FILED
U.S. BANKRUPTCY COURT
INDIANAPOLIS DIVISION
OCT 2 9 2004
SOUTHERN DISTRICT OF INDIANA
JOHN A. O'NEAL, CLERK

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

| | |
|---|---|
| In re ATA HOLDINGS, CORP., Debtor. | Chapter 11 Case No. 04-19866 |
| In re ATA AIRLINES, INC., Debtor. | Chapter 11 Case No. 04-19868 |
| In re AMBASSADOR TRAVEL CLUB, INC., Debtor. | Chapter 11 Case No. 04-19869 |
| In re ATA LEISURE CORP., Debtor. | Chapter 11 Case No. 04-19870 |
| In re AMBER TRAVEL, INC., Debtor. | Chapter 11 Case No. 04-19871 |
| In re AMERICAN TRANSAIR EXECUJET, INC., Debtor. | Chapter 11 Case No. 04-19872 |
| In re ATA CARGO, INC., Debtor. | Chapter 11 Case No. 04-19873 |
| In re CHICAGO EXPRESS AIRLINES, INC., Debtor. | Chapter 11 Case No. 04-19874 |

**MOTION OF MICHAEL A. AXEL, ESQ. FOR ADMISSION *PRO HAC VICE***

Michael A. Axel, Esq., pursuant to Local District Rule 83.5(c) and Local Bankruptcy Rule B-9010-1, and the Court's General Order 03-0006, moves for admission

in these cases, *pro hac vice*, as counsel for KeyCorp Leasing, nka Key Equipment Finance, a division of Key Corporate Capital Inc. ("**Key**").

In support of this Motion, the undersigned states the following:

1. Key, as party to certain unexpired leases of personal property with Debtor ATA Airlines, Inc., is a party in interest in these cases.

2. The undersigned is Senior Vice President and Managing Counsel of Key's affiliate, KeyBank National Association, and routinely provides legal services to Key and its affiliates in the commercial loan workout and bankruptcy areas. The undersigned is a member in good standing of the Courts of the State of Ohio and is also admitted to practice before the United States District Courts for the Northern District of Ohio, Eastern District of Michigan, and Central District of Illinois, and the United States Court of Appeals for the Sixth Circuit. He has previously been admitted *pro hac vice* at various times to practice before various United States Bankruptcy Courts.

3. The undersigned is not now, nor has he ever been, subject to any disciplinary proceedings or order of any Bar of which he is a member.

4. This Motion is supported by the undersigned's Affidavit attached hereto.

5. The undersigned seeks admission to this Court, *pro hac vice*, for the limited purpose of representing Key in these cases.

WHEREFORE, the undersigned prays for (i) entry of the accompanying proposed Order authorizing his admission to the Court, *pro hac vice*, for the limited purpose of representing Key in these cases, and (ii) such further relief as may be just and proper.

Dated: October 28, 2004
Cleveland, Ohio

MICHAEL A. AXEL (Ohio I.D. 0025145)
KeyBank National Association
127 Public Square
Second Floor
Cleveland, Ohio 44114-1306
Tel.: (216) 689-4959
Fax: (216) 689-5681
michael_axel@keybank.com

Attorney for KeyCorp Leasing, nka Key Equipment Finance, a Division of Key Corporate Capital Inc.