

**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)

Re: **D.I. 5107**

**CERTIFICATE OF NO OBJECTION REGARDING MOTION TO
FILE UNDER SEAL THE MOTION OF PETER KRAVITZ, AS THE
TRUSTEE OF THE EXIDE CREDITORS' LIQUIDATING TRUST
FOR ENTRY OF AN ORDER PURSUANT TO SECTION 105(A) OF
THE BANKRUPTCY CODE AND BANKRUPTCY RULE 9019
APPROVING THE SETTLEMENT AGREEMENT BETWEEN EXIDE
TECHNOLOGIES AND THE EXIDE CREDITORS' LIQUIDATING
TRUST**

The undersigned hereby certifies that, as of the date hereof, Morris, Nichols, Arsht & Tunnell LLP ("Morris Nichols") has received no answer, objection or other responsive pleading to the **Motion to File Under Seal the Motion of Peter Kravitz, as the Trustee of the Exide Creditors' Liquidating Trust for Entry of an Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019 Approving the Settlement Agreement Between Exide Technologies and the Exide Creditors' Liquidating Trust** (the "Motion") (D.I. 5107), filed on December 4, 2018.

The undersigned further certifies that Morris Nichols has caused the review of the Court's docket in this case and that no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the notice of hearing on the Motion, objections to the Motion were to be filed and served no later than December 18, 2018 at 4:00 p.m. (Eastern Time).

¹ The last four digits of the Debtor's taxpayer identification number are 2730. The Debtor's corporate headquarters are located at 13000 Deerfield Parkway, Building 200, Milton, Georgia 30004.

WHEREFORE, the GUC Trust Trustee respectfully requests that the order attached to the Motion be entered at the earliest convenience of the Court.

Dated: December 19, 2018
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Tamara K. Mann

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