

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  
 :  
 Debtor.<sup>1</sup> :  
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**NOTICE OF BANKRUPTCY FILING AND DEBTOR'S PRESENTATION OF  
MOTIONS AND APPLICATIONS TO THE COURT FOR CONSIDERATION**

PLEASE TAKE NOTICE that on June 10, 2013, Exide Technologies ("Exide"), the debtor and debtor in possession in the above-captioned cases (the "Debtor") filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that the Debtor has requested that the first day hearing in these cases (the "First Day Hearing") be held on June 11, 2013, to consider the following applications and motions:

1. Debtor's Motion For Interim And Final Orders (I) Authorizing Debtor (A) To Obtain Post-Petition Financing Pursuant To 11 U.S.C. §§ 105, 361, 362, 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1), And 364(e) And (B) To Utilize Cash Collateral Pursuant To 11 U.S.C. § 363, (II) Granting Adequate Protection To Pre-Petition Secured Parties Pursuant To 11 U.S.C. §§ 361, 362, 363 And 364 And (III) Scheduling Final Hearing Pursuant To Bankruptcy Rules 4001(b) And (c) (Docket No. 17)
2. Debtor's Motion For Entry Of An Order Authorizing The Filing Under Seal Of The Proposed Debtor-In-Possession Financing Fee Letter (Docket No. 18)

<sup>1</sup> The last four digits of Debtor's taxpayer identification number are 2730. The Debtor's corporate headquarters are 13000 Deerfield Parkway, Building 200, Milton, Georgia 30004.

3. Debtor's Motion For Order Pursuant To Bankruptcy Code Sections 105(a), 345(b), 363, And 503(b), Bankruptcy Rules 6003 And 6004, And Local Bankruptcy Rule 2015-2 Authorizing (I) Continued Maintenance Of Prepetition Bank Accounts And Payment Of Related Prepetition Obligations, (II) Continued Use Of Its Existing Cash Management System, (III) Continued Use Of Existing Business Forms, (IV) Continuation Of Existing Investment And Deposit Practices, And (V) Continuation Of Intercompany Transactions And Honoring Certain Related Prepetition Obligations (Docket No. 4)
4. Debtor's Motion For Interim And Final Orders Pursuant To Bankruptcy Code Sections 105(a), 363, 507(a), 541, 1107(a), And 1108 And Bankruptcy Rules 6003 And 6004, (I) Authorizing, But Not Directing, The Debtor To Pay Prepetition Employee Obligations; (II) Authorizing, But Not Directing, The Debtor To Continue Certain Employee Benefit Programs In The Ordinary Course; And (III) Authorizing, But Not Directing, Applicable Banks To Honor Prepetition Checks For Payment Of The Prepetition Employee Obligations (Docket No. 5)
5. Debtor's Motion For Order (I) Authorizing Payment Of Prepetition Claims Of Certain Critical Vendors And Service Providers, And (II) Authorizing Provisional Payment To Certain Contract Counterparties And Related Procedures Thereto (Docket No. 6)
6. Debtor's Motion For Order Pursuant To 11 U.S.C. §§ 105, 363, 1107, And 1108 And Fed. R. Bankr. P. 6003 And 6004 Authorizing Debtor To Pay Prepetition Claims Of Certain Foreign Vendors And Service Providers (Docket No. 7)
7. Debtor's Motion For Order Pursuant To 11 U.S.C. §§ 105(a) 363(b), 503(b), 506, 1107 And 1108 And Fed. R. Bankr. P. 6003 Authorizing Payment Of Certain Prepetition Shipping And Delivery Charges (Docket No. 8)
8. Debtor's Motion For Order Under 11 U.S.C. §§ 105(a), 363(b), And 506(c) Authorizing The Debtor To Pay Certain Prepetition Claims Of Mechanics And Materialmen In Satisfaction Of Perfected Or Potential Mechanics', Materialmen's, Or Similar Liens Or Interests (Docket No. 9)
9. Debtor's Motion For Order Pursuant To Bankruptcy Code Sections 105(a), 363(b), 1107(a), And 1108 And Bankruptcy Rules 6003 And 6004 Authorizing The Debtor To Continue Customer Programs And Practices In The Ordinary Course Of Business (Docket No. 10)
10. Debtor's Motion For Interim And Final Orders Pursuant To Bankruptcy Code Sections 105(a), 363(b), 507(a)(8), 541, 1107(a), And 1108 And Bankruptcy Rules 6003 And 6004 Authorizing The Debtor To Pay Certain Prepetition Taxes And Related Obligations (Docket No. 11)

