

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. 4733, 4742

:

----- X

ORDER SUSTAINING REORGANIZED DEBTOR’S (SUBSTANTIVE) TWENTY-SEVENTH OMNIBUS OBJECTION PURSUANT TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY RULE 3007, AND LOCAL RULE 3007-1 TO CERTAIN (A) MISCLASSIFIED CLAIMS, (B) NO LIABILITY CLAIMS, (C) REDUCE AND ALLOW CLAIMS AND (D) CONTINGENT CONTRIBUTION CLAIMS

Upon the Reorganized Debtor’s (Substantive) Twenty-Seventh Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 To Certain (A) Misclassified Claims, (B) No Liability Claims, (C) Reduce and Allow Claims and (D) Contingent Contribution 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-Seventh 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) No Liability Claims, (C) Reduce and

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.

Allow Claims and (D) Contingent Contribution Claims; and upon the record herein; and after due deliberation thereon and good and sufficient cause appearing therefor; it is hereby

ORDERED, ADJUDGED, AND DECREED that:

1. The relief requested in the Objection is GRANTED, as set forth herein.
1. 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.”
2. The No Liability Claims listed on Exhibit B are hereby disallowed and expunged in their entirety as set forth in Exhibit B.
3. The Reduce and Allow Claims listed on Exhibit C are hereby reduced and allowed in the amounts listed as set forth in Exhibit C under the headings “Modified Classification” and “Modified Amount.”
4. The Contingent Contribution Claims listed on Exhibit D are hereby disallowed and expunged in their entirety as set forth in Exhibit D.
5. The deadline to respond to the Objection has been extended to February 28, 2017 for Columbus McKinnon Corporation, Columbus McKinnon Limited, and Yale Industrial Products, Inc.; to March 30, 2017 for Oracle Corporation & Its Affiliates; and extended for Leopoldo Calderon (collectively, the “Responding Parties”). The hearing on the Objection with respect to the Responding Parties has been continued to a date and time to be determined.
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.

[Remainder of Page Left Intentionally Blank]

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: Jan 5, 2017
Wilmington, Delaware



THE HONORABLE KEVIN J. CAREY
UNITED STATES BANKRUPTCY JUDGE

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

	NAME OF CLAIMANT	CLAIM #	CLAIM CLASSIFICATION STATUS	CLAIM AMOUNT	MODIFIED CLASSIFICATION	MODIFIED CLAIM AMOUNT	REASON FOR RECLASSIFICATION
1	RUNCO, CHARLES 1255 COTTAGE POINTE CT. COLUMBUS, GA 31904	1543 ^(a)	Priority	Undetermined*	Priority	\$0.00	The Claimant was previously paid a priority claim at the 2013 cap of \$12,475.
			Secured	\$105,208.82*	Secured	\$0.00	The remainder of the income protection claim is not entitled to administrative or priority status under the bankruptcy code.
			Unsecured	Undetermined*	Unsecured	\$105,208.82*	Claim for income protection is not entitled to secured status under the bankruptcy code.
			Subtotal	\$105,208.82	Subtotal	\$105,208.82*	
2	YU, CHUNMAN 8920 MERION DR DULUTH, GA 30097	4109	Administrative	\$19,591.67	Administrative	\$0.00	The Claimant was previously paid a priority claim at the 2013 cap of \$12,475.
			Unsecured	\$0.00	Unsecured	\$19,591.67	Claim for additional pre-petition income protection is not entitled to administrative status.
			Subtotal	\$19,591.67	Subtotal	\$19,591.67	
			TOTAL	\$124,800.49*	TOTAL	\$124,800.49*	Claim No. 2253, for the same liability, was modified and reclassified as a general unsecured claim per Court Order dated July 2, 2015. (Docket No. 4371.) Claim No. 2253 was disallowed and expunged as an Amended and Superseded Claim in the 26 th Omnibus Claims Objection. (Docket No. 4719.)

