EXHIBIT G

KIRKLAND & ELLIS LLP
AND AFFILIATED PARTNERSHIPS

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Facsimile:
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Paul R. Garcia
To Call Writer Directly:
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August 29, 2003

VIA FACSIMILE AND FIRST CLASS MAIL

John J. Miravich
STEVENS & LEE
111 North Sixth Street
P.O. Box 679
Reading, PA 19603-0679

Re: Exide Technologies/EnerSys

Dear John:

As discussed, here is the deposition schedule for the last of the fact witnesses:

- Arthur Newman on September 5, 2003, at 11:00 a.m. in New York City.
- Craig Mulhauser (subject to 30(b)(6) objections) on September 11, 2003, at 9:00 a.m. in Philadelphia.
- Stuart Kupinksky (subject to 30(b)(6) objections and the enclosed stipulation) on September 12, 2003, at 9:00 a.m. in Philadelphia.
- John Craig on either September 9, 10, or 12, 2003, at 9:00 a.m. in Philadelphia. You will confirm which date is best.

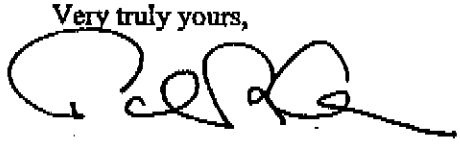
As agreed, the fact that these depositions will take place after the close of fact discovery shall not impact or affect any other scheduled dates, including but not limited to the expert discovery periods or the hearing date.

Also, as I mentioned, Exide will forego a motion to compel EnerSys to produce witness(es) in response to Exide's 30(b)(6) deposition notice with the understanding that Exide may use statements of EnerSys' deponents as statements of EnerSys under Rule 30(b)(6). Needless to say, it would not be fair for EnerSys both to refuse to produce any witnesses in response to our 30(b)(6) notice because you believe the topics were already covered, but at the same time not let us use any statements that we otherwise would be able to obtain and use under Rule 30(b)(6). Moreover, if we were to agree to forego the 30(b)(6) deposition, EnerSys' fact testimony would have to be confined to the testimony given by its deponents for each of the

noticed 30(b)(6) categories. In other words, EnerSys would not be permitted at the hearing to put forward fact evidence in addition to, or that differs from, the testimony of its deponents on the 30(b)(6) topics.

We believe this is a fair and reasonable accommodation to both side's positions, and avoids troubling the Court with a discovery dispute that seems to be easily resolvable. Please either confirm that this agreement is acceptable, or provide us with witnesses and dates for the 30(b)(6) deposition.

Very truly yours,



Paul R. Garcia

PRG/bb

Enclosure

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	
	)	Chapter 11
EXIDE TECHNOLOGIES, et al.,	)	Case No. 02-11125 (KJC)
	)	Jointly Administered
Debtor	)	

STIPULATION CONCERNING THE DESIGNATION OF STUART KUPINSKY, ESQ. AS A RULE 30(B)(6) DEPONENT OF EXIDE TECHNOLOGIES, ET. AL.

EnerSys, Inc. and Exide Technologies, et al., ("Debtors") hereby stipulate and agree that:

1. Subject to and without waiver of the objections set forth in Debtors' Objections to EnerSys's Notice of Rule 30(b)(6) Deposition, attached hereto as Exhibit A, Debtors will present Stuart Kupinsky, Esq., General Counsel of Exide Technologies, as Debtors' Rule 30(b)(6) designee as to deposition category numbers 2, 3, 5, 7, 24, 30, 31, and 33-35.

2. Questioning of Mr. Kupinsky will be strictly limited to the categories 2, 3, 5, 7, 24, 30, 31, and 33-35. EnerSys shall not ask, and Mr. Kupinsky need not answer, any deposition questions outside of categories 2, 3, 5, 7, 24, 30, 31, and 33-35 as limited by Debtors' objections thereto.

3. Debtors and its counsel do not waive and shall not be deemed to have waived, and EnerSys shall not argue that Debtors have waived, any rights under the attorney-client privilege or work product doctrine by presenting Mr. Kupinsky as a Fed.R.Civ.P. 30(b)(6) deponent. EnerSys shall not seek any privileged or work product information from Mr. Kupinsky.