11. Debtor's Motion For Order Pursuant To 11 U.S.C. §§ 105, 361, 362, 363, 364, 1107, And 1108 And Bankruptcy Rule 6003 Authorizing Debtor To (I) Maintain Existing Insurance Policies And Pay All Insurance Obligations Arising Thereunder; (II) Renew, Revise, Extend, Supplement, Change, Or Enter Into New Insurance Policies; And (III) Continue To Honor Insurance Premium Financing Obligations (Docket No. 12)
12. Debtor's Motion For Interim And Final Orders Pursuant To Bankruptcy Code Sections 105(a) And 366 (I) Approving Debtor's Proposed Form Of Adequate Assurance Of Payment, (II) Establishing Procedures For Resolving Objections By Utility Companies, And (III) Prohibiting Utility Companies From Altering, Refusing, Or Discontinuing Service (Docket No. 13)
13. Debtor's Motion For Interim Order And Final Order Pursuant To Bankruptcy Code Sections 105(a), 362(a)(3) And 541 And Bankruptcy Rule 3001 Establishing Notice And Hearing Procedures For Trading In Equity Securities In Debtor (Docket No. 14)
14. Debtor's Motion For An Order Granting Debtor Additional Time Within Which To File Schedules And Statements (Docket No. 15)
15. Application Of The Debtor For Entry Of An Order Authorizing Employment And Retention Of GCG, Inc. As Claims And Noticing Agent, Pursuant To 28 U.S.C. § 156(c), 11 U.S.C. § 105(a) And Fed. R. Bankr. P. 2002 And Del. Bankr. L.R. 2002-1(f), *Nunc Pro Tunc* To The Petition Date (Docket No. 16)

PLEASE TAKE FURTHER NOTICE that when the Debtor is notified of the date and time of the First Day Hearing, the Debtors will provide such information to the parties served with this notice.<sup>2</sup>

PLEASE TAKE FURTHER NOTICE that in addition to the documents listed above, the Debtors also have filed with the Bankruptcy Court the following:

1. Declaration Of Phillip A. Damaska In Support Of Chapter 11 Petition And First Day Pleadings (Docket No. 3)

PLEASE TAKE FURTHER NOTICE that copies of the above referenced documents may be obtained from [www.exiderestructuringinfo.com](http://www.exiderestructuringinfo.com).

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<sup>2</sup> The Debtor will file a First Day Agenda listing those matters that are scheduled to be heard. Once filed, a copy of the First Day Agenda may be obtained through PACER on the court's website at <https://ecf.deb.uscourts.gov>, or free-of-charge from [www.exiderestructuringinfo.com](http://www.exiderestructuringinfo.com).

PLEASE TAKE FURTHER NOTICE that documents also may be examined at the law firm of Skadden, Arps, Slate, Meagher & Flom LLP, One Rodney Square, 910 North King Street, Wilmington, Delaware, Attn: Christine Kim, (302) 651-3034.

Dated: Wilmington, Delaware  
June 10, 2013

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

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*Proposed Counsel for Debtor and Debtor in Possession*

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)  
Debtor.<sup>1</sup> :  
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**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON  
JUNE 11, 2013 AT 10:00 A.M. (EASTERN)**

Set forth below are the matters scheduled to be heard before the Honorable Kevin J. Carey, United States Bankruptcy Judge, in the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5th Floor, Courtroom 5, Wilmington, Delaware, on June 11, 2013 beginning at 10:00 a.m. (prevailing Eastern Time)<sup>2</sup>

**I. INTRODUCTION**

Preliminary Remarks and Introduction

1. Declaration Of Phillip A. Damaska In Support Of Chapter 11 Petition And First Day Pleadings (Docket No. 3)

**II. FIRST DAY PAPERS**

2. Debtor's Motion For Interim And Final Orders (I) Authorizing Debtor (A) To Obtain Post-Petition Financing Pursuant To 11 U.S.C. §§ 105, 361, 362, 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1), And 364(e) And (B) To Utilize Cash Collateral Pursuant To 11 U.S.C. § 363, (II) Granting Adequate Protection To Pre-Petition Secured Parties Pursuant To 11 U.S.C. §§ 361, 362, 363 And 364 And (III) Scheduling Final Hearing Pursuant To Bankruptcy Rules 4001(b) And (c) (Docket No. 17)
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<sup>1</sup> The last four digits of Debtor's taxpayer identification number are 2730. The Debtor's corporate headquarters are 13000 Deerfield Parkway, Building 200, Milton, Georgia 30004.

<sup>2</sup> On June 10, 2013, a binder containing the first day pleadings was provided to the Court and to the United States Trustee in compliance with Rule 9013-1(m)(iii) of the Local Rules for the United States Bankruptcy Court for the District of Delaware.

4. Debtor's Motion For Order Pursuant To Bankruptcy Code Sections 105(a), 345(b), 363, And 503(b), Bankruptcy Rules 6003 And 6004, And Local Bankruptcy Rule 2015-2 Authorizing (I) Continued Maintenance Of Prepetition Bank Accounts And Payment Of Related Prepetition Obligations, (II) Continued Use Of Its Existing Cash Management System, (III) Continued Use Of Existing Business Forms, (IV) Continuation Of Existing Investment And Deposit Practices, And (V) Continuation Of Intercompany Transactions And Honoring Certain Related Prepetition Obligations (Docket No. 4)
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Policies And Pay All Insurance Obligations Arising Thereunder; (II) Renew, Revise, Extend, Supplement, Change, Or Enter Into New Insurance Policies; And (III) Continue To Honor Insurance Premium Financing Obligations (Docket No. 12)

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16. Application Of The Debtor For Entry Of An Order Authorizing Employment And Retention Of GCG, Inc. As Claims And Noticing Agent, Pursuant To 28 U.S.C. § 156(c), 11 U.S.C. § 105(a) And Fed. R. Bankr. P. 2002 And Del. Bankr. L.R. 2002-1(f), *Nunc Pro Tunc* To The Petition Date (Docket No. 16)

Dated: Wilmington, Delaware  
June 10, 2013

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

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