IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

Trans World Airlines, Inc., et al.,	)	Chapter 11
	)	
Debtor	)	Case No. 01-00056 (PJW)
	)	
TWA Inc. Post Confirmation Estate,	)	
	)	
Plaintiff	)	
v.	)	
	)	Adversary Proceeding No. 02-06984 (PJW)
Aircraft Interior Resources, Inc.	)	
	)	
Defendant	)	
	)	

DEFENDANT'S OBJECTION TO PLAINTIFF'S
PROPOSED SCHEDULING ORDER

The above-captioned defendant (the "Defendant") objects to the proposed scheduling order (the "Proposed Order") of the above-captioned Plaintiff (the "Plaintiff") as follows:

1. The Parties Have Not Conducted Any Settlement Discussions. The Proposed Order states that "the parties [have] been unable to resolve this dispute prior to this juncture by settlement, voluntary mediation or binding arbitration." While that statement is technically true, it is misleading because the parties have not had any settlement discussions. Defendant submits that a reasonable time be built into the scheduling order to permit the parties to attempt to settle this matter before they are required to expend time and money on formal discovery. Defendant provided plaintiff with a written settlement proposal on April 29, 2003 to which plaintiff has not responded.

2. No Meeting Has Occurred Under Rule 26(f). The Proposed Order states that the parties have conferred as required under Fed. R. Civ. P. 26(f), as applicable under Fed. R. Bankr. P. 26. In fact, no such conference has occurred.

3. The June 18, 2003 Deadline for Motions to Amend is Not Appropriate. Rule 15 contemplates that a motion to amend a pleading may be heard even after trial. To require such motions to be filed before discovery has even commenced is inappropriate. This provision should be stricken from the Proposed Order.

4. This Court Lacks Jurisdiction Over This Matter as Defendant has Demanded a Trial by Jury. Defendant respectfully submits that no scheduling order be entered at this time as Defendant has demanded a trial by jury and has not filed a proof of claim under 11 U.S.C. § 502 in this bankruptcy case.

/s/ Christopher D. Loizides

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