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)
Debtors.	:	**Objection Deadline: April 9, 2004 @ 5 PM**
	:	**Hearing Date: April 16, 2004 @ 10 AM**

LIMITED OBJECTION OF OSWALD/DORNEY ROAD COOPERATING RESPONDENTS GROUP TO PLAN CONFIRMATION (Related to Document No. 3714)

Oswald/Dorney Road Cooperating Respondents Group (the "Dorney Group"), which is composed of Amana Refrigeration, Inc., Atlas Minerals and Chemicals, Inc., East Penn Manufacturing Company, Inc., Garden State Tanning, Inc., General Electric Company, The Glidden Company, Mack Trucks, Inc. and The Stroh Brewery Company, through its counsel, hereby files this Limited Objection to the Debtors' Joint Plan of Reorganization (the "Plan"), and in support thereof, avers as follows:

1. On April 15, 2002, the Debtors filed their Voluntary Chapter 11 Petitions.

2. The Dorney Group has a claim against the Debtors as a result of their environmental contamination of the Dorney Road Landfill Superfund Site in Mertztown, Pennsylvania.

3. The Dorney Group timely filed a Contaminant-Related Property Damage Proof of Claim on or about August 13, 2003.

4. On or about March 15, 2004, the Debtors and the Official Committee of Unsecured Creditors filed the Plan and supporting Disclosure Statement.

5. The Disclosure Statement lists certain environmental sites on pages 86-88 and Exhibit "E" at which there are alleged remediation issues; however, neither the Plan nor Disclosure Statement mention the Dorney Road Landfill Superfund Site.

6. To the extent that the Dorney Group will be prejudiced as a result of the Debtors' failure to list the Dorney Road Landfill Superfund Site in their Plan and Disclosure Statement, the Dorney Group objects to confirmation of the Plan under 11 U.S.C. § 1129(7), as the Dorney Group will receive under the Plan on account of its claim, as of the effective date, an amount that is less than the amount that the Dorney Group would receive if the Debtors were liquidated under chapter 7.

WHEREFORE, Oswald/Dorney Road Cooperating Respondents Group respectfully requests that this Honorable Court deny confirmation of the Debtors' Plan.

Respectfully submitted,

/s/ Michael L. Temin

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DATED: April 9, 2004

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	:	

ORDER

AND NOW, this _____ day of _____, 2004, upon consideration of Oswald/Dorney Road Cooperating Respondents Group's Limited Objection to Plan Confirmation, and any response thereto, it is hereby

ORDERED that confirmation of the Debtors' Joint Plan of Reorganization is **DENIED**.

BY THE COURT:

_____

The Honorable Kevin J. Carey
United States Bankruptcy Judge

DSW:46517.1

CERTIFICATION OF SERVICE

I, Michael L. Temin, Esquire, do hereby certify that on April 9, 2004, I caused to be served a true and correct copy of Oswald/Dorney Road Cooperating Respondents Group's Limited Objection to Plan Confirmation via first class mail, postage prepaid, on the party listed below.

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Dated: April 9, 2004