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.	)	

EMERGENCY MOTION ON SHORTENED NOTICE FOR BRIDGE AND FINAL ORDERS EXTENDING CERTAIN DEBTORS' EXCLUSIVE PLAN FILING PERIOD

Ambassadair Travel Club, Inc. ("Ambassadair") and Amber Travel, Inc. ("Amber"), two of the debtors and debtors in possession in the above captioned chapter 11 cases (the "Chapter 11 Cases"), hereby file this motion (the "Motion") for entry of a bridge order extending the exclusive period during which only Ambassadair and Amber may file their respective plans (collectively, the "Plans") to and including February 9, 2006 and a final order pursuant to 11 U.S.C. § 1121(d) extending the exclusive period during which only Ambassadair and Amber may file the Plans to and including April 3, 2006, and correspondingly extending the period for soliciting votes to accept or reject the Plans to and including June 2, 2006.

In support of this Motion, Ambassadair and Amber respectfully state as follows:

JURISDICTION

1. On October 26, 2004 (the "Petition Date"),the Debtors filed with the United States Bankruptcy Court for the Southern District of Indiana, Indianapolis Division (the "Bankruptcy Court"), their respective voluntary petitions 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 means 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. (04-19874).

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

2. 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.

3. The statutory bases for the relief requested herein is Sections 105(a) and 1121(d) of the Bankruptcy Code.

RELIEF REQUESTED

5. By this Motion, Ambassadairt and Amber seek bridge order extending the exclusive period during which only Ambassadair and Amber may file the Plans to and including February 9, 2006 and a final order pursuant to 11 U.S.C. § 1121(d) extending the exclusive period during which only Ambassadair and Amber may file the Plans to and including April 3, 2006, and correspondingly extending the period for soliciting votes to accept or reject the Plans to and including June 2, 2006.

BASIS FOR RELIEF

6. Section 1121(b) of the Bankruptcy Code states: "Except as otherwise provided in this section, only the debtor may file a plan until after 120 days after the date of the order for relief under this chapter."

7. Section 1121(d) of the Bankruptcy Code states: "On request of a party in interest made within the respective periods specified in subsections (b) and (c) of this section and after notice and a hearing, the court may for cause reduce or increase the 120-day period or the 180-day period referred to in this section."

8. On request of Ambassadair and Amber, this Court extended the Filing

Period to January 31, 2006 and Confirmation Period to April 3, 2006 in a prior Order (docket # 3300).

9. The Debtors have expended significant efforts and have filed a plan of reorganization for ATA Holdings Corp., ATA Airlines, Inc., ATA Leisure Corp., American Trans Air Execujet, Inc and ATA Cargo, Inc. (collectively, the "Reorganizing Debtors"). However, due to current circumstances, Ambassadair and Amber have determined that reorganization is not feasible and more time is needed to consider whether they should propose liquidating Chapter 11 plans or move to convert their cases to cases under Chapter 7 of the Bankruptcy Code.

10. Cause exists to extend Ambassadair's and Amber's respective plan exclusivity period beyond January 31, 2006. One factor considered by courts in determining whether cause exists to extend a debtor's exclusive period to file a plan is whether an unresolved contingency exists. E.g., In re Express One Int'l. Inc., 194 B.R. 98, 100 (Bankr. E.D. Tex. 1996). A number of unresolved contingencies exist which prevent Ambassadair and Amber from determining whether they should file liquidating plans (and the contents of such plans) or whether their creditors would be better served by converting their cases. The Debtors are currently focused on completing the transactions and financing associated with the Reorganizing Debtors' proposed reorganization. This task consumes most of the Reorganizing Debtors resources and personnel. Ambassadair and Amber are not yet positioned to make a responsible and informed determination of whether filing liquidating plans or converting their respective cases to Chapter 7 cases is in the best interest of their creditors. Additionally, Ambassadair and Amber need time to analyze the claims filed against them to determine the administrative solvency of their respective estates.

REQUEST FOR BRIDGE ORDER

11. Ambassadair and Amber request the Court to enter a bridge order, substantially in the form attached hereto as Exhibit A, (the "Bridge Order"), extending Ambassadair's and Amber's exclusive period to file the Plans to and including February 9, 2006. Concurrently herewith Ambassadair and Amber are filing a motion requesting the Court to consider this request for the Bridge Order on shortened notice on January 30, 2006. Without entry of the Bridge Order, Ambassadair's and Amber's exclusive periods to file the Plans will expire before the Court can consider the extension sought in this Motion on February 9, 2006.

Respectfully submitted,

BAKER & DANIELS LLP

By: /s/ Terry E. Hall

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served this 28th day of January, 2006 by electronic mail on the Core Group, 2002 List, and Appearance List.

/s/ Terry E. Hall