IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
EXIDE TECHNOLOGIES, et al.,	)	Case No. 02-11125 (KJC)
	)	(Jointly Administered)
Debtors	)	
	)	**Opposition Deadline: February 10, 2004**

DEBTORS' MOTION FOR AN ORDER AUTHORIZING REJECTION OF THE FOUR AGREEMENTS THAT ENERSYS CONTINUES TO OPPOSE OR, IN THE ALTERNATIVE, FOR RECONSIDERATION OF THE COURT'S INTEGRATION RULING

Debtors (collectively "Exide") respectfully move this Court for an order authorizing the rejection of the four agreements as to which EnerSys still objects, namely, the Asset Purchase Agreement (Docket No. 1614); the Administrative Services Agreement (Docket No. 1615); the December 1994 Letter Agreement (Docket No. 1617); and the Trademark and Trade Name License Agreement (Docket No. 1618). Alternatively, Exide respectfully requests that the Court find that the question of rejection for each of those four agreements is an independent inquiry separate and apart from the other agreements—*i.e.*, that they are not "integrated."

In support thereof, Exide relies on the arguments and authority set forth in its Brief In Support of their Motion filed herewith.

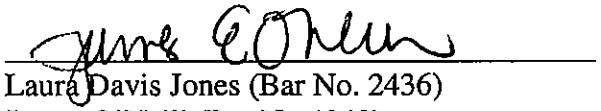
Respectfully submitted,

EXIDE TECHNOLOGIES, et al.

Dated: February 3, 2004

Matthew N. Kleiman
Paul R. Garcia
Michelle A. H. Francis
Lisa M. Barr
KIRKLAND & ELLIS LLP
200 East Randolph Drive
Chicago, IL 60601
Telephone: (312) 861-2000
Fax: (312) 861-2200

PACHULSKI, STANG, ZIEHL, YOUNG, JONES
& WEINTRAUB P.C.



Laura Davis Jones (Bar No. 2436)
James O'Neill (Bar No 4042)
919 North Market
P.O. Box 8705
Wilmington, Delaware 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Fax: (302) 652-4400

Co-Counsel for the Debtors and Debtors in Possession