

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: September 17, 2015 at 4:00 p.m. (Eastern)
	:	Obj. Due: August 14, 2015 at 4:00 p.m. (Eastern)
-----	x	

**REORGANIZED DEBTOR’S (SUBSTANTIVE) TWENTY-SECOND 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) NO LIABILITY CLAIMS, (D) INSUFFICIENT DOCUMENTATION CLAIMS,
AND (E) SUBSTANTIVE DUPLICATE CLAIMS**

(“TWENTY-SECOND 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, D, and E 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; (iv) disallowing and expunging the proofs of claim listed on Exhibit D to the Proposed Order; and (v) disallowing and expunging the proofs of claim listed on Exhibit E 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-Second 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) No Liability Claims, (D) Insufficient Documentation Claims, and (E) Substantive Duplicate 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-one 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; (iv) disallowing and expunging the proofs of claim listed on Exhibit D to the Proposed Order; and (v) disallowing and expunging the proofs of claim listed on Exhibit E 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. No Liability Claims

19. The Disputed Claims identified on Exhibit C 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 C 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.

D. Insufficient Documentation Claims

20. The Disputed Claims listed on Exhibit D to the Proposed Order (the “Insufficient Documentation Claims”) have been filed without any documentation to substantiate the proofs of claim. As explained in In re Rockefeller Ctr. Props., 272 B.R. 524, 542 n.17 (Bankr. S.D.N.Y. 2000):

A proof of claim is a special form of complaint against a debtor. Form 10 sets forth what is required in a proof of claim. What Form 10 requires is remarkably similar to FRCP 8(a)(2) which requires that a complaint contain “a short and plain statement of the claim showing that the pleader is entitled to relief.” FRCP 9, which is adopted by Bankruptcy Rule 7009 and applies to adversary proceedings, seems appropriately applied to proofs of claim as well.

21. A proof of claim must “set forth the facts necessary to support the claim.” In re Chain, 255 B.R. 278, 280 (Bankr. D. Conn. 2000) (citing COLLIER ON BANKRUPTCY ¶ 3001.09[1] (15th ed. rev. 2005)). If the proof of claim fails to set forth the necessary supporting facts, it is “not entitled to the presumption of prima facie validity, and the burdens of going forward and of proving its claims by a preponderance of the evidence are on the [claimant].” In re Marino, 90 B.R. 25, 28 (Bankr. D. Conn. 1988); see also In re Svendson, 34 B.R. 341, 342 (Bankr. D.R.I., 1983) (proofs of claim failed to “set forth all the necessary facts to establish the claim[s].”) (alteration in original) (citation omitted).

22. Without providing sufficient information or documentation to allow the Reorganized Debtor to reconcile the proofs of claim with the Books and Records, the Insufficient Documentation Claims fail to satisfy the requirements for a proof of claim. See Chain, 255 B.R. at 280; see also In re 20/20 Sport, Inc., 200 B.R. 972, 978 (Bankr. S.D.N.Y. 1996) (“In bankruptcy cases, courts have traditionally analogized a creditor’s claim to a civil complaint, [and] a trustee’s objection to an answer”). Although the Reorganized Debtor has attempted

to compare the amount requested in the Insufficient Documentation Claims with the amounts due according to the Schedules as well as the Books and Records, the Insufficient Documentation Claims do not contain any information to allow the Reorganized Debtor to determine from the proofs of claim themselves what amount, if any, is valid and owed to the Claimants by the Reorganized Debtor.

23. Accordingly, the Reorganized Debtor hereby requests that this Court enter an order expunging and disallowing the Insufficient Documentation Claims.

E. Substantive Duplicate Claims

24. With respect to the Disputed Claims listed on Exhibit E to the Proposed Order (the “Duplicate Claims”), it appears that the Claimants erroneously filed the same proof of Claim in the same amount against the Debtor more than once for a single alleged liability. The Debtor should not be required to satisfy the same obligation twice. Moreover, the elimination of duplicative Claims will enable GCG to maintain a claims register that more accurately reflects the valid claims asserted against the Debtor.

25. Therefore, the Debtor hereby objects to the allowance of the Duplicate Claims included on Exhibit E to the Proposed Order and request that such Duplicate Claims under the column heading “Duplicate Claim to be Disallowed” be disallowed. If the Debtor’s objection to the Duplicate Claims is sustained, the Claims listed under the column heading “Remaining Claim Number” will remain on the claims register, subject to the Debtor’s right to object on any grounds that bankruptcy or nonbankruptcy law permits. Therefore, any Claimant holding a Duplicate Claim will suffer no prejudice by having the applicable Duplicate Claim disallowed.

APPLICABLE AUTHORITY

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

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

11 U.S.C. § 502(b)(1).

27. 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.

28. 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; and (c) the Previously Discharged Claims, No Liability Claims, Insufficient Documentation Claims, and Substantive Duplicate Claims should be disallowed and expunged.

29. 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, Protective Environmental Claims, Insufficient Documentation Claims, and Substantive Duplicate Claims listed on Exhibits C, D, and E attached to the Proposed Order.

RESPONSES TO THE OBJECTION

30. 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.

31. 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).**

32. 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.

33. 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.

34. 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.

35. 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.

36. 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.**

37. 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

38. 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, D, and E 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, D, and E to the Proposed Order on any other ground.

STATEMENT OF COMPLIANCE WITH LOCAL BANKRUPTCY RULE 3007-1

39. 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

40. 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

41. 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, D, and E 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

----- X
:
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)**
:
----- X

NOTICE OF OBJECTION

PLEASE TAKE NOTICE that the reorganized debtor (“Exide” or the “Reorganized Debtor”) has filed the attached **Reorganized Debtor’s (Substantive) Twenty-Second 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) No Liability Claims, (D) Insufficient Documentation Claims, and (E) Substantive Duplicate 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 9130, 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:

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.

- (f) 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;
- (g) 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;
- (h) 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;
- (i) 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
- (j) 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 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) TWENTY-SECOND 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) NO LIABILITY CLAIMS, (D) INSUFFICIENT
DOCUMENTATION CLAIMS, AND (E) SUBSTANTIVE DUPLICATE 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-Second 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) No Liability Claims, (D) Insufficient Documentation Claims, and (E) Substantive Duplicate Claims (the “Objection”), and am

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.

directly, or by and through my personnel or agents, familiar with the information contained therein, the proposed form of order (the “Proposed Order”), and the exhibits attached thereto.

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, , No Liability Claims, , Insufficient Documentation Claims , and Substantive Duplicate Claims as defined in the Objection and identified respectively in Exhibits A, B, C, D, and E to the Proposed Order.

3. The information contained in Exhibits A, B, C, D, and E 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 proofs of claim listed on Exhibit C 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 C 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.

