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.	)	

MOTION TO HOLD UNDER SEAL EXHIBIT B TO MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT WITH THE BOEING COMPANY

ATA Airlines, Inc. ("ATA"), one of the debtors and debtors in possession in the above captioned chapter 11 cases, files this motion (this "Seal Motion") for entry of an order permitting ATA, 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 For Approval Of Settlement Agreement With The Boeing Company (the "Boeing Motion"). A form of proposed order granting this Seal Motion is attached as Exhibit A. In support of this Seal Motion, ATA respectfully states 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.

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)

[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).

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. ATA submits that Exhibit B contains sensitive, non-public details regarding the terms of its agreement with the Boeing Company ("Boeing"). The disclosure of such information would undoubtedly cause serious detriment to ATA. Further, ATA is 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. Upon request, ATA will make Exhibit B available on a confidential basis to the United States Trustee and counsel to the Official Committee Of Unsecured Creditors.

5. ATA submits that good cause exists for the Court to grant the relief requested in this Seal Motion.

WHEREFORE, ATA 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/ Terry E. Hall
Attorneys for the Debtors and Debtors-in Possession

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served this 13th day of April, 2006, by electronic mail on the Core Group, 2002 List, Appearance List, and the Boeing Company.

/s/ Terry E. Hall