EXHIBIT A

INSTRUCTIONS FOR DOCUMENT REQUESTS

1. R² shall produce for inspection and copying the following documents or things no later than 10:00 a.m. on October 3, 2003, at the offices of Akin Gump Strauss Hauer & Feld LLP, 590 Madison Avenue, New York, New York 10022 or at such other location as the Committee and R² may agree. To the extent documents responsive to this request are identified prior to October 3, they are to be produced on a rolling basis in accordance with a schedule to be agreed upon.

2. These Document Requests are to be considered continuing so as to require the service of supplemental responses in the event that R² or anyone acting on R²'s behalf obtains, discovers or becomes aware of any additional documents responsive to these Document Requests.

3. The Definitions included herein apply to these Instructions and to the Document Requests.

4. In responding to these Document Requests, R² is required to obtain and furnish all information available to it and to any of its representatives, agents, employees and/or attorneys, and to obtain and furnish all information in its actual or constructive possession, custody or control.

5. In the event that any information or document requested by these Document Requests is withheld on the basis of the claim of privilege, state, for each such document:

a. the nature of the privilege asserted;

b. the identity of the attorney with respect to whom the privilege is claimed;

c. the basis for claiming the privilege as to the specific information;

d. In the event any privilege is claimed with respect to a document requested or requested to be identified, set forth in writing a statement identifying each such document by author, addressee, persons to whom copies were furnished, and date together with a description of the subject matter of each such document.

e. If any privilege is claimed with respect to any information, identify each person who has had knowledge of such information, and to whom such information has been communicated in any way, at any time.

6. If any portion of any document is responsive, the entire document or such portion that is responsive shall be produced as shall be agreed upon. Moreover, if only a part of a document is protected by any privilege, the document shall be produced with only the privileged matter redacted.

7. Documents shall be produced in the order in which they are found and shall not be rearranged. Documents that are found stapled, clipped or otherwise fastened together shall be produced in such form. Moreover, if the documents are kept in a file with a file label, a copy of that label shall be produced together with the documents in the file. **Documents that are found in electronic format shall be produced in electronic format.**

8. If any document responsive to these Document Requests once existed, but has been destroyed, discarded, or is otherwise not capable of being produced, furnish a list specifying each such document, why such document is not capable of being produced and setting forth the date of the document, a description of the document, the name and address of each person who prepared and received the document, the date and manner of disposal of the

document and persons currently in possession or likely to be in possession of copies of the document.

9. The relevant time period for responding to these Document Requests is clearly indicated by the documents and things requested.

10. Use of the singular form of any word includes the plural and vice versa.

11. "Identify" means:

a. When referring to a person, give (to the extent known) the person's full name and present or last known address; when referring to a natural person, also give the present or last known place of employment, and the job title or (if unknown) a description of the person's responsibilities.

b. When referring to a document, give (to the extent known) (i) the type of document; (ii) its general subject matter; (iii) its date; and (iv) its author(s), addressee(s) and recipient(s).

DEFINITIONS

12. "Debtors" means the debtors in the above-captioned bankruptcy case and each of their past and present officers, directors, employees, partners, agents and representatives, including attorneys or other advisors and the Debtors' affiliates and subsidiaries. The Debtors in these proceedings are: Exide Technologies (f/k/a Exide Corporation); Exide Delaware, L.L.C.; Exide Illinois, Inc.; RBD Liquidation, L.L.C.; Dixie Metals Company and Refined Metals Corporation.

13. "The Plan" means the terms of the Joint Plan of Reorganization for Exide Technologies, et al., dated July 10, 2003, and all amendments and exhibits thereto.

14. "Pre-Petition Banks" means collectively the Agent, as defined in the Plan, all past and present Pre-Petition Lenders, as defined in the Plan, and Citigroup, as defined herein, and each of their respective past or present officers, directors, employees, partners, agents and representatives, including attorneys or other advisors.