7. To my knowledge, the proofs of claim listed on Exhibit D to the Proposed Order have been filed without any documentation to substantiate the proofs of claims. The Reorganized Debtor and A&M personnel have carefully reviewed the Insufficient Documentation Claims. Moreover, the Reorganized Debtor and A&M personnel have made reasonable efforts to research the Insufficient Documentation Claims on the Schedules and the Books and Records and believe that such documentation does not provide prima facie evidence of the validity and amount of the claim. Accordingly, the Reorganized Debtor seeks to disallow the Insufficient Documentation Claims identified on Exhibit D to the Proposed Order in full.

8. To my knowledge, the proofs of claim listed on Exhibit E are duplicative of other Claims filed in the Chapter 11 Case. Accordingly, to prevent the Claimants from receiving an

unwarranted double recovery, the Debtor seeks to disallow the Duplicate Claims identified on Exhibit E to the Proposed Order in full.

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-
SECOND 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) NO LIABILITY CLAIMS, (E) INSUFFICIENT DOCUMENTATION CLAIMS,
AND (E) SUBSTANTIVE DUPLICATE CLAIMS**

Upon the Reorganized Debtor’s (Substantive) Twenty-Second 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) No Liability
Claims, (D) Insufficient Documentation Claims, and (E) Substantive Duplicate 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, D, and E attached hereto, and
any responses thereto; and upon the Declaration of Holden Bixler in Support of the Reorganized
Debtor’s (Substantive) Twenty-Second Omnibus Objection Pursuant to Bankruptcy Code
Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 To Certain (A) Misclassified

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.

Claims, (B) Reduce and Allow Claims, (C) No Liability Claims, (D) Insufficient Documentation Claims, and (E) Substantive Duplicate 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:

9. The relief requested in the Objection is GRANTED, as set forth herein.
10. 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.”
11. 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.”
12. The No Liability Claims listed on Exhibit C are hereby disallowed and expunged in their entirety as set forth in Exhibit C.
13. The Insufficient Documentation Claims listed on Exhibit D are hereby disallowed and expunged in their entirety as set forth in Exhibit D.
14. The Substantive Duplicate Claims listed on Exhibit E are hereby disallowed and expunged in their entirety as set forth in Exhibit E.
15. 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.

16. 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, D, and E 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.

17. 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.

18. 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.

19. 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.

20. 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-SECOND (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT A - MISCLASSIFIED CLAIMS

	CLAIM #	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
1 AIRGAS PO BOX 532609 ATLANTA, GA 30353-2609	2374	503(b)(9)	\$8,260.69	503(b)(9)	\$7,628.76	Invoice numbers 9016257069, 9016257070, 9016218057, 9016701889 and 9016612176 assert shipping charges and sales taxes, in the aggregate amount of \$631.93, which are not goods as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$70,123.49	Unsecured	\$70,755.42	
	Subtotal	\$78,384.18	Subtotal	\$78,384.18		
2 AMRS-INC GLENN BROCK 39935 CORTE VELADO INDIO, CA 92203	1156 (b)	Priority	\$6,559.25	Priority	\$0.00	Claim for medical services does not qualify for priority status under section 507(a)(4) of the bankruptcy code.
		Unsecured	\$9,243.75	Unsecured	\$15,803.00	
	Subtotal	\$15,803.00	Subtotal	\$15,803.00		
3 APPLIED INDUSTRIAL TECHNOLOGIES - DIXIE INC ATTN DIANNE MISENKO, LEGAL DEPARTMENT APPLIED INDUSTRIAL TECHNOLOGIES ONE APPLIED PLAZA CLEVELAND, OH 44115-5056	2265 (a)(b)	503(b)(9)	\$11,999.15	503(b)(9)	\$10,441.84	Invoice numbers 20779195, 20779216, 20779272, 20779222, 20779325, 20779448, 20779151, 20779471, 29251078, 29251019, 29251149, 29251150 include freight charges, in the aggregate amount of \$228.16, which are not goods as required by section 503(b)(9) of the bankruptcy code. Invoice numbers 26748283, 26747173, 26748471, 29251076 and 29251225, in the aggregate amount of \$1,329.15, are for goods received prior to the 503(b)(9) period. Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Sixth Notice of Satisfaction - Exhibit B for Partially Satisfied Claims.
		Unsecured	\$60,774.88	Unsecured	\$62,332.19	
	Subtotal	\$72,774.03	Subtotal	\$72,774.03		
4 APPLIED INDUSTRIAL TECHNOLOGIES CA LLC ATTN DIANNE MISENKO ONE APPLIED PLAZA CLEVELAND, OH 44115-5056	2268 (b)	503(b)(9)	\$37,438.23	503(b)(9)	\$32,812.86	The goods received on invoice number 7000614673, in the amount of \$4,625.37, were received prior to the 503(b)(9) period.
		Unsecured	\$67,680.55	Unsecured	\$72,305.92	
	Subtotal	\$105,118.78	Subtotal	\$105,118.78		

* Plus unliquidated and/or undetermined amounts

(a) Claim was previously listed on the 6th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

(c) Claim was previously listed on the 7th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

(d) Claim was previously listed on the 4th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

(e) Claim was previously listed on the 5th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

NAME OF CLAIMANT	CLAIM #	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
5 APPLIED INDUSTRIAL TECHNOLOGIES INC ATTN DIANNE MISENKO ONE APPLIED PLAZA CLEVELAND, OH 44115-5056	2266	503(b)(9)	\$186,782.21	503(b)(9)	\$169,805.87	Invoice numbers 44412790 (\$4.80), 44413036 (\$134.31), 44412873 (\$10.12), 44412871 (\$745.50), 15785981 (\$3260.26), 44412861 (\$57.02), 44412876 (\$250), 44412874 (\$358.58), 44412899 (\$3,410), 44412902 (\$233.35), 44412905 (\$1,372.81), 44412906 (\$3693.69), 44412907 (\$1024.23), 44412898 (\$1098.58), in the aggregate amount of \$15,653.25, are for goods received prior to the 503(b)(9) period.
	(a)(b)	Unsecured	\$484,309.80	Unsecured	\$501,286.14	
		Subtotal	\$671,092.01	Subtotal	\$671,092.01	
						Invoice numbers 15786183, 15786234, 44412909, 47051056, 47273557, 47274069 and 47274074 include freight charges, in the aggregate amount of \$1,323.09, which are not goods as required by section 503(b)(9) of the bankruptcy code.
						Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Sixth Notice of Satisfaction – Exhibit B for Partially Satisfied Claims.
6 COMMUNITY COFFEE COMPANY 3332 PARTRIDGE LANE BLDG A BATON ROUGE, LA 70809	285 (b)	Secured	\$19.62	Secured	\$0.00	A credit on invoice number 8343308675, in the amount of \$19.62, is not entitled to secured status under the bankruptcy code.
		Unsecured	\$763.96	Unsecured	\$783.58	
		Subtotal	\$783.58	Subtotal	\$783.58	
7 DEVINE, BRENDAN 62 S WARNER AVE BRYN MAWR, PA 19010-2609	2862 (b)	503(b)(9)	\$6,400.00	503(b)(9)	\$0.00	Wages/Commissions do not represent goods as required by section 503(b)(9) of the bankruptcy code.
		Priority	\$6,400.00	Priority	\$6,400.00	
		Unsecured	\$6,400.00	Unsecured	\$12,800.00	
		Subtotal	\$19,200.00	Subtotal	\$19,200.00	

