

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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 In re: : Chapter 11
 :
 EXIDE TECHNOLOGIES, : Case No. 13-11482 (KJC)
 :
 Reorganized Debtor.¹ : **Related Docket No. 4435**
 :
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REPLY OF THE REORGANIZED DEBTOR IN SUPPORT OF THE REORGANIZED DEBTOR’S TWENTY-FIRST OMNIBUS OBJECTION TO CLAIM NO. 321 FILED BY ELECTRIC CONVERSIONS

The reorganized debtor in the above-captioned case (“Exide” or the “Reorganized Debtor”), files this reply in support of the Reorganized Debtor’s Twenty-First Omnibus Objection to Claim No. 321 (“Disputed Claim”) filed Gregory McCrea d/b/a Electric Conversions’ (“Claimant”), and states as follows:

INTRODUCTION

1. The Reorganized Debtor seeks to reclassify \$186,154.26 of the Disputed Claim (“Misclassified Amount”) as a general unsecured claim. Claimant asserts that the Misclassified Amount is entitled to priority status under 11 U.S.C. § 507(a)² because the Claimant is purportedly a “critical vendor” under § 105(a). Claimant has not provided the Court with any facts demonstrating that the Misclassified Amount is entitled to priority under § 507(a). Nor does § 105(a) enable Claimant to bootstrap priority treatment for a claim that is not otherwise

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 Unless otherwise indicated, all references to statutory provisions are intended as references to chapter 11 of title 11, United States Code, 11 U.S.C. §§ 101 *et seq.* (“Bankruptcy Code”).

afforded priority under § 507. *Southern Railway Co. v. Johnson Bronze Co.*, 758 F.2d 137, 141 (3d Cir. 1982). Accordingly, the Reorganized Debtor's objection should be granted.

BACKGROUND

2. On July 18, 2013, Claimant filed the Disputed Claim in the total amount \$195,574.26 for goods sold to Exide ("Disputed Claim"). A copy of Disputed Claim is attached hereto as Exhibit A. Claimant asserts that the total amount of the Disputed Claim is entitled to priority pursuant to §§ 105(a) and 507(a) and that \$9,420.00 of the Disputed Claim is also entitled to administrative priority pursuant to § 503(b)(9). *Id.*, at 3.

3. On July 31, 2015, 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 (I) No Liability Claims, (II) Misclassified Claims, And (III) Reduce And Allow Claims* [Docket No. 4435] ("Omnibus Objection"), which included an objection to the Disputed Claim.

4. In the Omnibus Objection, the Reorganized Debtor objected to the Disputed Claim on the basis that, with the exception of the amount of \$9,420.00 entitled to administrative priority pursuant to § 503(b)(9), the Misclassified Amount did not qualify for priority status under § 507(a). *Omnibus Objection*, Ex. B.

5. Claimant served the Reorganized Debtor with a copy of the "*Creditors response [sic] to Debtors 'Notice of Objection'*" ("Response"). In the Response, Claimant asserts that it is entitled to "critical vendor status" pursuant to § 105(a). A copy of the Response is attached as Exhibit B.

ARGUMENT

6. A claimant seeking priority status for its claim bears the burden of proving that the claim qualifies for priority status. *See, e.g. In re FBI Distrib. Corp.*, 330 F.3d 36, 42-43 (1st

Cir. 2003); *In re City Sports, Inc.*, 554 B.R. 329, 333 (Bankr. D. Del. 2016). Section 507(a) contains ten categories of claims that are entitled to priority in bankruptcy cases. 11 U.S.C. § 507(a). Since bankruptcy laws prefer that a debtor's limited resources be equally distributed among all creditors, priority statutes are "construed strictly and narrowly." *See, e.g. City Sports, Inc.*, 554 B.R. at 333; *In re WW Warehouse, Inc.*, 313 B.R. 588, 592 (Bankr. D. Del. 2004) ("priorities should be narrowly construed to ensure that the often limited resources will be equally distributed"). Thus, Claimant must prove that its claim is entitled to priority under one of the enumerated sections of § 507(a) in order to be afforded priority treatment under the Bankruptcy Code. *See In re Cont'l Airlines, Inc.*, 148 B.R. 207, 211 (D. Del. 1992) ("Priority should not be afforded unless it is founded on a clear statutory purpose.").

