

**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)

**CERTIFICATION OF COUNSEL REGARDING PROPOSED ORDER APPROVING
STIPULATION BETWEEN REORGANIZED DEBTOR AND NEW JERSEY
DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT,
DIVISION OF EMPLOYER ACCOUNTS RESOLVING CLAIM NO. 1519**

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 the New Jersey Department of Labor and Workforce Development, Division of Employer Accounts (the "New Jersey DOL") stipulate and agree hereto (the "Stipulation") for the resolution of the New Jersey DOL's claim, designated as claim number 1519 (the "New Jersey DOL Claim"), as memorialized in the *Stipulation Between Reorganized Debtor and New Jersey Department of Labor and Workforce Development, Division of Employer Accounts Resolving Claim No. 1519*.

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.

3. Attached hereto as Exhibit 1 is a proposed form of order (the "Proposed Order") approving the Stipulation that resolves the New Jersey DOL 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.

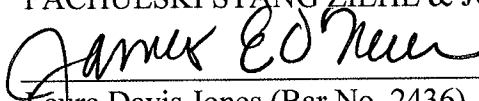
Dated: February 2, 2018

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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,)	
)	Case No. 13-11482 (KJC)
Reorganized Debtor.)	
)	
)	

**ORDER APPROVING STIPULATION BETWEEN REORGANIZED DEBTOR AND
NEW JERSEY DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT,
DIVISION OF EMPLOYER ACCOUNTS RESOLVING CLAIM NO. 1519**

Upon consideration of the *Stipulation Between Reorganized Debtor and New Jersey Department of Labor and Workforce Development, Division of Employer Accounts Resolving Claim No. 1519* (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: _____, 2018

The Honorable Kevin J. Carey
United States Bankruptcy Judge

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 NEW JERSEY
DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT,
DIVISION OF EMPLOYER ACCOUNTS RESOLVING CLAIM NO. 1519**

Exide Technologies, the reorganized debtor in the above-captioned case (the “Reorganized Debtor”), and New Jersey Department of Labor and Workforce Development, Division of Employer Accounts (the “New Jersey DOL” and together with the Reorganized Debtor, the “Parties”), respectfully submit this proposed stipulation and agreed order (“Stipulation”) for the resolution and allowance of Claim No. 1519.

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 October 16, 2013, New Jersey DOL filed a proof of claim designated as claim number 1519 (the “New Jersey DOL Claim”);

WHEREAS, on March 27, 2015, the Bankruptcy Court entered an order (“Confirmation Order”) confirming the Fourth Amended Plan of Reorganization of Exide Technologies (Docket No. 3423) (the “Plan”);²

² Capitalized terms not defined herein shall have the definitions ascribed to them in the Plan.

WHEREAS, on April 30, 2015, the Debtor substantially consummated the Plan (“Effective Date”), and the Debtor has emerged from chapter 11 as the Reorganized Debtor. Pursuant to Article 15.8 of the Plan, the Creditors’ Committee was dissolved on the Effective Date and Peter Kravitz of Province Inc. was appointed as GUC Trust Trustee. Pursuant to the Plan, the Reorganized Debtor may object to any Claims filed in the Case;

WHEREAS, the New Jersey DOL Claim is a claim for taxes asserting, in part, a priority status for the amount of \$1,179.21 and a general unsecured status for the amount of \$62,200.10. The New Jersey DOL Claim relates to assessments pursuant to Unemployment Compensation and Temporary Disability Benefits Laws of New Jersey and interest on the same;

WHEREAS, the Parties have conferred and have agreed to the allowance of the New Jersey DOL Claim in the total amount of Three Hundred Thirty-Three Dollars and Forty-Two Cents (\$333.42) and classified as follows: (i) a priority claim in the amount of Thirty-One Dollars and Fifty Cents (\$31.50); and (ii) a general unsecured claim in the amount of Three Hundred and One Dollars and Ninety-Two Cents (\$301.92).

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

STIPULATION

1. Claim No. 1519, the New Jersey DOL Claim, is allowed as a priority claim in the amount of Thirty-One Dollars and Fifty Cents (\$31.50) and a general unsecured claim in the amount of Three Hundred and One Dollars and Ninety-Two Cents (\$301.92), for a total claim of Three Hundred Thirty-Three Dollars and Forty-Two Cents (\$333.42), which shall be paid in accordance with the Plan in full and final satisfaction of Claim No. 1519.

2. Any other claim held, asserted or assertable by the New Jersey DOL against the Debtor, its estate, the Reorganized Debtor, or the GUC Trust arising or accruing on or before the Effective Date, is hereby released, expunged and discharged.

3. Neither this Stipulation and Agreed Order nor any negotiations and writings in connection with this Stipulation and Agreed Order shall in any way be construed as or deemed to be evidence of or an admission on behalf of any party regarding any claim or right that such party may have against the other party.

4. Each of the parties hereto represents and warrants that he, she and/or it (i) has selected or has had the opportunity to consult with independent counsel of their respective choice in connection with the matters related to this Stipulation and (ii) is duly authorized to enter into and be bound by this Stipulation.

5. This Stipulation may be executed in multiple counterparts, any of which may be transmitted by facsimile or electronic mail, and each of which shall be deemed an original, but all of which together shall constitute one instrument.

6. This Court retains jurisdiction with respect to all matters arising from or related to the enforcement or interpretation of this Stipulation.

AGREED TO AND APPROVED FOR ENTRY:

AGREED TO AND APPROVED FOR ENTRY:

Dated: January ____, 2018

/s/ Allen J. Guon

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