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 **Related to Docket Entry Nos. 3485, 3486, 3489, 3492, 3493, 3504 and 3506**

CERTIFICATION OF COUNSEL

Thomas G. Whalen, Jr., counsel for EnerSys, Inc. ("**EnerSys**"), hereby certifies as follows:

1. On January 28, 2004, the Court heard oral argument on the numerous motions in limine (the "Motions") filed respectively by the Debtors and EnerSys. Pursuant to the Court's instruction, the parties have attempted to reach agreement on a proposed Order reflecting the Court's disposition of the Motions, as set forth in the record.

2. Despite good faith effort by both the Debtors and EnerSys, the parties are unable to reach agreement on the language of a proposed Order.

3. As a result, the parties have agreed that each party will submits its own proposed Order for the Court's consideration. Attached as Exhibit "A" hereto is a proposed Order which EnerSys believes accurately reflects the Court's dispositions of the various Motions decided at the January 28, 2004 argument.

WHEREFORE, EnerSys respectfully requests that the Court execute and enter the attached proposed Order.

Dated: March 1, 2004

STEVENS & LEE, P.C.

/s/ Thomas G. Whalen, Jr.

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CERTIFICATE OF SERVICE

I certify that on March 1, 2004, I caused a true and correct copy of the forgoing *Certification of Counsel* to be served on the parties to be served upon all interested parties electronically through the Court's CM/ECF system and upon the individuals listed below in the manner indicated:

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