7. Claimant does not identify any section of § 507(a) which would entitle the Misclassified Amount to receive priority treatment. Instead, Claimant asserts that the Misclassified Amount is entitled to priority treatment under § 105(a) because a former employee of Exide allegedly said that Claimant was an "essential trade creditor." *Response*. Section 105(a), however, does not provide an independent basis to elevate a general unsecured claim to priority status under the Bankruptcy Code. Section 105(a) authorizes a court to "issue any order ... that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code]." 11 U.S.C. § 105(a). While § 105(a) "supplements courts' specifically enumerated bankruptcy powers," it is limited in scope and "does not 'create substantive rights that would otherwise be unavailable under the Bankruptcy Code.'" *In re Cont'l Airlines*, 203 F.3d 203, 211 (3d Cir. 2000) (quoting *United States v. Pepperman*, 976 F.2d 123, 131 (3d Cir. 1992)); *In re Combustion Eng'g, Inc.*, 391 F.3d 190, 236 (3d Cir. 2004), *as amended* (Feb. 23, 2005) (§ 105(a) "must be exercised within the parameters of the Code."). Accordingly, the Third Circuit has held that

§ 105(a) does not provide an independent basis for a creditor to receive a priority treatment of a claim that is not otherwise afforded priority under § 507. *Southern Railway*, 758 F.2d at 141. Claimant has not identified any applicable provision of § 507(a) that would entitle it to priority status for the Misclassified Amount and § 105(a) does not independently elevate Claimant's claim.

8. The only portion of the Disputed Claim that is entitled to priority as an administrative expense under § 507(a)(2) is the amount of \$9,420.00 for the goods delivered to Exide in the ordinary course of Exide's business within 20 days before the petition date pursuant to § 503(b)(9).³ See 11 U.S.C. § 507(a)(2) (administrative expenses receive priority over other unsecured claims). Section 503(b)(9) is a narrow exception granting administrative treatment to the claims of otherwise unsecured creditors that supply goods to a debtor prepetition. *In re World Imports*, 516 B.R. 296, 297 (Bankr. E.D. Pa. 2014). There simply is no basis to elevate any other portion of the Disputed Claim to priority treatment above other similarly situated unsecured creditors. See *Cont'l Airlines*, 148 B.R. at 211 (D. Del. 1992) (quoting *Jartran*, 732 F.2d at 584, 586 (7th Cir. 1984) ("Any preference for claims not intended by Congress to have priority would dilute the value of the intended priority and thus frustrate the intent of Congress.")).

9. Claimant has not met its burden of proving its entitlement to a priority claim for the Misclassified Amount. Accordingly, the Disputed Claim must be modified and reclassified as a general unsecured claim in the amount of \$186,154.26 and an administrative priority claim under § 503(b)(9) in the amount of \$9,420.00.

³ Section 503(b)(9) provides that, after notice and a hearing, the bankruptcy court shall allow, as administrative expenses, "the value of any goods received by the debtor within 20 days before the date of commencement of a case under this title in which the goods have been sold to the debtor in the ordinary course of the debtor's business."

WHEREFORE, the Reorganized Debtor respectfully requests that this Court enter an order (a) granting the relief requested in the Objection reclassifying the Misclassified Amount; and (b) granting to the Reorganized Debtor such other and further relief as this Court may deem just and proper.

Dated: Wilmington, Delaware
August 8, 2018

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-and-


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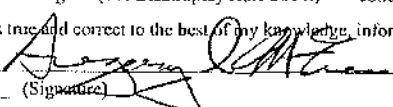
EXHIBIT A



UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE		PROOF OF CLAIM
Name of Debtor: Exide Technologies Case No. 13-11482		Your Claim is Scheduled As Follows:
NOTE: Do not use this form to make a claim for an administrative expense that arises after the bankruptcy filing. You may file a request for payment of an administrative expense according to 11 U.S.C. § 503.		
Name of Creditor (the person or other entity to whom the Debtor owes money or property): Gregory McCrea	<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim.	 <p>If an amount is identified above, you have a claim scheduled by one of the Debtors as shown. (This scheduled amount of your claim may be an amendment to a previously scheduled amount.) If you agree with the amount and priority of your claim as scheduled by the Debtor and you have no other claim against the Debtor, you do not need to file this proof of claim form, EXCEPT AS FOLLOWS: If the amount shown is listed as any of DISPUTED, UNLIQUIDATED, or CONTINGENT, a proof of claim MUST be filed in order to receive any distribution in respect of your claim. If you have already filed a proof of claim in accordance with the attached instructions, you need not file again.</p>
Name and address where notices should be sent: Electric Conversions 515 N. 10th Street Sacramento, CA 95811	<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to this claim. Attach copy of statement giving particulars.	
Telephone number: 916-441-4161 Email address: elcon@jps.net	Court Claim Number: 13-11482 <i>(if known)</i> Filed on: June 10, 2013	
Name and address where payment should be sent (if different from above): FILED - 00321 DISTRICT OF DELAWARE EXIDE TECHNOLOGIES 13-11482 (KJC)	<input type="checkbox"/> Check this box if the claim includes interest or other charges in addition to the principal amount of the claim. Attach a statement that itemizes interest or charges.	
1. Amount of Claim as of Date Case Filed: \$ 195,574.26 If all or part of the claim is secured, complete item 4. If all or part of the claim is entitled to priority, complete item 5. If all or part of the claim arises from the value of any goods received by the Debtor within 20 days before June 10, 2013, the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business, pursuant to 11 U.S.C. § 503(b)(9), complete item 6. <input type="checkbox"/> Check this box if the claim includes interest or other charges in addition to the principal amount of the claim. Attach a statement that itemizes interest or charges.		
2. Basis for Claim: goods sold (See instruction #2)		
3. Last four digits of any number by which creditor identifies Debtor:	3a. Debtor may have scheduled account as: ELCON <i>(See instruction #3a)</i>	3b. Uniform Claim Identifier (optional): <i>(See instruction #3b)</i>
4. Secured Claim (See instruction #4) Check the appropriate box if the claim is secured by a lien on property or a right of setoff, attach required redacted documents, and provide the requested information.		
Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other		Amount of arrearage and other charges, as of the time case was filed, included in secured claim, if any: \$ _____
Describe: _____		Basis for perfection: _____
Value of Property: \$ _____		Amount of Secured Claim: \$ _____
Annual Interest Rate _____ % <input type="checkbox"/> Fixed or <input type="checkbox"/> Variable (when case was filed)		Amount Unsecured: \$ _____
5. Amount of Claim Entitled to Priority under 11 U.S.C. § 507 (a). If any part of the claim falls into one of the following categories, check the box specifying the priority and state the amount.		
<input type="checkbox"/> Domestic support obligations under 11 U.S.C. § 507 (a)(1)(A) or (a)(1)(B). <input type="checkbox"/> Up to \$2,775* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. § 507 (a)(7).		Amount entitled to priority: \$ 195,574.26
<input type="checkbox"/> Wages, salaries, or commissions (up to \$12,475*) earned within 180 days before the case was filed or the Debtor's business ceased, whichever is earlier - 11 U.S.C. § 507 (a)(4). <input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. § 507 (a)(8).		
<input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. § 507 (a)(5). <input checked="" type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. § 507 (a)(): 11 U.S.C. § 105(a) *requested as essential supplier*		
*Amounts are subject to adjustment on 4/1/16 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.		
6. Claim Pursuant to 11 U.S.C. § 503(b)(9): Indicate the amount of your claim arising from the value of any goods received by the Debtor within 20 days before June 10, 2013, the date of commencement of the above cases, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim. § 542(b)(9)		
7. Credits. The amount of all payments on this claim has been credited for the purpose of making this proof of claim. (See instruction #7)		

Modified B10 (GCG) (12/11)

8. **Documents:** Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. [If the claim is secured, box 4 has been completed, and redacted copies of documents providing evidence of perfection of a security interest are attached. (See instruction #8, and the definition of "redacted".)]
DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.
 If the documents are not available, please explain: itemized statement of account, invoice copies referencing purchase order numbers

9. **Signature:** (See instruction #9) Check the appropriate box.
 I am the creditor. I am the creditor's authorized agent. I am the trustee, or the Debtor, or their authorized agent. (See Bankruptcy Rule 3004.) I am a guarantor, surety, indorser, or other codebtor. (See Bankruptcy Rule 3005.)
 I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.
 Print Name: Gregory I. McCree
 Title: Owner (Signature)  (Date) 7/17/13
 Company: Electric Conversions
 Address and telephone number (if different from notice address above):

 Telephone number: 916-441-4161 Email address: elcon@ps.net

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

INSTRUCTIONS FOR PROOF OF CLAIM FORM

The instructions and definitions below are general explanations of the law. In certain circumstances, such as bankruptcy cases not filed voluntarily by the Debtor, exceptions to these general rules may apply. The attorneys for the Debtors and their court-appointed claims agent, GCG, are not authorized and are not providing you with any legal advice.

PLEASE SEND YOUR ORIGINAL, COMPLETED CLAIM FORM AS FOLLOWS: IF BY MAIL: EXIDE CASE ADMINISTRATION, C/O GCG, P.O. BOX 9985 DUBLIN, OH 43017-5985. IF BY HAND OR OVERNIGHT COURIER: EXIDE CASE ADMINISTRATION, C/O GCG, 5151 BLAZER PARKWAY, SUITE A, DUBLIN, OH 43017. ANY PROOF OF CLAIM SUBMITTED BY FACSIMILE OR EMAIL WILL NOT BE ACCEPTED.

Items to be completed in Proof of Claim Form

Court, Name of Debtor, and Case Number:
 These chapter 11 cases were commenced in the United States Bankruptcy Court for the District of Delaware on June 10, 2013 (the "Petition Date"). You should select the Debtor against which you are asserting your claim.

A SEPARATE PROOF OF CLAIM FORM MUST BE FILED AGAINST EACH DEBTOR.

Creditor's Name and Address:
 Fill in the name of the person or entity asserting a claim and the name and address of the person who should receive notices issued during the bankruptcy case. Please provide us with a valid email address. A separate space is provided for the payment address if it differs from the notice address. The creditor has a continuing obligation to keep the court informed of its current address. See Federal Rule of Bankruptcy Procedure (FRBP) 2002(g).

