

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

In re:	:	Chapter 11
	:	
EXIDE TECHNOLOGIES, INC., et al.,	:	Case No. 02-11125 (KJC)
a Delaware corporation,	:	
	:	Jointly Administered
Debtors.	:	

**CERTIFICATION OF COUNSEL**

I, David B. Stratton, a partner with the law firm of Pepper Hamilton LLP, co-counsel for the Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned Chapter 11 proceedings, hereby certify:

1. The Court had requested the Debtors and the Committee to agree on a form of order embodying the Court’s ruling that the three day confirmation hearing will be divided one and one-quarter days for the Debtors and those supporting the Debtors’ plan of reorganization, one and one-quarter days for the Committee and the principle opponents of the plan and one-half day for other objectors and related matters.

2. The Committee and the Debtors have been unable to agree on the terms of an order embodying Your Honor’s ruling. Accordingly, attached hereto is the Committee’s proposed form of order and a blackline showing changes from the Debtors’ proposed form of order.

3. The Committee believes that its form of order incorporates the Court’s ruling and the more flexible approach the Court articulated. Moreover, the Committee believes that it is simpler to count the time a party uses to present its case (including direct and cross) rather than the “chess clock” approach advocated by the Debtor, which is almost certain to lead

to confusion and further disagreements. Moreover, the Committee's suggested approach permits the Court to adjust time if one party or the other appears to be abusive in using time, which the Committee understands to be the Debtors' concern. Finally, given the number of parties that will be in attendance at the start of the confirmation hearing on Tuesday, October 21, 2003, the Committee believes that it would be most efficient to address nonsubstantive or resolved matters at the end of the three day hearing.

Date: October 20, 2003

PEPPER HAMILTON LLP

/s/ David B. Stratton  
David B. Stratton (DE No. 960)  
1201 Market Street, Suite 1600  
Wilmington, DE 19801  
(302) 777-6500

and

Fred S. Hodara, Esq.  
Mary R. Masella, Esq.  
AKIN, GUMP, STRAUSS, HAUER  
& FELD LLP  
590 Madison Avenue, 20<sup>th</sup> Floor  
New York, NY 10022  
(212) 872-1000  
*Attorneys for the Official Committee  
of Unsecured Creditors*