

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

In re:	:	Chapter 11
	:	
EXIDE TECHNOLOGIES, INC., et al.,	:	Case No. 02-11125 (KJC)
a Delaware corporation,	:	
	:	Jointly Administered
Debtors.	:	

**CERTIFICATION OF COUNSEL REGARDING
SCHEDULING AND DISCOVERY ORDER**

I, David B. Stratton, a partner with the law firm of Pepper Hamilton LLP, co-counsel for the Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned Chapter 11 proceedings, hereby certify:

1. Attached hereto is a form of Order Pursuant to Rule 2004 of the Federal rules of Bankruptcy Procedure Authorizing the Examination of R² Parties and Directing Document Production (the “Order”) together with Exhibits A and B to the Order.

2. The Order has been agreed upon by the undersigned counsel for the Official Committee of Unsecured Creditors and R² Investments, LDC and its affiliates and it is respectfully submitted that it may be entered without further notice or a hearing.

Date: October 1, 2003

PEPPER HAMILTON LLP

/s/ David B. Stratton
David B. Stratton (DE No. 960)
1201 Market Street, Suite 1600
Wilmington, DE 19801
(302) 777-6500

and

Fred S. Hodara, Esq.
Mary R. Masella, Esq.
AKIN, GUMP, STRAUSS, HAUER
& FELD LLP
590 Madison Avenue, 20th Floor
New York, NY 10022
(212) 872-1000
*Attorneys for the Official Committee
of Unsecured Creditors*

CERTIFICATE OF SERVICE

I, David B. Stratton, do hereby certify that on October 1, 2003, I did serve the foregoing *Certification of Counsel Regarding Scheduling and Discovery Order* by causing true and correct copies thereof to be served via United States mail, first class, postage pre-paid upon those parties listed on the attached service list.

David B. Stratton