UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re	)	Chapter 11
	)	
TRANS WORLD AIRLINES, INC., *et al.*,	)	Case No. 01-00056 (PJW)
	)	Jointly Administered
	)	
	)	Response Deadline: August 23, 2002
	)	Hearing Date: September 30, 2002
Debtors.	)	
	)	

RESPONSE OF EGYPTAIR TO TWA INC. POST-CONFIRMATION ESTATE'S SECOND OMNIBUS OBJECTION TO CLAIMS

EgyptAir, through undersigned counsel, hereby responds to TWA Inc. Post-Confirmation Estate's Second Omnibus Objection to Claims.

1. EgyptAir filed a Proof of Claim (dated July 31, 2001) for a total of $224,173.00. That claim was stamped as being "filed/received" on August 1, 2001 and designated as Claim Number **8708**.

2. Two other claims were filed that were identical to Claim Number 8708. The first identical claim was dated July 30, 2002 and designated as Claim Number **9276**. That claim was stamped by the Court as being filed on August 1, 2002. The Court, evidently, made a copy of that claim, designated that cliam as Claim Number **9254**, and forwarded the copy to Bankruptcy Services, Inc., which stamped the copy as being "filed/received" on August 9, 2001.

3. EgyptAir filed a Proof of Claim (dated August 9, 2001) for a total of $72,700.00. That claim was stamped as being "filed/received" on August 13, 2001 and designated as Claim Number **9366**. That claim was for an amount owed in addition to the claims filed on August 1, 2001. That additional amount represented additional amounts rejected on August 1, 2001 in the

IATA Clearing House.

4. A claim identical to Claim Number 9366 was filed in the Bankruptcy Court and designated as Claim Number **9407**.

5. EgyptAir filed a Proof of Claim (dated January 23, 2002) for a total of $359,937.14. That claim was stamped as being "filed/received" on January 24, 2002 and designated as Claim Number **9727**. That claim was an amendment of the claim for the amount of $224,173.00.

6. EgyptAir attached documents to its Proofs of Claims to support payment of those claims.

7. The TWA Inc. Post-Confirmation Estate (the "Estate") filed its Second Omnibus Objection to Claim (the "Objection") on August 2, 2002. The Estate argued that certain of the forgoing claims were either duplicates or late. The Estate raised no other objections to the claims of EgyptAir.

8. The Estate served six Notices of Hearing in conjunction with its Objection. In those Notices, the Estate indicated that certain claims of EgyptAir were duplicates, late, or surviving claims.

9. EgyptAir submits that certain claims are duplicate. Those duplicate claims are Claim Numbers 9254, 9276, and 9407.

10. EgyptAir submits that no claims were late. Claim Number **9254** was merely a copy of a valid claim that was inadvertently recorded as a separate claim. In any event, Claim Number 9254 was a duplicate. Claim Number **9366** was for additional amounts rejected on August 1, 2001 in the IATA Clearing House, so the claim was not due on August 1, 2001. Moreover, that claim could be considered as an amendment to EgyptAir's original claim.

11. Given the foregoing, EgyptAir has the following valid claims: (1) **8708** for $224,173.00; (2) **9366** for $72,700.00; and (3) **9727** for $359,937.14 (amending the claim for $224,173.00).

12. EgyptAir, in support of this Response, incorporates herein by reference thereto the documents that were attached to its Proofs of Claims and the documents it has filed in this proceeding. EgyptAir reserves the right to submit further documents and argument in support of its position.

13. EgyptAir opposes any objection to claims filed by the Estate or to be filed by the Estate. Moreover, to the extent the claim encompasses amounts that are "cure costs" within the meaning of 11 U.S.C. § 365, no objection to those amounts is valid since the obligation to cure those costs is on the Estate without the need to engage in the claims process. 11 U.S.C. § 1107(a); *In the Matter of National Gypsum Co.*, 208 F.3d 498, 506 (5th Cir. 2000); *see Adventure Resources, Inc. v. Holland*, 137 F.3d 786, 799 (4th Cir. 1998).

WHEREFORE, EgyptAir requests that its claim in the amount of $432,637.14 be allowed.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the Response of EgyptAir to TWA Inc. Post-Confirmation Estate's Second Omnibus Objection to Claims , this 22nd day of August, 2002, by *hand delivery* to:

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