

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

----- x
 In re: : Chapter 11
 :
 EXIDE TECHNOLOGIES, : Case No. 13-11482 (KJC)
 :
 Reorganized Debtor.¹ :
 : **Related Docket No. 4883**
 ----- x

CERTIFICATE OF NO OBJECTION TO MOTION FOR ORDER PURSUANT TO BANKRUPTCY CODE SECTION 107(B), FEDERAL BANKRUPTCY RULE 9018, AND LOCAL RULE 9018-1(B) PERMITTING THE REORGANIZED DEBTOR TO FILE UNDER SEAL THE PRELIMINARY RESPONSE AND OBJECTION TO THE SUPPLEMENTAL 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 AND TO COMPEL THE REORGANIZED DEBTOR TO COMPLY WITH THE TERMS THEREOF [D.I. 4859]

The undersigned hereby certifies that he is aware of no formal or informal objection or response to the Motion for Order Pursuant to Bankruptcy Code Section 107(B), Federal Bankruptcy Rule 9018, and Local Rule 9018-1(B) Permitting the Reorganized Debtor to File Under Seal the Preliminary Response and Objection to the Supplemental 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 and to Compel the Reorganized Debtor to Comply with the Terms Thereof [D.I. 4859] (Docket No. 4883) (the “Motion”), filed by counsel to the above captioned reorganized

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.

debtor (“Exide” or the “Reorganized Debtor”) on October 11, 2017. He has reviewed the Court’s docket and no objection to the Motion appears thereon.

The notice of the Motion established December 5, 2017 at 4:00 p.m. (Eastern) as the deadline (the “Objection Deadline”) for receipt of objections to the Motion, and no extension of the Objection Deadline was granted.

Accordingly, it is respectfully requested that the Court enter the proposed form of order filed with the Motion, a copy of which order (modified only to reflect the docket number of the Motion) is attached hereto as Exhibit 1.

Dated: Wilmington, Delaware
January 11, 2018

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

/s/ Jason M. Liberi

Anthony W. Clark (I.D. No. 2051)

Jason M. Liberi (I.D. No. 4425)

One Rodney Square

P.O. Box 636

Wilmington, Delaware 19899-0636

Telephone: (302) 651-3000

Fax: (302) 651-3001

- and -

J. Eric Ivester

Four Times Square

New York, New York 10036-6522

Telephone: (212) 735-3000

Fax: (212) 735-2000

- and -

James J. Mazza, Jr.

155 N. Wacker Dr.

Chicago, Illinois 60606-1720

Telephone: (312) 407-0700

Fax: (312) 407-0411

Counsel for the Reorganized Debtor

EXHIBIT 1

ORDER

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

----- X
 In re: :
 : Chapter 11
 EXIDE TECHNOLOGIES, :
 : Case No. 13-11482 (KJC)
 Reorganized Debtor.¹ :
 : **Re: Docket Nos. 3093, 3409, 3423, 3567, 4807, 4808,**
 : **4809, 4817, 4859, 4860, 4861, 4883,**
 ----- X

**ORDER PURSUANT TO BANKRUPTCY CODE SECTION 107(B), FEDERAL
BANKRUPTCY RULE 9018, AND LOCAL RULE 9018-1(B) GRANTING
REORGANIZED DEBTOR’S MOTION TO FILE UNDER SEAL THE PRELIMINARY
RESPONSE AND OBJECTION TO THE SUPPLEMENTAL 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 AND TO COMPEL THE REORGANIZED DEBTOR TO
COMPLY WITH THE TERMS THEREOF [D.I. 4859]**

Upon consideration of the motion (the “Motion to Seal”)² of the Reorganized Debtor for entry of an order (the “Order”), pursuant to Section 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1(b) authorizing the Reorganized Debtor to file under seal the Objection, including exhibits thereto; and due and sufficient notice of the Motion to Seal having been given; and this Court having fully considered the record before it; and it appearing that the relief requested by the Motion to Seal is in the best interests of the Reorganized Debtor, the Trustee, and other parties in interest; and after due deliberation thereon; and good and sufficient cause appearing therefore, it is hereby

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.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Motion to Seal.

ORDERED, ADJUDGED AND DECREED that:

1. The Motion to Seal is GRANTED.
2. The Reorganized Debtor is authorized to file the Objection under seal.
3. The Clerk of the Court shall segregate and maintain the Objection under seal pursuant to the procedures set forth in Local Rule 9018-1(b) until further order of this Court.
4. The Reorganized Debtor is under no further filing obligation with respect to the Objection; *provided however*, that the Reorganized Debtor shall make copies of the Objection available only to the Court, the Trustee and his counsel, the U.S. Trustee, and any person or entity upon joint consent of the Trustee and Reorganized Debtor.
5. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.

Dated: Wilmington, Delaware
January __, 2018

The Honorable Kevin J. Carey
UNITED STATES BANKRUPTCY JUDGE