

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 AUTHORITY TO ASSUME AGREEMENTS
ANCILLARY TO AIRCRAFT LEASE AGREEMENT WITH GATX THIRD
AIRCRAFT CORPORATION AND FOR APPROVAL OF AMENDMENT**

The above-captioned debtors and debtors in possession (collectively, the "Debtors") 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 Debtors' Motion For Authority To Assume Agreements Ancillary To Aircraft Lease Agreement With GATX Third Aircraft Corporation And For Approval Of Amendment (the "Assumption Motion").

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), Ambassador Travel Club, Inc. (04-19869), ATA Leisure Corp. (04-19870), Amber Travel, Inc. (04-19871),

Footnote continued on next page . . .

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 Assumption Motion.

6. Circumstances justify shortening notice of the Assumption Motion. Pursuant to the Assumption Order², the Debtors have authority to take all actions contemplated by the Term Sheet. One such action is the negotiation and execution of the Amendment. Therefore, ATA and ATAH do not believe further Court approval of the Amendment is required, however, out of an abundance of caution, ATA and ATAH request that the Court authorize ATA and ATAH to enter into the Agreement. The terms of the Amendment are substantially similar

American Trans Air Execujet, Inc. (04-19872), ATA Cargo, Inc. (04-19873), and Chicago Express Airlines, Inc. (04-19874).

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

to the terms of the Term Sheet previously approved by the Court, making a further hearing on the matter unnecessary.

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 Assumption Motion as described herein so that if no objections are filed within ten (10) days, the Court may enter an appropriate order granting the relief requested and such other related relief as may be required without conducting an actual hearing.

Respectfully submitted,

BAKER & DANIELS

By: /s/ Jeffrey C. Nelson

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served this 11th day of May, 2005, by electronic mail, facsimile, hand delivery or overnight mail on the Core Group, 2002 List, Appearance List, and GATX.

/s/ Jeffrey C. Nelson