1. Amount of Claim as of Date Case Filed:
 State the total amount owed to the creditor on the Petition Date. Follow the instructions concerning whether to complete items 4, 5 and 6. Check the box if interest or other charges are included in the claim.

2. Basis for Claim:
 State the type of debt or how it was incurred. Examples include goods sold, money loaned, services performed, personal injury/wrongful death, car loan, mortgage note, and credit card. If the claim is based on delivering health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information. You may be required to provide additional disclosure if an interested party objects to your claim.

3. Last Four Digits of Any Number by Which Creditor Identifies Debtor: State only the last four digits of the Debtor's account or other number used by the creditor to identify the Debtor.

3a. Debtor May Have Scheduled Account As:
 Report a change in the creditor's name, a transferred claim, or any other information that clarifies a difference between this proof of claim and the claim as scheduled by the Debtor.

3b. Uniform Claim Identifier:
 If you use a uniform claim identifier, you may report it here. A uniform claim identifier is an optional 24-character identifier that certain large creditors use to facilitate electronic payment in chapter 13 cases.

4. Secured Claim:
 Check whether the claim is fully or partially secured. Skip this section if the claim is entirely unsecured. (See Definitions.) If the claim is secured, check the box for the nature and value of property that secures the claim, attach copies of lien documentation, and state, as of the date of the bankruptcy filing, the annual interest rate (and whether it is fixed or variable), and the amount past due on the claim.

5. Amount of Claim Entitled to Priority Under 11 U.S.C. § 507(a):
 If any portion of your claim falls in one or more of the listed categories, check the appropriate box(es) and state the amount entitled to priority. (See DEFINITIONS, below.) A claim may be partly priority and partly non-priority. For example, in some of the categories, the law limits the amount entitled to priority.

6. Claim Pursuant to 11 U.S.C. § 503 (b)(9):
 If you have a claim arising from the value of any goods received by the Debtor within 20 days before June 10, 2013, the date of commencement of the above cases, in which the goods have been sold to the Debtor in the ordinary course of the Debtor's business, state the amount of such claim and attach documentation supporting such claim. (See DEFINITIONS, below.)

7. Credits:
 An authorized signature on this proof of claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the Debtor credit for any payments received toward the debt.

8. Documents:
 Attach redacted copies of any documents that show the debt exists and a lien secures the debt. You must also attach copies of documents that evidence perfection of any security interest. You may also attach a summary in addition to the documents themselves. FRBP 3001(c) and (d). If the claim is based on delivering health care goods or services, limit disclosing confidential healthcare information. Do not send original documents, as attachments may be destroyed after scanning.

9. Date and Signature:
 The individual completing this proof of claim must sign and date it. FRBP 9011. If the claim is filed electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what constitutes a signature. If you sign this form, you declare under penalty of perjury that the information provided is true and correct to the best of your knowledge, information, and reasonable belief. Your signature is also a certification that the claim meets the requirements of FRBP 9011(b). Whether the claim is filed electronically or in person, if your name is on the signature line, you are responsible for the declaration. Print the name and title, if any, of the creditor or other person authorized to file this claim. State the filer's address and telephone number if it differs from the address given on the top of the form for purposes of receiving notices. If the claim is filed by an authorized agent, attach a complete copy of any power of attorney, and provide both the name of the individual filing the claim and the name of the agent. If the authorized agent is a servicer, identify the corporate servicer as the company. Criminal penalties apply for making a false statement on a proof of claim.

Modified B10 (GCG) (12/11)

2:12 PM
07/16/13

Electric Conversions
Open Invoices
As of July 1, 2013

Type	Date	Num	P.O. #	Terms	Due Date	Aging	Open Balance
Exide Technologies							
Payment	04/06/09	4491...					-37.74
Payment	02/11/13	5353...					-43,950.00
Invoice	06/25/12	10591		Net 60	08/24/12	311	47,752.00
Invoice	11/16/12	11179		Net 60	01/15/13	167	35,640.00
Invoice	12/27/12	11332		Net 60	02/25/13	126	25,920.00
Invoice	01/15/13	11404		Net 60	03/16/13	197	25,920.00
Invoice	03/19/13	11677		Net 60	05/18/13	44	3,140.00
Invoice	03/20/13	11678a		Net 60	05/19/13	43	3,140.00
Invoice	03/21/13	11679a		Net 60	05/20/13	42	3,140.00
Invoice	03/22/13	11685		Net 60	05/21/13	41	3,140.00
Invoice	04/05/13	11702		Net 60	06/04/13	27	9,420.00
Invoice	04/09/13	11743		Net 60	06/08/13	23	15,300.00
Invoice	04/11/13	11757		Net 60	06/10/13	21	9,420.00
Invoice	04/15/13	11764		Net 60	06/14/13	17	15,700.00
Invoice	04/22/13	11795		Net 60	06/21/13	10	3,260.00
Invoice	04/23/13	11800		Net 60	06/22/13	9	9,420.00
Invoice	05/08/13	11844		Net 60	07/05/13		9,420.00
Invoice	05/12/13	11903		Net 60	07/16/13		9,420.00
Invoice	06/03/13	11950		Net 60	08/02/13		9,420.00
Total Exide Technologies							195,574.25
TOTAL							195,574.25

11 U.S.C. § 503(b)(9)

Account ^{balance} list, referencing
PO#'s & invoice numbers.