* - Plus unliquidated and/or undetermined amounts
 (a) Claim also contained on Exhibit C – Reduce and Allow Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
TWENTY-SEVENTH (SUBSTANTIVE) OMNIBUS OBJECTION
EXHIBIT B – NO LIABILITY CLAIMS

	CLAIM NUMBER	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1. FRANCHISE TAX BOARD BANKRUPTCY SECTION MS A340 PO BOX 2952 SACRAMENTO, CA 95812-2952	3959	Undetermined*	No liability exists on the books and records. The Reorganized Debtor filed income tax returns for the March, 2014 and March, 2015 periods on January 15, 2015 and January 15, 2016, respectively. Asserted claim fails to allege any facts or amounts due and owing necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its rights to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
2. GEIGER, RALPH 803 LAS VEGAS DR TEMPLE, PA 19560-1125	1007	Undetermined*	No liability exists on the books and records. The workers' compensation case was settled and closed on February 25, 2014. Pursuant to Section 11.11(b) of the Plan, one of the Debtor's insurers agreed to satisfy the claim in full, which served to disallow and expunge the claim to the extent of the agreed upon satisfaction. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
3. JENNINGS, MISTY C/O TRACI HARTLEY, ESQ 529 ALABAMA ST BRISTOL, TN 37620	325	Undetermined*	No liability exists on the books and records. The workers' compensation case was settled and closed on June 29, 2015. Pursuant to Section 11.11(b) of the Plan, one of the Debtor's insurers agreed to satisfy the claim in full, which served to disallow and expunge the claim to the extent of the agreed upon satisfaction. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
4. LUJAN, JORGE 1626 DOVER CIR SALINA, KS 67601	2905	Undetermined*	No liability exists on the books and records. The workers' compensation case was settled and closed on December 16, 2008. Pursuant to Section 11.11(b) of the Plan, one of the Debtor's insurers agreed to satisfy the claim in full, which served to disallow and expunge the claim to the extent of the agreed upon satisfaction. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
5. NEILL, TIMOTHY C/O WHIPPLE LAW FIRM PC 201 N SPRING ST INDEPENDENCE, MO 64050	2296	Undetermined*	No liability exists on the books and records. The workers' compensation case was settled and closed on August 2, 2016. Pursuant to Section 11.11(b) of the Plan, one of the Debtor's insurers agreed to satisfy the claim in full, which served to disallow and expunge the claim to the extent of the agreed upon satisfaction. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.

* - Indicates claim contains unliquidated and/or undetermined amounts
(a) Claim also contained on Exhibit D – Contingent Contribution Claims

Page 1 of 2

EXIDE TECHNOLOGIES 13-11482 (KJC)
TWENTY-SEVENTH (SUBSTANTIVE) OMNIBUS OBJECTION
EXHIBIT B – NO LIABILITY CLAIMS

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
6.	PENNSYLVANIA DEPARTMENT OF REVENUE BANKRUPTCY DIVISION PO BOX 280946 HARRISBURG, PA 17128-0946	4139	\$0.00	No liability exists on the books and records. The Reorganized Debtor filed sales tax returns for the November, 2012 and March, 2013 periods on December 18, 2012 and April 18, 2013, respectively. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
7.	SCHAWANG, PAUL E C/O WHIPPLE LAW FIRM PC 201 N SPRING ST INDEPENDENCE, MO 64050-2822	2300	Undetermined*	No liability exists on the books and records. The workers' compensation case was settled on March 23, 2016. Pursuant to Section 11.11(b) of the Plan, one of the Debtor's insurers agreed to satisfy the claim in full, which served to disallow and expunge the claim to the extent of the agreed upon satisfaction. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
8.	WEITSMAN, SANDRA C/O FEDERMAN & SHERWOOD ATTN WILLIAM B FEDERMAN 10205 NORTH PENNSYLVANIA AVENUE OKLAHOMA CITY, OK 73120	2715	\$2,597,662.92	Claimant released the Debtor pursuant to the Stipulation of Settlement dated March 7, 2016, as approved by the Final Judgment and Order of Dismissal entered by the United States District Court for the Central District of Florida in Case No. 2:13-cv-02607-SVW-E. The stipulation included a release of claims. Thus, claimant has no further right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
		TOTAL	\$2,597,662.92	

