195,574.26	Subtotal	\$195,574.26	
2	EQUIPMENT & PROCESS MANAGEMENT CONSULT CONSULTANTS, INC. DBA EPMC, INC. 7007 E. 650 N. NEEDHAM, IN 46162	1080	Priority Unsecured	\$9,000.00 \$600.00	Priority Unsecured	\$0.00 \$9,600.00	Claim for services performed does not qualify for priority status under sections 507(a)(4), 507(a)(5) or 507(a)(8) of the bankruptcy code.
			Subtotal	\$9,600.00	Subtotal	\$9,600.00	
3	FORKLIFT SERVICE COMPANY OF HOUSTON, INC CHERIE HUESKE 3312 TOLIVER HOUSTON, TX 77093	721	Priority Unsecured	\$2,072.44 \$0.00	Priority Unsecured	\$0.00 \$2,072.44	Claim for repair services does not qualify for priority status under section 507(a) of the bankruptcy code.
			Subtotal	\$2,072.44	Subtotal	\$2,072.44	
4	GLOBAL PERSONNEL SERVICES INC C/O FIFE M WHITESIDE PO BOX 5383 COLUMBUS, GA 31906	737	Priority Unsecured	\$285,212.85 \$118,109.29	Priority Unsecured	\$0.00 \$403,322.14	Claim for professional staffing services does not qualify for priority status under sections 507(a)(4) or 503 (b) (4) of the bankruptcy code.
			Subtotal	\$403,322.14	Subtotal	\$403,322.14	
5	GUARDIAN DOOR & DOCK 508 W 155TH ST GARDENA, CA 90248	586 (a)	Secured Unsecured	Undetermined* \$1,975.31*	Secured Unsecured	\$0.00 \$1,975.31*	Door and lock services do not qualify for secured status under the bankruptcy code. Invoice number 16848, in the amount of \$1,975.31, should be liquidated as a general unsecured claim.
			Subtotal	\$1,975.31*	Subtotal	\$1,975.31*	
6	INDIANA MICHIGAN POWER COMPANY DBA AMERICAN ELECTRIC POWER C/O LAW FIRM OF RUSSELL R JOHNSON III PLC ATTN RUSSELL R JOHNSON III ESQ 2258 WHEATLANDS DR MANAKIN-SABOT, VA 23103	2608	503(b)(9) Unsecured	\$70,754.18 \$0.00	503(b)(9) Unsecured	\$0.00 \$70,754.18	Electricity does not constitute a good under section 503(b)(9) of the bankruptcy code.
			Subtotal	\$70,754.18	Subtotal	\$70,754.18	

* Plus unliquidated and/or undetermined amounts

(a) Claim is also contained on Exhibit B - Reduce and Allow Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
TWENTY-FIRST (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT A - MISCLASSIFIED CLAIMS

	NAME OF CLAIMANT	CLAIM NUMBER	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
7	NORTHWEST FIRE PROTECTION INC 2430 S VICKSBURG FT SMITH, AR 72901	73	Priority Unsecured	\$9,241.58 \$0.00	Priority Unsecured	\$0.00 \$9,241.58	Claim for services performed does not qualify for priority status under section 507(a)(4) of the bankruptcy code.
			Subtotal	\$9,241.58	Subtotal	\$9,241.58	
8	PORT HUDSON PRODUCTS 6655 E ACHORD RD BATON ROUGE, LA 70817	234	Priority Unsecured	\$289,419.23 \$0.00	Priority Unsecured	\$0.00 \$289,419.23	Claim for environmental services does not support priority status under section 507 (a) of the bankruptcy code.
			Subtotal	\$289,419.23	Subtotal	\$289,419.23	
9	SECURITY GUARDS INC 600 PARK RD N PO BOX 6283 WYOMISSING, PA 19610	32	503(b)(9) Priority Unsecured	\$2,562.75 \$28,957.06 \$0.00	503(b)(9) Priority Unsecured	\$0.00 \$0.00 \$31,519.81	Invoice numbers 02518750, 02416364, 02512335, 02416364, 02524296 & 02416364, in the aggregate amount of \$2,562.75, are for services not goods as required by section 503(b)(9) of the bankruptcy code.
			Subtotal	\$31,519.81	Subtotal	\$31,519.81	Claim for security services does not qualify for priority status under section 507(a) of the bankruptcy code.
10	WATER TECH OF AMERICA INC 5000 S 110TH ST GREENFIELD, WI 53228-3130	2606	Priority Unsecured	\$7,649.48 \$0.00	Priority Unsecured	\$0.00 \$7,649.48	Claim for water treatment services does not qualify for priority status under section 507(a)(4) of the bankruptcy code.
			Subtotal	\$7,649.48	Subtotal	\$7,649.48	
11	WESTERN AUTO OF MORTON 4239 HIGHWAY 80 MORTON, MS 39117	923	Secured Unsecured	\$211.28 \$0.00	Secured Unsecured	\$0.00 \$211.28	Returned goods are not entitled to secured status under the bankruptcy code.
			Subtotal	\$211.28	Subtotal	\$211.28	
			TOTAL	\$1,021,339.71*	TOTAL	\$1,021,339.71*	

