

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	
)	Chapter 11
EXIDE TECHNOLOGIES,)	
)	Case No. 13-11482 (KJC)
Reorganized Debtor.)	
)	Related Docket No. 3739
)	

**NOTICE OF WITHDRAWAL OF THE DEBTOR’S (SUBSTANTIVE)
NINETEENTH OMNIBUS CLAIMS OBJECTION PURSUANT TO
BANKRUPTCY CODE SECTION 502(b), BANKRUPTCY RULE 3007, AND
LOCAL RULE 3007-1 AS IT RELATES TO PROOF OF CLAIM NO. 859,
FILED BY JOHN THOMAS**

PLEASE TAKE NOTICE that on May 29, 2015, Exide Technologies, the reorganized debtor in the above-captioned bankruptcy case (the “Reorganized Debtor”), filed the *Reorganized Debtor’s (Substantive) Nineteenth Omnibus Objection Pursuant To Bankruptcy Code Section 502(b), Bankruptcy Rule 3007, And Local Rule 3007-1 To Certain (A) Misclassified Claims, (B) Reduce and Allow Claims, (C) Previously Discharged Claims, (D) No Liability Claims, (E) Contingent Contribution Claims, (F) Protective Environmental Claims, and (G) Insufficient Documentation Claims* [Docket No. 3739] (the “Nineteenth Omnibus Claims Objection”).¹

PLEASE TAKE FURTHER NOTICE that pursuant to the Nineteenth Omnibus Claims Objection, the Reorganized Debtor objected, *inter alia*, to Proof of Claim No. 859 (the “Thomas Claim”) filed by John Thomas listed on Exhibit D – “No Liability Claims” to the Nineteenth Omnibus Claims Objection.

¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Nineteenth Omnibus Claims Objection.

PLEASE TAKE FURTHER NOTICE that, pursuant to the terms of the parties' settlement, the Reorganized Debtor, hereby withdraws its objection to the Thomas Claim contained in the Nineteenth Omnibus Claims Objection pursuant to the parties' settlement.

Respectfully submitted,

EXIDE TECHNOLOGIES

Dated: September 7, 2018

/s/ Allen J. Guon

FOX ROTHSCHILD LLP
Robert M. Fishman
Allen J. Guon
321 N. Clark Street, Suite 800
Chicago, IL 60654
Main: (312) 541-0151
Fax: (312) 980-3888

Counsel for the Reorganized Debtor

– and –

/s/ James E. O'Neill

PACHULSKI STANG ZIEHL & JONES LLP
Laura Davis Jones (Bar No. 2436)
James E. O'Neill (Bar No. 4042)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
Email: joneill@pszjlaw.com

Special Conflicts Counsel for the Reorganized Debtor