UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:	**Chapter 11**
TRANS WORLD AIRLINES, INC., et al.,	**Case No. 01-00056 (PJW)**
Debtors.	**(Jointly Administered)**
	Re: Docket No. 4706
	Objection Deadline: August 7, 2003 @ 4:00 p.m. **Hearing Date: August 11, 2003 @ 1:30 p.m.** **(the above dates are subject to Court approval)**

EMERGENCY MOTION OF AMERICAN AIRLINES, INC. TO CONTINUE HEARING ON MOTION OF ELIZABETH A.M. ROBINSON SEEKING TO COMPEL AMERICAN AIRLINES TO CONTINUE PAYING HER CERTAIN TWA WORKERS' COMPENSATION BENEFITS [Re: Docket No. 4706]

American Airlines, Inc. ("American") hereby moves the Court for the entry of an order continuing the hearing on the Motion of Elizabeth A.M. Robinson Seeking to Compel American Airlines to Continue Paying Certain TWA Workers' Compensation Benefits [Docket No. 4706] (the "Robinson Motion") filed by Elizabeth A.M. Robinson ("Ms. Robinson"). In support of this Motion, American states as follows:

Background to the Motion

A. The Asset Purchase Agreement

1. On January 10, 2001, the above-captioned debtors (collectively, the "Debtors" or "TWA") filed voluntary petitions for relief under chapter 11 of the United States Bankruptcy Code, 11 U.S.C. § 101-1330 (the "Bankruptcy Code").

2. In early 2001, TWA - which had been unable to enter into a strategic transaction or obtain desperately needed financing -- was on the brink of a piecemeal liquidation that would have been disastrous for TWA and its constituents,

including its nearly 20,000 employees. To avoid that calamity, on January 9, 2001, after extensive negotiations, TWA and American entered into that certain Asset Purchase Agreement, as amended (the "APA"), whereby American agreed to purchase substantially all of TWA's assets subject to an auction and sale pursuant to section 363 of the Bankruptcy Code.

3. On February 7, 2001, the Court entered an order approving certain bidding procedures (the "Bidding Procedures") with respect to the sale of TWA's assets. Pursuant to the Bidding Procedures, an auction was held on March 5, 2001, at which American's bid was selected as the highest and best conforming bid for TWA's assets. After three days of extensive hearings, on March 12, 2001, the Court entered an order approving the sale of substantially all of TWA's assets to American in accordance with the terms and conditions of the APA.

B. The Robinson Motion

4. Ms. Robinson was a flight attendant for TWA. She sustained a work-related injury on January 31, 1984 and began receiving benefits soon after that date. Under the collective bargaining agreement between TWA and Ms. Robinson's union, Ms. Robinson was entitled to benefits under either the worker's compensation laws of New York or the Longshoremen's Act, whichever provided higher benefits.

5. On March 24, 2003, Ms. Robinson filed her Motion seeking to compel American to pay Federal Longshoremen and Harbor Worker's Disability Act ("Longshoremen's Act") disability benefits to her. On May 5, 2003, American filed the Objection of American Airlines, Inc. and Its Affiliates to Motion of Elizabeth A.M. Robinson Seeking to Compel American Airlines to Continue Paying Her Certain TWA

Workers' Compensation Benefits [Docket No. 4744] (the "Objection"). On May 8, 2003, Ms. Robinson filed a response to American's Objection (the "Response").

C. **Procedural Status of Robinson Motion**

6. On May 8, 2003, a hearing was held to consider the relief requested in the Motion. Upon conclusion of the hearing, the Court adjourned the matter to July 7, 2003 to allow (i) Ms. Robinson to file and serve on American certain related documents (the "Related Documents") that were presented for the first time at the May 8, 2003 hearing and (ii) American to explore certain evidentiary issues that were raised for the first time at the May 8, 2003 hearing. Ms. Robinson filed and served the Related Documents on May 13, 2003. On July 2, 2003, American filed its supplemental objection in response to the Robinson Motion and Related Documents.

