

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re: : Chapter 11

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EXIDE TECHNOLOGIES, : Case No. 13-11482 (KJC)

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Debtor.¹ :

: **Related Docket Nos. 1477**

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**CERTIFICATE OF NO OBJECTION TO DEBTOR’S MOTION FOR AN ORDER
AUTHORIZING ENTRY INTO A MEMORANDUM OF AGREEMENT
WITH UNITED STEELWORKERS**

The undersigned hereby certifies that she is aware of no formal or informal objection or response to the Debtor’s Motion For An Order Authorizing Entry Into A Memorandum Of Agreement With United Steelworkers (Docket No. 1477) (the “Motion”), filed by counsel to the above-captioned debtor and debtor in possession (the “Debtor”) on February 28, 2014. She has reviewed the Court’s docket and no objection to the Motion appears thereon.

The notice of the Motion established March 17, 2014 at 4:00 p.m. (Eastern) as the deadline (the “Objection Deadline”) for receipt of objections to the Motion, and no extension of the Objection Deadline was granted.

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

Accordingly, it is respectfully requested that the Court enter the proposed form of order attached hereto as Exhibit A. A redline showing non-substantive revisions contained in the attached form of order against the version submitted with the Motion is attached hereto as Exhibit B.

Dated: Wilmington, Delaware
March 19, 2014

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

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Counsel for Debtor and Debtor in Possession

EXHIBIT A

ORDER

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.¹ :

:

----- X **Related Docket No. 1477**

**ORDER AUTHORIZING ENTRY INTO A MEMORANDUM OF AGREEMENT
WITH UNITED STEEL WORKERS LOCAL 675**

Upon consideration of the motion (the “Motion”)² of the above-captioned debtor and debtor in possession (the “Debtor”) for entry of an order (this “Order”), pursuant to sections 105 and 363 of chapter 11 of the United States Code (the “Bankruptcy Code”) authorizing entry into the Agreement; and the Court having reviewed and considered (a) the Motion and (b) the objections to the Motion, if any; and it appearing that the relief requested in the Motion is in the best interest of the Debtor, its estate, creditors, and other parties in interest; and upon the record of the Chapter 11 Case; and after due deliberation thereon; and good cause appearing therefore, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is GRANTED and APPROVED in all respects.

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.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

2. All objections to the Motion or the relief requested therein that have not been withdrawn, waived, or settled, and all reservations of rights included therein, are overruled on the merits and denied with prejudice.

3. The Debtor is authorized to enter into the Agreement with the Union.

4. The Debtor is authorized and empowered to take all actions necessary to implement the relief granted in this Order.

5. Nothing in this Order shall be construed as affecting or impairing the rights of the Debtor to reject the Agreement or request interim relief in accordance with applicable law.

6. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation or interpretation of this Order.

Dated: Wilmington, Delaware
_____, 2014

Honorable Kevin J. Carey
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT B

REDLINE FORM OF ORDER

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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 In re: : Chapter 11
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 : Case No. 13-11482 (KJC)
 EXIDE TECHNOLOGIES, :
 : **Related Docket No. ____**
 :
 Debtor.¹ :
 X

**ORDER AUTHORIZING ENTRY INTO A MEMORANDUM OF AGREEMENT
WITH UNITED STEEL WORKERS LOCAL 675**

Upon consideration of the motion (the "Motion")² of the above-captioned debtor and debtor in possession (the "Debtor") for entry of an order (this "Order"), pursuant to sections 105 and 363 of chapter 11 of the United States Code (the "Bankruptcy Code") authorizing entry into the Agreement; and the Court having ~~held a hearing (the "Hearing") on the Motion; and the Court having~~ reviewed and considered (a) the Motion; and (b) the objections to the Motion, if any; ~~(c) the arguments of counsel made, and (d) the evidence proffered or adduced at the Hearing~~; and it appearing that the relief requested in the Motion is in the best interest of the Debtor, its estate, creditors, and other parties in interest; and upon

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.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

the record of the ~~Hearing and the~~ Chapter 11 Case; and after due deliberation thereon; and good cause appearing therefore, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Motion is GRANTED and APPROVED in all respects.
2. All objections to the Motion or the relief requested therein that have not been withdrawn, waived, or settled, and all reservations of rights included therein, are overruled on the merits and denied with prejudice.
3. The Debtor is authorized to enter into the Agreement with the Union.
4. The Debtor is authorized and empowered to take all actions necessary to implement the relief granted in this Order.
5. Nothing in this Order shall be construed as affecting or impairing the rights of the Debtor to reject the Agreement or request interim relief in accordance with applicable law.
6. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation or interpretation of this Order.

Dated: Wilmington, Delaware
_____, 2014

Honorable Kevin J. Carey
UNITED STATES BANKRUPTCY JUDGE

Summary report:	
Litéra® Change-Pro TDC 7.5.0.45 Document comparison done on 3/19/2014 10:23:45 AM	
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Move To	0
Table Insert	0
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Table moves to	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format Changes	0
Total Changes:	6