

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re: : Chapter 11
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EXIDE TECHNOLOGIES, : Case No. 13-11482 (KJC)
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Reorganized Debtor.¹ : **Hearing Date: Not Applicable**
: **Objection Deadline: May 18, 2017 at 4:00 p.m. (ET)**
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NINTH NOTICE OF CLAIMS PREVIOUSLY SATISFIED

The reorganized debtor in the above-captioned case (“Exide” or the “Reorganized Debtor”) hereby files this notice (this “Notice”) identifying claims filed against the former debtor and debtor in possession in the above-captioned case (the “Debtor”) which have been satisfied in full (the “Fully Satisfied Claims”) post-petition in accordance with title 11 of the United States Code (the “Bankruptcy Code”), applicable rules, or an order of this Court. A list of the Fully Satisfied Claims is attached hereto as Exhibit A. In support of this Notice, the Reorganized Debtor respectfully represents as follows:

BACKGROUND

1. 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”).
2. 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.

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.

3. 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.

4. On August 9, 2013, the Debtor filed its schedules of assets and liabilities and statements of financial affairs (Docket No. 498) (the “Schedules”).

5. 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”).

6. 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.

7. 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.

8. To date, approximately 4,100 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-seven omnibus claims objections to Claims. After hearing these omnibus claims objections, this Court disallowed and expunged approximately 1460 Claims asserting more than \$4.9 billion in liquidated liabilities (plus unliquidated amounts).

9. Prior to the Petition Date, in the ordinary course of its business, the Debtor maintained books and records that reflected, among other things, the Debtor’s liabilities in the amounts thereof owed to its creditors (the “Books and Records”). The Reorganized Debtor has continued to review the filed proofs of claim and reconcile the claims asserted therein with the Books and Records.

CLAIMS SATISFIED AFTER THE PETITION DATE

10. Based upon such review to date, the Reorganized Debtor has identified and determined that the Fully Satisfied Claims have been satisfied in full by payments made after the Petition Date. Accordingly, the Reorganized Debtor intends to designate the Fully Satisfied Claims on the Claims Register as having been satisfied in full so that the Claims Register is accurate.

11. Out of an abundance of caution, however, the Reorganized Debtor has determined that it is appropriate to serve this notice on all Claimants holding the Fully Satisfied Claims to

provide them with an opportunity to object to the Reorganized Debtor's determination that such claims have been satisfied in full.

RESPONSES

12. By this Notice, the Reorganized Debtor requests that any Claimants disputing the Reorganized Debtor's determination that such Claimant's Fully Satisfied Claim has been paid in full file a written response ("Response") with the Clerk of the United States Bankruptcy Court so that it is **actually received no later than 4:00 p.m. (Eastern) on May 18, 2017** (the "Response Deadline"). Additionally, the Debtor requests that each Response be served so as to be **actually received** on or before the Response Deadline by the following parties: (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: Keith Scott; (iii) special conflicts counsel to the Reorganized Debtor, Pachulski Stang Ziehl & Jones LLP, 919 N. Market Street, 17th Floor, Wilmington, Delaware 19801, Attn: James E. O'Neill; (iv) counsel to the Reorganized Debtor, Shaw Fishman Glantz & Towbin, LLC, 321 N. Clark St. Suite 800, Chicago, Illinois 60654, Attn: John Guzzardo and Allen Guon; (v) the GUC Trust Trustee, Peter S. Kravitz of Province, Inc., 9209 Canwood Street, Suite 210, Agoura Hills, CA 91301; and (vi) counsel to the GUC Trust, Dana P. Kane of Kelley Drye & Warren LLP, 101 Park Avenue, New York, NY 10178

13. The Reorganized Debtor will then make a good faith effort to review the Fully Satisfied Claim with the Claimant to determine what indebtedness, if any, remains outstanding under such Fully Satisfied Claim. In the event that the parties are unable to reach a resolution, the Debtor will schedule a hearing on the Fully Satisfied Claim.

