

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

EXIDE TECHNOLOGIES,

Reorganized Debtor.

Chapter 11

Case No. 13-11482 (KJC)

Related Docket Nos. 4435, 4481

**CERTIFICATION OF COUNSEL REGARDING PROPOSED SECOND ORDER
SUSTAINING 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
(A) MISCLASSIFIED CLAIMS, (B) REDUCE AND ALLOW CLAIMS,
(C) PREVIOUSLY DISCHARGED CLAIMS, AND (D) NO LIABILITY CLAIMS**

The undersigned hereby certifies the following:

1. On July 31, 2015, the reorganized debtor in the above-captioned case ("Exide" or 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 (A) Misclassified Claims, (B) Reduce and Allow Claims, (C) Previously Discharged Claims, and (D) No Liability Claims* (the "Twenty-First Objection") [Docket No. 4435].
2. The deadline to respond to the Twenty-First Objection was August 14, 2015 at 4:00 p.m. Eastern Time (the "Response Deadline").
3. The Reorganized Debtor received a response to the Twenty-First Objection, *inter alia*, from Electric Conversions.
4. On September 15, 2015, the Court entered the *Order Sustaining 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 (A) Misclassified*

Claims, (B) Reduce and Allow Claims, (C) Previously Discharged Claims, and (D) No Liability Claims (the “Order”) [Docket No. 4481]. The Order adjourned, *inter alia*, the hearing with respect to the objection to Electric Conversions proof of claim no. 321, subject to the Reorganized Debtor’s right to notice the objection to Electric Conversions proof of claim no. 321 for a future hearing.

5. On August 8, 2018, the Reorganized Debtor filed the *Re-Notice of Hearing on 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 (A) Misclassified Claims, (B) Reduce and Allow Claims, (C) Previously Discharged Claims, and (D) No Liability Claims with Respect to Claim No. 321 Filed by Electric Conversions* [Docket No. 5056] scheduling a hearing on the objection to Electric Conversions proof of claim no. 321 for September 18, 2018 at 2:30 p.m. Eastern Time.

6. On August 8, 2018, the Reorganized Debtor filed the *Reply of the Reorganized Debtor in Support of the Reorganized Debtor’s Twenty-First Omnibus Objection to Claim No. 321 Filed by Electric Conversions* [Docket No. 5057].

7. On September 18, 2018, the Court held a hearing with respect to the objection to Electric Conversions proof of claim no. 321 (the “Hearing”). The Court sustained the objection to Electric Conversions proof of claim no. 321 and requested the Reorganized Debtor submit a proposed order consistent with the Court’s ruling.

8. Attached hereto as Exhibit A is a proposed form of order (the “Proposed Order”) granting the relief requested in the Twenty-First Objection with respect to Electric Conversions proof of claim no. 321.

9. Accordingly, the Reorganized Debtor respectfully requests entry of the Proposed Order at the Court's convenience.

Dated: September 18, 2018

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Special Conflicts Counsel for the Reorganized Debtor

Exhibit A

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 Nos. 4435, 4481
	:
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SECOND ORDER SUSTAINING 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 (A) MISCLASSIFIED CLAIMS, (B) REDUCE AND ALLOW CLAIMS, (C) PREVIOUSLY DISCHARGED CLAIMS, AND (D) NO LIABILITY CLAIMS

Upon 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 (A) Misclassified Claims, (B) Reduce and Allow Claims, (C) Previously Discharged Claims, and (D) No Liability Claims [Docket No. 4435],² and it appearing that notice of the Objection was good and sufficient upon the particular circumstances and that no other or further notice need be given; and this Court having considered (i) the Objection, (ii) Claim No. 321 filed by Gregory McCrea d/b/a Electric Conversions (“Electric Conversions”) listed on Exhibit A to the Objection, (iii) Electric Conversion’s response in opposition to the Objection [Undocketed], and (iv) the Reply of the Reorganized Debtor in Support of the Reorganized Debtor’s Twenty-First Omnibus Objection to Claim No. 321 Filed by Electric Conversions [Docket No. 5057]; the Reorganized Debtor having re-noticing the Objection for hearing on September 18, 2018 (the

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 defined herein, capitalized terms used herein shall have the meanings ascribed to them in the Objection.

“Hearing”) [Docket No. 5056]; and upon the record herein including the statements of counsel at the Hearing; and after due deliberation thereon and good and sufficient cause appearing therefor; it is hereby

ORDERED, ADJUDGED, AND DECREED that:

1. The relief requested in the Objection is GRANTED, as set forth herein.
2. Claim No. 321 filed by Electric Conversions is modified and reclassified as a Class D – General Unsecured Claim under the Plan in the amount of \$186,154.26 and an administrative priority claim under § 503(b)(9) of the Bankruptcy Code in the amount of \$9,420.00. Claim 321 shall be paid in accordance with the Plan in full and final satisfaction of the Claim.
3. This Court shall retain jurisdiction over the Debtor, the Reorganized Debtor, and the Claimants whose Disputed Claims are subject to the Objection with respect to any matters related to or arising from the Objection or the implementation of this Order.
4. The Reorganized Debtor is authorized and empowered, to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.
5. The Reorganized Debtor’s Claims and Noticing Agent, Garden City Group, LLC, is hereby directed to serve this Order, including any relevant exhibits, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

Dated: _____, 2018
Wilmington, Delaware

THE HONORABLE KEVIN J. CAREY
UNITED STATES BANKRUPTCY JUDGE