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 **Hearing date: November 20, 2003 at 10:00 a.m.**

MOTION OF ENERSYS, INC. FOR AN ORDER EXPEDITING TIME FOR THE HEARING TO CONSIDER ITS EMERGENCY MOTION FOR SANCTIONS AND TO STRIKE

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 SANCTIONS AND TO STRIKE* (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 hearing scheduled for November 20, 2003 at 10:00 a.m. before conducting the Daubert hearing as to EnerSys' expert Dr. Keegan. The relief requested in the Motion is time-sensitive because it relates to the testimony and exhibits that Debtors may improperly proffer at the November 20, 2003 hearing as to Dr. Keegan. Moreover, EnerSys could not have moved for this relief any earlier because Debtors just filed the McCullough Report (the document EnerSys asks this Court to strike) on November 11, 2003, without any prior notice, and EnerSys has been unsuccessful in its attempts to have Debtors withdraw the improperly filed report (and preclude possible testimony,) of Debtors' unauthorized, untimely and undeposed expert, effectively substituted without leave of

Court and in violation of the Court's October 6, 2003 Second Amended Scheduling Order requiring all expert reports by October 20, 2003.

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 hearing scheduled for November 20, 2003 at 10:00 a.m.

Dated: November 18, 2003

STEVENS & LEE, P.C.

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Attorneys for EnerSys, Inc.

CERTIFICATE OF SERVICE

I, THOMAS G. WHALEN, JR., hereby certify that on November 18, 2003, I caused a true and correct copy of *MOTION OF ENERSYS, INC. FOR AN ORDER EXPEDITING TIME FOR THE HEARING TO CONSIDER ITS EMERGENCY MOTION FOR SANCTIONS AND TO STRIKE* to be served upon the parties listed below in the manner indicated:

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/s/ Thomas G. Whalen, Jr.
Thomas G. Whalen, Jr.

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 **Hearing date: November 20, 2003 at 10:00 a.m.**

NOTICE OF MOTION

PLEASE TAKE NOTICE that on November 18, 2003, EnerSys, Inc. ("**EnerSys**") filed its *MOTION OF ENERSYS, INC. FOR AN ORDER EXPEDITING TIME FOR THE HEARING TO CONSIDER ITS EMERGENCY MOTION TO STRIKE,* which requests that the Court hear oral argument on the *EMERGENCY MOTION TO STRIKE* at the hearing already scheduled for November 20, 2003 at 10:00 a.m.

Dated: November 18, 2003

STEVENS & LEE, P.C.

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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 **Hearing date: November 20, 2003 at 10:00 a.m.**

ORDER GRANTING MOTION OF ENERSYS, INC. FOR AN ORDER EXPEDITING TIME FOR THE HEARING TO CONSIDER ITS EMERGENCY MOTION FOR THE ENTRY OF AN ORDER ENTRY GRANTING MOTION TO PRECLUDE THE REBUTTAL TESTIMONY OF DEBTORS' EXPERT

This Court having considered the *MOTION OF ENERSYS, INC. FOR AN ORDER EXPEDITING TIME FOR THE HEARING TO CONSIDER ITS EMERGENCY MOTION TO STRIKE* (the "**Motion to Shorten**") in the above captioned matter; and due and proper notice of the Motion to Shorten having been given; and cause appearing therefor; it is hereby

ORDERED that the Motion to Shorten is GRANTED; and it is further

ORDERED that a hearing with respect to *MOTION OF ENERSYS, INC. FOR AN ORDER EXPEDITING TIME FOR THE HEARING TO CONSIDER ITS EMERGENCY MOTION TO STRIKE* (the "**Motion**") shall be heard on November 20, 2003 at 10:00 a.m.

Dated: November ___, 2003

_____
The Honorable Kevin J. Carey
United States Bankruptcy Judge