IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

) Chapter 11
) Chapter 11
) Case No. 02-11125 (JCA)) (Jointly Administered)
)
Hearing Date: September 18, 2002 at 4:00 p.m. Eastern time (if necessary) Objection Deadline: September 13, 2002 at 4:00

AMENDED NOTICE OF DEBTORS' MOTION FOR ORDER AUTHORIZING THE DEBTORS TO FILE UNDER SEAL CERTAIN UNREDACTED EXHIBITS RELATING TO DEBTORS' MOTION FOR ORDER AUTHORIZING DEBTORS TO ASSUME AN AMENDED LICENSE AGREEMENT WITH FEDERAL-MOGUL IGNITION COMPANY (F/K/A CHAMPION SPARK PLUG COMPANY)

p.m. Eastern time

TO: The Office of the United States Trustee; counsel to the Official Committee of Unsecured Creditors; counsel for Pre-Petition Lenders; counsel for the Post Petition Lenders; counsel for Federal Mogul; and Parties requesting notice pursuant to Bankruptcy Rule 2002.

The debtors and debtors in possession (the "Debtors") in the above-captioned cases have filed with the United States Bankruptcy Court for the District of Delaware, 824

Market Street, Wilmington, Delaware 19801 (the "Bankruptcy Court") the annexed *Debtors*'

Motion for Order Authorizing Debtors to File Under Seal Certain Unredacted Exhibits Relating to Debtors Motion to Assume an Amended License Agreement with Federal-Mogul Ignition

Company (F/K/A Champion Spark Plug Company) (the "Motion").

You are required to file in writing any objection or response to the entry of an order on the Motion with the United States Bankruptcy Court for the District of Delaware,

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The Debtors in these proceedings are: Exide Technologies a/k/a Exide Corporation, Exide Delaware, L.L.C., Exide Illinois, Inc. and RBD Liquidation, L.L.C.

Marine Midland Plaza, 824 Market Street, 5th Floor, Wilmington, Delaware 19801 no later than **SEPTEMBER 13, 2002 at 4:00 p.m. prevailing Eastern Time.**

At the same time, you must also serve a copy of the response or objection upon counsel for the Debtors: (i) Matthew N. Kleiman, Esquire, Kirkland & Ellis, 200 East Randolph Drive, Chicago, IL 60601; Counsel for the Official Committee of Unsecured Creditors: (i) Fred Hodara, Esquire, Akin, Gump, Strauss, Hauer & Feld, L.L.P., 590 Madison Avenue, New York, NY 10022 and (ii) David B. Stratton, Esquire, Pepper Hamilton LLP, 1201 Market Street, Suite 1600, Wilmington, DE 19899-1709; and the Office of the United States Trustee, Attn: Mark S. Kenney, Esquire, 844 King Street, Suite 2313, Lockbox 35, Wilmington, Delaware 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

IF OBJECTIONS OR RESPONSES ARE TIMELY FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, A HEARING ON THE MOTION WILL BE HELD ON **SEPTEMBER**18, 2002 AT 4:00 P.M. EASTERN TIME BEFORE THE HONORABLE JOHN C. AKARD, IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE, LOCATED AT THE J. CALEB BOGGS FEDERAL BUILDING, 844 KING STREET, COURTROOM 2B, WILMINGTON, DELAWARE 19801.

Dated: September 9, 2002

KIRKLAND & ELLIS Matthew N. Kleiman 200 East Randolph Drive Chicago, IL 60601 Telephone: (312) 861-2000

Facsimile: (312) 861-2200

/s/ Matthew N. Kleiman

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