* Plus unliquidated and/or undetermined amounts

(a) Claim is also contained on Exhibit B - Reduce and Allow Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
 TWENTY-FIRST (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
 EXHIBIT B - REDUCE AND ALLOW CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION
1	GUARDIAN DOOR & DOCK 508 W 155TH ST GARDENA, CA 90248	586 (a)	Secured Unsecured	\$0.00 \$1,975.31*	Secured Unsecured	\$0.00 \$1,975.31	Invoice number 16848, in the amount of \$1,975.31, should be liquidated as a general unsecured claim.
			Subtotal	\$1,975.31*	Subtotal	\$1,975.31	
2	TANNOR PARTNERS CREDIT FUND LP AS ASSIGNEE FOR NICKELSON INDUSTRIAL 150 GRAND ST STE 401 WHITE PLAINS, NY 10601	691	503(b)(9)	\$4,762.64	503(b)(9)	\$3,004.40	
			TOTAL	\$6,737.95*	TOTAL	\$4,979.71	

* Plus unliquidated and/or undetermined amounts
 (a) Claim also contained on Exhibit A - Misclassified Claims

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

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	DANIELL BATTERY MANUFACTURING CO., INC. PO BOX 15349 BATON ROUGE, LA 70895	2197 (a)	\$19,645.95	Liability asserted within the Proof of Claim was previously discharged. No liability exists on the books and records.
2	FIVE FLAGS CO 712 JEFFERSON ST BURLINGTON, IA 52601-1051	800 (a)	\$789.34	Liability asserted within the Proof of Claim was previously discharged. No liability exists on the books and records.
3	KELLEY DRYE & WARREN LLP ATTN MICHELE SCHAFFEL 101 PARK AVE NEW YORK, NY 10178	824 (a)	\$20,068.06	Liability asserted within the Proof of Claim was previously discharged. No liability exists on the books and records.
4	RENDON, LAURA 10216 BOWMAN AVE SOUTH GATE, CA 90280-6740	1664 (a)	\$2,674.44	Liability asserted within the Proof of Claim was previously discharged. No liability exists on the books and records.
5	THE HOME INSURANCE COMPANY IN LIQUIDATION ATTN KAREN TISDELL 55 S COMMERCIAL ST MANCHESTER, NH 03101	629 (a)	Undetermined*	Liability asserted within the Proof of Claim was previously discharged. No liability exists on the books and records.
6	THOMAS, JOYCE 379 FARNHAM AVE LODI, NJ 07644-1113	2741 (a)	\$1,000.00	Liability asserted within the Proof of Claim was previously discharged. No liability exists on the books and records.
		TOTAL	\$44,177.79*	

* Plus unliquidated and/or undetermined amounts
 (a) Claim also contained on Exhibit D - No Liability Claims