7. On July 7, 2003, a second hearing was held, at which the Court heard additional argument from American and Ms. Robinson on the Robinson Motion[1]. Upon conclusion of the hearing, the Court adjourned the hearing to August 14, 2003. See Ex. A, p. 20. The Court instructed Ms. Robinson to provide certain additional documents to American and the Court, including but not limited to (i) unredacted copies of any checks received by Ms. Robinson relating to any New York workers' compensation or Federal Longshoremen and Harbor Workers' Act benefits, dating back to 1999, (ii) a copy of the settlement agreement between TWA and Ms. Robinson, that Ms. Robinson referenced at the July 7, 2003 hearing, and (iii) any available proof of her disability status (the "Additional Related Documents"). See Ex. A, pp.55-59, 66, 69. The Court also

[1] Due to its voluminous nature, American has attached only a portion of the transcript of the July 7, 2003 hearing (the "Transcript") hereto as Ex. A. Complete copies of the Transcript are available by contacting the undersigned counsel at 302-651-7700.

directed American to make available at the August 14, 2003 hearing a live witness knowledgeable about TWA's workers' compensation related obligations. See Ex. A, pp. 51, 69.

Requested Relief

8. By this Motion, American respectfully requests that the hearing on the Robinson Motion, currently scheduled for August 14, 2003, be continued to October 14, 2003 at 1:30 p.m. (Eastern Time).

9. In response to the Court's request at the July 7, 2003 hearing, American intends to make available Mr. Dennis L. Steeves, TWA's former Director of Workers' Compensation, to testify at the hearing on the Robinson Motion[2]. However, Mr. Steeves' job requires that he be in Denver, Colorado for the week of August 11-15, thereby making him unavailable for the August 14, 2003 hearing on the Robinson Motion. Additionally, to date, Ms. Robinson has failed to provide counsel to American with any of the Additional Related Documents that the Court ordered her to provide. Accordingly, on July 24, 2003, counsel to American contacted the Court and obtained October 14, 2003 as an available alternate hearing date.

10. On July 23, 2003, counsel to American sent a certified letter to Ms. Robinson, requesting that Ms. Robinson provide the Additional Related Documents and contact American regarding her availability for purposes of continuing the hearing.[3] Ms. Robinson did not respond. Accordingly, on August 1, 2003, counsel to American sent a follow-up letter, via certified and express mail, again requesting the Additional Related

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[2] Ms. Steeves was the signatory on the letter to Ms. Robinson indicating that Ms. Robinson no longer would be receiving longshoreman's benefits. See Ex. A, p. 59.

[3] A copy of the July 23, 2003 letter is attached hereto as Ex. B.

Documents and asking Ms. Robinson to contact American regarding her availability on October 14, 2003.[4] Once again, Ms. Robinson did not respond. On August 4, 2003, counsel to American contacted Ms. Robinson by telephone for purposes of obtaining her agreement to continue the hearing. Ms. Robinson refused.

11. Accordingly, American respectfully requests that the Court continue the hearing on the Robinson Motion to October 14, 2003 at 1:30 p.m. (Eastern Time). American believes that the requested continuance will assist the Court in reaching a final determination with respect to the Robinson Motion. First, it will allow American to present the testimony of Mr. Steeves, a witness whose appearance was requested by the Court at the July 7, 2003 hearing. Second, the continuance will give Ms. Robinson time to provide the Additional Related Documents and American to respond thereto (if necessary), in advance of the hearing.

Notice

12. Notice of this Motion has been given to: (a) the office of the United States Trustee for the District of Delaware; (b) counsel to the Debtors; and (c) Ms. Robinson. American submits that no other or further notice need be given.

No Previous Request for Relief

13. No previous motion for the relief requested herein has been made to this or any other Court.

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[4] A copy of the August 1, 2003 letter is attached hereto as Ex. C.

WHEREFORE American respectfully requests that the Court enter an order, substantially in the form attached hereto as Ex. D, granting the relief requested in the Motion and such other and further relief as is just.

Dated: August 4, 2003
Wilmington, Delaware

Respectfully submitted,

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