

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

FILED  
2002 JUL -8 AM 10:40  
U.S. BANKRUPTCY COURT  
DISTRICT OF DELAWARE

In re: )  
 ) Chapter 11  
EXIDE ILLINOIS, INC., et al. )  
 ) Case No. 02-11125 JCA  
Debtor. ) (Jointly Administered)

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ENTRY OF APPEARANCE, REQUEST FOR NOTICE, AND RESERVATION OF RIGHTS

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COMES NOW the City and County of Denver, by and through undersigned counsel, J. Wallace Wortham, Jr., City Attorney, and Stephen R. Ford, Assistant City Attorney, and, for its Entry of Appearance, Request for Notice, and Reservation of Rights states as follows:

1. Pursuant to Bankruptcy Rule 9010(b), the undersigned hereby enters his appearance on behalf of the City and County of Denver, a municipal corporation, a creditor and party in interest herein, and requests that copies of all notices, pleadings, motions, applications, and other documents filed and/or served in this case (including, without limitation, all notices pursuant to Bankruptcy Rule 2002, plans, disclosure statements and U.S. Trustee's reports) be served upon the following:

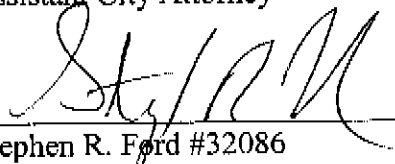
Stephen R. Ford  
Assistant City Attorney  
City and County of Denver  
1437 Bannock Street, Room 353  
Denver, Colorado 80202  
Office Phone: (720) 913-3275  
Direct Phone: (720) 913-3195  
Facsimile: (720) 913-3180  
E-mail: Stephen.Ford@ci.denver.co.us

2. Nothing herein nor any subsequent appearance, pleading, claim, or suit is intended to waive (i) the above-mentioned creditor's right to have final orders in non-core matters entered only after *de novo* review by a district judge; (ii) this creditor's right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related thereto; (iii) this creditor's right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which this creditor is or may be entitled under agreements in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments this creditor expressly reserves.

Respectfully submitted this 3<sup>rd</sup> day of July, 2002.

J. WALLACE WORTHAM, JR.  
City Attorney  
STEPHEN R. FORD  
Assistant City Attorney

By: \_\_\_\_\_

  
Stephen R. Ford #32086  
Attorneys for City and County of Denver  
1437 Bannock Street, Room 353  
Denver, Colorado 80202-5306  
Telephone: (720) 913-3275  
Direct Line: (720) 913-3283  
Facsimile: (720) 913-3180

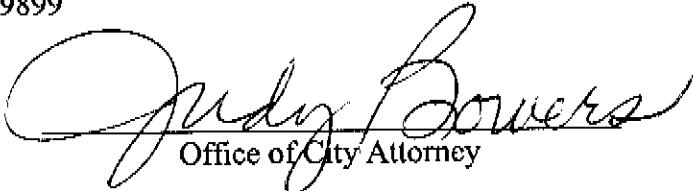
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing ENTRY OF APPEARANCE, REQUEST FOR NOTICE, AND RESERVATION OF RIGHTS was forwarded this 3<sup>rd</sup> day of July, 2002, via U.S. mail, postage prepaid, and addressed to:

U.S. Trustee  
Attn: Mark Kenney, Esq.  
844 King Street  
Room 2313  
Wilmington, DE 19801

Pepper Hamilton LLP  
Attn: David M. Fournier, Esq.  
1201 Market Street, Suite 1600  
Wilmington, DE 19801

Pachulski, Stang, Ziehl, Young & Jones  
Attn: James O'Neill, Esq.  
P.O. Box 8705  
Wilmington, DE 19899

  
Office of City Attorney