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 EXHIBIT B TO MOTION ON SHORTENED NOTICE FOR ORDER APPROVING SETTLEMENT AGREEMENT WITH JOHN HANCOCK LEASING CORPORATION

ATA Airlines, Inc. ("ATA") and ATA Holdings Corp. ("ATAH," and together with ATA, the "Debtors"), two of the debtors and debtors in possession in the above captioned chapter 11 cases, files 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 "Exhibit B" to the Motion On Shortened Notice For Order Approving Settlement Agreement With John Hancock Leasing Corporation (the "Approval Motion"). 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 C8 Airlines, Inc. f/k/a 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 in Exhibit B is not presently in the public domain. The Debtors submit that Exhibit B contains sensitive, non-public details regarding the resolution of existing claims by John Hancock Leasing Corporation. The disclosure of such information would undoubtedly cause serious detriment to the Debtors. Further, the Debtors are not aware of any compelling reason for the information contained in Exhibit B to be made a matter of public record at this time.

4. The Debtors have provided (or will provide) Exhibit B on a confidential basis to the United States Trustee; counsel for the ATSB; and the professionals retained by the Committee.

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

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

Respectfully Submitted,

BAKER & DANIELS LLP

By: /s/ Jeffrey C. Nelson
Attorneys for the Debtors and Debtors-in Possession

James M. Carr (#3128-49)
Terry E. Hall (#22041-49)
Stephen A. Claffey (#3233-98)
Melissa M. Hinds (#24230-49)
Jeffrey C. Nelson (#25173-49)
300 North Meridian Street, Suite 2700
Indianapolis, Indiana 46204
Telephone: (317) 237-0300
Facsimile: (317) 237-1000
jim.carr@bakerd.com
terry.hall@bakerd.com
steve.claffey@bakerd.com
melissa.hinds@bakerd.com
jeffrey.nelson@bakerd.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served this 2nd day of September, 2005, by electronic mail on the Core Group, 2002 List, Appearance List and John Hancock Leasing Corporation.

/s/ Jeffrey C. Nelson