

James M. Carr (#3128-49)
Terry E. Hall (#22041-49)
Stephen A. Claffey (#3233-98)
Jeffrey C. Nelson (#25173-49)
BAKER & DANIELS LLP
300 North Meridian Street, Suite 2700
Indianapolis, Indiana 46204
Telephone: (317) 237-0300
Facsimile: (317) 237-1000

Attorneys for Debtors and Debtors in Possession

**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.)

ATA AIRLINES, INC.'S MOTION FOR EXPEDITED DISCOVERY

Pursuant to Rules 33, 34 and 36 of the Federal Rules of Bankruptcy Procedure, ATA Airlines, Inc. ("Reorganized ATA"), by counsel, respectfully request that the Court enter an Order requiring the City of Los Angeles, Department of Airports ("Los Angeles"), to respond to Reorganized ATA's discovery requests within five (5) days after the date of service. In support of this Motion, Reorganized ATA states as follows:

1. This Court entered a Temporary Restraining Order ("Order") against Los Angeles on January 25, 2007 and scheduled a preliminary injunction hearing (the "Hearing") for February 8, 2007 at 11:00 a.m. EST.

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

2. In order to adequately prepare for the Hearing, Reorganized ATA needs to conduct discovery relating to the facts surrounding Los Angeles' assertion of a default under the Operating Permit.²

3. ATA has attached interrogatories and requests for the production of documents that it will serve upon Los Angeles. As Los Angeles certified in its draw documents, that there existed a "default," it should not be unduly burdensome for Los Angeles to respond within five (5) days to the requests seeking the factual basis for such assertion.

WHEREFORE, Reorganized ATA respectfully requests the Court enter an Order expediting discovery so that Los Angeles is required to respond to Reorganized ATA's discovery requests within five (5) days of service.

Respectfully submitted,

BAKER & DANIELS LLP

By: /s/Terry E. Hall

Attorneys for the Debtors and
Debtors-in-Possession

Terry E. Hall (#22041-49)
Brent D. Taylor (#1923-49)
300 North Meridian Street, Suite 2700
Indianapolis, Indiana 46204
Telephone: (317) 237-0300
Facsimile: (317) 237-1000

² Capitalized terms not defined herein have the meanings given them in the Emergency Ex Parte Motion For Temporary Restraining Order And Order To Show Cause filed January 25, 2007 (Docket No. 4615).

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was served on this 5th day of February, 2007, via electronic mail, and United States express mail overnight delivery, on the following:

Walter K. Oetzell
Danning, Gill, Diamond & Kollitz, LLP
2029 Century Park East, Third Floor
Los Angeles, CA 90067
Facsimile: (310) 277-5735
woetzell@dgdgk.com

Aaron E. de Leest
Danning, Gill, Diamond & Kollitz, LLP
2029 Century Park East, Third Floor
Los Angeles, CA 90067
Facsimile: (310) 277-5735
adeleest@dgdgk.com

/s/Terry E. Hall