* Plus unliquidated and/or undetermined amounts

- (a) Claim was previously listed on the 6th Notice of Satisfaction – Exhibit B for Partially Satisfied Claims
- (b) Claim is also contained on Exhibit B – Reduce and Allow Claims
- (c) Claim was previously listed on the 7th Notice of Satisfaction – Exhibit B for Partially Satisfied Claims
- (d) Claim was previously listed on the 4th Notice of Satisfaction – Exhibit B for Partially Satisfied Claims
- (e) Claim was previously listed on the 5th Notice of Satisfaction – Exhibit B for Partially Satisfied Claims

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

	CLAIM #	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
8 DISCOVER STAFFING - ALPHARTTA 12850 HIGHWAY 9 N STE 1700 ALPHARETTA, GA 30004-4252	1264 (b)	503(b)(9)	\$3,368.85	503(b)(9)	\$0.00	The claimant provided a service not a good as required by section 503(b)(9) of the bankruptcy code.
		Priority	\$74,165.19	Priority	\$0.00	
		Unsecured	\$12,300.97	Unsecured	\$89,835.01	
	Subtotal		\$89,835.01	Subtotal	\$89,835.01	The claimant is not entitled to priority classification under section 507(a)(4) of the bankruptcy code.
9 EXPRESS EMPLOYMENT PROFESSIONALS ATTN ALAN KROUSE 3080 ORCHARD LAKE RD SUITE A KEEGO HARBOR, MI 48335	1688 (b)	503(b)(9)	\$5,623.62	503(b)(9)	\$0.00	The Claimant provided a service not a good as required by section 503(b)(9) of the bankruptcy code.
		Priority	\$5,623.62	Priority	\$0.00	
		Unsecured	\$0.00	Unsecured	\$11,247.24	
	Subtotal		\$11,247.24	Subtotal	\$11,247.24	The Claimant is not entitled to priority classification under section 507(a)(4) of the bankruptcy code.
10 INDEPENDANT CHARGER SERVICES 366 LINDEN VALLEY ROAD RR # 1 WOODVILLE ON KOM 2T0 CANADA	2404 (d)	Secured	\$10,515.17	Secured	\$0.00	Claim for services and parts are not entitled to secured status under the bankruptcy code.
		Unsecured	\$0.00	Unsecured	\$10,515.17	
		Subtotal	\$10,515.17	Subtotal	\$10,515.17	
11 LIBERTY UTILITIES C/O WERB & SULLIVAN ATTN "J" JACKSON SHRUM 300 DELAWARE AVE STE 1300 WILMINGTON, DE 19801	2764 (e)	503(b)(9)	\$1,643.89	503(b)(9)	\$0.00	Electricity does not constitute a good as required by section 503(b)(9) of the bankruptcy code.
		Unsecured	\$5,940.19	Unsecured	\$7,584.08	
		Subtotal	\$7,584.08	Subtotal	\$7,584.08	
12 PRAXAIR DISTRIBUTION INC C/O RMS BANKRUPTCY RECOVERY SERVICES PO BOX 5126 TIMONIUM, MD 21094	1985 (a)(b)	Priority	\$600.00	Priority	\$0.00	Claim for unreturned cylinders does not qualify for priority status under section 507(a) of the bankruptcy code.
		Unsecured	\$12,658.49	Unsecured	\$13,258.49	
		Subtotal	\$13,258.49	Subtotal	\$13,258.49	

* Plus unliquidated and/or undetermined amounts

(a) Claim was previously listed on the 6th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

(c) Claim was previously listed on the 7th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

(d) Claim was previously listed on the 4th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

(e) Claim was previously listed on the 5th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

	NAME OF CLAIMANT	CLAIM #	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
13	REPUBLIC CONTRACTORS INC ATTN MR CURTISS D WRIGHT 6870 BERT KOUNS INDUSTRIAL LOOP SHREVEPORT, LA 71129	3352 (a)(b)	503(b)(9) Unsecured	\$89,633.58 \$0.00	503(b)(9) Unsecured	\$0.00 \$89,633.58	Invoice numbers 9716, 9717, 9718, 9742, 9686, 9732, 9458, 9603 and 9652, asserted in the aggregate amount of \$89,633.58, are for goods and services received prior to the 503(b)(9) period. Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Sixth Notice of Satisfaction - Exhibit B for Partially Satisfied Claims.
			Subtotal	\$89,633.58	Subtotal	\$89,633.58	
<hr/>							
14	SBMC ATLANTA LLC 7206 COLLINGWOOD LN ALPHARETTA, GA 30022	1900 (b)	Priority Unsecured	\$4,780.00 \$4,780.00	Priority Unsecured	\$0.00 \$9,560.00	Claim for services performed does not qualify for priority status under section 503(b)(9) of the bankruptcy code.
			Subtotal	\$9,560.00	Subtotal	\$9,560.00	

* Plus unliquidated and/or undetermined amounts

- (a) Claim was previously listed on the 6th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims
- (b) Claim is also contained on Exhibit B - Reduce and Allow Claims
- (c) Claim was previously listed on the 7th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims
- (d) Claim was previously listed on the 4th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims
- (e) Claim was previously listed on the 5th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

	NAME OF CLAIMANT	CLAIM #	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
15	TEXTRON INC (DBA "E-Z-GO") E-Z-GO A DIVISION OF TEXTRON INC C/O FLETCHER C THOMSON 40 WESTMINSTER ST PROVIDENCE, RI 02903	2372 (b)(c)	503(b)(9) Administrative Priority Secured Unsecured Subtotal	\$0.00* \$0.00* \$0.00* \$0.00* \$100,577.70* \$100,577.70*	503(b)(9) Administrative Priority Secured Unsecured Subtotal	\$6,240.00* \$0.00 \$0.00 \$0.00 \$94,337.70* \$100,577.70*	The claimant asserts an unliquidated amount as 503(b)(9). Based on the Debtor's books and records, the goods received on invoice numbers 17167656 (\$1,530), 17167657 (\$660), 17172614 (\$255), 17192521 (\$112.50), 17192522 (\$622.50) and 17211318 (\$3,060) were within the 503(b)(9) period. The invoices listed in the supporting documentation do not qualify for administrative status under the bankruptcy code. The invoices listed in the supporting documentation do not qualify for priority status under the bankruptcy code. The invoices listed in the supporting documentation do not qualify for secured status under the bankruptcy code as the Debtor does not hold a claim against the Claimant. Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Seventh Notice of Satisfaction – Exhibit B for Partially Satisfied Claims.
16	W W GRAINGER INC ATTN MES17859401507 7300 N MELVINA NILES, IL 60714	514 (b)(c)	503(b)(9) Secured Unsecured Subtotal	\$30,036.22* \$54,964.95* \$44,984.90* \$129,986.07*	503(b)(9) Secured Unsecured Subtotal	\$30,036.22* \$0.00 \$99,949.85* \$129,986.07*	Claim for goods sold is not entitled to a secured reclamation claim. Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Seventh Notice of Satisfaction – Exhibit B for Partially Satisfied Claims.

