

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.)	

**REORGANIZED DEBTORS' MOTION FOR ENTRY OF AN ORDER EXTENDING
CLAIMS OBJECTION DEADLINE**

The Reorganized Debtors² hereby move (the "Motion") this Court for an order (the "Order") extending the Claims Objection Deadline (as defined in the Plan) to and including July 31, 2006.

In support of this Motion, the Reorganized Debtors state the following:

JURISDICTION

1. The Reorganized Debtors filed voluntary petitions for relief on October 26, 2004 (the "Petition Date"), commencing these Chapter 11 Cases (these "Cases"). The First Amended Joint Chapter 11 Plan For Reorganizing Debtors (the "Plan") was confirmed January 31, 2006 (the "Confirmation Date") and became effective on February 28, 2006 (the "Effective Date").

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.

¹ The Debtors are the following entities: ATA Holdings Corp. (04-19866), ATA Airlines, Inc. (04-19868), Ambassadors 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).

3. The statutory bases for the relief sought herein is Sections 105(a) 502 of the Bankruptcy Code.

RELIEF REQUESTED

4. For the reasons stated below, the Reorganized Debtors request that the Court enter an order extending the date on or before which the Reorganized Debtors may object to Claims to and including July 31, 2006, without prejudice to the Reorganized Debtors' right to seek a further extension of such deadline.

BASIS FOR RELIEF

5. Pursuant to the Plan, the Reorganized Debtors now have through June 28, 2006 to object to Claims. The Plan was without prejudice to the Reorganized Debtors' rights to seek further extensions of time to object to Claims.

6. Despite due diligence, the Reorganized Debtors have been unable to make fully informed decisions with regard to all the Claims by June 28, 2006. Many of the Claims are currently in negotiation and the Reorganized Debtors contemplate resolution without the added expense to the estate of filing numerous claims objections or to the creditors to respond to such objections. Further, as the Reorganized Debtors examine Claims in the remaining non-Reorganized Debtor Cases, it appears some Claims may have been more properly filed in the Reorganized Debtor Cases.

NO PRIOR REQUEST

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

² The Reorganized Debtors are the following entities: ATA Holdings Corp, ATA Airlines, Inc., ATA Leisure Corp., American Trans Air Execujet, and ATA Cargo, Inc.

8. Counsel for the Post-Confirmation Committee of Unsecured Creditors consents to the Reorganized Debtors' request for extension of time.

WHEREFORE, Reorganized Debtors respectfully request that this Court enter an Order, substantially in the form attached hereto as Exhibit A, extending the time within which Reorganized Debtors may object to the Claims to and including July 31, 2006, and grant such other proper relief as this Court deems equitable, just and appropriate under the circumstances.

Respectfully submitted,

BAKER & DANIELS LLP

By: /s/ Terry E. Hall

Attorneys for the Debtors and Debtors-in-Possession

James M. Carr (#3128-49)
Terry E. Hall (#22041-49)
Stephen A. Claffey (#3233-98)
Jeffrey C. Nelson (#25173-49)
300 North Meridian Street, Suite 2700
Indianapolis, Indiana 46204
Telephone: (317) 237-0300
Facsimile: (317) 237-1000
jim.carr@bakerd.com
terry.hall@bakerd.com
steve.claffey@bakerd.com
jeffrey.nelson@bakerd.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served this 27th day of June, 2006, by electronic mail on the Core Group, 2002 List, and Appearance List.

/s/ Terry E. Hall