ORIGINAL

FILED
2003 JAN 23 PM 4:09
CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF DELAWARE

IN RE:	§	**Chapter 11**
	§	
TWA INC. POST CONFIRMATION ESTATE,	§	**CASE NO. 01-00056 (PJW)**
	§	
Debtor.	§	

CERTIFICATION OF INABILITY TO ELECTRONICALLY FILE DOCUMENT

The attached OBJECTION OF DALLAS/FT. WORTH INTERNATIONAL AIRPORT TO MOTION OF TWA INC. POST CONFIRMATION ESTATE FOR ENTRY OF AN ORDER (A) SETTING THE CURE AMOUNT FOR THE ASSUMED EXECUTORY CONTRACTS AND UNEXPIRED LEASES, (B) AUTHORIZING THE ESTATE TO PAY SUCH CURE AMOUNTS IN FULL, FINAL AND COMPLETE SETTLEMENT AND (C) EXPUNGING THE COUNTERPARTIES' CLAIMS FILED ON ACCOUNT OF THE ASSUMED CONTRACTS (Docket No. 4364) is being filed by paper due to our inability to access the Internet. I am told by our Informational Systems' personnel that the local phone company's (Verizon) service is not functional. We have been informed that our electronic capabilities will not be functional in time to file this electronically (4:00 p.m. deadline).

DATE: January 23, 2003.

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ATTORNEYS FOR DALLAS/FT. WORTH
INTERNATIONAL AIRPORT

ORIGINAL

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF DELAWARE

IN RE:	§	**Chapter 11**
	§	
TWA INC. POST CONFIRMATION ESTATE,	§	**CASE NO. 01-00056 (PJW)**
	§	
Debtor.	§	

OBJECTION OF DALLAS/FT. WORTH INTERNATIONAL AIRPORT TO MOTION OF TWA INC. POST CONFIRMATION ESTATE FOR ENTRY OF AN ORDER (A) SETTING THE CURE AMOUNT FOR THE ASSUMED EXECUTORY CONTRACTS AND UNEXPIRED LEASES, (B) AUTHORIZING THE ESTATE TO PAY SUCH CURE AMOUNTS IN FULL, FINAL AND COMPLETE SETTLEMENT AND (C) EXPUNGING THE COUNTERPARTIES' CLAIMS FILED ON ACCOUNT OF THE ASSUMED CONTRACTS (Docket No. 4364)

COMES NOW, Dallas/Ft. Worth International Airport (hereinafter "DFW") and files its Objection to the Motion Of TWA Inc. Post Confirmation Estate For Entry Of An Order (A) Setting The Cure Amount For The Assumed Executory Contracts And Unexpired Leases, (B) Authorizing The Estate To Pay Such Cure Amounts In Full, Final And Complete Settlement And (C) Expunging The Counterparties' Claims Filed On Account Of The Assumed Contracts (the "Motion"), and in support thereof would show unto this Court as follows:

1. Prior to and subsequent to the Petition Date, prior to the sale to American Airlines, DFW provided goods and services to TWA, pursuant to the Restated Use Agreement between the parties dated October 1995. TWA previously assumed and assigned this executory contract with DFW.

2. The Motion states that the cure amount owing to DFW is $77,042.89. This is incorrect.

3. Instead, the correct Cure Amount is $396,819.75. This Cure Amount is calculated and based on amounts due and owing both pre- and post-petition, for services provided to TWA through to the date TWA was sold to American Airlines.

WHEREFORE, PREMISES CONSIDERED, DFW objects to the cure amount set forth in the Motion and moves this Court to establish the required cure amount reflecting the full amount due under the Use Agreement of $396,819.75, and to grant such other and further relief as is just and equitable.

DATE: January 23, 2003.

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ATTORNEYS FOR DALLAS/FT. WORTH INTERNATIONAL AIRPORT

UNITED STATES BANKRUPTCY COURT

DISTRICT OF DELAWARE

In re:

TRANS WORLD AIRLINES, INC.	)	Chapter 11
	)	
	)	Case No. 01-00056 (PJW)
	)	
Debtors.	)	Jointly Administered
	)	

AFFIDAVIT OF NICHOLE M. SESSA, PARALEGAL

STATE OF DELAWARE :
: SS:
NEW CASTLE COUNTY :

I, Nichole M. Sessa, certify that I am, and at all times during the service, have been an employee of Morris, James, Hitchens & Williams LLP, not less than 18 years of age and not a party to the matter concerning which service was made. I certify further that on January 23, 2003 I caused service of the following:

Objection of Dallas/Ft. Worth International Airport to Motion of TWA Inc. Post Confirmation Estate for Entry of an Order (a) Setting the Cure Amount for the Assumed Executory Contracts and Unexpired Leases, (b) Authorizing the Estate to Pay Such Cure Amounts in Full, Final and Complete Settlement and (c) Expunging the Counterparties' Claims Filed on Account of the Assumed Contracts [Re: D.I. 4364]

Service was completed upon the parties on the attached list in the manner indicated thereon.

Date : January 23, 2003

Nichole M. Sessa

SWORN AND SUBSCRIBED before me this 23rd day of January, 2003.

NOTARY
My commission expires:

NMS/99999-8888/850896/1

Via Facsimile and Hand Delivery

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