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

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
1	AAA PALLET RECYCLING - LONDON BOX 32005, RPO NORTHLAND LONDON ON N5V 5K4 CANADA	1974	\$1,535.67	No liability exists on the books and records.
2	ADT SECURITY SERVICES INC 14200 E. EXPOSITION AVENUE AURORA, CO 80012	99	\$5,792.90	No liability exists on the books and records.
3	ADT SECURITY SERVICES INC 3190 S VAUGHN WAY STE 150 AURORA, CO 80014-3537	97	\$279.78	No liability exists on the books and records.
4	ADVANCED RECYCLING 2965 BEACH DR E PORT ORCHARD, WA 98366-8136	1340	\$4,981.69	No liability exists on the books and records.
5	AT&T CORP C/O AT&T SERVICES INC ATTN KAREN A CAVAGNARO, LEAD PARALEGAL ONE AT&T WAY, RM 3A104 BEDMINSTER, NJ 07921	2325	\$2,141.45	No liability exists on the books and records.
6	AVAYA INC C/O RMS BANKRUPTCY RECOVERY SERVICES PO BOX 5126 TIMONIUM, MD 21094	28	\$279.81	No liability exists on the books and records.
7	BATAVIA CITGO 18 CLINTON STREET PO BOX 395 BATAVIA, NY 14021	709	\$2,745.49	No liability exists on the books and records.
8	BCD M&I LLC C/O KILPATRICK TOWNSEND & STOCKTON LLP ATTN SHANE G RAMSEY, ESQ 1100 PEACHTREE ST NE STE 2800 ATLANTA, GA 30309	1932	\$22,923.34	No liability exists on the books and records.

* Plus unliquidated and/or undetermined amounts
 (a) Claim also contained on Exhibit C - Previously Discharged Claims

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

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
9	BEYOND DIGITAL IMAGING 36 APPLE CREEK BLVD MARKHAM ON L3R 4Y4 CANADA	1752	\$1,220.40	No liability exists on the books and records.
10	BOARD OF PUBLIC UTILITIES 540 MINNESOTA AVE KANSAS CITY, KS 66101	98	\$260.75	No liability exists on the books and records.
11	BRUNOS SEMI TRAILERS ATTN ROBERT J BRUNO, PRESIDENT 600 SUNSHINE RD KANSAS CITY, KS 66115	1216	\$4,084.68	No liability exists on the books and records.
12	BUGLE FORKLIFT SALES AND RENTALS, LTD JOLENE KANE #105 - 4919 72ND AVE SE CALGARY, AB T2C 3H3 CANADA	1118	\$327.52	No liability exists on the books and records.
13	CARLILE PATCHEN & MURPHY LLP 366 E BROAD ST COLUMBUS, OH 43215-3819	1110	\$5,522.36	No liability exists on the books and records.
14	CAROLINA HANDLING LLC PO BOX 7548 CHARLOTTE, NC 28241-7548	353	\$763.98	No liability exists on the books and records.
15	CAROLINA POWER AND LIGHT CO. C/O DUKE ENERGY PROGRESS P.O. BOX 1551 RALEIGH, NC 27602	2458	\$1,523.24	No liability exists on the books and records.
16	CLEVELAND ELECTRIC ILLUMINATING COMPANY 1310 FAIRMONT AVE FAIRMONT, WV 26554	1252	\$176.81	No liability exists on the books and records.
17	CMH SERVICES 151 GREENLAWN DR COLUMBIA, SC 29202	419	\$647.71	No liability exists on the books and records.

* Plus unliquidated and/or undetermined amounts
 (a) Claim also contained on Exhibit C - Previously Discharged Claims

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

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
18	CORRO-SHIELD INTERNATIONAL INC.-ROSEMONT 7059 BARRY ST ROSEMONT, IL 60018-3401	939	\$3,179.70	No liability exists on the books and records.
19	CREDIT SERVICE CO PO BOX 3591 FORT SMITH, AR 72913-3591	714	\$910.66	No liability exists on the books and records.
20	D & K TRUCK COMPANY 319 E NORTH ST LANSING, MI 48906	107	\$1,635.00	No liability exists on the books and records.
21	DANIELL BATTERY MANUFACTURING CO., INC. PO BOX 15349 BATON ROUGE, LA 70895	2197 (a)	\$19,645.95	No liability exists on the books and records.
22	DARR FMH PO BOX 975053 DALLAS, TX 75397-5053	1768	\$5,681.90	No liability exists on the books and records.
23	DEATON'S LAWN SERVICE CHARLES BO DEATON 8414 SOPHIE LN GREENWOOD, LA 71033-3402	1696	\$2,600.00	No liability exists on the books and records.
24	DURKIN EQUIPMENT CO., INC PO BOX 46927 SAINT LOUIS, MO 63146	1043	\$543.89	No liability exists on the books and records.
25	EAST ALLEN AG & TURF 4724 STATE RD 101 PO BOX 487 WOODBURN, IN 46797	2477	\$1,905.00	No liability exists on the books and records.
26	FISHER SCIENTIFIC CO LLC ATTN GARY BARNES 300 INDUSTRY DR PITTSBURGH, PA 15275	958	\$658.61	No liability exists on the books and records.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit C - Previously Discharged Claims