Electric Conversions
 515 N. 10th Street
 Sacramento, CA 95811

Invoice

Date	Invoice #
6/25/12	10591

Bill To
Exide Technologies PMB #713 123 Townsquare Place Jersey City, NJ 07310

Ship To
Exide Technologies-IND #275 4115 South Zero Street Ft. Smith, AR 72908-6997

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
2217151	Net 60		6/25/12	UPS		
Quantity	Item Code	Description			Price Each	Amount
0	NG1	SPP 06500 S1F chargers			0.00	0.00
0	NG1	SPP 06500 S1F chargers			0.00	0.00
0	NG1	SPP 06500 S1F chargers			0.00	0.00
0	NG1	SPP 12500 S1F chargers			0.00	0.00
150	NG1	SPP 12500 S1F chargers			314.00	47,100.00
	Shipping	Local Drayage 3-day shipping			312.00	312.00
	Shipping	Local Drayage ground			340.00	340.00
Thank you for your business.					Subtotal	\$47,752.00

If you have questions please call us at (916)441-4161, or fax at (916)444-8190. Thank you

Sales Tax (8.75%)	\$0.00
Total	\$47,752.00

Electric Conversions
 515 N. 10th Street
 Sacramento, CA 95811

Invoice

Date	Invoice #
11/16/12	11179

Bill To
Exide Technologies PMB #713 123 Townsquare Place Jersey City, NJ 07310

Ship To
Exide Technologies-IND #275 4115 South Zero Street Ft. Smith, AR 72908

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
2371589	Net 60		11/16/12	Federal Express		
Quantity	Item Code	Description			Price Each	Amount
110	NGI	SPP 12500 SIF chargers			314.00	34,540.00
110	Shipping	Inbound Air Freight and Customs			10.00	1,100.00
	Shipping	Local Drayage			0.00	0.00
Thank you for your business.					Subtotal	\$35,640.00
If you have questions please call us at (916)441-4161, or fax at (916)444-8190. Thank you					Sales Tax (8.75%)	\$0.00
					Total	\$35,640.00

Electric Conversions

515 N. 10th Street
 Sacramento, CA 95811

Invoice

Date	Invoice #
12/27/12	11332

Bill To
Exide Technologies PMB #713 123 Townsquare Place Jersey City, NJ 07310

Ship To
Exide Technologies-IND #275 4115 South Zero Street Ft. Smith, AR 72908

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
2371590	Net 60		12/27/12	Federal Express		
Quantity	Item Code	Description			Price Each	Amount
80	NG1	SPP 12500 SIF chargers			314.00	25,120.00
80	Shipping	Inbound air freight and customs			10.00	800.00
Thank you for your business.					Subtotal	\$25,920.00
If you have questions please call us at (916)441-4161, or fax at (916)444-8190. Thank you					Sales Tax (8.75%)	\$0.00
					Total	\$25,920.00

Electric Conversions

515 N. 10th Street
 Sacramento, CA 95811

Invoice

Date	Invoice #
1/15/13	11404

Bill To
Exide Technologies PMB #713 123 Townsquare Place Jersey City, NJ 07310

Ship To
Exide Technologies-IND #275 4115 South Zero Street Ft. Smith, AR 72908

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
2371590	Net 60		1/15/13	Federal Express		
Quantity	Item Code	Description			Price Each	Amount
80	NGI	SPP 12500 SIF charger			314.00	25,120.00
80	Shipping	Inbound air freight and customs			10.00	800.00
	Shipping	Local Drayage			0.00	0.00

Thank you for your business.

If you have questions please call us at (916)441-4161, or fax at (916)444-8190. Thank you

Subtotal	\$25,920.00
Sales Tax (8.75%)	\$0.00
Total	\$25,920.00

Electric Conversions
 515 N. 10th Street
 Sacramento, CA 95811

Invoice

Date	Invoice #
3/19/13	11677

Bill To
Exide Technologies PMB #713 123 Townsquare Place Jersey City, NJ 07310

Ship To
Exide Technologies-IND #421 501 Kindelberger Kansas City KS 66115

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
2427244	Net 60		3/19/13	Federal Express		
Quantity	Item Code	Description			Price Each	Amount
10	NG1	SPP 12500 SII ² charger			314.00	3,140.00
	Shipping	Local Drayage			0.00	0.00
Thank you for your business.					Subtotal	\$3,140.00

If you have questions please call us at (916)441-4161, or fax at (916)444-8190. Thank you

