

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

EXIDE TECHNOLOGIES,<sup>1</sup>

Reorganized Debtor.

Chapter 11

Case No. 13-11482 (KJC)

**Hearing Date:**

September 27, 2017 at 1:30 p.m. (ET)

**Objection Deadline:**

August 11, 2017 at 4:00 p.m. (ET)

Re: D.I. 3093, 3409, 3423 & 4807

**MOTION OF PETER KRAVITZ, AS THE GUC TRUST TRUSTEE OF THE EXIDE CREDITORS' LIQUIDATING TRUST, FOR ENTRY OF AN ORDER CLARIFYING AND ENFORCING THE TERMS OF THE CONFIRMATION ORDER, PLAN AND GUC SETTLEMENT AGREEMENT TO COMPEL THE REORGANIZED DEBTOR TO COMPLY WITH THE TERMS THEREOF**

**FILED UNDER SEAL**

Dated: July 28, 2017  
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

*/s/ Eric D. Schwartz*

Robert J. Dehney (No. 3578)  
Eric D. Schwartz (No. 3134)  
Tamara K. Minott (No. 5643)  
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*Counsel to Peter Kravitz, as GUC Trust Trustee*

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 2730. The Debtor's corporate headquarters are located at 13000 Deerfield Parkway, Building 200, Milton, Georgia 30004.

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

EXIDE TECHNOLOGIES,<sup>1</sup>

Reorganized Debtor.

Chapter 11

Case No. 13-11482 (KJC)

**Hearing Date:**

**September 27, 2017 at 1:30 p.m. (ET)**

**Objection Deadline:**

**August 11, 2017 at 4:00 p.m. (ET)**

**NOTICE OF MOTION OF PETER KRAVITZ, AS THE GUC TRUST TRUSTEE OF  
THE EXIDE CREDITORS' LIQUIDATING TRUST, FOR ENTRY OF AN ORDER  
CLARIFYING AND ENFORCING THE TERMS OF THE CONFIRMATION  
ORDER, PLAN AND GUC SETTLEMENT AGREEMENT TO COMPEL THE  
REORGANIZED DEBTOR TO COMPLY WITH THE TERMS THEREOF**

PLEASE TAKE NOTICE that on July 28, 2017, Peter Kravitz of Province Inc., GUC Trust Trustee (as defined in the Plan) of the Exide Creditors' Liquidating Trust (the "GUC Trust"), filed the **Motion Of Peter Kravitz, As The GUC Trust Trustee Of The Exide Creditors' Liquidating Trust, For Entry Of An Order Clarifying And Enforcing The Terms Of The Confirmation Order, Plan And GUC Settlement Agreement To Compel The Reorganized Debtor To Comply With The Terms Thereof** (the "Motion").

PLEASE TAKE FURTHER NOTICE that any party wishing to oppose the entry of an order approving the Motion must file a response or an objection to the Motion (the "Response") with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 on or before **August 11, 2017 at 4:00 p.m. (ET) (the "Objection Deadline")**. At the same time, you must serve such Response upon the undersigned counsel for the GUC Trust so as to be received by the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION WILL BE HELD ON **SEPTEMBER 27, 2017 AT 1:30 PM (ET)** BEFORE THE HONORABLE KEVIN J. CAREY AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 5<sup>TH</sup> FLOOR, COURTROOM #5, WILMINGTON, DELAWARE 19801. ONLY PARTIES WHO HAVE FILED A TIMELY RESPONSE WILL BE HEARD AT THE HEARING.

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 2730. The Debtor's corporate headquarters are located at 13000 Deerfield Parkway, Building 200, Milton, Georgia 30004.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: July 28, 2017  
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL LLP**

/s/ Eric D. Schwartz

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*Counsel to Peter Kravitz, as GUC Trust Trustee*

**EXHIBIT A**

**FILED UNDER SEAL**

**EXHIBIT B**

**FILED UNDER SEAL**

**EXHIBIT C**

**FILED UNDER SEAL**

**EXHIBIT D**

**FILED UNDER SEAL**