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

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
27	FIVE FLAGS CO 712 JEFFERSON ST BURLINGTON, IA 52601-1051	800 (a)	\$789.34	No liability exists on the books and records.
28	FPWEB.NET LLC 1714 GILSINN LN FENTON, MO 63026-2004	2138	\$6,356.00	No liability exists on the books and records.
29	GEORGE RAUPP & GLADYS RAUPP 4400 W 115TH ST APT 235 LEAWOOD, KS 66211	1794	\$8,532.92	No liability exists on the books and records.
30	GILES CHEMICAL INDUSTRIES (SALTEX) PO BOX 370 WAYNESVILLE, NC 28786	888	\$6,375.00	No liability exists on the books and records.
31	GULF POWER COMPANY ONE ENERGY PLACE ATTN D GAINES / BIN 712 PENSACOLA, FL 32520-0712	699	\$0.00	No liability exists on the Debtor's books and records.
32	HAYNSWORTH SINKLER BOYD PA ATTN TARA E NAUFUL PO BOX 11889 COLUMBIA, SC 29201	1939	\$952.72	No liability exists on the books and records.
33	HEMI - SENECA 898 SWY 36 SENECA, KS 66538	2201	\$1,204.24	No liability exists on the books and records.
34	HOLIDAY COMMERCIAL PO BOX 1216 MINNEAPOLIS, MN 55440-1216	729	\$4,683.48	No liability exists on the books and records.
35	HUKILL CHEMICAL CORP C/O WELTMAN WEINBERG & REIS CO LPA 323 W LAKESIDE AVE STE 200 CLEVELAND, OH 44113	348	\$1,657.92	No liability exists on the books and records.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit C - Previously Discharged Claims

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

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
36	HURT, JAMES 146 AVIATION DR ELIZABETHTON, TN 37643-6037	1684	\$5,400.00	No liability exists on the books and records.
37	INDUSTRIAL DOOR CO.,INC. - MINNEAPOLIS 360 COON RAPIDS BLVD NW MINNEAPOLIS, MN 55433-5627	720	\$184.00	No liability exists on the books and records.
38	JANI KING OF SOUTHERN, BC STN. R BOX 2177 KELOWNA BC V1X 4K6 CANADA	1922	\$504.00	No liability exists on the books and records.
39	JOHNSON EQUIPMENT COMPANY PO BOX 802009 DALLAS, TX 75380-2009	1645	\$987.62	No liability exists on the books and records.
40	KAESER COMPRESSORS INC. P.O. BOX 946 FREDRICKSBURG, VA 22404	1502	\$2,874.21	No liability exists on the books and records.
41	KELLEY DRYE & WARREN LLP ATTN MICHELE SCHAFFEL 101 PARK AVE NEW YORK, NY 10178	824 (a)	\$20,068.06	No Liability
42	KURT FAULK BOILERS 3500 WANDA LYNN DR METAIRIE, LA 70002-4630	934	\$2,408.98	No liability exists on the books and records.
43	LAB. D'ETUDE ET DE REALISATION - FRANCE Z.I PRE-FUSE RUE JEAN MOULIN PONTAULT-COMBAULT 77340 FRANCE	1641	\$16,764.00	No liability exists on the books and records.
44	LAKE DESIGN & DECOR, LLC-MANCHESTER 107 N FRANKLIN ST MANCHESTER, IA 52057-1540	975	\$150.00	No liability exists on the books and records.

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit C - Previously Discharged Claims

