

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

In re:) Chapter 11
)
ATA Holdings Corp., et al.,¹) Case No. 04-19866
) (Jointly Administered)
Debtors.)

**MOTION TO SHORTEN NOTICE ON
MOTION FOR APPROVAL OF PROCEDURES TO ENTER INTO
NEW LEASES FOR CERTAIN BOEING 767-300 AIRCRAFT**

The debtors and debtors in possession (collectively, the "Debtors") in the above-captioned chapter 11 cases (the "Chapter 11 Cases") hereby move (the "Motion") this Court for an order (the "Order"), substantially in the form attached hereto as Exhibit A, pursuant to 11 U.S.C. §105(a) and Rules 2002(m) and 9007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") shortening notice of the Motion For Approval Of Procedures To Enter Into New Leases For Certain Boeing 767-300 Aircraft (the "Procedures Motion") and scheduling the Procedures Motion for telephonic hearing on May 13, 2005.

In support of the Motion, Debtors represent as follows:

JURISDICTION

1. On October 26, 2004 (the "Petition Date"), each of the Debtors filed with the United States Bankruptcy Court for the Southern District of Indiana, Indianapolis Division (the "Bankruptcy Court"), its respective voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. as amended (the "Bankruptcy Code")

¹ The Debtors are the following entities: ATA Holdings Corp. (04-19866), ATA Airlines, Inc. (04-19868), Ambassadair Travel Club, Inc. (04-19869), ATA Leisure Corp. (04-19870), Amber Travel, Inc. (04-19871), American Trans Air Execujet, Inc. (04-19872), ATA Cargo, Inc. (04-19873), and Chicago Express Airlines, Inc. (04-19874).

commencing these Chapter 11 Cases. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

2. No trustee has been appointed. On November 1, 2004, the United States Trustee appointed an official committee of unsecured creditors (the "Committee") pursuant to § 1102(a)(1) of the Bankruptcy Code.

3. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper before this Court under 28 U.S.C. §§ 1408 and 1409.

4. The statutory basis for the relief sought herein is Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 2002(m) and 9007.

RELIEF REQUESTED/BASIS FOR RELIEF

5. For the reasons set forth below the Debtors request that the Court enter an order shortening notice of the Procedures Motion and schedule such motion for telephonic hearing on May 13, 2005.

6. Circumstances justify shortening notice of the Procedures Motion. As more particularly detailed in the Procedures Motion, the Debtors have decided in their sound business judgment to lease the Aircraft². Since the Aircraft is in high demand and short supply in the Industry, the Debtors' ability to quickly supply a bid and prove both the authority and capability of performing any such bid is hampered due to the uncertainty of when and if such Court approval may be obtained. Hearing the Procedures Motion on shortened notice will avoid exposing the Debtors and their estates to possible unnecessary administrative expenses.

NO PRIOR REQUEST

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

WHEREFORE, Debtors request that the Court shorten notice of the Procedures Motion as described herein and hear such motion telephonically on May 13, 2005.

Respectfully submitted,

BAKER & DANIELS

By: /s/ Terry E. Hall

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² All capitalized terms not defined herein shall have the meaning ascribed to such terms in the Charter Motion.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served this 10th day of May, 2005, by electronic mail, facsimile, hand delivery or overnight mail on the Core Group, 2002 List, Appearance List and Lessor.

/s/ Terry E. Hall _____