* Plus unliquidated and/or undetermined amounts

- (a) Claim was previously listed on the 6th Notice of Satisfaction – Exhibit B for Partially Satisfied Claims
- (b) Claim is also contained on Exhibit B – Reduce and Allow Claims
- (c) Claim was previously listed on the 7th Notice of Satisfaction – Exhibit B for Partially Satisfied Claims
- (d) Claim was previously listed on the 4th Notice of Satisfaction – Exhibit B for Partially Satisfied Claims
- (e) Claim was previously listed on the 5th Notice of Satisfaction – Exhibit B for Partially Satisfied Claims

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

	CLAIM #	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
17 WESTERN PETERBILT-WEST YAKIMA 2028 RUDKIN RD UNION GAP, WA 98903-4020	1015 (b)	503(b)(9)	\$13,243.02	503(b)(9)	\$8,078.82	The Claimant has not provided prima facie evidence that the claim is secured or properly perfected as a secured claim.
		Secured	\$13,092.35	Secured	\$0.00	
		Unsecured	\$14,069.42	Unsecured	\$32,325.97	
	Subtotal		\$40,404.79	Subtotal	\$40,404.79	Invoice number SC24435, in the amount of \$5,164.20, is for labor which is not a good as required by section 503(b)(9) of the bankruptcy code.
18 YARD TRUCK SPECIALISTS INC PO BOX 421 BENSALEM, PA 19020-0421	1697 (b)	Secured	\$27,745.00	Secured	\$0.00	The claimant has not provided prima facie evidence that the claim is secured or properly perfected as a secured claim.
		Unsecured	\$0.00	Unsecured	\$27,745.00	
		Subtotal	\$27,745.00	Subtotal	\$27,745.00	
		TOTAL	\$1,493,502.71*	TOTAL	\$1,493,502.71*	

* Plus unliquidated and/or undetermined amounts

- (a) Claim was previously listed on the 6th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims
- (b) Claim is also contained on Exhibit B - Reduce and Allow Claims
- (c) Claim was previously listed on the 7th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims
- (d) Claim was previously listed on the 4th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims
- (e) Claim was previously listed on the 5th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

	NAME OF CLAIMANT	CLAIM #	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION
1	AIRGAS USA LLC - CENTRAL DIVISION ATTN LISA MENTON 110 W SEVENTH ST STE 1300 TULSA, OK 74119	695	Unsecured	\$36,361.45	Unsecured	\$30,925.14	Sales tax, in the amount of \$52.83, for a cylinder rental charge should not be allowed on invoice number 9910707339. Invoice numbers 9016025348, 9016143921, 9016167286, 9016253608, 9016253607, 9016465592, 9909106215, 9016295704, 9909106214 and 9016376335, in the aggregate amount of \$5,383.48, are duplicated on Proof of Claim number 696.
2	AMRS-INC GLENN BROCK 39935 CORTE VELADO INDIO, CA 92203	1156 (b)	Priority Unsecured	\$0.00 \$15,803.00	Priority Unsecured	\$0.00 \$14,215.00	There is a \$1,588 discrepancy on the amount listed on the Proof of Claim. The total allowed amount should be \$14,215 general unsecured.
			Subtotal	\$15,803.00	Subtotal	\$14,215.00	
3	APPLIED INDUSTRIAL TECHNOLOGIES - DIXIE INC ATTN DIANNE MISENKO, LEGAL DEPARTMENT APPLIED INDUSTRIAL TECHNOLOGIES ONE APPLIED PLAZA CLEVELAND, OH 44115-5056	2265 (a)(b)	503(b)(9) Unsecured	\$10,441.84 \$62,332.19	503(b)(9) Unsecured	\$10,441.84 \$61,459.29	Invoice number 29249438, in the amount of \$872.88, was paid 11/30/2012 on ACH number 169500. Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Sixth Notice of Satisfaction - Exhibit B for Partially Satisfied Claims.
			Subtotal	\$72,774.03	Subtotal	\$71,901.13	
4	APPLIED INDUSTRIAL TECHNOLOGIES CA LLC ATTN DIANNE MISENKO ONE APPLIED PLAZA CLEVELAND, OH 44115-5056	2268 (a)	503(b)(9) Unsecured	\$32,812.86 \$72,305.92	503(b)(9) Unsecured	\$32,812.86 \$72,206.50	Invoice number 84320175, in the amount of \$99.42, was paid 5/3/2013 on ACH number 175405.
			Subtotal	\$105,118.78	Subtotal	\$105,019.36	

* Plus unliquidated and/or undetermined amounts

(a) Claim is also contained on Exhibit A- Misclassified Claims

(b) Claim was previously listed on the 6th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

(c) Claim was previously listed on the 7th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

	CLAIM #	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION	
5	APPLIED INDUSTRIAL TECHNOLOGIES INC ATTN DIANNE MISENKO ONE APPLIED PLAZA CLEVELAND, OH 44115-5056	2266 (a)(b)	503(b)(9) Unsecured	\$169,805.87 \$501,286.14	503(b)(9) Unsecured	\$166,188.95 \$500,772.55	Invoice numbers 44408442 (\$260.61) and 44408472 (\$86.87) were paid 7/12/2012 on ACH number 162761. Invoice number 44408923, in the amount to \$57.52, was paid 9/6/2012 on ACH number 165483. Invoice number 44411218, in the amount of \$96.20, was paid 5/3/2012 on ACH number 175405. Invoice number 44412330, asserted in the amount of \$1,674.52, exists on the Debtor's books and records in the amount of \$1,647.52. Invoice number 44412569, asserted in the amount of \$136.32, exists on the Debtor's books and records in the amount of \$117.60. Invoice number 44412579, asserted in the amount of \$137.10, exists on the Debtor's books and records in the amount of \$130.16. Invoice number 44412584, asserted in the amount of \$423.58, exists on the Debtor's books and records in the amount of \$415.47. Invoice number 44412654, asserted in the amount of \$440.80, exists on the Debtor's books and records in the amount of \$411.08. Invoice number 17268646, asserted in the amount of \$3,257.19, exists on the Debtor's books and records in the amount of \$576.41. Invoice number 17268658, asserted in the amount of \$660.08, exists on the Debtor's books and records in the amount of \$512.30. Invoice number 17268712, asserted in the amount of \$51.08, exists on the Debtor's books and records in the amount of \$25.81. Invoice number 44413008, asserted in the amount of \$191.04, exists on the Debtor's books and records in the amount of \$189.80. Invoice number 44413017, asserted in the amount of \$309.60, exists on the Debtor's books and records in the amount of \$307.20. Invoice number 47274225, asserted in the amount of \$104.49, exists on the Debtor's books and records in the amount of \$85.95. Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Sixth Notice of Satisfaction - Exhibit B for Partially Satisfied Claims.
		Subtotal	\$671,092.01	Subtotal	\$666,961.50		