15. "Citigroup" means Citigroup Global Markets, Inc. and Salomon Smith Barney, Inc. in its/their capacity as syndication agent under the Pre-Petition Credit Facility.

16. Creditors' Committee" means the Official Committee of Unsecured Creditors of Exide Technologies, et al., appointed in the Debtors' bankruptcy cases.

17. "Disclosure Statement" means the Disclosure Statement for the Plan, dated July 24, 2003, and all amendments and exhibits thereto.

18. "Communication" means the transmittal of information, in the form of facts, ideas, inquiries or otherwise.

19. "Concerning" means relating to, referring to, describing, evidencing or constituting.

20. "R²" means R² Top Hat Ltd., R² Investments LDC, and each of their past and present affiliates, officers, directors, employees, partners, agents and representatives, including attorneys or other advisors.

21. "Document" is defined to be synonymous in meaning and scope to the usage of this term in Federal Rule of Civil Procedure 34(a), including, without limitation, electronic or computerized data compilations. Any draft or non-identical copy is a separate document within the meaning of this term.

22. "Person" means any natural person or any business, legal or governmental entity or association.

23. Rules of construction: "All" and "each" shall be construed as all and each; "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this request all responses that might otherwise be construed to be outside its scope.

DOCUMENT REQUESTS

24. A chart itemizing when R^2 acquired any equity securities or debt obligations issued by the Debtors and owned by R^2 , which chart shall include the date of purchase or sale, the security or debt obligation purchased or sold, the quantity purchased or sold and, in respect to equity securities or debt obligations issued by the Debtors during the period between January 1, 2002 and the present only (the "Period"), the price paid or received.

25. All draft or final versions of letters, emails, memoranda, notes or any other communications regardless of their format, whether to or from R^2, to or from persons at R^2, or to or from persons outside of R^2 related to the purchase and sale of any equity securities or debt obligations of the Debtors by R^2 during the Period except that R^2 shall not be required to produce any spreadsheets, emails, letters, memoranda, notes, reports, analyses or any other documents relating to the price of such equity security or debt obligation or R^2's decision as to whether to purchase or sell any such equity securities or debt obligations at a particular price.

26. All documents concerning or comprising any communications during the Period whatsoever, regardless of their format, between R² and the Debtors concerning any matter that may relate in any way or which is likely to lead to the discovery of admissible evidence in support of the designation of any claim held by R² pursuant to 11 U.S.C. § 1126(e), the subordination of any claim held by R² pursuant to 11 U.S.C. § 510(c) or the disallowance of any claim held by R².

27. All documents concerning or comprising any communications during the period whatsoever, regardless of their format, between R² and any Pre-Petition Banks relating in any manner to the Debtors, the Debtors' bankruptcy cases, the Plan or the claims of the Pre-Petition Banks in the Debtors' bankruptcy cases.

28. All documents concerning the Creditors' Committee, including but not limited to (i) all documents from any member or advisor to the Creditors' Committee to the extent those documents contain any notes, alterations or annotations by R², (ii) all documents, for whatever source, distributed to Creditors' Committee members and ex officio members to the extent those documents contain any notes, alterations or annotations by R², (iii) draft or final versions of letters, e-mails, memoranda, spreadsheets, reports, notes, analyses, terms sheets relating to R²'s role as an ex officio member of the Creditors' Committee, and (iv) any communications whatsoever regardless of their format, whether to or from R², to or from persons at R², or to or from persons outside of R² relating to R²'s role as an ex officio member of the Creditors' Committee.

29. All documents concerning R²'s resignation from the Creditors' Committee, including but not limited to (i) draft or final versions of letters, e-mails, memoranda, reports, notes, analyses, or terms sheets, and (ii) any communications whatsoever regardless of its format, whether to or from R², to or from persons at R², or to or from persons outside of R².

EXHIBIT B

Michael Diament

Scott McCarty

William B. Holloway, Jr.