Sales Tax (8.75%)	\$0.00
Total	\$3,140.00

Electric Conversions

515 N. 10th Street
 Sacramento, CA 95811

Invoice

Date	Invoice #
3/20/13	11678a

Bill To
Exide Technologies PMB #713 123 Townsquare Place Jersey City, NJ 07310

Ship To
Exide Technologies-IND #421 501 Kindelberger Kansas City KS 66115

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
2427245	Net 60		3/20/13	Federal Express		

Quantity	Item Code	Description	Price Each	Amount
10	NGI	SPP 12500 SIF charger	314.00	3,140.00
	Shipping	Local Drayage	0.00	0.00

Thank you for your business.	Subtotal	\$3,140.00
If you have questions please call us at (916)441-4161, or fax at (916)444-8190. Thank you	Sales Tax (8.75%)	\$0.00
	Total	\$3,140.00

Electric Conversions
 515 N. 10th Street
 Sacramento, CA 95811

Invoice

Date	Invoice #
3/21/13	11679a

Bill To
Exide Technologies PMB #713 123 Townsquare Place Jersey City, NJ 07310

Ship To
Exide Technologies-IND #421 501 Kindelberger Kansas City KS 66115

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
2427247	Net 60		3/21/13	Federal Express		

Quantity	Item Code	Description	Price Each	Amount
10	NG1	SPP 12500 SIF charger	314.00	3,140.00
	Shipping	Local Drayage	0.00	0.00

Thank you for your business. If you have questions please call us at (916)441-4161, or fax at (916)444-8190. Thank you	Subtotal	\$3,140.00
	Sales Tax (8.75%)	\$0.00
	Total	\$3,140.00

Electric Conversions

515 N. 10th Street
 Sacramento, CA 95811

Invoice

Date	Invoice #
3/22/13	11685

Bill To
Exide Technologies PMB #713 123 Townsquare Place Jersey City, NJ 07310

Ship To
Exide Technologies-IND #275 4115 South Zero Street Ft. Smith, AR 72908

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
2341202	Net 60		3/22/13	Federal Express		

Quantity	Item Code	Description	Price Each	Amount
10	NG1	SPP 12500 S1F charger	314.00	3,140.00
	Shipping	Local Drayage	0.00	0.00

Thank you for your business.	Subtotal	\$3,140.00
If you have questions please call us at (916)441-4161, or fax at (916)444-8190. Thank you	Sales Tax (8.75%)	\$0.00
	Total	\$3,140.00

Electric Conversions

515 N. 10th Street
 Sacramento, CA 95811

Invoice

Date	Invoice #
4/5/13	11702

Bill To
Exide Technologies PMB #713 123 Townsquare Place Jersey City, NJ 07310

Ship To
Exide Technologies-IND #275 4115 South Zero St Ft. Smith, AR 72908

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
2431852	Net 60		4/5/13	Federal Express		
Quantity	Item Code	Description			Price Each	Amount
30	NG1	SPP 12500 S1F charger			314.00	9,420.00
	Shipping	Local Drayage			0.00	0.00

Thank you for your business.	Subtotal	\$9,420.00
If you have questions please call us at (916)441-4161, or fax at (916)444-8190. Thank you	Sales Tax (8.75%)	\$0.00
	Total	\$9,420.00

Electric Conversions

515 N. 10th Street
 Sacramento, CA 95811

Invoice

Date	Invoice #
4/9/13	11743

Bill To
Exide Technologies PMB #713 123 Townsquare Place Jersey City, NJ 07310

Ship To
Exide Technologies-IND #476 3001 Fairfax Trafficway Kansas City KS 66115

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
2458670	Net 60		4/9/13	Federal Express		
Quantity	Item Code	Description			Price Each	Amount
50	NG1	SPP 12500 S11'B charger			326.00	16,300.00
	Shipping	Local Drayage			0.00	0.00

Thank you for your business.	Subtotal	\$16,300.00
If you have questions please call us at (916)441-4161, or fax at (916)444-8190. Thank you	Sales Tax (8.5%)	\$0.00
	Total	\$16,300.00

Electric Conversions

515 N. 10th Street
 Sacramento, CA 95811

Invoice

Date	Invoice #
4/11/13	11757

Bill To
Exide Technologies PMB #713 123 Townsquare Place Jersey City, NJ 07310

Ship To
Exide Technologies-IND #421 501 Kindelberger Kansas City KS 66115

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
2471038	Net 60		4/11/13	Federal Express		

Quantity	Item Code	Description	Price Each	Amount
30	NG1	SPP 12500 S1F charger	314.00	9,420.00
	Shipping	Local Drayage	0.00	0.00

Thank you for your business, If you have questions please call us at (916)441-4161, or fax at (916)444-8190. Thank you	Subtotal	\$9,420.00
	Sales Tax (8.5%)	\$0.00
	Total	\$9,420.00

