

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

In re:

EXIDE TECHNOLOGIES,¹

Reorganized Debtor.

Chapter 11

Case No. 13-11482 (KJC)

Re: D.I. 4808

**CERTIFICATE OF NO OBJECTION REGARDING MOTION TO FILE
UNDER SEAL 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 undersigned hereby certifies that, as of the date hereof, Morris, Nichols, Arsht & Tunnell LLP (“Morris Nichols”) has received no answer, objection or other responsive pleading to the **Motion To File Under Seal 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”) (D.I. 4808), filed on July 28, 2017.

The undersigned further certifies that Morris Nichols has caused the review of the Court’s docket in this case and that no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the notice of rescheduled hearing (D.I. 4852) filed on September 8, 2017, objections to the Motion were to be filed and served no later than August 11, 2017 at 4:00 p.m. (Eastern Time).

¹ 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.

WHEREFORE, the GUC Trust Trustee respectfully requests that the order attached to the Motion be entered at the earliest convenience of the Court.

Dated: January 8, 2018
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Andrew J. Roth-Moore

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