

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

IN RE:)
)
ATA AIRLINES, INC.,) Case No. 04-19866-FJO-11
)
Debtor.)

MOTION FOR RELIEF FROM STAY

Comes now Vincent Tribo, by counsel, and for her Motion for Relief From Stay, hereby alleges and says:

1. The Bankruptcy Court has jurisdiction of this matter under 11 U.S.C., Section 362.
2. On October 26, 2004, ATA Airlines, Inc. filed for relief under Chapter 11 of the Bankruptcy Code under the above-captioned case.
3. The movant has filed a claim for personal injuries in the Circuit Court of Cook County, Illinois, County Department – Law Division, under Cause No. 06L 066058, and captioned *Vincent Tribo v. ATA Airlines, Inc. and Unknown Flight Attendant*.
4. The claim alleges that the Debtor and its agent's negligence caused personal injuries.
5. Debtor has insurance which provides coverage for the claim, asserted by Vincent Tribo.
6. Vincent Tribo's claim will not effect the Chapter 11 reorganization since the Debtor has insurance to cover the personal injury claim.

7. Vincent Tribo should be granted relief from the stay so as to permit him to pursue the personal injury claim.
8. WHEREFORE, Vincent Tribo respectfully prays the Court for an Order lifting the Automatic Stay so as to allow Vincent Tribo to pursue the State Court claim for personal injuries in *Vincent Tribo v. ATA Airlines, Inc. and Unknown Flight Attendant*, and for all other relief just and proper in the premises.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 17th day of January, 2007, a true and accurate copy of the above and foregoing was sent, via first class United States mail, postage prepaid, to all parties listed below. The following registered EFC users were electronically notified to the email addresses listed below.

/s/ Michael C. Adley

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