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.	)	

EMERGENCY MOTION TO HOLD UNDER SEAL
(I) THE SECOND FRICK DECLARATION AND
(II) EXHIBITS 56 AND 57 TO THE SECOND MEYER DECLARATION

The debtors and debtors in possession (collectively, the "Debtors") in the above captioned Chapter 11 cases file this motion (the "Seal Motion") for entry of an order permitting the Debtors, pursuant to 11 U.S.C. § 107(b)(1) and Rule 9018 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") to file under seal (i) the Second Declaration Of Sean Frick (the "Second Frick Declaration"); and (ii) exhibits 56 and 57 to the Second Declaration of Richard Meyer, Jr. (the "Meyer Exhibits"). A form of proposed order granting this Seal Motion is attached as Exhibit A. In support of this Seal Motion, the Debtors respectfully state the following:

1. Section 107(b)(1) of the Bankruptcy Code provides bankruptcy courts with the power to issue orders that will protect entities from potential harm that may result from the disclosure of certain confidential information. This section provides, in relevant part, that on request of a party in interest, the bankruptcy court shall protect an entity with respect to a trade secret or confidential research, development, or commercial information.

[1] The Debtors are the following entities: ATA Holdings Corp. (04-19866), ATA Airlines, Inc. (04-19868), Ambassadair 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).

2. Bankruptcy Rule 9018 defines the procedures by which a party may move for relief under Section 107(b) of the Bankruptcy Code, and provides that "[o]n motion, or on its own initiative, with or without notice, the court may make any order which justice requires (1) to protect the estate or any entity in respect of a trade secret or other confidential research, development, or commercial information. . . ." Fed. R. Bankr. P. 9018.

3. The information contained the Second Frick Declaration and the Meyer Exhibits (collectively, the "Confidential Filings") is not presently in the public domain. Debtors submit that the Confidential Filings contain sensitive, non-public details regarding the Debtors' present and projected financial status. This information is highly proprietary and confidential, and the disclosure of such information would undoubtedly cause serious detriment to the Debtors. Further, Debtors are not aware of any compelling reason for the information contained in the Confidential Filings needs to be made a matter of public record at this time.

4. Debtors have provided (or will provide) the Confidential Filings on a confidential basis to the United States Trustee; counsel for Southwest Airlines, Co., the Debtors' DIP lender; the professionals retained by the Committee; the Air Line Pilots Association, International ("ALPA") and the Air Transportation Stabilization Board (the "ATSB").

5. The Debtors submit that good cause exists for the Court to grant the relief requested in this Seal Motion.

WHEREFORE, the Debtors respectfully request that the Court (i) accept the Confidential Filings on a confidential, non-public basis into the record of these cases, (ii) hold the Confidential Filings under seal in the Court's file until further Order of the Court, (iii) direct any party who obtains a copy of the Confidential Filings to hold it as confidential information and (iv) grant all other just and proper relief.

Respectfully Submitted,

BAKER & DANIELS

By: /s/ Melissa M. Hinds

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served this 10th day of August, 2005, by electronic mail on the Core Group, 2002 List and Appearance List.

/s/ Melissa M. Hinds