* - Indicates claim contains unliquidated and/or undetermined amounts
(a) Claim also contained on Exhibit D – Contingent Contribution Claims

Page 2 of 2

EXIDE TECHNOLOGIES 13-11482 (KJC)
TWENTY-SEVENTH (SUBSTANTIVE) OMNIBUS OBJECTION
EXHIBIT C – REDUCE AND ALLOW CLAIMS

NAME OF CLAIMANT	CLAIM #	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED AMOUNT	REASON
1 AVNET INC 5400 PRAIRIE STONE PKWY HOFFMAN ESTATES, IL 60192	4063	Administrative	\$54,800.84	\$0.00	Invoice numbers 8100387850, 8100334188F and 8100283017FREV, in the aggregate amount of \$54,800.84, do not exist on the books and records. The service was canceled on June 1, 2013.
		Unsecured	\$50,450.83	\$50,450.83	
		Subtotal	\$105,251.67	\$50,450.83	
The claim should be allowed in the amount of \$50,450.83 general unsecured.					
2 RUNCO, CHARLES 1255 COTTAGE POINTE CT. COLUMBUS, GA 31904	1543 ^(a)	Priority	Undetermined*	\$0.00	The total liability due on the books and records is \$105,208.82.
		Secured	\$105,208.82*	\$0.00	
		Unsecured	Undetermined*	\$105,208.82	
Subtotal			\$105,208.82	\$105,208.82	Claim should be liquidated as a general unsecured claim at \$105,208.82.
3 VANFAB INC C/O NEAL GERBER & EISENBERG LLP ATTN NICHOLAS M MILLER 2 N LASALLE ST STE 1700 CHICAGO, IL 60602	1738	Administrative	\$30,244.49	\$3,109.69	The total liability due on the books and records is \$3,109.69 administrative priority and \$328,812.79 general unsecured.
		Unsecured	\$310,471.60	\$328,812.79	
		Subtotal	\$340,716.09	\$331,922.48	
TOTAL			\$551,176.80	\$487,582.13	

[11390-001 EXH A0453273.DOCX 3]

* - Indicates claim contains unliquidated and/or undetermined amounts

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

EXIDE TECHNOLOGIES 13-11482 (KJC)
TWENTY-SEVENTH (SUBSTANTIVE) OMNIBUS OBJECTION
EXHIBIT D – CONTINGENT CONTRIBUTION CLAIMS
Exhibit Intentionally Left Blank

NAME	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
------	---------	------------------------	----------------------------------

[11390-001 EXH A0454229.DOCX 2]

* - Indicates claim contains unliquidated and/or undetermined amounts

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

Exhibit B
(Blackline Order)

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. 4733
 :
 ----- x

ORDER SUSTAINING REORGANIZED DEBTOR’S (SUBSTANTIVE) TWENTY-SEVENTH OMNIBUS OBJECTION PURSUANT TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY RULE 3007, AND LOCAL RULE 3007-1 TO CERTAIN (A) MISCLASSIFIED CLAIMS, (B) NO LIABILITY CLAIMS, (C) REDUCE AND ALLOW CLAIMS AND (D) CONTINGENT CONTRIBUTION CLAIMS

Upon the Reorganized Debtor’s (Substantive) Twenty-Seventh Omnibus Objection Pursuant to Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 To Certain (A) Misclassified Claims, (B) No Liability Claims, (C) Reduce and Allow Claims and (D) Contingent Contribution 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-Seventh 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) No Liability Claims, (C) Reduce and

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.

Allow Claims and (D) Contingent Contribution Claims; and upon the record herein; and after due deliberation thereon and good and sufficient cause appearing therefor; it is hereby

ORDERED, ADJUDGED, AND DECREED that:

1. The relief requested in the Objection is GRANTED, as set forth herein.
1. 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.”
2. The No Liability Claims listed on Exhibit B are hereby disallowed and expunged in their entirety as set forth in Exhibit B.
3. The Reduce and Allow Claims listed on Exhibit C are hereby reduced and allowed in the amounts listed as set forth in Exhibit C under the headings “Modified Classification” and “Modified Amount.”
4. The Contingent Contribution Claims listed on Exhibit D are hereby disallowed and expunged in their entirety as set forth in Exhibit D.

