

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

In re	:	Chapter 11
	:	
EXIDE TECHNOLOGIES, <u>et al.</u> , ¹	:	Case No. 02-11125 (KJC), <u>et seq.</u>
	:	(Jointly Administered)
Debtors.	:	
	:	

**SPECIAL LITIGATION COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS' SECOND AMENDED EXHIBIT LIST**

Exhibit No.	Description	Date
CA-1.	Memo from Corporate Banking-Syndications (CSFB 50644)	3/28/02
CA-2.	Sumitomo Credit Approval Report (SUM 117-134)	3/27/02
CA-3.	Memo from T. Siahaan/R. Cotton (SSB 4622-4624)	12/17/01
CA-4	Exide Update - Draft (TD 227-228)	11/14/01
CA-5	Sumitomo Credit Approval Report (SUM 797-805)	12/20/01
CA-6	Credit Suisse First Boston ("CSFB") Presentation to Exide Board of Directors (CSFB 16206-16245)	10/15/01
CA-7.	Email from C. McCarthy (EE 12296)	6/30/00
CA-8.	Letter from D. Kelly of Exide (CSFB 21941)	6/13/00
CA-9.	CSFB Report (SUM 806-807)	5/01
CA-10.	Blackstone Retention Agreement Letter (supercedes letter agreement dated 10/19/01)	4/15/02
CA-11.	Exide Corporation 10-K FYE 3/31/00 (COMLIT 1171, 1212-1220)	
CA-12.	Exide Corporation 10-Q FQE 10/1/00 (COMLIT 29, 31-35)	
CA-13.	Exide Corporation 10-K FYE 3/31/01 (COMLIT 1251, 1301-1308)	
CA-14.	Exide Corporation 10-Q FQE 9/31/01 (COMLIT 129-136)	

¹ 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.

CA-15.	Exide Corporation 10-Q FQE 12/31/01 (COMLIT 166-172)	
CA-16.	Exide Corporation 10-K FYE 3/31/02 (COMLIT 1357, 1429-1436)	
CA-17.	Chronological listing of all collateral pledged or granted by the Debtors from and after September, 2000	
CA-18.	Chronological listing of all collateral pledged or granted by the non-Debtor Domestic and Foreign Subsidiaries from December, 1997 through July 2, 2002.	
CA-18.1	Bar Graph: Exide Stockholders' Equity (Deficit) Quarterly 3/1999-3/2002	
CA-19.	CSFB Summary Restructuring Discussion Materials (CSFB 16138-16148)	10/15/01
CA-20.	Interoffice Memo from R. Marsh and S. Edelman of Salomon Smith Barney ("SSB") (SSB 8926-8928)	9/21/00
CA-21.	Memo from P. Briggs and T. Koch: re 2000 10-K, 2001 10-Q and CLMR (SSB 3930-3942)	8/30/01
CA-22.	Letter from C. Muhlhauser to Exide Board Members (EXP 172415)	3/19/02
CA-23	Email from R. Cotton to D. Potrykus (CSFB 35241)	11/6/01
CA-24	Email from J. Hewitt of Shearman & Sterling ("SS") (CSFB 17457 - 17465)	11/16/01
CA-25	Email from J. D'Angelo of Alvarez & Marsal ("AM") attaching AM Presentation to Senior Lenders (A&M 80981- 80998)	11/28/01
CA-26	Email from J. Hewitt of SS attaching proposed term sheet for Third Amendment to Exide Credit and Guarantee Agreement (CSFB 24579-24588)	12/7/01
CA-27	Exide questions on indenture analysis from 12/7 conference call (EE 11821-11837)	
CA-28	Exide Audit Committee Meeting: FY 2003 Plan and Budget Presentation (EXP 172899-172922)	2/14/02
CA-29	Email from C. McDermott (CSFB 63777)	6/26/03
CA-30	S&P Invoice for services rendered to SS from 8/1/03-8/31/03	9/11/03
CA-31	Email from C. Wahlstrom to L. Kristie (CSFB 5441-55096)	12/20/01
CA-32	Letter from J. Rouner of CSFB to R. Lutz confirming CSFB's engagement as Exide's exclusive financial advisor (EE 5441-5446)	4/3/00
CA-33	Email from S. Rose re: Exide Waiver Request (CSFB 28185)	12/10/01
CA-34	Email from B. Cerreta to C. Usas of Scotiabank ("SB") re: Exide Receivables	4/11/02

	Financing (CSFB 137955-137960)	
CA-35	Email from T. Belyk of SB to C. Usas of SB re: QSR report re: Exide (CSFB 138065-138067)	4/11/02
CA-36	Deutsche Bank Report re: Exide (CSFB 58568-58587)	12/27/01
CA-37	Email from S. Meadows re: reasons to sell Exide (CSFB 18487-18489)	2/26/02
CA-38	Amended and Restated Credit and Guarantee Agreement (CSFB 16302-16470)*	9/29/00
CA-39	[First] Amendment to the Amended and Restated Credit and Guarantee Agreement (EXI 1324-1331)*	6/20/01
CA-40	Second Amendment to the Amended and Restated Credit and Guarantee Agreement (EXI 1413-1417)*	10/31/01
CA-41	Third Amendment and Waiver to the Loan Documents (EXI 1534-1683)*	12/28/01
CA-42	Fourth Amendment and Waiver to the Loan Documents (EXI 1684-1689)*	3/28/02
CA-43	Standstill Agreement and Fifth Amendment to the Credit Agreement (EXI 1800-1932)*	4/15/02
CA-44	Sixth Amendment to the Credit Agreement and First Amendment to the Standstill Agreement (EXI 1198-1203)*	5/21/02
CA-45	Exide Technologies Board Minutes (EXP 224784.37-224784.75)	1/15/03
CA-45.1	Expert Report of Jefferies & Company, Inc. re: Solvency Analysis and Valuation of Secured Lender Collateral	10/15/03
Exhibits Relating To Discovery Conduct:		
CA-46	Letter from P. Hessler of SS	2/20/03
CA-47	Letter from G. Meyerhoff to P. Hessler of SS	3/25/03
CA-48	Sign in Sheet for Exide Committee Meeting	4/30/03
CA-49	Fax/Letter from G. Meyerhoff to M. Warren and P. Hessler of SS	6/4/03
CA-50	Email from M. Warren of SS	6/9/03
CA-51	Letter from P. Hessler of SS	6/9/03
CA-52	Fax/Letter from G. Meyerhoff to M. Warren and P. Hessler of SS	6/12/03

