

**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)

**CERTIFICATION OF COUNSEL REGARDING PROPOSED ORDER APPROVING  
STIPULATION BETWEEN REORGANIZED DEBTOR AND MITSUBISHI  
ELECTRIC POWER PRODUCTS, INC. RESOLVING CLAIM NO. 3880**

The undersigned hereby certifies the following:

1. On June 10, 2013 (the "Petition Date"), Exide Technologies, the reorganized debtor in the above-captioned case (the "Reorganized Debtor") filed a voluntary petition under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"), in the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

2. The Reorganized Debtor and Mitsubishi Electric Power Products, Inc. ("Mitsubishi") stipulate and agree hereto (the "Stipulation") for the resolution of Mitsubishi's claim, designated as claim number 3880 (the "Mitsubishi Claim"), as memorialized in the *Stipulation Between Reorganized Debtor and Mitsubishi Electric Power Products, Inc. Resolving Claim No. 3880*.

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<sup>1</sup> 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. Attached hereto as Exhibit 1 is a proposed form of order (the “Proposed Order”) approving the Stipulation that resolves the Mitsubishi Claim. The Stipulation is attached to the Proposed Order as Exhibit A.

4. Accordingly, the Reorganized Debtor respectfully requests entry of the Proposed Order at the Court’s earliest convenience.

Dated: October 30, 2017

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*Special Conflicts Counsel for the Reorganized Debtor*

**EXHIBIT 1**

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

In re:	)	
	)	Chapter 11
EXIDE TECHNOLOGIES, <sup>1</sup>	)	
	)	Case No. 13-11482 (KJC)
Reorganized Debtor.	)	
	)	
	)	

**ORDER APPROVING STIPULATION BETWEEN REORGANIZED DEBTOR AND MITSUBISHI ELECTRIC POWER PRODUCTS, INC. RESOLVING CLAIM NO. 3880**

Upon consideration of the *Stipulation Between Reorganized Debtor and Mitsubishi Electric Power Products, Inc. Resolving Claim No. 3880* (the "Stipulation"), a copy of which is attached as **Exhibit A** to this Order; and due and proper notice of the Stipulation having been given; and after due deliberation and it appearing that sufficient cause exists to approve the Stipulation;

IT IS HEREBY ORDERED THAT:

1. The Stipulation is approved; and
2. This Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

Dated: \_\_\_\_\_, 2017

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The Honorable Kevin J. Carey  
United States Bankruptcy Judge

<sup>1</sup> 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.

**EXHIBIT A**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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

**STIPULATION BETWEEN REORGANIZED DEBTOR AND MITSUBISHI  
ELECTRIC POWER PRODUCTS, INC. RESOLVING CLAIM NO. 3880**

Exide Technologies, the reorganized debtor in the above-captioned case (the "Reorganized Debtor"), and Mitsubishi Electric Power Products, Inc. ("Mitsubishi" and together with the Reorganized Debtor, the "Parties"), respectfully submit this proposed stipulation and agreed order ("Stipulation")<sup>2</sup> for the resolution and disallowance of Claim No. 3880.

**RECITALS**

WHEREAS, on June 10, 2013 (the "Petition Date"), Exide Technologies filed a voluntary petition for relief under chapter 11 of title 11 of the United States Bankruptcy Code (the "Bankruptcy Code") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court") initiating the above-captioned chapter 11 case ("Case");

WHEREAS, on February 13, 2014, Mitsubishi filed a proof of claim designated as claim number 3880 (the "Mitsubishi Claim");

<sup>2</sup> Any capitalized terms not otherwise defined herein shall have the meaning ascribed to such terms in the Objection.

WHEREAS, the Parties have conferred and have agreed to reduce the Mitsubishi Claim to Six Hundred Thousand Dollars (\$600,000.00) and allow it as a general unsecured claim.

NOW THEREFORE, it is hereby stipulated and agreed, by and among the Parties, as follows:

**STIPULATION**

1. Claim No. 3880, the Mitsubishi Claim, is reduced to the amount of Six Hundred Thousand Dollars (\$600,000.00) and allowed as a general unsecured claim, which shall be paid in accordance with the Plan in full and final satisfaction of Claim No. 3880.
2. This Court retains jurisdiction with respect to all matters arising from or related to the enforcement or interpretation of this Stipulation.

[Signature page to follow.]

AGREED TO AND APPROVED FOR ENTRY:

Dated: October 27, 2017

*/s/ Allen J. Guon*

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*/s/ James E. O'Neill*

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