5. The deadline to respond to the Objection has been extended to February 28, 2017 for Columbus McKinnon Corporation, Columbus McKinnon Limited, and Yale Industrial Products, Inc.; to March 30, 2017 for Oracle Corporation & Its Affiliates; and extended for Leopoldo Calderon (collectively, the “Responding Parties”). The hearing on the Objection with respect to the Responding Parties has been continued to a date and time to be determined.

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. ~~6.~~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. ~~7.~~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. ~~8.~~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. ~~9.~~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.

[Remainder of Page Left Intentionally Blank]

11. ~~10.~~

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: _____
Wilmington, Delaware

THE HONORABLE KEVIN J. CAREY
UNITED STATES BANKRUPTCY JUDGE

EXIDE TECHNOLOGIES 13-11482 (KJC)
TWENTY-SEVENTH (SUBSTANTIVE) OMNIBUS OBJECTION
EXHIBIT B – NO LIABILITY CLAIMS

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1.	CALDERON, LEOPOLDO 3620 LEXINGTON AVE KANSAS CITY, MO 64124-2007	1896	Undetermined*	No liability exists on the books and records. The workers' compensation case was settled and closed on April 13, 2016. Pursuant to Section 11.11(b) of the Plan, one of the Debtor's insurers agreed to satisfy the claim in full, which served to disallow and expunge the claim to the extent of the agreed-upon satisfaction. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
2.	COLUMBUS MCKINNON CORPORATION C/O PHILLIPS LYTTLE LLP ATTN MICHAEL B POWERS ONE HSBC CENTER STE 3400 BUFFALO, NY 14203	4029 ^(a)	\$1,000,000.00*	No liability exists on the books and records. The claimant asserts a contingent claim for contribution and/or indemnity which is barred by the applicable state law. In particular, the Reorganized Debtor is entitled to immunity under the exclusivity provision of the Pennsylvania Workers Compensation Act, 77 P.S. §481(a). See <i>Soto v. Nabisco, Inc.</i> , 32 A.3d 787, 790 (Pa. Super. 2001). The Reorganized Debtor also denies all liability and incorporates by reference its Answer, New Matter and Cross-Claim to the Complaint filed by Jamie Cortez, the Plaintiff in the underlying Pennsylvania state court action entitled <i>Cortez v. Exide Technologies, Inc., et al.</i> , Philadelphia Court of Common Pleas, December Term 2011, No. 03838, including all other defenses previously asserted in the underlying action and related proceedings. The Reorganized Debtor has investigated the allegations asserted in the claim, as well as its applicable defenses, and has determined that the claimant fails to allege any damages or facts necessary to support a compensable claim, and thus, has no present right to payment under applicable law. The Reorganized Debtor reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.

* - Indicates claim contains unliquidated and/or undetermined amounts
(a) Claim also contained on Exhibit D – Contingent Contribution Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
TWENTY-SEVENTH (SUBSTANTIVE) OMNIBUS OBJECTION
EXHIBIT B – NO LIABILITY CLAIMS