Electric Conversions
 515 N. 10th Street
 Sacramento, CA.95811

Invoice

Date	Invoice #
4/15/13	11764

Bill To
Exide Technologies PMB #713 123 Townsquare Place Jersey City, NJ 07310

Ship To
Exide Technologies-IND #275 4115 South Zero St Ft. Smith, AR 72908

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
2431852	Net 60		4/15/13	Federal Express		
Quantity	Item Code	Description			Price Each	Amount
50	NG1	SPP 12500 SIF charger			314.00	15,700.00
	Shipping	Local Drayage			0.00	0.00

Thank you for your business.	Subtotal	\$15,700.00
If you have questions please call us at (916)441-4161, or fax at (916)444-8190. Thank you	Sales Tax (8.5%)	\$0.00
	Total	\$15,700.00

Electric Conversions
 515 N. 10th Street
 Sacramento, CA 95811

Invoice

Date	Invoice #
4/22/13	11795

Bill To
Exide Technologies PMB #713 123 Townsquare Place Jersey City, NJ 07310

Ship To
Exide Technologies-IND #421 501 Kindelberger Kansas City KS 66115

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
2471035	Net 60		4/22/13	Federal Express		
Quantity	Item Code	Description			Price Each	Amount
5	NG1	SPP 12500 S1FB charger			326.00	1,630.00
5	NG1	SPP 12500 S1FB charger			326.00	1,630.00
	Shipping	Local Drayage			0.00	0.00
Thank you for your business.					Subtotal	\$3,260.00
If you have questions please call us at (916)441-4161, or fax at (916)444-8190. Thank you					Sales Tax (8.5%)	\$0.00
					Total	\$3,260.00

Electric Conversions
 515 N. 10th Street
 Sacramento, CA 95811

Invoice

Date	Invoice #
4/23/13	11800

Bill To
Exide Technologies PMB #713 123 Townsquare Place Jersey City, NJ 07310

Ship To
Exide Technologies-IND #275 4115 South Zero St Ft. Smith, AR 72908

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
2358636	Net 60		4/23/13	Federal Express		
Quantity	Item Code	Description			Price Each	Amount
30	NGI	SPP 06500 SIF charger			314.00	9,420.00
	Shipping	Local Drayage			0.00	0.00

					Subtotal	\$9,420.00
					Sales Tax (8.5%)	\$0.00
					Total	\$9,420.00

If you have questions please call us at (916)441-4161, or fax at (916)444-8190. Thank you

Electric Conversions
 515 N. 10th Street
 Sacramento, CA 95811

Invoice

Date	Invoice #
5/6/13	11844

Bill To
Exide Technologies PMB #713 123 Townsquare Place Jersey City, NJ 07310

Ship To
Exide Technologies-IND #421 501 Kindelberger Kansas City KS 66115

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
2471038	Net 60		5/6/13	UPS		
Quantity	Item Code	Description			Price Each	Amount
30	NG1	SPP 12500 SIF charger			314.00	9,420.00
	Shipping	Local Drayage				

Thank you for your business.

Subtotal	\$9,420.00
Sales Tax (8.5%)	\$0.00
Total	\$9,420.00

If you have questions please call us at (916)441-4161, or fax at (916)441-8190. Thank you

Electric Conversions
 515 N. 10th Street
 Sacramento, CA 95811

Invoice

Date	Invoice #
5/17/13	11903

Bill To
Exide Technologies PMB #713 123 Townsquare Place Jersey City, NJ 07310

Ship To
Exide Technologies-IND #421 501 Kindelberger Kansas City KS 66115

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
2471038	Net 60		5/17/13	Federal Express		

Quantity	Item Code	Description	Price Each	Amount
0	NGI	SPP 12500 SIF charger	314.00	0.00
30	NGI	SPP 12500 SIF charger	314.00	9,420.00
	Shipping	Local Drayage	0.00	0.00

Thank you for your business. If you have questions please call us at (916)441-4161, or fax at (916)444-8190. Thank you	Subtotal	\$9,420.00
	Sales Tax (8.5%)	\$0.00
	Total	\$9,420.00

Electric Conversions
 515 N. 10th Street
 Sacramento, CA 95811

Invoice

Date	Invoice #
6/3/13	11950

Bill To
Exide Technologies PMB #713 123 Townsquare Place Jersey City, NJ 07310

Ship To
Exide Technologies-IND #421 501 Kindelberger Kansas City KS 66115

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
2471038	Net 60		6/3/13	Federal Express		
Quantity	Item Code	Description			Price Each	Amount
0	NG1	SPP 12500 SIF charger			314.00	0.00
0	NG1	SPP 12500 SIF charger			314.00	0.00
0	NG1	SPP 12500 SIF charger			314.00	0.00
30	NG1	SPP 12500 SIF charger			314.00	9,420.00
	Shipping	Local Drayage			0.00	0.00

Thank you for your business.	Subtotal	\$9,420.00
If you have questions please call us at (916)441-4161, or fax at (916)444-8190. Thank you	Sales Tax (8.5%)	\$0.00
	Total	\$9,420.00