* Signature pages intentionally omitted due to volume. Available if needed.

CA-53	Email from G. Meyerhoff to M. Warren of SS	6/17/03
CA-54	The Official Committee of Unsecured Creditors of Exide Technologies' ("the Committee") Second Set of Document requests to CSFB and SSB	6/17/03
CA-55	Email from S. Kupinsky of Exide	6/18/03
CA-56	Email from M. Warren of SS	6/20/03
CA-57	Email from G. Meyerhoff to M. Warren of SS	6/24/03
CA-58	Email from G. Meyerhoff to S. Kupinsky of Exide	8/4/03
CA-59	Email from G. Meyerhoff to S. Kupinsky of Exide	8/5/03
CA-60	Email from G. Meyerhoff to P. Hessler of SS	8/5/03
CA-61	The Committee's Second Set of Document Requests to Debtors	8/6/03
CA-62	Email from G. Meyerhoff to P. Hessler of SS	8/13/03
CA-63	Letter from B. Bates of Kirkland & Ellis ("KE")	8/13/03
CA-64	Letter from B. Bates of KE	8/15/03
CA-65	Letter from R. Ellis of KE	8/15/03
CA-66	Letter from B. Bates of KE	8/16/03
CA-67	Fax/Letter from M. Kleinman of KE	8/27/03
CA-68	Fax/Letter from J. Abitbol to R. Ellis of KE	8/27/03
CA-69	The Committee's Third Set of Document requests to CSFB and SSB	8/29/03
CA-70	The Committee's Third Set of Document Requests to Debtors	8/29/03
CA-71	Letter from J. Inwald to W. Roll of SS	9/4/03
CA-72	Letter from J. Inwald to W. Roll of SS	9/15/03
CA-73	Letter from J. Abitbol to R. Ellis of KE	9/17/03
CA-74	Letter from J. Abitbol to R. Ellis of KE	9/18/03
CA-75	Letter from J. Abitbol to R. Ellis of KE	9/22/03
CA-76	Omnibus Objection to Discovery Requests submitted by CSFB	9/22/03
CA-77	Debtors' Responses to the Committee's Second Set of Interrogatories	9/26/03
CA-78	Composite of cover letters from SS attaching documents in response to the	9/30/03 -

	Committee's requests for documents	10/16/03
CA-79	CSFB's Revised Objection and Response to the Committee's Second Set of Interrogatories to the Pre-Petition Banks.	10/8/03
CA-80	Composite of emails re: SS privilege log	9/26/03- 10/12/03
CA-81	Fax attaching SS privilege log	10/9/03
CA-82	Fax attaching revised SS privilege log	10/17/03
CA-83	Letter from H. Falkowitz to W. Roll	10/17/03
CA-84**	<i>Working Group List for Proposed Exide DIP Financing (EXEM 179-189)</i>	12/04/01
CA-85***	<i>Memo from F. Aase to US Credit Committee (CREDAG 2914-2915)</i>	12/18/01
CA-86***	<i>Handwritten notes on Grand Hyatt New York Stationary (CREDAG 1784-1785)</i>	
CA-87****	<i>Email from E. Bogdanoff attaching drafts of proposed DIP financing timeline (SSB 499-504)</i>	12/06/01

The Committee also designates all exhibits on any other party's exhibit lists, all pleadings or other documents filed with the Court in the Committee's adversary proceeding or in the bankruptcy case, and all exhibits referred to in the deposition testimony separately designated by Special Litigation Counsel.

Given the delays in production of responsive documents, the Committee reserves the right to supplement this list with materials it finds between now and the close of the Court's confirmation hearing.

Any document's inclusion in this exhibit list does not constitute a waiver to any arguments the Committee may wish to make should another party seek to use such document at the hearing.

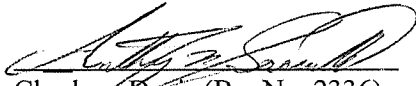
[signature page follows]

** Already admitted into evidence during testimony of Lisa Donahue.

*** Recently discovered amongst productions made long after document production deadline.

**** Added to rebut unexpected testimony of Lisa Donahue.

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FOR THE DISTRICT OF DELAWARE**

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Debtors.	:	(Jointly Administered)

CERTIFICATE OF SERVICE

I, Anthony M. Saccullo, Esquire, hereby certify that on this 28th day of October, 2003, I caused a copy of the foregoing **Special Litigation Counsel to the Official Committee of Unsecured Creditors' Second Amended Exhibit List** to be served upon the following parties in the manner(s) indicated:

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¹ 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.

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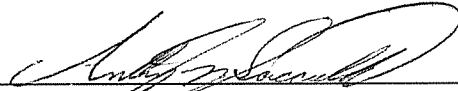
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