IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF INDIANA INDIANAPOLIS DIVISION

In re:)	Chapter 11
ATA Holdings Corp., et al., ¹)	Casa No. 04 10966
)	Case No. 04-19866 (Jointly Administered)
Debtors.	ĺ	,

MOTION ON SHORTENED NOTICE FOR ENTRY OF ORDER EXTENDING CLAIMS OBJECTION DEADLINE THROUGH MAY 11, 2007 FOR CHICAGO EXPRESS AIRLINES, INC. N/K/A C8 AIRLINES, INC.

Chicago Express Airlines, Inc., n/k/a C8 Airlines, Inc. (the "Debtor") moves the Court (this "Motion") 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 May 11, 2007 (the "Order").

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 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.

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. n/k/a C8 Airlines, Inc. (04-19874).

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 entry of the Order extending the Claims Objection Deadline through May 11, 2007.
- 5. If no objections to this Motion are filed before March 12, 2007, C8 requests that the Court enter the Order without a hearing. If any objections to this Motion are filed before March 12, 2007, C8 requests that this Motion and any objections be heard telephonically prior to the expiration of the current claims objection deadline or in the alternative that a bridge order be entered extending the deadline until a hearing on any objections may be heard.
- 6. C8 is requesting this Motion be considered on shortened notice and with a shortened deadline for objections to allow entry of an order extending the deadline prior to its expiration.
- 7. 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 March 12, 2007. Despite due diligence, the Debtor is unable to make fully informed decisions with respect to all of the claims by the Claims Objection Deadline, as well as to object to any claims that may be filed as a result of the Debtor's ongoing preference actions.
- 8. 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 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 immediately enter the Order extending the Claims Objection Deadline through May 11, 2007.

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 6th day of March, 2007 by electronic mail or first class United States mail, postage prepaid, on the Core Group, 2002 List, and Appearance List.

/s/ Terry E. Hall