* Plus unliquidated and/or undetermined amounts

(a) Claim is also contained on Exhibit A- Misclassified Claims

(b) Claim was previously listed on the 6th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

(c) Claim was previously listed on the 7th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

	CLAIM #	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION	
6	COMMUNITY COFFEE COMPANY 3332 PARTRIDGE LANE BLDG A BATON ROUGE, LA 70809	285 (a)	Secured Unsecured Subtotal	\$0.00 \$783.58 \$783.58	Secured Unsecured Subtotal	\$0.00 \$718.96 \$718.96	Due to a discrepancy on the Proof of Claim, the total amount of the claim should be \$718.96 general unsecured.
7	DE LAGE LANDEN FINANCIAL SERVICES 1111 OLD EAGLE SCHOOL RD WAYNE, PA 19087	1059	Unsecured	\$233,867.65	Unsecured	\$7,280.02	The Reorganized Debtor's books and records indicate an open pre-petition liability in the amount of \$7,280.02.
8	DEKALB COUNTY GEORGIA TREASURY & ACCOUNTING DIVISION ATTN BANKRUPTCY CLERK PO BOX 1027 DECATUR, GA 30031	3358 (c)	Priority Secured Subtotal	\$0.00 \$1,063.73* \$1,063.73*	Priority Secured Subtotal	\$0.00 \$1,063.73 \$1,063.73	No additional liability exists on the books and records on account of the asserted 2013 Business Permit Renewal. The claim should be liquidated at \$1,063.73 secured for pre-petition Sanitation charges. Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Seventh Notice of Satisfaction - Exhibit B for Partially Satisfied Claims.
9	DELL MARKETING LP ONE DELL WAY RR1 MS52 ROUND ROCK, TX 78682	416 (b)	503(b)(9) Unsecured Subtotal	\$11,376.15 \$155,999.89 \$167,376.04	503(b)(9) Unsecured Subtotal	\$11,376.15 \$129,754.40 \$141,130.55	The general unsecured amount should be adjusted to \$129,754.40.
10	DEVINE, BRENDAN 62 S WARNER AVE BRYN MAWR, PA 19010-2609	2862 (a)	503(b)(9) Priority Unsecured Subtotal	\$0.00 \$6,400.00 \$12,800.00 \$19,200.00	503(b)(9) Priority Unsecured Subtotal	\$0.00 \$1,834.52 \$0.00 \$1,834.52	The asserted claim amount of \$6,400 was duplicated across the 503(b)(9) priority and unsecured claim classifications. The Reorganized Debtor's books and records indicate commissions due in the amount of \$1,834.52.

* Plus unliquidated and/or undetermined amounts

(a) Claim is also contained on Exhibit A- Misclassified Claims

(b) Claim was previously listed on the 6th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

(c) Claim was previously listed on the 7th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

	CLAIM #	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION
11	DISCOVER STAFFING - ALPHARTTA 12850 HIGHWAY 9 N STE 1700 ALPHARETTA, GA 30004-4252	1264 (a) 503(b)(9) Priority Unsecured Subtotal	\$0.00 \$0.00 \$89,835.01 \$89,835.01	503(b)(9) Priority Unsecured Subtotal	\$0.00 \$0.00 \$89,835.01 \$89,835.01	There is a discrepancy between the amounts listed on the Proof of Claim and the supporting documentation. Invoice numbers 24985, 24986, 24987, 24988, 24989, 24990, 24991 and 24992, in the aggregate amount of \$15,230.36, were paid 4/11/2013 on check number 5368782. The claim should be allowed in the amount of \$89,835.01 general unsecured.
12	ENVIRON INTERNATIONAL CORPORATION ATTN KRISTEN MCCORMICK 214 CARNEGIE CENTER PRINCETON, NJ 08540	1088 (b) Unsecured	\$71,580.23	Unsecured	\$71,192.69	Invoice number 341927A, in the amount of \$387.54, was paid 5/16/2013 on ACH number 175769. Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Sixth Notice of Satisfaction - Exhibit B for Partially Satisfied Claims.
13	EXPRESS EMPLOYMENT PROFESSIONALS ATTN ALAN KROUSE 3080 ORCHARD LAKE RD SUITE A KEEGO HARBOR, MI 48335	1688 (a) 503(b)(9) Priority Unsecured Subtotal	\$0.00 \$0.00 \$11,247.24 \$11,247.24	503(b)(9) Priority Unsecured Subtotal	\$0.00 \$0.00 \$5,623.62 \$5,623.62	Claimant duplicated the invoices across the 503(b)(9) and priority classifications. The claim should be allowed at \$5,623.62 general unsecured.
14	GLOBAL SHARES IRELAND LTD C/O LEECH TISHMAN FUSCALDO & LAMPL LLC ATTN GREGORY W HAUSWIRTH ESQ 525 WILLIAM PENN PL 30TH FL PITTSBURGH, PA 15219	2652 Unsecured	\$40,275.70*	Unsecured	\$40,275.70	The claim should be liquidated at \$40,275.70 general unsecured.

* Plus unliquidated and/or undetermined amounts

(a) Claim is also contained on Exhibit A- Misclassified Claims

(b) Claim was previously listed on the 6th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

(c) Claim was previously listed on the 7th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

	NAME OF CLAIMANT	CLAIM #	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION
15	HCL AMERICA INC C/O CARL E AILARA JR, ESQ 15 EXCHANGE PL STE 730 JERSEY CITY, NJ 07302	2795 (c)	Unsecured	\$2,092,950.29	Unsecured	\$2,078,105.59	<p>Invoice number 4000146981, in the amount of \$7,051.61, was paid 6/3/2013 on check number 2778.</p> <p>Invoice number 4000144697, in the amount of \$7,793.09, is duplicated within the claimant's asserted claim amount.</p> <p>Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Seventh Notice of Satisfaction - Exhibit B for Partially Satisfied Claims.</p>
16	INDUSTRIE COMPOSIZIONE STAMPATI SRL CENTRO AZIENDALE QUERCETE SNC 81016 SAN POTITO SANNITICO CE ITALY	333 (c)	Unsecured	\$135,914.75*	Unsecured	\$135,914.75	<p>The claimant asserts the invoice amounts in Euros. The invoices and USD amounts are listed below:</p> <p>Invoice number 21000483 in the amount of \$18,708.96; Invoice number 21000476 in the amount of \$33,773.02; Invoice number 21000468 in the amount of \$1,806.52; Invoice number 21000528 in the amount of \$5,107.83; Invoice number 21000452 in the amount of \$8,229.64; Invoice number 21000454 in the amount of \$18,267.41; Invoice number 21000296 in the amount of \$15,092.26; Invoice number 21000286 in the amount of \$8,575.08; Invoice number 21000453 in the amount of \$26,354.03.</p> <p>The claim should be liquidated at \$135,914.75 USD general unsecured.</p> <p>Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Seventh Notice of Satisfaction - Exhibit B for Partially Satisfied Claims.</p>