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

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
45	LANCASTER LABORATORIES INC PO BOX 12425 2425 NEW HOLLAND PIKE LANCASTER, PA 17605-2425	906	\$678.00	No liability exists on the books and records.
46	LKQ NORTH TEXAS #1702 904 I-45 SOUTH HUTCHINS, TX 75141	1749	\$3,090.00	No liability exists on the books and records.
47	MAGELLAN DIAGNOSTICS INC 101 BILLERICA AVE BLDG 4 BILLERICA, MA 01862	147	\$3,136.00	No liability exists on the books and records.
48	MEADWESTVACO CORP. ATTN RICK CAPUTO 501 SOUTH 5TH ST RICHMOND, VA 23219	1418	\$4,936.69	No liability exists on the books and records.
49	MEMA FINANCIAL SERVICES GROUP INC ACCOUNTING DEPARTMENT 10 LABORATORY DR RESEARCH TRIANGLE PARK, NC 27709-0161	769	\$5,047.95	No liability exists on the books and records.
50	METROPOLITAN EDISON COMPANY A FIRSTENERGY COMPANY 331 NEWMAN SPRINGS RD BLDG 3 RED BANK, NJ 07701	102	\$11,555.93	No liability exists on the books and records.
51	MID-STATE DOOR INC. HEIDI EARL 602 CAMBRIDGE AVE SYRACUSE, NY 13208	796	\$669.60	No liability exists on the books and records.
52	MOBILITY MATTERS LLC 24 WOODSTOCK RD STE 200 ROSWELL, GA 30075-3594	2361	\$23,100.00	No liability exists on the books and records.

* Plus unliquidated and/or undetermined amounts
 (a) Claim also contained on Exhibit C - Previously Discharged Claims

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

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
53	MOLLEN IMMUNIZATION CLINICS LLC 15029 N THOMPSON PEAK PKWY STE B111 SCOTTSDALE, AZ 85260-2223	1337	\$575.00	No liability exists on the books and records.
54	MURDOCH'S RANCH & HOME SUPPLY 2275 N 7TH AVENUE BOZEMAN, MT 59715	973	\$2,332.55	No liability exists on the books and records.
55	MURREYS DISPOSAL PO BOX 399 PUYALLUP, WA 98371	1524	\$453.18	No liability exists on the books and records.
56	NATIONAL FUEL GAS DISTRIBUTION CORPORATION 6363 MAIN ST WILLIAMSVILLE, NY 14221	1049	\$643.94	No liability exists on the books and records.
57	NORDSON CORPORATION 300 NORDSON DR AMHERST, OH 44001-2454	704	\$7,855.18	No liability exists on the books and records.
58	NORFOLK SOUTHERN RAILWAY COMPANY ATTN WILLIAM H JOHNSON, ESQ THREE COMMERCIAL PL NORFOLK, VA 23510-9241	2423	\$5,981.60	No liability exists on the books and records.
59	NORTHEAST PLASTIC SUPPLY CO INC 3021 DARNELL RD PHILADELPHIA, PA 19154-3201	2713	\$19,145.85	No liability exists on the books and records.
60	NORTHERN STATES POWER CO A MINNESOTA CORP DBA XCEL ENERGY 3215 COMMERCE ST LA CROSSE, WI 54603	64	\$3,089.66	No liability exists on the books and records.
61	NORTHLAND INDUSTRIAL TRUCK INC PO BOX 845534 BOSTON, MA 02284-5534	989	\$50.00	No liability exists on the books and records.

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

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
62	NORTHWEST IMPLEMENT CHEYENNE FRANCIS 2918 MILLER ST. BETHANY, MO 64424	1938	\$825.00	No liability exists on the books and records.
63	OMNI WHOLESALE EQUIPMENT INC DBA OMNI INDUSTRIAL TIRE PO BOX 1976 BOERNE, TX 78006-6976	17	\$4,280.75	No liability exists on the books and records.
64	PACIFIC GAS AND ELECTRIC COMPANY C/O BANKRUPTCY DEPARTMENT PO BOX 8329 STOCKTON, CA 95208	532	\$1,635.72	No liability exists on the books and records.
65	PENA, A B 819 RIDGECREST ST MONTEREY PARK, CA 91754-3709	2719	\$3,340.00	No liability exists on the books and records.
66	PENN STAINLESS PRODUCTS INC 190 KELLY RD PO BOX 9001 QUAKERTOWN, PA 18951-4208	795	\$559.74	No liability exists on the books and records.
67	PIERCE PUMP PO BOX 560727 DALLAS, TX 75356-0727	1035	\$4,258.20	No liability exists on the books and records.
68	PRAIRIE PALLET 30 MOBERLY AVENUE WINNIPEG MB R2C 4C1 CANADA	1981	\$1,881.60	No liability exists on the books and records.
69	PRECISION TOOL AND MOLD SHERRY MOWERY 12050 44TH ST. N CLEARWATER, FL 33762	1127	\$2,633.33	No liability exists on the books and records.