SO STIPULATED AND AGREED:

Counsel for EnerSys	Counsel for Debtors

STEVENS & LEE
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August 29, 2003

Via Facsimile & Electronic Mail

Paul R. Garcia, Esquire
Kirkland & Ellis
200 East Randolph Drive
Chicago, IL 60601

Re: In re Exide Technologies, Case No. 02-B-11125 (KJC)

Dear Paul:

I left you a voicemail but did not hear back. The following is in response to your letter of August 29, 2003 regarding some of the remaining discovery:

1. We agree Arthur Newman's deposition will be in New York City on September 5, 2003. We have asked his counsel to move the time to 11:00 a.m. from 10:00 a.m. and hope to hear back shortly. Other than the exact time, we are in agreement.

2. We agree that Craig Mulhauser's deposition will be on September 11, 2003 at 9:00 a.m. in Philadelphia. We did not agree that it be limited to any 30(b)(6) topics. We noticed his deposition individually. Are you suggesting that Mulhauser will only testify regarding his 30(b)(6) categories at trial? Please advise.

3. We agree that Stuart Kupinsky will be deposed in September 12, 2003 at 9:00 a.m. in Philadelphia. Again, we did not agree to limit his deposition to any 30(b)(6) categories. We do understand your concern regarding privilege, however, we need to work through how you expect to use him at trial. We are not waiving the right to object to his trial testimony based on the prior assertion by Exide of privilege and work product.

4. We have agreed to John Craig's deposition. As I mentioned to you, I forwarded your message concerning dates for his deposition and was waiting for Craig's availability. He is not available the 9, 10, 12, but is available the 16th at 10:00 a.m. in Reading. Please advise if that day is acceptable.

5. You agreed that you will not be seeking the deposition of Michael Philion based on our agreement to produce Craig.

We are having difficulty understanding in what area of your 30(b)(6) you are attempting to bind EnerSys. Can you narrow the categories? Concerning fairness, there are a number of areas in which Exide has never produced a 30(b)(6) witness as it relates to EnerSys' notice and apparently Exide is still "investigating" whether there is an appropriate witness.

We also have some difficulties with the Kupinsky stipulation. Please call so we can work through each paragraph and its purpose. We will not agree that you can limit Kupinsky's deposition and then offer his trial testimony in other areas nor will we agree to limit our ability to cross-examine him at trial.

Very truly yours,

STEVENS & LEE

John J. Miravich

JJM:lmb
cc: Robert Lapowsky, Esquire
Carl Hittinger, Esquire
James E. O'Neill, Esquire

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September 10, 2003

VIA FACSIMILE

John J. Miravich
STEVENS & LEE
111 North Sixth Street
P.O. Box 679
Reading, PA 19603-0679

Re: Exide Technologies/EnerSys

Dear John:

This is our last effort to resolve the parties' dispute with respect to EnerSys's refusal to provide us with witnesses in response to Exide's Notice of Deposition under Fed.R.Civ.P. 30(b)(6). On August 29, 2003, I sent you a letter requesting that EnerSys either provide us with deponents for each of the categories in Exide's 30(b)(6) Deposition Notice, or that EnerSys confirm that Exide may use statements by EnerSys's fact deponents as statements under Rule 30(b)(6). As I explained, it is unfair and duplicitous for EnerSys both to refuse to provide us with witnesses under the 30(b)(6) categories because, the argument goes, the only knowledgeable witnesses on those topics have already been deposed personally, and for EnerSys at the same time to refuse to agree that those witnesses' testimony may be used by Exide as statements of EnerSys under Rule 30(b)(6). In an effort to reach a compromise on this issue, we offered to consider narrowing the topics if EnerSys would identify which of them EnerSys believes, for example, are not properly the subject of fact testimony at all (because EnerSys believes them to be purely legal questions), but EnerSys to date has not identified any such categories.

We need to bring this issue to a close. Please immediately either identify witnesses and dates for Exide's 30(b)(6) deposition to proceed, or confirm EnerSys's agreement that at trial Exide may use the statements of EnerSys's fact deponents as testimony under Rule 30(b)(6). If we do not receive one or the other by the close of business on September 11, 2003, we will have no choice but to seek the appropriate relief from the Court at the appropriate time. Respectfully, EnerSys cannot have it both ways on this issue, because it is not fair.

Very truly yours,

Paul R. Garcia /mak

Paul R. Garcia

PRG/bb

cc: Roger Furey (by facsimile)