* Plus unliquidated and/or undetermined amounts

(a) Claim is also contained on Exhibit A- Misclassified Claims

(b) Claim was previously listed on the 6th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

(c) Claim was previously listed on the 7th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

	CLAIM #	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION
17 MID KANSAS COOPERATIVE ASSOCIATION BRENT HEIZELMAN P.O BOX D MOUNDRIDGE, KS 67107	2341 (b)	503(b)(9)	\$19,433.44	503(b)(9)	\$18,751.44	Invoice number SLSTE00012943, asserted in the amount of \$65.18, exists on the Debtor's books and records in the amount of \$59.91.
		Unsecured	\$67,456.40	Unsecured	\$67,451.13	
	Subtotal		\$86,889.84	Subtotal	\$86,202.57	Invoice number SLSTE00015318, asserted in the amount of \$6,361.70, exists on the Debtor's books and records in the amount of \$5,679.70.
Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Sixth Notice of Satisfaction - Exhibit B for Partially Satisfied Claims.						
18 POWERLAB INC PO BOX 913 TERRELL, TX 75160	387 (c)	Unsecured	\$227,637.00	Unsecured	\$151,759.40	The books and records of the Reorganized Debtor reflect an open pre-petition amount of \$151,759.40 general unsecured.
Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Seventh Notice of Satisfaction - Exhibit B for Partially Satisfied Claims.						
19 PRAXAIR DISTRIBUTION INC C/O RMS BANKRUPTCY RECOVERY SERVICES PO BOX 5126 TIMONIUM, MD 21094	1985 (a)(b)	Priority	\$0.00	Priority	\$0.00	Claim for unreturned cylinders, in the amount of \$600, does not exist on the Debtor's books and records.
		Unsecured	\$13,258.49	Unsecured	\$12,658.49	
	Subtotal		\$13,258.49	Subtotal	\$12,658.49	Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Sixth Notice of Satisfaction - Exhibit B for Partially Satisfied Claims.

* Plus unliquidated and/or undetermined amounts

(a) Claim is also contained on Exhibit A- Misclassified Claims

(b) Claim was previously listed on the 6th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

(c) Claim was previously listed on the 7th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

	CLAIM #	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION	
20	R & L CARRIERS PO BOX 10020 PORT WILLIAM, OH 45164-2000	1610 (c)	Unsecured	\$418,758.87	Unsecured	\$416,814.86	<p>Invoice number 921378141, asserted in the amount of \$565.90, was paid 1/22/2013 on check number 0005107499. The invoice was paid as billed through D2L in the amount of \$143.20.</p> <p>Invoice number M115772292, asserted in the amount of \$780.83, was paid 4/23/2013 on check number 0005111141. The invoice was paid as billed through D2L in the amount of \$306.75.</p> <p>Invoice number M228399858, asserted in the amount of \$81.38, was paid 4/4/2013 on check number 0005110344. The invoice was paid as billed through D2L in the amount of \$78.48.</p> <p>Invoice number M474108255, asserted in the amount of \$836.14, exists on the books and records in the amount of \$320.24.</p> <p>Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Seventh Notice of Satisfaction - Exhibit B for Partially Satisfied Claims.</p>

* Plus unliquidated and/or undetermined amounts

- (a) Claim is also contained on Exhibit A- Misclassified Claims
- (b) Claim was previously listed on the 6th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims
- (c) Claim was previously listed on the 7th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

	CLAIM #	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION
21	R & L CARRIERS PO BOX 10020 PORT WILLIAM, OH 45164	1609 (c) Unsecured	\$1,181,361.06	Unsecured	\$1,175,458.69	<p>Invoice number 226649853, asserted in the amount of \$3,025.97, exists on the Debtor's books and records in the amount of \$568.83. In addition, the invoice was paid 1/07/2013 on check number 0005106864.</p> <p>Invoice number 479749077, asserted in the amount of \$515.58, exists on the Debtor's books and records in the amount of \$197.09. In addition, the invoice was paid 8/29/2012 on check number 0005101422.</p> <p>Invoice number 991025316, asserted in the amount of \$409.86, exists on the Debtor's books and records in the amount of \$240.56. In addition, the invoice was paid 5/09/2013 on check number 0005111662.</p> <p>Invoice number M150915528, asserted in the amount of \$107.60, exists on the Debtor's books and records in the amount of \$100.98. In addition, the invoice was paid 4/23/2013 on check number 0005111141.</p> <p>Invoice number M579549168, asserted in the amount of \$469.20, exists on the Debtor's books and records in the amount of \$184.15. In addition, the invoice was paid 11/21/2012 on check number 0005105263.</p> <p>Invoice number M911373075, asserted in the amount of \$1,047.87, exists on the Debtor's books and records in the amount of \$409.25. In addition, the invoice was paid 2/08/2013 on check number 0005108243.</p> <p>Invoice number M991036638, asserted in the amount of \$326.29, exists on the Debtor's books and records in the amount of \$126.69. In addition, the invoice was paid 3/12/2013 on check number 0005109517.</p> <p>The audit performed by Data 2 Logistics found that the asserted amounts on the following invoice numbers do not match the Debtor's books and records; Invoice 16064145: \$417.25 (asserted); \$161.6 (Debtor's books);</p>

* Plus unliquidated and/or undetermined amounts
 (a) Claim is also contained on Exhibit A- Misclassified Claims
 (b) Claim was previously listed on the 6th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims
 (c) Claim was previously listed on the 7th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

