

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

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

**REORGANIZED DEBTORS' LIMITED OBJECTION TO CERTAIN CLAIMS FOR  
WORKERS' COMPENSATION BENEFITS  
(Claim Nos. 1692, 1390, 771, 1631, 1587, 1634, 1752, and 675)**

The Reorganized Debtors<sup>2</sup> file this limited objection (this "Objection") to the following claim numbers (as set forth on the official claims register in these cases - www.bmccorp.net/ATA) (the "Claims") filed by the following claimants (the "Claimants"):

Claimant	Claim Number
Henry, Betty	1692
Kessler, Paulette	1390
Junior, Rasheed	771
Leach, Mitchell	1631
Smith, Elena	1587
Stout, Nancy	1634
Szafran, Jodette	1752
Tennyson, Marva	675

1. This Court has jurisdiction over this Objection under 28 U.S.C. § 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(B). Venue of this proceeding and this Objection is properly in this district pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory bases for the relief requested herein are 28 U.S.C. § 502 and Rules 3001 and 3007 of the Bankruptcy Rules.

2. The Reorganized Debtors filed voluntary petitions for relief on October 26, 2004 (the "Petition Date"). The First Amended Joint Chapter 11 Plan For Reorganizing Debtors was confirmed January 31, 2006, and became effective on February 28, 2006.

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<sup>1</sup> The Debtors means the following entities: ATA Holdings Corp. (04-19866), ATA Airlines, Inc. (04-19868), Ambassador 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. (04-19874).

<sup>2</sup> ATA Holdings Corp. (04-19866); ATA Airlines, Inc. (04-19868); ATA Leisure Corp. (04-19870) American Trans Air Execujet, Inc. (04-19872), and ATA Cargo, Inc. (04-19873).

3. Each of the Claims asserts workers compensation claims. To the extent the Reorganized Debtors have any liability on the Claims, with liability to be determined in the customary manner in the customary forum, such liability will be satisfied by the Reorganized Debtors or its insurers in the ordinary course of business, and that no payment be made from the estates.

4. **NOTICE.** Response to this Objection, if any, must be filed in writing or by means of the Court's electronic filing system with the Clerk's Office (PO Box 44978, Indianapolis, Indiana 46244) and served on Reorganized Debtors' counsel at the address below, on counsel for the Post-Confirmation Committee of Unsecured Creditors (Akin Gump Strauss Hauer & Feld LLP, 590 Madison Avenue, New York, NY 10022-2524, Attn: Lisa Beckerman), and the U.S. Trustee (101 W. Ohio St., Suite 1000, Indianapolis, IN 46204) so as to be received **no later than twenty-five (25) days** after the date this Objection is filed.

5. If no response is timely filed to this Objection the Court may enter an order granting the relief requested without a hearing. If a response is timely filed, the Court will hold a pretrial status hearing on the Objection and any response(s) filed thereto on **September 7, 2006 at 10:30 a.m. EDT** in Room 310, 46 E. Ohio Street, Indianapolis, Indiana 46204. The dial-in telephone number for interested parties to participate in the hearing by conference call is 1-800-559-1261; passcode 6117474, followed by the "#" key.

WHEREFORE, the Reorganized Debtors ask that the Court grant the relief requested, determining the claims to be contingent and disputed and allow any such liability to be established pursuant to ordinary procedures for determining such claims.

Respectfully Submitted,

BAKER & DANIELS LLP

By: /s/Terry E. Hall

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was served this 31<sup>st</sup> day of July, 2006, by (i) electronic mail on the Core Group, 2002 List, and the Appearance List and by (ii) first class United States Mail, postage prepaid, on the Claimants.

/s/Terry E. Hall \_\_\_\_\_