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**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.)

**ATA AIRLINES, INC.'S,
FIRST SET OF INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS TO CITY OF LOS ANGELES**

Pursuant to Federal Rules of Bankruptcy Procedure ("FRBP") 7033 and 7034 made applicable to this contested matter by FRBP 9015, ATA Airlines, Inc. ("ATA"), requests that the City of Los Angeles ("City") answer the following Interrogatories in writing and under oath, and produce the documents described below at the offices of Baker & Daniels LLP, 300 North Meridian Street, Suite 2700, Indianapolis, Indiana 46204, on an expedited basis as requested, within five (5) days of the date of service of this Request.

¹ The Debtors are 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. f/k/a Chicago Express Airlines, Inc. (04-19874).

Instructions and Definitions

1. If any of the information requested in any interrogatory is being withheld because of a claim of attorney-client privilege or work product immunity, please set forth the legal (e.g. attorney-client or work product) and the factual basis for the privilege claimed.

2. If any documents are being withheld because of a claim of attorney-client privilege or work product immunity, please set forth the following information:

a. The legal (e.g. attorney-client or work product) and the factual basis for the privilege claimed;

b. The author of the documents;

c. The addressee(s);

d. The person(s) who received copies;

e. The date of the communication, document or information; and

f. The subject matter of the communication, document or information.

3. "Identify" and "state the identity of" mean:

a. With respect to an individual person, to state the person's full present or last known address, telephone number, present or last known occupation and job title, job duties, and the name, address and telephone number of the person's employer;

b. With respect to an organization (e.g., a corporation, partnership or association), to state the type of organization, its full name, its principal place of business, its address and telephone number, and the state in which it was organized (e.g., incorporated);

c. With respect to a document, to state the date of issuance, author, addressee and type of document (e.g., letter, memorandum, spreadsheet, etc.), or some other means of identifying it, and the identity of each person having possession, custody or control of the original or copies of the document; and

e. With respect to an oral communication, to state what was said, when and where it was said, by and to whom it was said, and the form of the communication (e.g. telephone, in person, etc.).

4. "ATA" means ATA Airlines, Inc., and includes each of ATA's past and present officers, directors, employees, attorneys, agents and other representatives.

5. "City," "you," "your," "yours," and "yourself" mean and refer to the City of Los Angeles, City of Los Angeles Department of Airports, and Los Angeles World Airports.

6. "Demand Draw" means the documents filed collectively as Exhibit A to the Emergency Ex Parte Motion For Temporary Restraining Order And Order To Show Cause filed by ATA on January 25, 2006 in these cases (Docket No. 4615).

7. "Document" means all original writings, papers, records, tapes, films, photographs, electronic mail ("e-mail"), computer software, and all other items of any kind that are in any way subject to visual inspection or auditory examination or reproduction, and includes all items subject to production under FRBP 7034. In any case in which the original document is not available, the term "document" means an identical copy. Each document bearing notations, markings or writings of any kind different from the original shall be considered an original document.

8. "Letter of Credit" means original letter of credit SCL008692 with an original date of March 6, 2003 issued by National City Bank of Indiana to Los Angeles World Airports as beneficiary and all amendments thereto.

10. "Permit" means the Non-Exclusive Operating Permit Between The City Of Los Angeles And American Trans Air dba American Trans Air Covering The Use Of Landing Facilities with a term commencing July 1, 2002 and ending June 30, 2007 and identified as the "Operating Agreement Dated 07/02/02 Between The City Of Los Angeles And American Trans Air, Inc." in the Demand Draw.

11. "Person" includes individuals, organizations (e.g. corporations, partnerships and associations) and governmental offices, agencies and instrumentalities. Any reference herein to any "person" (including the parties to this action) includes attorneys, officers, directors, employees, agents and other representatives of that person.

Construction

The interrogatories shall be construed as follows:

1. The terms "and" and "or" shall be construed disjunctively as well as conjunctively as necessary in order to bring within the scope of the following interrogatories all responses which might otherwise be construed to be outside their scope.

2. References to the singular shall include the plural, and references to the plural shall include the singular.

Interrogatories

INTERROGATORY NO. 1. Identify each person who provided any information used in answering any of these interrogatories, and for each person identified, state for which answer(s) that person provided information.

ANSWER:

INTERROGATORY NO. 2. Identify the alleged "default" in the Demand Draw with particularity stating each and every asserted default, the monetary value of each asserted default, the dates of particular landings, parkings, and/or use of other services by ATA related to the asserted defaults under the Permit, and the particular section or article of the Permit upon which the City believes the "defaults" are based.

ANSWER:

INTERROGATORY NO. 3. Identify any and all now existing defaults of ATA under the Permit with particularity stating each and every asserted default, the monetary value of each asserted default, the dates of particular landings, parkings, and/or use of other services by ATA related to the asserted defaults, and the particular section or article of the Permit upon which the City believes any listed default is based.

ANSWER:

INTERROGATORY NO. 4. Identify any and all documents dated or originated on or after October 26, 2004 related to any default or asserted lack of payment by ATA under the Permit.

Documents Requested

1. Copies of all documents and tangible things identified or referred to in your responses to the foregoing interrogatories, and all other documents and tangible things upon which you relied in answering the interrogatories.

2. Copies of all documents that refer or relate in any way to the Demand Draw.

3. Copies of any oral or written communications made by you to ATA related to the Permit and any amounts asserted to be due thereunder on or after October 26, 2004 through the present.

4. Copies of all ledgers, billings, invoices, and other documents related to billings to ATA under the Permit dated or originated on or after October 26, 2004.

BAKER & DANIELS

By: /s/ Terry E. Hall

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that true and correct copies of the foregoing
ATA Airlines, Inc.'s First Set Of Interrogatories And Requests For Production Of Documents To
City Of Los Angeles was served via electronic mail and US Express Mail overnight delivery, this
5th day of January, 2007 on:

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/s/Terry E. Hall