

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	:	CHAPTER 11
	:	
EXIDE TECHNOLOGIES, et al.,	:	Case No. 02-11125 (JCA)
	:	(Jointly Administered)
	:	
Debtors.	:	

**OBJECTION OF POLYCEL STRUCTURAL FOAM, INC.
TO DEBTORS' REPORT OF VALID RECLAMATION
CLAIMS REGARDING DOCKET NUMBER 608**

Polycel Structural Foam, Inc. ("Polycel"), by and through its undersigned counsel, hereby files this Objection Of Polycel Structural Foam, Inc. To Debtors' Report Of Valid Reclamation Claims ("Objection") and states as follows:

Background

1. On April 15, 2002 (the "Petition Date"), each of the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.
2. On or about April 15, 2002, the Debtors filed a motion for an order establishing procedures for the treatment of valid reclamation claims (the "Motion").
3. On May 1, 2002, the Official Committee of Unsecured Creditors was appointed.
4. On or about May 16, 2002, this Court entered the Order Under 11 U.S.C. §§ 105(a), 503(b), 546(c) and 546(g), Establishing Procedures For Treatment Of Valid Reclamation Claims (the "Reclamation Order").
5. On or about August 7, 2002, the Debtors filed their Notice of Debtors' Report Of Valid Reclamation Claims (the "Reclamation Notice").

Polycel's Reclamation Claims Are Valid

6. In the Reclamation Notice, the Debtors assert that Polycel's maximum reclamation claim totals \$2,500.68. Polycel believes that it has a valid reclamation claim in the amount of \$24,418.20 ("Reclamation Claim").

7. The Debtors object to Polycel's Reclamation Claim on three (3) grounds: (1) the Reclamation Claim falls outside of the "Reclamation Period;" (2) the Debtors did not receive some of the goods included in the Reclamation Claim; and (3) the Debtors were not in possession of the goods prior to the receipt of Polycel's reclamation demand.

8. The Debtors have taken the position that some of Polycel's Reclamation Claim falls outside of the "Reclamation Period," which is defined by the Debtors as April 5, 2002 through and including April 15, 2002. Polycel believes that this portion of the claim is valid. Polycel has provided sufficient evidence to the Debtors to establish the validity of this portion of the Reclamation Claim.

9. The Debtors have also taken the position that they did not receive some of the goods covered by the Reclamation Claim. However, Polycel received confirmation from the transportation company, Roadway Express, that the goods were delivered to the Debtors. Polycel believes that this portion of the Reclamation Claim is also valid.

10. Finally, the Debtors have taken the position that some of the goods received by the Debtors were either sold or consumed by the Debtors prior to their receipt of Polycel's reclamation demand. However, the Debtors have not provided sufficient proof that the goods were consumed or sold prior to the receipt of Polycel's reclamation demand.

11. For all of the foregoing reasons, Polycel objections to the Debtors' statement of the amount of Polycel's Reclamation Claim.

12. Polycel hereby reserves its rights to pursue all of its rights and remedies available at law or in equity.

WHEREFORE, Polycel hereby requests that this Court deny Debtors' statement that Polycel only has a reclamation claim in the amount of \$2,500.68

Wilmington, Delaware
Dated: August 28, 2002

Respectfully submitted,

By: /s/ Kimberly E.C. Lawson
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CERTIFICATE OF SERVICE

I, Kimberly E.C. Lawson, Esquire, certify that, on this 28th day of August 2002, I served a true and correct copy of the foregoing Objection Of Polycel Structural Foam, Inc. To Debtors' Report Of Valid Reclamation Claims Regarding Docket Number 608 upon the following in the manner indicated:

Via Hand Delivery

Laura Davis Jones, Esquire
Pachulski, Stang, Ziehl, Young & Jones P.C.
919 North Market Street, 16th Floor
Wilmington, DE 19801

Via First Class Mail

Matthew N. Kleiman, Esquire
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By: /s/ Kimberly E.C. Lawson
Kimberly E.C. Lawson (No. 3966)