

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

EXIDE TECHNOLOGIES, ET AL

Debtors.

CHAPTER 11

Case No. 02-11125(KJC)
Jointly Administered Cases

**MOTION OF ENERSYS, INC. FOR AN ORDER EXPEDITING TIME
FOR THE HEARING TO CONSIDER ITS EMERGENCY MOTION FOR THE
ENTRY OF AN ORDER AUTHORIZING AN EXAMINATION OF EXIDE
TECHNOLOGIES, INC. PURSUANT TO BANKRUPTCY RULE 2004**

EnerSys, Inc. ("**EnerSys**"), pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure and Local Rule 9006-1(e), requests that the Court enter an order expediting the time for the hearing with respect to its *EMERGENCY MOTION FOR THE ENTRY OF AN ORDER AUTHORIZING AN EXAMINATION OF EXIDE TECHNOLOGIES, INC. PURSUANT TO BANKRUPTCY RULE 2004* (the "**Motion**").

EnerSys respectfully requests that this Court enter an Order expediting the hearing with respect to its Motion and permit argument on the Motion to be heard at the earliest convenience of the Court. The relief requested in the Motion, which is attached hereto as Exhibit A is time-sensitive and critically important. As the Court is aware, the confirmation hearing (the "**Confirmation Hearing**") to consider the Debtors' Proposed Plan of Reorganization (the "**Plan**") is scheduled for October 21 and 22, 2003. EnerSys has expressed its interest in purchasing a substantial portion of the Debtors' assets at a value significantly in excess of that assumed in the Plan. For the reasons stated in the Motion, EnerSys needs an order allowing it to conduct an examination of Exide Technologies, Inc. under Federal Rule of Bankruptcy Procedure 2004 as soon as possible. Upon information and belief, the Official Committee of Unsecured Creditors supports this motion.

WHEREFORE, EnerSys respectfully requests that the Court enter an order expediting the time for hearing on the Motion and allow argument on the Motion at the earliest convenience of the Court.

Dated: September 5, 2003

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