NAME OF CLAIMANT	CLAIM #	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION
R & L CARRIERS	1609 (c) (cont.)					Invoice 101797596: \$98.65 (asserted); \$78.16 (Debtor's books); Invoice 101797605: \$298.16 (asserted); \$115.47 (Debtor's books); Invoice 227312874: \$147.35 (asserted); \$78.16 (Debtor's books); Invoice 403354062: \$1927.16 (asserted); \$746.37 (Debtor's books); Invoice 403937541: \$187.07 (asserted); \$78.16 (Debtor's books); Invoice 424268127: \$491.69 (asserted); \$190.43 (Debtor's books); Invoice 424268136: \$345.56 (asserted); \$133.83 (Debtor's books); Invoice 424268145: \$476.47 (asserted); \$184.53 (Debtor's books); Invoice 424268154: \$275.39 (asserted); \$106.65 (Debtor's books); Invoice 424268163: \$248.63 (asserted); \$98.65 (Debtor's books); Invoice 424268172: \$616.88 (asserted); \$238.91 (Debtor's books); Invoice 424268181: \$120.75 (asserted); \$98.65 (Debtor's books); Invoice 492788583: \$587.81 (asserted); \$227.65 (Debtor's books); Invoice 492788592: \$1404.64 (asserted); \$544 (Debtor's books); Invoice 500184018: \$603.76 (asserted); \$233.83 (Debtor's books); Invoice 500184027: \$417.12 (asserted); \$161.65 (Debtor's books); Invoice 500184036: \$184.05 (asserted); \$98.65 (Debtor's books); Invoice 500184045: \$258.22 (asserted); \$100 (Debtor's books); Invoice 500184054: \$248.71 (asserted); \$98.65 (Debtor's books); Invoice 500184063: \$160.41 (asserted); \$98.65 (Debtor's books); Invoice 812713185: \$167.86 (asserted); \$78.16 (Debtor's books); Invoice 851178249: \$1115.68 (asserted); \$432.09 (Debtor's books); Invoice 903043008: \$89.86 (asserted); \$78.16 (Debtor's books); Invoice 991572336: \$227.18 (asserted); \$98.65 (Debtor's books); Invoice 991572345: \$135.92 (asserted); \$98.65 (Debtor's books); Invoice 41726583: \$2286.88 (asserted); \$885.89 (Debtor's books); Invoice 41726601: \$557.74 (asserted); \$216.01 (Debtor's books);

* Plus unliquidated and/or undetermined amounts

(a) Claim is also contained on Exhibit A- Misclassified Claims

(b) Claim was previously listed on the 6th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

(c) Claim was previously listed on the 7th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

NAME OF CLAIMANT	CLAIM #	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION
R & L CARRIERS	1609 (c) (cont.)					Invoice 571623732: \$384.96 (asserted); \$149.09 (Debtor's books); Invoice 991033686: \$716.2 (asserted); \$287.79 (Debtor's books); Invoice 991033695: \$201.31 (asserted); \$114.36 (Debtor's books); Invoice 991033704: \$1184.9 (asserted); \$458.9 (Debtor's books); Invoice 991033713: \$410.07 (asserted); \$169.23 (Debtor's books); Invoice 991033722: \$1127.23 (asserted); \$436.57 (Debtor's books); Invoice 991033731: \$515.21 (asserted); \$199.53 (Debtor's books); Invoice 991033749: \$534.58 (asserted); \$207.04 (Debtor's books); Invoice 991033758: \$547.81 (asserted); \$212.16 (Debtor's books); Invoice 991033767: \$730.87 (asserted); \$283.06 (Debtor's books); Invoice 991033776: \$1080.95 (asserted); \$418.64 (Debtor's books); Invoice 991033785: \$788.4 (asserted); \$305.34 (Debtor's books); Invoice 991033794: \$264.28 (asserted); \$102.36 (Debtor's books); Invoice 991033803: \$166.6 (asserted); \$98.65 (Debtor's books); Invoice 991033812: \$810.3 (asserted); \$313.82 (Debtor's books); Invoice 991033821: \$99.75 (asserted); \$98.65 (Debtor's books); Invoice 991033839: \$1006.6 (asserted); \$389.84 (Debtor's books); Invoice 991046277: \$370.45 (asserted); \$143.47 (Debtor's books); Invoice 851495157: \$106.05 (asserted); \$98.65 (Debtor's books).

Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Seventh Notice of Satisfaction – Exhibit B for Partially Satisfied Claims.

* Plus unliquidated and/or undetermined amounts
 (a) Claim is also contained on Exhibit A- Misclassified Claims
 (b) Claim was previously listed on the 6th Notice of Satisfaction – Exhibit B for Partially Satisfied Claims
 (c) Claim was previously listed on the 7th Notice of Satisfaction – Exhibit B for Partially Satisfied Claims

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

	CLAIM #	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION
22	R & L CARRIERS PO BOX 10020 PORT WILLIAM, OH 45164-2000	1608 (c) Unsecured	\$62,278.11	Unsecured	\$61,614.80	Invoice number D492402843 was paid in full, in the amount of \$182.43, 11/15/2012 on check number 0005104987. Invoice number M228138309, in the amount of \$100.42, was paid 5/9/2013 on check number 0005111662. Invoice number M426298194, in the amount of \$115.66, was paid 5/14/2013 on check number 0005111921. Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Seventh Notice of Satisfaction - Exhibit B for Partially Satisfied Claims.
23	REPUBLIC CONTRACTORS INC ATTN MR CURTISS D WRIGHT 6870 BERT KOUNS INDUSTRIAL LOOP SHREVEPORT, LA 71129	3352 (a)(b) 503(b)(9) Unsecured Subtotal	\$0.00 \$89,633.58 \$89,633.58	503(b)(9) Unsecured Subtotal	\$0.00 \$88,425.02 \$88,425.02	Invoice number 9686, asserted in the amount of \$15,261.56, exists on the Debtors books and records in the amount of \$14,053. Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Sixth Notice of Satisfaction - Exhibit B for Partially Satisfied Claims.
24	SBMC ATLANTA LLC 7206 COLLINGWOOD LN ALPHARETTA, GA 30022	1900 (b) Priority Unsecured Subtotal	\$0.00 \$9,560.00 \$9,560.00	Priority Unsecured Subtotal	\$0.00 \$4,780.00 \$4,780.00	Invoice numbers 2013154 (\$2,000), 2013156 (\$2,000), 2013158 (\$390) and 2013155 (\$2,000) were asserted as both priority and unsecured. The total unsecured amount should be \$4,780.
25	TEXTRON INC (DBA "E-Z-GO") E-Z-GO A DIVISION OF TEXTRON INC C/O FLETCHER C THOMSON 40 WESTMINSTER ST PROVIDENCE, RI 02903	2372 (a)(c) 503(b)(9) Administrative Priority Secured Unsecured Subtotal	\$6,240.00* \$0.00 \$0.00 \$0.00 \$94,337.70* \$100,577.70*	503(b)(9) Administrative Priority Secured Unsecured Subtotal	\$6,240.00 \$0.00 \$0.00 \$0.00 \$94,337.70 \$100,577.70	Claim should be liquidated at \$6,240 as 503(b)(9) and \$94,337.70 as general unsecured. Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Seventh Notice of Satisfaction - Exhibit B for Partially Satisfied Claims.

