

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

In re:)
) Chapter 11
EXIDE TECHNOLOGIES,)
) Case No. 13-11482 (KJC)
 Reorganized Debtor.)
) **Related Docket No. 4435**
)

NOTICE OF WITHDRAWAL OF THE REORGANIZED DEBTOR’S TWENTY-FIRST (SUBSTANTIVE) OMNIBUS CLAIMS OBJECTION PURSUANT TO BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY RULE 3007, AND LOCAL RULE 3007-1 AS IT RELATES TO PROOF OF CLAIM NO. 2059, FILED BY RMG KEY ASSOCIATES, LLC

PLEASE TAKE NOTICE that on July 31, 2015, Exide Technologies, the reorganized debtor in the above-captioned bankruptcy case (the “Reorganized Debtor”), filed the *Reorganized Debtor’s (Substantive) Twenty-First Omnibus Objection Pursuant To Bankruptcy Code Section 502(B), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain (A) Misclassified Claims, (B) Reduce And Allow Claims, (C) Previously Discharged Claims, And (D) No Liability Claims* [Docket No. 4435] (The “Twenty-First Omnibus Claims Objection”).¹

PLEASE TAKE FURTHER NOTICE that pursuant to the Twenty-First Omnibus Claims Objection, the Reorganized Debtor objected, *inter alia*, to Proof of Claim No. 2059 filed by RMG Key Associates, LLC (“RMG”) listed on Exhibit D – “No Liability Claims” to the Twenty-First Omnibus Claims Objection (the “RMG Claim”).

¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Twenty-First Omnibus Claims Objection.

PLEASE TAKE FURTHER NOTICE that the Reorganized Debtor hereby withdraws its objection to the RMG Claim contained in the Twenty-First Omnibus Claims Objection without prejudice to object to the RMG Claim (or any other claim) on the same or different bases in the future.

Dated: August 24, 2017

SHAW FISHMAN GLANTZ & TOWBIN LLC
Robert M. Fishman
Allen J. Guon
John Guzzardo
321 N. Clark Street, Suite 800
Chicago, IL 60654
Telephone: (312) 541-0151
Facsimile: (312) 980-3888
Email: rfishman@shawfishman.com
aguon@shawfishman.com
jguzzardo@shawfishman.com

Counsel for the Reorganized Debtor

-and-

PACHULSKI STANG ZIEHL & JONES LLP



Laura Davis Jones (Bar No. 2436)
James E. O'Neill (Bar No. 4042)
919 N. Market Street, 17th Floor
Wilmington, DE 19801
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
joneill@pszjlaw.com

Special Conflicts Counsel for the Reorganized Debtor