

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 FOR ENTRY OF BRIDGE ORDER EXTENDING CLAIMS
OBJECTION DEADLINE FOR CHICAGO EXPRESS AIRLINES, INC. N/K/A C8
AIRLINES, INC. AND FINAL ORDER EXTENDING CLAIMS OBJECTION
DEADLINE THROUGH JANUARY 30, 2007**

Chicago Express Airlines, Inc., n/k/a C8 Airlines, Inc. (the "Debtor") moves the Court (this "Motion"): (i) for entry of an order extending the Claims Objection Deadline (as defined in the Second Amended Plan of Liquidation of C8 Airlines, Inc. f/k/a Chicago Express Airlines (the "Plan")) through January 30, 2007 (the "Final Order"); and (ii) for immediate entry of a bridge order extending the Claims Objection Deadline through the later of (a) December 20, 2006; and (b) the date of entry of an order on the Debtor's request herein for entry of the Final Order (the "Bridge Order"). A proposed form of the Bridge Order is attached as Exhibit 1 and a proposed form of the Final Order is attached as Exhibit 2.

In support of this Motion, the Debtor states:

JURISDICTION

1. The Debtor filed with the United States Bankruptcy Court for the Southern District of Indiana, Indianapolis Division (the "Bankruptcy Court"), its voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. as

¹ 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 Chicago Express Airlines, Inc. (04-19874).

amended (the "Bankruptcy Code") on October 26, 2004 (the "Petition Date"). The Plan was confirmed on June 12, 2006 (the "Confirmation 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.

3. The statutory basis for the relief requested herein is Sections 105(a) of the Bankruptcy Code.

RELIEF REQUESTED

4. By this Motion, the Debtor seeks: (i) entry of the Final Order extending the Claims Objection Deadline through January 30, 2007; and (ii) immediate entry of the Bridge Order extending the Claims Objection Deadline through the later of (a) December 20, 2006; and (b) the date of entry of an order on the Debtor's request herein for entry of the Final Order.

5. If no objections to this Motion are filed on or before December 19, 2006, C8 requests that the Court enter the Final Order without a hearing. If any objections to this Motion are filed on or before December 19, 2006, C8 requests that this Motion be heard telephonically on December 20, 2006.

6. The Plan established October 9, 2006 as the Claims Objection Deadline without prejudice to the Debtor's right to seek extensions of the Claims Objection Deadline. The Claims Objection Deadline is currently December 9, 2006. Despite due diligence, the Debtor is unable to make fully informed decisions with respect to all of the claims by the Claims Objection Deadline.

7. Many of the claims filed against the Debtor are being negotiated and may be settled without the need for filing claims objection. However, without entry of the Bridge

Order, the approaching Claims Objection Deadline will force the Debtor to file objections to such claims. The Debtor's estate will incur unnecessary expenses related to the filing of such objections and creditors will incur unnecessary costs related to responding to such objections.

WHEREFORE, the Debtor requests that the Court (i) immediately enter the Bridge Order and (ii) enter the Final Order extending the Claims Objection Deadline through January 30, 2007.

Respectfully submitted,

BAKER & DANIELS LLP

By: /s/ Louis T. Perry

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Attorneys for the Debtors and Debtors-in-Possession

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served this 5th day of December, 2006 by electronic mail on the Core Group, 2002 List, and Appearance List.

/s/ Louis T. Perry