EXHIBIT B

Exhibit B

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.	)	

DISCOVERY REQUESTS/EXIDE TECHNOLOGIES

Specific Definitions and Instructions

These discovery requests relate to the identification of all applicable insurance policies which could provide coverage for the personal injury claims of children who were lead poisoned as a result of the operation of the Greer, South Carolina lead battery plant owned by Exide.

Exide commenced operations at this Greer, South Carolina plant in 1987 when it purchased all assets and liabilities of General Battery Corporation. Prior to 1987 General Battery Corporation operated the facility continuously from 1960 until Exide's purchase. During the initial operations the company was known as Bower's Battery. Later the name was changed to General Battery and Ceramic Corporation. Finally, in 1968 the corporate name was shortened to General Battery Corporation.

After 1987 General Battery Corporation became a wholly owned subsidiary of Exide and the plant continued for a time to operate in the name of General Battery. Documents suggest that this practice continued until the mid 90's and only gradually did the plant operation change over to the name of Exide and/or Exide Technologies. Therefore, insurance coverages during this time period (1987-1995) may have been purchased in the name of General Battery Corporation or Exide. In 1996 Exide Technologies closed its Greer, South Carolina facility but has continued to own the plant

property through present. Many of the children's claims for lead poisoning result from the alleged contamination of residential areas adjacent to the Greer facility. Substantial evidence exists establishing that this contamination was ongoing and continuous from the initial operation of the plant in 1960 through the year 2001 when final remediation and removal of contaminated soil by Exide occurred under EPA and South Carolina Department of Health under EPA direction. Therefore, the inquiry as to insurance coverages is not limited to the time period in which the children suffered lead poisoning (generally 1985-2001) but is inclusive of all periods of operation of the plant since the cumulative effect caused contamination of the environment (1960-2001).

The term "liability insurance" is used in its most inclusive sense and includes general liability coverage, environmental coverage, premises' coverage, production and products completed coverage, and liability coverages for officers, directors, shareholders, and/or managers of Exide and its predecessor companies previously identified.

Definitions and General Provisions:

"**Document**", when used in its customary broad sense and includes, but is not limited to, all writings of every kind, including but not limited to letters, telegrams, memoranda, reports, studies, engineering drawings, engineering calculations and records of engineering analysis, calendar and diary entries, maps, pamphlets, notes, charts, tabulations, analyses, statistical information, accumulations, advertisements, any kind or records of meetings and conversations, film, impressions, magnetic tape, sound or mechanical reproductions and the like, brochures, files, computer data on disk or hard drive capable of reproduction in printable form, financial and accounting records, microfilm, notes used to prepare memoranda, and all other printed or readable material which is in the Defendant's possession, custody or control or is available and obtainable by the Plaintiff within the purview of the Federal Rules of Civil Procedure.

"**Identify**", when referring to a person, shall include:

(a) His or her name;

(b) Address and telephone number at the time referred to;

(c) Present or last known address;

(d) Employer at the time referred to;

(e) Employer's address at the time referred to;

(f) Present employer and employer's address;

(g) Position, title and responsibilities at the time referred to and to the present and most recent position, title and responsibilities;

When referring to a company, identify shall include:

(a) The name of the entity at the time referred to;

(b) Current name;

(c) Address and telephone number at the time referred to;

(d) Present address;

All of the following Discovery Requests are directed to your knowledge and to the contents of your books and records and to the knowledge of your attorneys, investigators, employees, agents, insurance carriers and to the contents of their respective books and records and to the knowledge of all other persons of who inquiry may reasonably be made.

In answering these Discovery Requests, please furnish all information available to you. For any Discovery Requests answered in whole or in part by "I don't know" or by "unknown", state in detail all efforts to obtain the information requested, and any continuing efforts in that regard and by whom such continuing efforts are being made.

For any Discovery Requests answered in whole or in part by "investigation is continuing" or "discovery is continuing", state the nature of any such continuing investigation, the name of each person or entity conducting such investigation, and the anticipated date of completion of each such investigation.

With respect to any items which seek to identify a document, you may, in lieu of

the identifying information, simply attach a copy of said document to your answers. With respect to any Discovery Requests which ask for the contents of a document you may, if you wish, in lieu of answering said Discovery Request, attach a copy of said document, with the statement to the Discovery Request that the copy attached is a true copy of the original of said document.

With respect to any items which refer to a communication, oral or in writing, identify the nature of the communication, and the name, address and job title of the person who presently has custody of copy of such written communication; or if the communication was oral and a recording of any kind was made of it, identify the name, address and job title of the person who presently has custody of such recording.

With respect to each Discovery Request, such request shall also extend to and include all documents which are made, altered, or modified during the period commencing from the date of the Complaint and shall extend forward in time to the present date. These first discovery requests shall be continuing in nature as provided by the applicable Rules of Civil Procedure requiring timely additions or supplementations as further information, documents, and records are discovered or become available to the Defendant, its agents, representatives, employees, accountants and attorneys.

DISCOVERY REQUESTS

1. For each policy of insurance coverage (as broadly defined above) from 1960 through 2001, provide:

a) Insurer's name and address;

b) Names of all insured entities and/or persons;

c) Coverage periods;

d) Coverage limits or amounts;

e) Policy number;

f) Premiums charged and dates premiums were paid;

2. For each policy of insurance coverage identified in response to Discovery Request 1:

a) Produce the policy;

b) Produce all records showing the payment of premiums.

3. For each policy of insurance coverage identified in response to Discovery Request 1, provide a complete accounting of all payments made under that policy. As to each payment made, provide the following:

a) If it was a payment on a claim, identify the date of the claim, date of loss; name, address and telephone number of claimant; claim number; and the amount of payment made.

b) If it was a payment that was credited against available coverage, other than one made for a claim, or to a claimant, identify the amount of payment; purpose of payment; why the payment was made; by whom it was authorized; date of payment; and who received the payment. If Exide or any of its predecessor corporations received the money then identify in detail what was done with this money.

c) If the insured and insurer entered into any agreements in which a payment was made to the insured by the insurer to reduce the insurer's exposure under the policy identify each such agreement; the amount of payment; date of payment; who authorized the payment on behalf of the insured and insurer; and provide a complete accounting of what happened to the money paid by the insurer to the insured (Exide).

d) Produce all documents which relate to the responses to discovery requests 3(a)(b) and (c).

4. As to personal injury or property damage claims emanating from allegations of lead contamination or lead poisoning occurring as a result of the operation of the Greer, South Carolina Battery plant by either Exide, any of its predecessor corporations, or wholly owned subsidiaries, identify each insurance carrier which was placed on notice of the claims and provide all documents relating to the respective

insurance carriers' responses to those notifications, including the admission or denial of coverage, and specifically any payments made under applicable coverage.

5. As to litigation filed in Greenville, South Carolina relating to property damage or personal injury claims for lead contamination or lead poisoning (this would include cases filed in both State and Federal Court) set forth the details of and provide all documentation concerning Exide's inquiry into and efforts to determine the extent of or availability of liability insurance coverage applicable to those claims.

Respectfully submitted,

Douglas F. Patrick
COVINGTON, PATRICK, HAGINS STERN and LEWIS
Post Office Box 2343
Greenville, South Carolina 29602
(864) 242-9000
Attorneys for the Plaintiff

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Greenville, South Carolina