

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

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

**STIPULATION CONCERNING REORGANIZED DEBTORS' OBJECTION TO CLAIM
OF CITY AND COUNTY OF DENVER
(Claim Nos. 87, 2196, 2197, and 2277)**

IT IS HEREBY STIPULATED AND AGREED by and between the City and County of Denver ("Denver") and ATA Holdings Corp. and the other debtors, debtors-in-possession, and reorganized debtors in these jointly administered cases (the "Reorganized Debtors"), by their undersigned attorneys as follows:

RECITALS

1. On October 26, 2004, the Reorganized Debtors filed voluntary petitions under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* The First Amended Joint Chapter 11 Plan for Reorganizing Debtors (the "Plan") was confirmed January 31, 2006, and became effective on February 28, 2006.

2. On November 22, 2004, Denver timely filed a proof of claim in this Bankruptcy Case for prepetition personal property tax, use tax and occupational tax in the amount of \$199,348.52 (Claim No. 87).

3. On February 7, 2006, Denver amended its prepetition claim against Debtor to \$40,714.10 (Claim No. 2196).

4. On July 13, 2006, Denver amended its prepetition claim against Debtor for a second time to \$14,485.04 (Claim No. 2276).²

5. On February 1, 2006, Denver timely filed an administrative claim in the Bankruptcy Case against Debtors for postpetition personal property tax and use tax in the amount of \$504,967.56 (Claim No. 2197).

¹ The Debtors are the following entities, ATA Holdings Corp., ATA Airlines, Inc., Ambassadors Travel Club, Inc., ATA Leisure Corp., Amber Travel, Inc., American Trans Air Execujet, Inc., ATA Cargo, Inc., and Chicago Express Airlines, Inc.

² The Reorganized Debtors have not objected to Denver's prepetition claim number 2276 and it is therefore not addressed herein. The claim of Denver International Airport (Claim No. 1109) is also not addressed herein. Nothing in this Stipulation shall be construed as a release or waiver of Claims 2276 or 1109.

6. On July 13, 2006, Denver amended its administrative claim against Debtor to \$254,302.98 (Claim No. 2277).

7. On July 31, 2006, the Reorganized Debtors objected to claim numbers 87, 2196, 2197, and 2277 by filing the Reorganized Debtors' Objection to Claim of City and County of Denver and Notice of response Deadline and Hearing (the "Objection").

8. On August 22, 2006, Denver filed its Response to Reorganized Debtors' Objection to Claim of City and County of Denver.

STIPULATION

The Reorganized Debtors and Denver now agree as follows:

A. Claim numbers 87, 2196 and 2197 are hereby withdrawn and deemed expunged.

B. Denver and the Reorganized Companies (as that term is defined in the Plan) recognize and acknowledge that Claim No. 2277 represents taxes assessed by Denver on the Reorganized Debtors property post-petition but not yet payable and that such claim is an ordinary course liability of the Reorganized Companies to be paid in the ordinary course of business subject to all rights of the Reorganized Companies to dispute the claim and assessment in such Colorado forum as is common to the dealing between Denver and the Reorganized Companies.

Dated this 26th day of February, 2007.

The City and County of Denver, Colorado

ATA Holdings Corp., et. al

By: /s/ Kerstin Cass

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served this 26th day of February, 2007, by electronic mail or first class United States mail, postage prepaid, on the Core Group, 2002 List (Post-Confirmation), Appearance List (Post-Confirmation), and counsel for the City and County of Denver, Colorado.

/s/ Terry E. Hall _____