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 FOR AN ORDER ESTABLISHING AN AMENDED SCHEDULES BAR DATE

The above-captioned debtors and debtors-in-possession (the "Debtors") hereby file this motion (this "Motion") and respectfully request that the Court enter an order: (i) providing that any party whose interests are affected by the Amendments (as hereinafter defined) (each an "Affected Party," and collectively, the "Affected Parties") and who disagrees with the amount and/or classification of the Debtors' liability to such Affected Party set forth in the Amendments (as hereinafter defined) (the "Amendment Liability") must file a proof of claim asserting the amount and/or classification of the Debtors' liability to such Affected Party such Affected Party deems appropriate within twenty three (23) days of the date the Debtors file the Amendments (as hereinafter defined) (the "Amendment Bar Date") or such Affected Party will be forever bound by the Amendment Liability; (ii) approving the notice of the Amendment Bar Date attached to this Motion as Exhibit A (the "Amendment Bar Date Notice"); and (iii) finding the notice to be provided to the Affected Parties in the manner described herein to be sufficient under Bankruptcy Rules 1009, 2002 and 3003.

[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 C8 Airlines, Inc., formerly named Chicago Express Airlines, Inc. (04-19874).

In support of this Motion, the Debtors respectfully state as follows:

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 "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") commencing these Chapter 11 Cases. The Chapter 11 Cases are being jointly administered under Case No. 04-19866-BHL-11. 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. 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 over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

4. Venue of the Debtors' chapter 11 cases and this Motion in this district is proper under 28 U.S.C. §§ 1408 and 1409.

5. The statutory basis for the relief requested herein are Section 105 of the Bankruptcy Code and Rules 1009, 2002 and 3003 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

6. Each of the Debtors filed its respective Statement of Financial Affairs and its Schedule of Assets and Liabilities on December 13, 2005 (collectively, the "Schedules").

7. Pursuant to an order entered by the Court on December 21, 2004 (the "Bar Date Order"), all persons and entities, subject to certain exceptions set forth therein, desiring to

assert a pre-Petition Date claim against any of the Debtors were required to file a proof of claim on or before January 24, 2005.

8. The Bar Date Order did not require any person or entity (i) whose claim is listed on the Schedules or any amendments thereto; (ii) whose claim is not listed as "disputed," "contingent," or "unliquidated," and (iii) who does not dispute the amount, classification or nature of the claim for such person or entity as set forth in the Schedules or any amendments thereto to file a proof of claim.

9. Each of the Debtors intend to file Amended Schedules of Assets and Liabilities (collectively, the "Amendments").

Relief Requested

10. By this Motion, the Debtors seek entry of an order pursuant to Section 105 of the Bankruptcy Code and Bankruptcy Rules 1009, 2002, 3003: (i) establishing the Amendment Bar Date as the last day for an Affected Party to file a proof of claim disputing the Amendment Liability, and ordering that any Affected Party that fails to file a proof of claim on or before 5:00 p.m. Pacific time on the Amendment Bar Date shall be forever bound by the Amendment Liability; and (ii) approving the Amendment Bar Date Notice.

Basis for Relief

11. Bankruptcy Rule 1009 provides that the Debtors must give notice of the Amendments to the trustee and to the Affected Parties.

12. Bankruptcy Rule 3003(c)(3) provides: "The court shall fix and for cause shown may extend the time within which proofs of claim or interest may be filed." Fed. R. Bankr. P. 3003(c)(3).

13. The Debtors respectfully request entry of an order pursuant to Bankruptcy Rule 3003(c)(3) establishing the Amendment Bar Date.

14. Debtors also request that the Court approve the Amendment Bar Date Notice.

15. Based on the notice procedures set forth below, the Debtors believe that the Amendment Bar Date will give all Affected Parties ample opportunity to prepare and timely file proofs of claims.

Notice of the Amendment Bar Date

16. Pursuant to Bankruptcy Rule 2002(a)(7), the Debtors will serve the Amendment Bar Date Notice on the following parties by the method so indicated within one (1) business days of filing the Amendments:

a. All Affected Parties at the addresses stated in the Amendments and their counsel (if known), provided that any prior mailings to such parties to the listed addresses have not been returned without a forwarding address, by U.S. first class mail;

b. the Core Group by email, facsimile or overnight mail;

c. the 2002 List by email, facsimile or overnight mail; and

f. the Appearance List by email, facsimile or overnight mail.

17. In addition, the Amendment Bar Date Notice will be posted on the website of BMC Group ("BMC"), the Debtors' notice, claims and balloting agent. Any person or entity may obtain a copy of the Amendment Bar Date Notice by going to the BMC website at http://www.bmcgroup.com/ata, or by calling 1-888-909-0100.

18. Under the Debtors' proposal, the Affected Parties would receive the twenty days notice required by Bankruptcy Rule 2002(a)(7).

Notice

19. In light of the nature of the relief requested, the Debtors submit that no further notice is required.

WHEREFORE, the Debtors respectfully request that the Court enter an order: (i) establishing the Amendment Bar Date; (ii) providing that any Affected Party that fails to file a proof of claim on or before 5:00 p.m. Pacific time on the Amendment Bar Date is forever bound by the Amendment Liability; (iii) approving the Amendment Bar Date Notice; (iv) authorizing the Debtors to distribute the Amendment Bar Date Notice as set forth herein, (v) declaring that the notice to be provided to the Affected Parties in the manner described herein sufficient under Bankruptcy Rules 1009, 2002 and 3003; and (vi) granting the Debtors all other appropriate relief.

Respectfully submitted,

BAKER & DANIELS LLP

/s/ Jeffrey C. Nelson
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served this 30th day of September, 2005, by the method so indicated on the parties below:

All Affected Parties at the addresses stated in the Amendments and their counsel (if known), provided that any prior mailings to such parties to the listed addresses have not been returned without a forwarding address, by U.S. first class mail;

The Core Group by email, facsimile or overnight mail;

The 2002 List by email, facsimile or overnight mail; and

The Appearance List by email, facsimile or overnight mail.

/s/ Jeffrey C. Nelson