

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 OF JOINT MOTION OF ATA
AND FLYING FOOD GROUP LLC TO ALLOW CLAIM AND
AUTHORIZE ENTRY INTO NEW AGREEMENT**

ATA Airlines, Inc. ("ATA") hereby moves (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 Joint Motion Of ATA And Flying Food Group LLC To Allow Claim And Authorize Entry Into New Agreement (the "Joint Motion") and scheduling the Joint Motion for hearing on April 11, 2006.

In support of the Motion, ATA represents 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"), their 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 Debtors continue to operate their businesses

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. f/k/a Chicago Express Airlines, Inc. (04-19874).

and manage their properties 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 sought herein is Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 2002(m) and 9007.

RELIEF REQUESTED/BASIS FOR RELIEF

4. For the reasons set forth below, ATA requests that the Court enter an order shortening notice of the Joint Motion and schedule such motion for hearing on April 11, 2006.

5. Due to an extensive negotiating period and the importance of the New Agreement to both ATA and FFG, circumstances justify shortening notice of the Joint Motion. The decision to enter into the New Agreement² is within the sound business judgment of ATA. The terms and conditions of the New Agreement are fair and represent market terms for similar contracts. Upon the execution of the New Agreement, ATA and FFG intend to release and discharge each other from any and all claims related to the Prepetition Agreement.

NO PRIOR REQUEST

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

WHEREFORE, ATA requests that the Court shorten notice of the Joint Motion as described herein and hear such motion on April 11, 2006.

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

Respectfully submitted,

BAKER & DANIELS LLP

By: /s/ Terry E. Hall

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served by electronic mail this 31st day of March, 2006, on the Core Group, 2002 List, Appearance List, and counsel for Flying Food Group, LLC.

/s/ Terry E. Hall