* Plus unliquidated and/or undetermined amounts

(a) Claim is also contained on Exhibit A- Misclassified Claims

(b) Claim was previously listed on the 6th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

(c) Claim was previously listed on the 7th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

	CLAIM #	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION
26	TRAILER BRIDGE INC ATTN MARK TANNER, CHIEF ACCOUNTING OFFICER 10405 NEW BERLIN RD E JACKSONVILLE, FL 32226	345 (c) Unsecured	\$51,763.73	Unsecured	\$50,895.00	The claimant asserts late payments fees, in the aggregate amount of \$868.73, which does not exist on the Debtor's books and records. Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Seventh Notice of Satisfaction - Exhibit B for Partially Satisfied Claims.
27	W W GRAINGER INC ATTN MES17859401507 7300 N MELVINA NILES, IL 60714	514 (a)(c) 503(b)(9) Secured Unsecured Subtotal	\$30,036.22* \$0.00 \$99,949.85* \$129,986.07*	503(b)(9) Secured Unsecured Subtotal	\$29,997.52 \$0.00 \$99,536.54 \$129,534.06	Invoice number 9029441491, in the amount of \$379.89, does not exist on the Debtor's books and records. Invoice number 9113084553, asserted in the amount of \$271.88, exists on the Debtor's books and records in the amount of \$249.60. Invoice number 9113084512, asserted in the amount of \$135.94, exists on the Debtor's books and records in the amount of \$124.80. Invoice number 9152229622, asserted in the amount of \$435.59, exists on the Debtor's books and records in the amount of \$399.90. Invoice number 9151062438, asserted in the amount of \$53.22, exists on the Debtor's books and records in the amount of \$50.21. The claim should be liquidated at \$99, 536.54 general unsecured and \$29,997.52 503(b)(9) for a total claim of \$129,534.06. Asserted and Modified Claim Amounts include reduction in the asserted invoices per the Seventh Notice of Satisfaction - Exhibit B for Partially Satisfied Claims.
28	WESTERN PETERBILT-WEST YAKIMA 2028 RUDKIN RD UNION GAP, WA 98903-4020	1015 (a) 503(b)(9) Secured Unsecured Subtotal	\$8,078.82 \$0.00 \$32,325.97 \$40,404.79	503(b)(9) Secured Unsecured Subtotal	\$8,078.82 \$0.00 \$19,082.95 \$27,161.77	Invoice numbers SC23118 and SC24435, in the aggregate amount of \$13,243.02, were duplicated across the 503(b)(9) and unsecured claim classifications. The total amount of the claim should be reduced to \$27,161.77.

* Plus unliquidated and/or undetermined amounts

(a) Claim is also contained on Exhibit A- Misclassified Claims

(b) Claim was previously listed on the 6th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

(c) Claim was previously listed on the 7th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

NAME OF CLAIMANT	CLAIM #	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED AMOUNT	REASON FOR MODIFICATION
29 YARD TRUCK SPECIALISTS INC PO BOX 421 BENSALEM, PA 19020-0421	1697 (a)	Secured	\$0.00	Secured	\$0.00	Invoice numbers 1R2574390, in the amount of \$2,475, and 1R2615260, in the amount of \$2,475, are for post-petition charges.
		Unsecured	\$27,745.00	Unsecured	\$22,795.00	
		Subtotal	\$27,745.00	Subtotal	\$22,795.00	
		TOTAL	\$6,205,097.73*	TOTAL	\$5,790,674.63	

* Plus unliquidated and/or undetermined amounts

(a) Claim is also contained on Exhibit A- Misclassified Claims

(b) Claim was previously listed on the 6th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

(c) Claim was previously listed on the 7th Notice of Satisfaction - Exhibit B for Partially Satisfied Claims

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

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	ATKINS, ALBERT C/O THE SANTILLI LAW GROUP, LTD 111 W WASHINGTON ST, STE 1240 CHICAGO, IL 60602	2207 (a)	\$30,000.00*	No liability exists on the books and records.
2	BOYD, BOBBY C/O THE SANTILLI LAW GROUP, LTD 111 W WASHINGTON ST, STE 1240 CHICAGO, IL 60602	2206 (a)	\$30,000.00*	No liability exists on the books and records.
3	COLE, DAVIEN C/O THE SANTILLI LAW GROUP, LTD 111 W WASHINGTON ST, STE 1240 CHICAGO, IL 60602	2204 (a)	\$30,000.00*	No liability exists on the books and records.
4	TAYLOR, ALMA 1618 MARTIN LUTHER KING JR DR MERIDIAN, MS 39301-2911	1592	Undetermined*	No liability exists on the books and records.
5	THOMAS, JASON 1663 BRISTOL CAVERNS HWY BRISTOL, TN 37620-8156	2656	Undetermined*	No liability exists on the books and records.
6	WHITE, JONATHON C/O THE SANTILLI LAW GROUP, LTD 111 W WASHINGTON ST, STE 1240 CHICAGO, IL 60602	2205 (a)	\$30,000.00*	No liability exists on the books and records.
		TOTAL	\$120,000.00*	

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit D- Insufficient Supporting Documentation Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
TWENTY-SECOND (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT D - INSUFFICIENT SUPPORTING DOCUMENTATION CLAIMS

	CLAIM NUMBER	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	ATKINS, ALBERT C/O THE SANTILLI LAW GROUP, LTD 111 W WASHINGTON ST, STE 1240 CHICAGO, IL 60602	2207 (a) \$30,000.00*	Claim does not include sufficient documentation to ascertain the validity of the asserted claim amount.
2	BOYD, BOBBY C/O THE SANTILLI LAW GROUP, LTD 111 W WASHINGTON ST, STE 1240 CHICAGO, IL 60602	2206 (a) \$30,000.00*	Claim does not include sufficient documentation to ascertain the validity of the asserted claim amount.
3	COLE, DAVIEN C/O THE SANTILLI LAW GROUP, LTD 111 W WASHINGTON ST, STE 1240 CHICAGO, IL 60602	2204 (a) \$30,000.00*	Claim does not include sufficient documentation to ascertain the validity of the asserted claim amount.
4	WHITE, JONATHON C/O THE SANTILLI LAW GROUP, LTD 111 W WASHINGTON ST, STE 1240 CHICAGO, IL 60602	2205 (a) \$30,000.00*	Claim does not include sufficient documentation to ascertain the validity of the asserted claim amount.
TOTAL		\$120,000.00*	

* Plus unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit C- No Liability Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
TWENTY-SECOND (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION
EXHIBIT E - SUBSTANTIVELY DUPLICATE CLAIMS

	REMAINING CLAIM NUMBER	DUPLICATE CLAIM TO BE DISALLOWED	CLAIM AMOUNT	REASON FOR DISALLOWANCE
1 COVENANT TRANSPORT INC ON BEHALF OF STAR TRANSPORTATION INC ATTN JANETTE WHITE, CREDIT & COLLECTION MGR PO BOX 22997 CHATTANOOGA, TN 37422	670	380	\$172,316.46	The liability asserted in the Proof of Claim listed in column entitled Duplicate Claim to be Disallowed is substantively duplicative of the liability asserted in Proof of Claim number 670.
2 R & L TRUCKLOAD C/O R & L CARRIERS INC 600 GILLIAM RD WILMINGTON, OH 45177	1611	1936	\$30,579.88	The liability asserted in the Proof of Claim listed in column entitled Duplicate Claim to be Disallowed is substantively duplicative of the liability asserted in Proof of Claim number 1611.
		TOTAL	\$202,896.34	