

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

In re:)	Chapter 11
)	
ATA Holdings Corp., et al., ¹)	Case No. 04-19866
)	(Jointly Administered)
Debtors.)	

DEBTORS' SUPPLEMENTARY FILING OF NO CONTEST TO DEMANDED REJECTION
OF AFFILIATED AGREEMENTS OF GREATER ORLANDO AVIATION AUTHORITY
AIRPORT USE LEASE AND NOTICE OF HEARING AND OBJECTION DEADLINE

Original Motion (Docket #1591) filed:	March 3, 2005
Objection (Docket #1716) filed:	March 14, 2005
Hearing held:	April 18, 2005
Further hearing set:	April 27, 2005 8:00 am EST (9:00 EDT)
	Telephone: 1-877-213-2541
	Passcode: 6325186#

The debtors and debtors in possession (the "Debtors") in the above captioned chapter 11 cases (the "Chapter 11 Cases"), file this statement related to the Motion On Shortened Notice For Entry Of An Order Authorizing Debtors To Reject Airport Lease And Use Agreement With Greater Orlando Aviation Authority (the "Motion") filed by the Debtors March 3, 2005. The Greater Orlando Aviation Authority ("GOAA") filed an objection (the "Objection") to the Motion March 14, 2005 listing numerous concerns, including: (1) there must be a date certain for the effective date of the proposed rejection of the Airline-Airport Lease and Use Agreement effective January 1, 1996 ("Lease"); (2) subtenants on the Lease should be notified and required to vacate the premises on the effective date of the rejection; and (3) certain other

¹ The Debtors are the following entities: ATA Holdings Corp. (04-19866), ATA Airlines, Inc. (04-19868), Ambassadors Travel Club, Inc. (04-19869), ATA Leisure Corp. (04-19870), Amber Travel, Inc. (04-19871), American Trans Air Execujet, Inc. (04-19872), ATA Cargo, Inc. (04-19873), and Chicago Express Airlines, Inc. (04-19874).

agreements² not listed by the Debtors but that are dependent on the Lease will terminate upon the termination of the Lease.

A hearing on the Motion and Objection was held April 18, 2005 at which the Debtors in response to the Objection stated (1) the effective date of the rejection would be April 30, 2005; (2) all subtenants had been notified of the rejection of the Lease and the termination of their subleases as of the effective date of the rejection; and (3) any proposed new lease space contracts would not require further court approval and could be executed in the ordinary course of the Debtors' business. The Debtors further requested additional time to evaluate the Objection related to the status of the Affiliated Agreements alleged to be dependent on the Lease. With no objection from GOAA to the extension sought by the Debtors, the Court set the remaining matter for telephonic hearing on April 27, 2005 beginning at 8:00 a.m. EST (9:00 a.m. EDT).

The Debtors, now having reviewed the Affiliated Agreements at issue, concede the point raised in GOAA's objection that rejection of the Lease mandates rejection of the Affiliated Agreements, and that such rejection of the Affiliated Agreements should be effective as of the rejection date of the Lease, and the Debtors still conclude that rejection of the Lease which now mandates rejection of the Affiliated Leases is still in the best interests of the bankruptcy estates, and seek to have the Court consider authorizing such additional rejection authority for the Affiliated Leases as part of the order authorizing the rejection of the Lease at

² The other agreements are the Orlando International Airport Fuel System Lease Agreement ("Fuel Lease Agreement"), effective date of January 1, 1996 between GOAA and ATA Airlines, Inc. (f/k/a/ American Trans Air, Inc.) together with Amendment 1 dated September 20, 2000; Joinder Orlando International Airport Fuel System Interline Agreement ("Interline Agreement") effective date January 1, 1996; Joinder Orlando International Airport Fuel System Access Agreement ("Access Agreement") and any other affiliated agreements that are dependent upon the Debtors being a lessee under the Lease or under the Fuel Lease Agreement ("Other Affiliated Agreements" and together with the Fuel Lease Agreement, the Interline Agreement, and the Access Agreement, the "Affiliated Agreements").

the telephonic hearing previously scheduled for April 27, 2005 ("Hearing") with any objections to such supplemental authorization be filed so as to be heard at the Hearing.

WHEREFORE, for the reasons set forth above and the reasons and argument listed in the Motion, the Debtors request that the Court enter an Order (1) authorizing the rejection of the Lease and all Affiliated Agreements effective as of April 30, 2005; (2) finding that the rights of any subtenants to the Lease terminate on the effective date as notified; and (3) for all other just and proper relief.

Respectfully submitted,

BAKER & DANIELS

By: /s/Terry E. Hall

Attorneys for the Debtors and Debtors-in-Possession

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served this 21st day of April 2005, by electronic mail on the Core Group, 2002 List, Appearance List, and the Authority.

/s/ Terry E. Hall