

# **EXHIBIT B**

# KIRKLAND & ELLIS

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June 17, 2003

## Via Facsimile

Carl W. Hittinger  
Stevens & Lee  
1818 Market Street - 29<sup>th</sup> Floor  
Philadelphia, PA 19103

Re: Exide Technologies, et al.

Dear Carl:

I am in receipt of your letters dated June 13 and June 16 and the attached Notices of Deposition in connection with the rejection by Exide Technologies ("Exide") of certain executory contracts of Enersys, Inc. ("Enersys"). Exide is prepared to fully cooperate with these requests as set forth herein.

Exide is prepared to make available for deposition Ms. Lisa Donahue on a mutually agreeable date at your Philadelphia offices. Ms. Donahue is the Chief Restructuring Officer of Exide and will also serve as Exide's Rule 30(b)(6) designee.

Exide will make available Mr. Mitchell Bregman on a mutually agreeable date. Mr. Bregman is head of Exide's U.S. Industrial battery business. Mr. Bregman's offices are located in suburban Chicago, and therefore we propose that the deposition be conducted at Kirkland & Ellis' Chicago office.

Exide will make available Mr. Neil Bright for deposition on a mutually agreeable date. Mr. Bright is in charge of Exide's worldwide Industrial battery business. Mr. Bright, however, does not maintain an office in the United States. Accordingly we propose that Mr. Bright's deposition be conducted by telephone or video conference.

Exide does not believe that the additional depositions requested by Enersys are appropriate for the reasons set forth herein. Any testimony of Messrs. Mulhauser and Enstone and Dr. Leuschner would likely be duplicative of the testimony of some or all of the proposed deponents described above.

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Finally, Messrs. Kupinsky and Furey and Ms. Hatcher are inside and outside counsel to Exide, and therefore to the extent of their involvement in this matter, the substantial entirety of their testimony would be subject to attorney-client privilege; to the limited extent that any of them might be fact witnesses, their testimony would likely be similarly duplicative of the proposed deponents above.

Although Exide has not yet determined the identity of any witnesses it intends to call at the hearing with respect to this matter, please be assured that Exide will give Enersys reasonable opportunity to take a deposition if such witness is other than the three individuals described above.

Exide believes that the proposal described herein is a reasonable and fair compromise of its objections to the depositions requested by Enersys. In light of the Bankruptcy Court's ruling at the recent telephonic hearing, it is clear that the court does not intend to allow either party to impose unreasonable or burdensome discovery requests on the other. Therefore, in the spirit of compromise, we trust that our suggestions as described herein will be favorably received. I look forward to your reply.

Very truly yours,



Matthew N. Kleiman

MNK/bk

cc: Barbara A. Hatcher