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
3.	COLUMBUS MCKINNON LIMITED C/O PHILLIPS LYTTLE LLP ATTN MICHAEL B POWERS ONE HSBC CENTER STE 3400 BUFFALO, NY 14203	4030 ^(a)	\$1,000,000.00*	No liability exists on the books and records. The claimant asserts a contingent claim for contribution and/or indemnity which is barred by the applicable state law. In particular, the Reorganized Debtor is entitled to immunity under the exclusivity provision of the Pennsylvania Workers Compensation Act, 77 P.S. §481(a). See <i>Soto v. Nabisco, Inc.</i> , 32 A.3d 787, 790 (Pa. Super. 2001). The Reorganized Debtor also denies all liability and incorporates by reference its Answer, New Matter and Cross Claim to the Complaint filed by Jamie Cortez, the Plaintiff in the underlying Pennsylvania state court action entitled <i>Cortez v. Exide Technologies, Inc., et al.</i> , Philadelphia Court of Common Pleas, December Term 2011, No. 03838, including all other defenses previously asserted in the underlying action and related proceedings. The Reorganized Debtor has investigated the allegations asserted in the claim, as well as its applicable defenses, and has determined that the claimant fails to allege any damages or facts necessary to support a compensable claim, and thus, has no present right to payment under applicable law. The Reorganized Debtor reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
4.1	FRANCHISE TAX BOARD BANKRUPTCY SECTION MS A340 PO BOX 2952 SACRAMENTO, CA 95812-2952	3959	Undetermined*	No liability exists on the books and records. The Reorganized Debtor filed income tax returns for the March, 2014 and March, 2015 periods on January 15, 2015 and January 15, 2016, respectively. Asserted claim fails to allege any facts or amounts due and owing necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its rights to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
5.2	GEIGER, RALPH 803 LAS VEGAS DR TEMPLE, PA 19560-1125	1007	Undetermined*	No liability exists on the books and records. The workers' compensation case was settled and closed on February 25, 2014. Pursuant to Section 11.11(b) of the Plan, one of the Debtor's insurers agreed to satisfy the claim in full, which served to disallow and expunge the claim to the extent of the agreed upon satisfaction. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.

* - Indicates claim contains unliquidated and/or undetermined amounts
(a) Claim also contained on Exhibit D – Contingent Contribution Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
TWENTY-SEVENTH (SUBSTANTIVE) OMNIBUS OBJECTION
EXHIBIT B – NO LIABILITY CLAIMS

	NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
6.3	JENNINGS, MISTY C/O TRACI HARTLEY, ESQ 529 ALABAMA ST BRISTOL, TN 37620	325	Undetermined*	No liability exists on the books and records. The workers' compensation case was settled and closed on June 29, 2015. Pursuant to Section 11.11(b) of the Plan, one of the Debtor's insurers agreed to satisfy the claim in full, which served to disallow and expunge the claim to the extent of the agreed upon satisfaction. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
7.4	LUJAN, JORGE 1626 DOVER CIR SALINA, KS 67601	2905	Undetermined*	No liability exists on the books and records. The workers' compensation case was settled and closed on December 16, 2008. Pursuant to Section 11.11(b) of the Plan, one of the Debtor's insurers agreed to satisfy the claim in full, which served to disallow and expunge the claim to the extent of the agreed upon satisfaction. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
8.5	NEILL, TIMOTHY C/O WHIPPLE LAW FIRM PC 201 N SPRING ST INDEPENDENCE, MO 64050	2296	Undetermined*	No liability exists on the books and records. The workers' compensation case was settled and closed on August 2, 2016. Pursuant to Section 11.11(b) of the Plan, one of the Debtor's insurers agreed to satisfy the claim in full, which served to disallow and expunge the claim to the extent of the agreed upon satisfaction. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
9.	ORACLE CORP & ITS AFFILIATES ORACLE CREDIT CORP & ORACLE AMERICA INC SUCCESSOR IN INTEREST ET AL C/O BUCHALTER NEMER PC ATTN SHAWN CHRISTIANSON ESQ 55 SECOND ST 17TH FL SAN FRANCISCO, CA 94105	4128	\$3,983,120.56	Underlying liability for this objection was resolved by stipulation and order dated June 23, 2015 (Docket No. 4271), which included a release of claims. Thus, claimant has no further right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.

* - Indicates claim contains unliquidated and/or undetermined amounts
(a) Claim also contained on Exhibit D – Contingent Contribution Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
TWENTY-SEVENTH (SUBSTANTIVE) OMNIBUS OBJECTION
EXHIBIT B – NO LIABILITY CLAIMS

NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
10.2 PENNSYLVANIA DEPARTMENT OF REVENUE BANKRUPTCY DIVISON PO BOX 280946 HARRISBURG, PA 17128-0946	4139	\$0.00	No liability exists on the books and records. The Reorganized Debtor filed sales tax returns for the November, 2012 and March, 2013 periods on December 18, 2012 and April 18, 2013, respectively. Asserted claim fails to allege any damages or facts necessary to support a compensable claim and, thus, claimant has no present right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
11.7 SCHAWANG, PAUL E C/O WHIPPLE LAW FIRM PC 201 N SPRING ST INDEPENDENCE, MO 64050-2822	2300	Undetermined*	No liability exists on the books and records. The workers' compensation case was settled on March 23, 2016. Pursuant to Section 11.11(b) of the Plan, one of the Debtor's insurers agreed to satisfy the claim in full, which served to disallow and expunge the claim to the extent of the agreed upon satisfaction. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
12.8 WEITSMAN, SANDRA C/O FEDERMAN & SHERWOOD ATTN WILLIAM B FEDERMAN 10205 NORTH PENNSYLVANIA AVENUE OKLAHOMA CITY, OK 73120	2715	\$2,597,662.92	Claimant released the Debtor pursuant to the Stipulation of Settlement dated March 7, 2016, as approved by the Final Judgment and Order of Dismissal entered by the United States District Court for the Central District of Florida in Case No. 2:13-cv-02607-SVW-E. The stipulation included a release of claims. Thus, claimant has no further right to payment under applicable law. The Reorganized Debtor denies all liability with respect to the claim and reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.

* - Indicates claim contains unliquidated and/or undetermined amounts
(a) Claim also contained on Exhibit D – Contingent Contribution Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
 TWENTY-SEVENTH (SUBSTANTIVE) OMNIBUS OBJECTION
 EXHIBIT B – NO LIABILITY CLAIMS**

NAME OF CLAIMANT	CLAIM NUMBER	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
13. YALE INDUSTRIAL PRODUCTS INC C/O PHILLIPS LYTTLE LLP ATTN MICHAEL B POWERS ONE HSBC CENTER STE 3400 BUFFALO, NY 14203	4028 ^(a)	\$1,000,000.00*	No liability on the Debtor's books and records. The claimant asserts a contingent claim for contribution and/or indemnity which is barred by the applicable state law. In particular, the Reorganized Debtor is entitled to immunity under the exclusivity provision of the Pennsylvania Workers Compensation Act, 77 P.S. §481(a). See <i>Soto v. Nabisco, Inc.</i> , 32 A.3d 787, 790 (Pa. Super. 2001). The Reorganized Debtor also denies all liability and incorporates by reference its Answer, New Matter and Cross Claim to the Complaint filed by Jamie Cortez, the Plaintiff in the underlying Pennsylvania state court action entitled <i>Cortez v. Exide Technologies, Inc., et al.</i> , Philadelphia Court of Common Pleas, December Term 2011, No. 03838, including all other defenses previously asserted in the underlying action and related proceedings. The Reorganized Debtor has investigated the allegations asserted in the claim, as well as its applicable defenses, and has determined that the claimant fails to allege any damages or facts necessary to support a compensable claim, and thus, has no present right to payment under applicable law. The Reorganized Debtor reserves its right to assert defenses to any additional support that may be provided by the claimant in connection with the claim.
	TOTAL	\$2,597,662,929,580, 783.48	

* - Indicates claim contains unliquidated and/or undetermined amounts
 (a) Claim also contained on Exhibit D – Contingent Contribution Claims

EXIDE TECHNOLOGIES 13-11482 (KJC)
TWENTY-SEVENTH (SUBSTANTIVE) OMNIBUS OBJECTION
EXHIBIT D – CONTINGENT CONTRIBUTION CLAIMS

