## 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## REORGANIZED DEBTORS' OBJECTION TO CLAIMS THAT BY AMENDMENT ARE SUPERCEDED AND NOTICE OF RESPONSE DEADLINE AND HEARING

The Reorganized Debtors<sup>2</sup> object (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(the "Claims") filed by the following claimants (the "Claimants") on the basis that the Claims have been amended and superceded by later filed claims and therefore the Claims should be disallowed and expunged:

Claimant	Objected	Remaining
	Claim	Claim
ACC Business	77	333
Air Cargo International	119	560
AJ Walter Aviation Ltd	29	1452
Aramark Management Services	1216, 1528	1217
AvFuel Corp.	1544	2075
Buehler Assoc.	1082	1083
Canandaigua Wine Company Inc.	24	784
CarQuest Auto Parts of 63 <sup>rd</sup> St.	1450	2176
Circle International	141	1715
Epic Aviation LLC	1412	2273
Glenn Fleming	1555	1069
Grupo Aeroportuario Del Pacifico	1667	2042
Imagistics International Inc.	1672	2171
Indecon Inc.	1044	1043
Kent County Dept. of Aeronautics	1190, 2183	1795
Kerry's Auto Body Inc.	458	472, 492
Oracle Corp.	482	2186
Sarasota Manatee Airport	1304	2010
Southwestern Bell Telephone LP	1382	20287
Sprint Communications Company LP	353	2110

<sup>&</sup>lt;sup>1</sup> The Debtors means 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. (04-19874).

<sup>&</sup>lt;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).

St. Joseph County Airport Authority	1975	2011
Stephen Ambrose Historical Tours	596	597
Travelocity Com LP	1330	1506

- 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.
- 3. The Reorganized Debtors object to the Claims on the grounds that the Claims have been amended by later filed claims and should therefore be expunged from the record and disallowed.
- 4. The Reorganized Debtors reserve the right to object to the Claims on any grounds other than the reasons given in this Objection. The Reorganized Debtors request that should an order be entered allowing the Claim, that such order be without prejudice to the Reorganized Debtors' rights and avoidance powers under sections 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, and 558 of the Bankruptcy Code or other applicable nonbankruptcy law.
- 5. 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.
- 6. 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 object on the grounds that the Claims have been amended and superceded by later filed claims and therefore the Claims should be disallowed and expunged in their entirety.

Respectfully Submitted,

## **BAKER & DANIELS LLP**

By: /s/Terry E. H	all
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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 Appearance List, and by (ii) first class United States Mail, postage prepaid, on the Claimant.

/s/Terry E. Hall