

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

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that on September 8, 2003, EnerSys, Inc. ("**EnerSys**") filed its *MOTION OF ENERSYS, INC. FOR AN ORDER EXPEDITING TIME FOR THE HEARING TO CONSIDER ITS EMERGENCY MOTION OF ENERSYS, INC. FOR THE ENTRY OF AN ORDER EXTENDING THE RESPONSE DEADLINE TO THE DEBTORS' MOTION FOR SUMMARY JUDGMENT PURSUANT TO LOCAL RULE 9006-2* (the "**Motion to Shorten**").

The Motion to Shorten seeks an expedited hearing on the *EMERGENCY MOTION OF ENERSYS, INC. FOR THE ENTRY OF AN ORDER EXTENDING THE RESPONSE DEADLINE TO THE DEBTORS' MOTION FOR SUMMARY JUDGMENT PURSUANT TO LOCAL RULE 9006-2* (the "**Motion**") at the earliest convenience of the Court.

Dated: September 8, 2003

**STEVENS & LEE, P.C.**

/s/ Thomas G. Whalen, Jr. \_\_\_\_\_  
Thomas G. Whalen, Jr. (No. 4034)  
300 Delaware Avenue, Suite 800  
Wilmington, DE 19801  
Tel: (302) 425-3304  
Fax: (610) 371-8512  
E-mail: [tgw@stevenslee.com](mailto:tgw@stevenslee.com)

-and-

Robert Lapowsky, Esquire  
Carl W. Hittinger, Esquire  
1818 Market Street, 29<sup>th</sup> Floor  
Philadelphia, PA 19103  
Tel: (215) 751-2884  
E-mail: [rl@stevenslee.com](mailto:rl@stevenslee.com)  
[cwh@stevenslee.com](mailto:cwh@stevenslee.com)  
*Attorneys for EnerSys, Inc.*