	NAME	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
1	COL UMBUS MCKINNON CORPORATION C/O PHILLIPS LYTTLE LLP ATTN MICHAEL B POWERS ONE HSBC CENTER STE 3400 BUFFALO, NY 14203	4029 ^(a)	\$1,000,000.00*	The asserted claim is a contingent claim for contribution and/or indemnity which should be disallowed in its entirety as a contingent reimbursement claim under section 502(e)(1)(B) of the Bankruptcy Code. The claimant is a co-defendant with the Debtor in a personal injury action filed by Jamie Cortez ("Plaintiff") in Pennsylvania state court arising out of a prepetition industrial accident entitled <i>Cortez v. Exide Technologies, Inc., et al.</i> , Philadelphia Court of Common Pleas, December Term 2011, No. 03838. The Plaintiff in the underlying complaint alleged that the claimant and the Debtor are liable for the same injuries and damages. The Plaintiff also filed a proof of claim against the Debtor in the bankruptcy case (Claim No. 2352) based upon the same claims asserted in the underlying litigation. Accordingly, the claimant's claim for liability arising out of the underlying action should be disallowed pursuant to section 502(e)(1)(B) of the Bankruptcy Code because: (i) the claim is a contingent claim for contribution and/or indemnity; (ii) the claim is for reimbursement based on indemnity and/or contribution; and (iii) the Debtor and the claimant are allegedly co-liable for the claims asserted by the Plaintiff in the underlying action and proof of claim.
2	COL UMBUS MCKINNON LIMITED C/O PHILLIPS LYTTLE LLP ATTN MICHAEL B POWERS ONE HSBC CENTER STE 3400 BUFFALO, NY 14203	4030 ^(a)	\$1,000,000.00*	The asserted claim is a contingent claim for contribution and/or indemnity which should be disallowed in its entirety as a contingent reimbursement claim under section 502(e)(1)(B) of the Bankruptcy Code. The claimant is a co-defendant with the Debtor in a personal injury action filed by Jamie Cortez ("Plaintiff") in Pennsylvania state court arising out of a prepetition industrial accident entitled <i>Cortez v. Exide Technologies, Inc., et al.</i> , Philadelphia Court of Common Pleas, December Term 2011, No. 03838. The Plaintiff in the underlying complaint alleged that the claimant and the Debtor are liable for the same injuries and damages. The Plaintiff also filed a proof of claim against the Debtor in the bankruptcy case (Claim No. 2352) based upon the same claims asserted in the underlying litigation. Accordingly, the claimant's claim for liability arising out of the underlying action should be disallowed pursuant to section 502(e)(1)(B) of the Bankruptcy Code because: (i) the claim is a contingent claim for contribution and/or indemnity; (ii) the claim is for reimbursement based on indemnity and/or contribution; and (iii) the Debtor and the claimant are allegedly co-liable for the claims asserted by the Plaintiff in the underlying action and proof of claim.

[11390-001 EXH A0454229.DOCX 2]

* - Indicates claim contains unliquidated and/or undetermined amounts

(a) Claim also contained on Exhibit B – No Liability Claims

**EXIDE TECHNOLOGIES 13-11482 (KJC)
 TWENTY-SEVENTH (SUBSTANTIVE) OMNIBUS OBJECTION
 EXHIBIT D – CONTINGENT CONTRIBUTION CLAIMS**

	NAME	CLAIM #	TOTAL CLAIM DOLLARS	REASON FOR PROPOSED DISALLOWANCE
3	YALE INDUSTRIAL PRODUCTS INC C/O PHILLIPS LYTTLE LLP ATTN: MICHAEL B POWERS ONE HSBC CENTER STE 3400 BUFFALO, NY 14203	4028 ^(a)	\$1,000,000.00*	The asserted claim is a contingent claim for contribution and/or indemnity which should be disallowed in its entirety as a contingent reimbursement claim under section 502(e)(1)(B) of the Bankruptcy Code. The claimant is a co-defendant with the Debtor in a personal injury action filed by Jamie Cortez ("Plaintiff") in Pennsylvania state court arising out of a prepetition industrial accident entitled <i>Cortez v. Exide Technologies, Inc., et al.</i> , Philadelphia Court of Common Pleas, December Term 2011, No. 03838. The Plaintiff in the underlying complaint alleged that the claimant and the Debtor are liable for the same injuries and damages. The Plaintiff also filed a proof of claim against the Debtor in the bankruptcy case (Claim No. 2352) based upon the same claims asserted in the underlying litigation. Accordingly, the claimant's claim for liability arising out of the underlying action should be disallowed pursuant to section 502(e)(1)(B) of the Bankruptcy Code because: (i) the claim is a contingent claim for contribution and/or indemnity; (ii) the claim is for reimbursement based on indemnity and/or contribution; and (iii) the Debtor and the claimant are allegedly co-liable for the claims asserted by the Plaintiff in the underlying action and proof of claim.
		TOTAL	\$3,000,000.00*	