IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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

CERTIFICATION OF COUNSEL
REGARDING DOCKET NUMBER 3915

I, Anthony M. Saccullo, of The Bayard Firm, special litigation counsel for the official committee of unsecured creditors (the "Committee") appointed in the chapter 11 cases of the above-captioned debtors and debtors in possession (the "Debtors"), hereby certify the following:

1. On March 15, 2004, this Court approved the Stipulation and Order Allowing for Payment of Fees and Expenses of Sonnenschein, Nath & Rosenthal LLP ("SNR") and The Bayard Firm ("TBF") as Special Litigation Counsel for the Official Committee of Unsecured Creditors (the "Stipulation").[1] Pursuant to the terms of the Stipulation, SNR and TBF received 40 percent of their respective fees and 100 percent of their respective expenses, and such amounts were deposited into a segregated accounts.

2. Pursuant to Paragraphs 4 and 5 of the Stipulation, the payment made to SNR and TBF must remain in a segregated account until "immediately after the objection deadline [for the respective fee applications] has passed and a certificate of no objection has been filed **and the Court so orders.**" See Stipulation, Paragraphs 4 and 5.

[1] A copy of the Stipulation, as approved, is attached hereto as Exhibit A.

3. The objection deadlines for the TBF and SNR fee applications have passed, and certificates of no objection have been filed; however, TBF and SNR require an Order from this Court authorizing the release of the funds from the segregated accounts.

4. Attached hereto as Exhibit B is a proposed form of Order authorizing the SNR and TBF to apply the funds currently held in a segregated account to the outstanding fees and expenses incurred in these cases, in accordance with the terms of the Stipulation.

WHEREFORE, the Committee respectfully requests that this Court enter an Order, substantially in the form attached hereto as Exhibit A, and grant such other and further relief as is just and proper.

Dated: March 19, 2004
Wilmington, Delaware

THE BAYARD FIRM

By: _____
Charlene D. Davis (No. 2336)
Anthony M. Saccullo (No. 4141)
222 Delaware Avenue, Suite 900
Wilmington, Delaware 19899

Counsel for the Official
Committee of Unsecured Creditors