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

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
70	RAILROAD MANAGEMENT COMPANY III LLC 5910 N CENTRAL EXPRESSWAY STE 1590 DALLAS, TX 75206	451	\$132.87	No liability exists on the books and records.
71	REARDON PALLET COMPANY INC.-KANSAS CITY 1600 W 8TH STREET PO BOX 025610 KANSAS CITY, MO 64102	2280	\$13,596.10	No liability exists on the books and records.
72	REMINGER & CO LPA 101 W PROSPECT AVE STE 1400 CLEVELAND, OH 44115	1988	\$3,591.20	No liability exists on the books and records.
73	REMY BATTERY CO., INC. 4301 W LINCOLN AVE MILWAUKEE, WI 53219-1644	988	\$162.86	No liability exists on the books and records.
74	RENDON, LAURA 10216 BOWMAN AVE SOUTH GATE, CA 90280-6740	1664 (a)	\$2,674.44	No liability exists on the books and records.
75	RICHLAND PRIMARY CARE CTR PO BOX 180367 RICHLAND, MS 39218-0367	1020	\$2,730.00	No liability exists on the books and records.
76	RING POWER CORPORATION 10421 FERN HILL DR RIVERVIEW, FL 33578	2106	\$570.48	No liability exists on the books and records.
77	RMG KEY ASSOCIATES, LLC 6203 LEA RAY DR GREENSBORO, NC 27410-4984	2059	\$5,560.00	No liability exists on the books and records.
78	RUSH TRUCK CENTERS OF CALIFORNIA INC DBA RUSH TRUCK CENTER SYLMAR ATTN MICHAEL S LYONS 555 IH-35 SOUTH STE 500 NEW BRAUNFELS, TX 78130	1760	\$1,185.00	No liability exists on the books and records.

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(a) Claim also contained on Exhibit C - Previously Discharged Claims

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

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
79	RUSH TRUCK CENTERS OF GEORGIA INC D/B/A RUSH TRUCK CENTER ATLANTA ATTN MICHAEL S LYONS 555 IH-35 SOUTH STE 500 NEW BRAUNFELS, TX 78130	1764	\$735.00	No liability exists on the books and records.
80	RUSH TRUCK CENTERS OF NORTH CAROLINA INC DBA RUSH INTERNATIONAL TRUCK CENTER, CHARLOTTE ATTN MICHAEL S LYONS 555 IH-35 SOUTH STE 500 NEW BRAUNFELS, TX 78130	1765	\$3,420.00	No liability exists on the books and records.
81	RUSH TRUCK CENTERS OF OHIO INC DBA RUSH TRUCK CENTER, CINCINNATI ATTN MICHAEL S LYONS 555 IH-35 SOUTH STE 500 NEW BRAUNFELS, TX 78130	1766	\$2,400.00	No liability exists on the books and records.
82	RUSH TRUCK CENTERS OF OHIO INC DBA RUSH TRUCK CENTER, COLUMBUS EAST ATTN MICHAEL S LYONS 555 IH-35 SOUTH STE 500 NEW BRAUNFELS, TX 78130	1767	\$2,932.50	No liability exists on the books and records.
83	RUSH TRUCK CENTERS OF OHIO INC DBA RUSH TRUCK CENTER DAYTON ATTN MICHAEL S LYONS 555 IH-35 SOUTH STE 500 NEW BRAUNFELS, TX 78130-2552	1763	\$810.00	No liability exists on the books and records.
84	RUSH TRUCK CENTERS OF TEXAS LP DBA RUSH PETERBILT TRUCK CENTER ODESSA ATTN MICHAEL S LYONS 555 IH-35 SOUTH STE 500 NEW BRAUNFELS, TX 78130	1761	\$292.50	No liability exists on the books and records.

