

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

IN RE:) Chapter 11
)
ATA HOLDINGS CORP., et al.¹) Case No.: 04-19866
)
Debtors.)

**MOTION TO SHORTEN NOTICE ON MOTION TO COMPEL
ASSUMPTION OR REJECTION OF UNEXPIRED LEASE OF
NONRESIDENTIAL REAL PROPERTY**

The Indianapolis Airport Authority (the "IAA"), by and through counsel, for its *Motion to Shorten Notice on Motion to Compel Assumption or Rejection of Unexpired Lease of Non-Residential Real Property* (the "Motion"), respectfully states the following:

1. On April 21, 2005, the Debtors filed their *Third Motion for Entry of an Order Extending Time to Assume or Reject Unexpired Leases of Nonresidential Real Property on Shortened Notice to and Including the Earlier of May 3, 2005, or the Date on Which a Plan of Reorganization is Confirmed* (the "Extension Motion"), through which the Debtors have sought a third extension of time to assume, assume and assign, or reject leases of nonresidential real property. Pursuant to Notice issued on April 21, 2005, the Debtors' Extension Motion has been set for hearing on May 3, 2005 at 10:30 a.m.

2. On April 22, 2005, the IAA filed its Objection to the Debtors' Extension Motion and its *Motion to Compel Assumption or Rejection of Unexpired Lease of Non-Residential Real Property* ("Motion to Compel"). The IAA's Motion to Compel seeks the entry of an Order requiring that the Debtors immediately assume, assume and assign, or reject an unexpired lease of nonresidential real property between the Debtors and the IAA.

¹ The Debtors are the following entities: ATA Holdings Corp., ATA Airlines, Inc., Ambassador Travel Club, Inc., ATA Leisure Corp., Amber Travel, Inc., American Trans Air Execujet, Inc., ATA Cargo, Inc., and Chicago Express Airlines, Inc.

3. For the reasons set forth herein, the IAA respectfully requests that the Court enter an order shortening notice of the IAA's Motion to Compel and schedule such motion for hearing on May 3, 2005 at 10:30 a.m.

4. As more fully set forth in the IAA's Motion to Compel, cause exists to compel the assumption or rejection of the unexpired lease described therein on an immediate basis and it is appropriate to hear the IAA's Motion to Compel on an expedited basis. In addition, the issues set forth in the Motion to Compel are interrelated with the Debtors' Extension Motion and the IAA's Objection thereto, thereby making it most efficient to hear and address such issues contemporaneously. Finally, the IAA anticipates that its Motion to Compel may be contested and, per the *Notice of Additional Omnibus Hearing Dates* submitted in the Debtors' jointly administered proceedings on March 1, 2005, the next available Omnibus Hearing to consider contested matters is June 7, 2005.

5. The IAA's request to shorten notice will not unduly prejudice the Debtors and will provide interested parties with a full and fair opportunity to consider and object to the Motion to Compel.

WHEREFORE, the IAA respectfully requests that, pursuant to Bankruptcy Rule 9007, notice of the Motion to Compel be shortened such that the Motion to Compel may be heard on May 3, 2005 at 10:30 a.m., and that this Court grant such other further relief as the Court may deem proper.

Respectfully submitted,

ICE MILLER

/s/ Ben T. Caughey

Henry A. Efroymsen

Ben T. Caughey

Counsel for the Indianapolis Airport Authority

ICE MILLER

One American Square

Box 82001

Indianapolis, Indiana 46282-0200

Telephone: (317) 236-2100

Facsimile: (317) 236-2219

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served upon the following parties via electronic means and/or U.S. First-Class United States Mail on this 22nd day of April, 2005:

Joseph F. McGonigal
Office of the United States Trustee
101 W. Ohio Street, Suite 1000
Indianapolis, IN 46204

James M. Carr
Terry E. Hall
Stephen A. Claffey
Melissa M. Hinds
Jeffrey C. Nelson
Robert K. Stanley
BAKER & DANIELS
300 North Meridian Street, Suite 2700
Indianapolis, IN 46204

Wendy W. Ponader
Ponader & Associates, LLP
5241 North Meridian Street
Indianapolis, IN 46208

Jeffrey J. Graham
Jerald Ancel
Marlene Reich
Michael P. O'Neil
SOMMER BARNARD ATTORNEYS, PC
One Indiana Square, Suite 3500
Indianapolis, IN 46204

Daniel H. Golden
David H. Botter
Lisa G. Beckerman
Angela Ferrante
AKIN GUMP STRAUSS HAUER & FELD
LLP
590 Madison Avenue
New York, NY 10022-2524

C. R. Bowles, Jr.
John W. Ames
GREENBAUM DOLL & MCDONALD
PLLC
3500 National City Tower
Louisville, KY 4020

/s/ Ben T. Caughey
Ben T. Caughey

ICE MILLER
One American Square
Box 82001
Indianapolis, Indiana 46282-0200