*Proof for claim
pursuant to*

Invoice

Electric Conversions
515 N. 10th Street
Sacramento, CA 95811

11 USC § 503(b)(9)

Date	Invoice #
6/3/13	11950

Bill To
Exide Technologies PMB #713 123 Townsquare Place Jersey City, NJ 07310

Ship To
Exide Technologies-IND #421 501 Kindelberger Kansas City KS 66115

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
2471038	Net 60		6/3/13	Federal Express		
Quantity	Item Code	Description			Price Each	Amount
0	NG1	SPP 12500 SIF charger			314.00	0.00
0	NG1	SPP 12500 SIF charger			314.00	0.00
0	NG1	SPP 12500 SIF charger			314.00	0.00
30	NG1	SPP 12500 SIF charger			314.00	9,420.00
	Shipping	Local Drayage			0.00	0.00

*Proof for
claim pursuant to
11 U.S.C.
§ 503(b)(9).*

Thank you for your business.	Subtotal	\$9,420.00
If you have questions please call us at (916)441-4161, or fax at (916)444-8190. Thank you	Sales Tax (8.5%)	\$0.00
	Total	\$9,420.00

7/17/13

FedEx Ship Manager - Print Your Label(s)

From: (916) 441-4161
Gregg McCreia
ELCONV Zivan Chargers
515 N. 10TH STREET
Sacramento, CA 95811

Origin ID: BLUA



J1311302120328

BILL SENDER

SHIP TO: (916) 441-4161
GCCG
Exide Case Administration
5151 Blazer Pkwy
Suite A
DUBLIN, OH 43017

Ship Date: 17/JUL/13
ActWgt 0.5 LB
CAD: 4138287/NET3370

Delivery Address Bar Code



Ref #
Invoice #
PO #
Dept #

TRK# 7962 5241 5333
0201

THU - 18 JUL 3:00P
STANDARD OVERNIGHT

XX OSUA

43017
OH:US
LCK

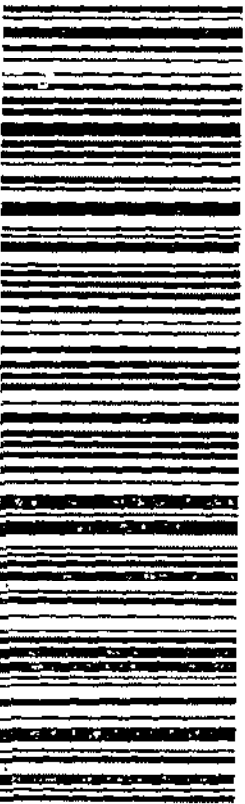
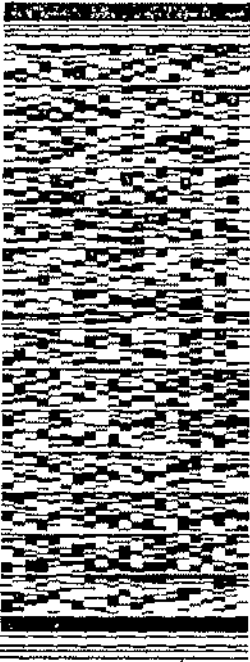


EXHIBIT B

The United States Bankruptcy Court
For the District of Delaware

-----X
 In re: :
 : Chapter 11
 Exide Technologies, :
 : Case No. 13-11482 (KJC)
 Debtor . :
 : Hrg. Date: Sept. 17, 2015 at 4:00pm Eastern
 : Obj. Due: Aug. 14, 2015 at 4pm Eastern
 -----X

Creditors response to Debtors "Notice Of Objection"

Creditor Gregory McCrea DBA "Electric Conversions" (also "EIcon").

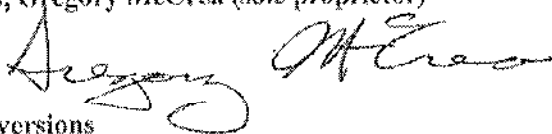
Claim is for cost of goods sold to Debtor.

I hereby state that claim #321 is a valid priority claim as described by former Exide manager Scott Lange. During his campaign in the summer of 2013 to convince us to resume shipment of product he stated repeatedly in correspondence that we would be treated as an "essential trade creditor" as our product and software are not available elsewhere.

Critical Vendor status in section 5 (11U.S.C. 105(a))

If we are to continue making custom charger projects for Exide we expect our creditor status not to be downgraded as this action is attempting. Considering the upcoming California Energy Commission mandate requiring all medium to large chargers sold to have power factor correction starting 2017, now would be a bad time to sour our supplier relationship.

Best Regards, Gregory McCrea (sole proprietor)



Aug 12 15

Electric Conversions
515 North 10th Street
Sacramento, CA 95811
Telephone (916) 441-4161
FAX (916) 444-8190
e-mail: elcon@jps.net