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

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
85	RUSH TRUCK CENTERS OF TEXAS LP DBA RUSH TRUCK CENTER HOUSTON ATTN MICHAEL S LYONS 555 IH-35 SOUTH STE 500 NEW BRAUNFELS, TX 78130	1762	\$4,027.50	No liability exists on the books and records.
86	SALTEX, LLC JOE KANE 7755 BELLAIRE SOUTH FT WORTH, TX 76132	896	\$11,129.39	No liability exists on the books and records.
87	SAP AMERICA INC C/O BROWN & CONNERY LLP ATTN DONALD K LUDMAN, ESQ 6 N BROAD ST STE 100 WOODBURY, NJ 08096	2398	\$29,212.09	No liability exists on the Reorganized Debtor's books and records.
88	SIGOURNEY TRACTOR AND IMPLEMENT C/O CATHY MASTERSON 1407 200TH AVE SIGOURNEY, IA 52591	351	\$1,885.00	No liability exists on the books and records.
89	SONITROL SECURITY SYSTEMS OF MUNCIE, LLC 208 NW THIRD STREET EVANSVILLE, IN 47708-1234	1300	\$373.00	No liability exists on the books and records.
90	SOUTHERN CALIFORNIA GAS COMPANY C/O THE GAS COMPANY MASS MARKETS CREDIT & COLLECTIONS PO BOX 30337 LOS ANGELES, CA 90030-0337	358	\$7,024.40	No liability exists on the books and records.
91	TANNOR PARTNERS CREDIT FUND LP AS ASSIGNEE FOR HYDRITE CHEMICAL CO 150 GRAND ST STE 401 WHITE PLAINS, NY 10601	2063	\$20,522.62	The Claimant failed to provide a valid transfer of claim.

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

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
92	TANNOR PARTNERS CREDIT FUND LP AS ASSIGNEE FOR CLARK'S TOOL - CLAYCOMO 150 GRAND ST STE 401 WHITE PLAINS, NY 10601	657	\$8,488.08	The Claimant failed to provide a valid transfer of claim.
93	TENNESSEE FILTER SALES CO. INC. PO BOX 100337 NASHVILLE, TN 37224-0337	1894	\$1,297.92	No liability exists on the books and records.
94	THE HOME INSURANCE COMPANY IN LIQUIDATION ATTN KAREN TISDELL 55 S COMMERCIAL ST MANCHESTER, NH 03101	629 (a)	Undetermined*	No liability exists on the books and records.
95	THE LEADERSHIP INSTU STATE UNIVERSITY 3100 GENTIAN BLVD. COLUMBUS, GA 31907	984	\$3,050.00	No liability exists on the books and records.
96	THE SHAW GROUP INC C/O CB&I FORMALLY THE SHAW GROUP INC ATTN BRANDON POLITZ 4171 ESSEN LANE BATON ROUGE, LA 70809	605	\$13,145.91	No liability exists on the books and records.
97	THOMAS, JOYCE 379 FARNHAM AVE LODI, NJ 07644-1113	2741 (a)	\$1,000.00	No liability exists on the books and records.
98	UNITED TELEPHONE SOUTHEAST-TN DBA CENTURYLINK ATTN BANKRUPTCY 1801 CALIFORNIA ST RM 900 DENVER, CO 80202-2658	239	\$346.17	No liability exists on the books and records.

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 TWENTY-FIRST (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
 EXHIBIT D - NO LIABILITY CLAIMS**

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM AMOUNT	REASON FOR DISALLOWANCE
99	UNIVERSITY OF KANSAS HOSPITAL AUTHORITY DBA CORPORATE HEALTH - STATE AVENUE 4810 STATE AVE KANSAS CITY, KS 66102	1991	\$7,132.17	No liability exists on the books and records.
100	VECTREN ENERGY DELIVERY ATTN SHARON ARMSTRONG PO BOX 209 EVANSVILLE, IN 47702	905	\$2,409.59	No liability exists on the books and records.
101	VECTREN ENERGY DELIVERY ATTN SHARON ARMSTRONG PO BOX 209 EVANSVILLE, IN 47702	904	\$947.32	No liability exists on the books and records.
102	VECTREN ENERGY DELIVERY ATTN SHARON ARMSTRONG PO BOX 209 EVANSVILLE, IN 47702	903	\$11,343.45	No liability exists on the books and records.
103	WALLDROFF FARM EQUIPMENT INC. 22537 MURROCK CIR WATERTOWN, NY 13601-5030	1544	\$70.00	No liability exists on the books and records.
104	WEST SIDE TRACTOR SALES CO. 3110 PRAIRIE RD ROCKFORD, IL 61102-3948	969	\$6,755.88	No liability exists on the books and records.
105	WESTERN CANADA EXP PO/CP BOX 1197 WINNIPEG MB R3C 2Y4 CANADA	1784	\$3,172.69	No liability exists on the books and records.
TOTAL			\$457,742.38*	

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 (a) Claim also contained on Exhibit C - Previously Discharged Claims