RESERVATION OF RIGHTS

14. The Reorganized Debtor expressly reserves the right to amend, modify, or supplement this Notice, and to file objections to the Fully Satisfied Claims or any other claims in the Chapter 11 Case, including, without limitation, objections as to the amounts asserted by each of the Fully Satisfied Claims, or any other claims (filed or not), against the Debtor or the Reorganized Debtor.

Dated: Wilmington, Delaware
April 27, 2017

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Special Conflicts Counsel for the Reorganized Debtor

EXHIBIT A

FULLY SATISFIED CLAIMS

EXIDE TECHNOLOGIES 13-11482 (KJC)
NINTH NOTICE OF SATISFACTION
EXHIBIT A – THE FULLY SATISFIED CLAIMS

	NAME OF CLAIMANT	CLAIM NUMBER	ASSERTED CLAIM CLASSIFICATION	ASSERTED CLAIM AMOUNT	REASON FOR FULL SATISFACTION
1	M3 RESOURCES USA LLC 4908 CAHABA RIVER RD STE 100 VESTAVIA, AL 35243-3278	1394 ⁽¹⁾	503(b)(9) Unsecured	\$179,575.25 \$3,252.82	Proof of claim 1394 ("Claim 1394") has been satisfied pursuant to a valid setoff exercised by M3 Resources USA LLC against invoice number 4525. The Reorganized Debtor agrees to not further seek amounts owing with respect to invoice number 4525.
			Subtotal	\$182,828.07	
2	MARSH USA INC ATTN SEAN GRAY 1166 AVE OF THE AMERICAS 23RD FL NEW YORK, NY 10036	2762	Unsecured	\$102,761.90	The liability asserted in the proof of claim was satisfied by the Reorganized Debtor.
3	RANKIN COUNTY COLLECTOR 211 E. GOVERNMENT ST. BRANDON, MS 39042	3902	Priority	\$90,128.58	Per the real and personal property tax notices issued by the Rankin County Tax Collector, the total tax liability owed for the 2013 tax year was \$81,163.26. The Reorganized Debtor satisfied the claim by check No. 6046952 dated 1/31/2014 in the amount of \$66,814.47, check No. 6046953 dated 1/31/2014 in the amount of \$1,653.52, check No. 6046954 dated 1/31/14 in the amount of \$500.33, Check No. 6046955 dated 1/31/14 in the amount of \$12,695.27.
4	ROCKWELL AUTOMATION INC C/O GONZALEZ SAGGIO & HARLAN LLP 3945 HOLCOMB BRIDGE RD STE 300 PEACHTREE CORNERS, GA 30092	4080	Administrative	\$121,964.56	Claimant agreed that the amount owed for this liability was \$78,671.71. Such liability has been paid in full.
5	STATE BOARD OF EQUALIZATION SPECIAL OPERATIONS BRANCH MIC55 PO BOX 942879 SACRAMENTO, CA 94279-0055	3972	Priority	\$1,251,528.03	The BOE reduced the amount due for sales and use taxes for the period 2007 to 2013 was \$465,661.95 per the Notice of Redetermination No. 0002 5217 674 dated September 30, 2016. The Reorganized Debtor satisfied the claim by electronic payment in the amount of \$467,303.30 on October 27, 2016, which included \$1,641.35 in additional interest for the month of October 2016.

* - Plus unliquidated and/or undetermined amounts

(1) - Claim previously adjourned on Exhibit D to No Liability Claims on the 19th Omnibus Claims Objection.

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NINTH NOTICE OF SATISFACTION
EXHIBIT A – THE FULLY SATISFIED CLAIMS**

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6	VAN AM TOOL & ENGINEERING LLC ATTN TODD LAWRENCE 5025 EASTON RD ST JOSEPH, MO 64507	4092	Administrative	\$872.13	Post-petition invoice number 57733 was previously satisfied by the Reorganized Debtor.
			TOTAL	\$1,750,083.27	

* - Plus unliquidated and/or undetermined amounts

(1) - Claim previously adjourned on Exhibit D to No Liability Claims on the 19th Omnibus Claims Objection.