

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 MOTION FOR ENTRY OF AN ORDER
EXTENDING CLAIMS OBJECTION DEADLINE FOR CHICAGO EXPRESS
AIRLINES, INC. N/K/A C8 AIRLINES, INC. THROUGH SEPTEMBER 11, 2007**

Chicago Express Airlines, Inc., n/k/a C8 Airlines, Inc. (the "Debtor") 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 Motion On Shortened Notice For Entry Of An Order Extending Claims Objection Deadline For Chicago Express Airlines, Inc. n/k/a C8 Airlines, Inc. Through September 11, 2007 (the "Extension Motion").

In support of the Motion, the Debtor 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"), its 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")

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).

commencing these Chapter 11 Cases. The First Amended Joint Chapter 11 Plan For Reorganizing Debtors, as immaterially modified (the "Plan"), was confirmed on January 31, 2006 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.

3. The statutory basis 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, the Debtor requests that the Court enter an order shortening notice of the Extension Motion to ten (10) days.

5. Circumstances justify shortening notice of the Extension Motion. No hearings are scheduled in the cases for July and electronic notice shall provide immediate notice to all parties who have entered an appearance in this case. No prejudice will result to the claimants as a result of extension of the deadline as pursuant to the Plan. Any and all payments on claims other than administrative or priority claims are dependent on the results of preference actions.

6. 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 on shortened notice, the approaching Claims Objection Deadline² will force the Debtor to file objections to such claims. The Debtor's estate will incur unnecessary expenses related to the

² Capitalized terms not defined herein shall have the meaning ascribed to such terms in the Extension Motion.

filing of such objections and creditors will incur unnecessary costs related to responding to such objections.

NO PRIOR REQUEST

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

WHEREFORE, the Debtor requests that the Court shorten notice of the Extension Motion as described herein.

Respectfully submitted,

BAKER & DANIELS LLP

By: /s/ Terry E. Hall

Attorneys for the Debtors and Debtors-in-Possession

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served this 28th day of June, 2007 by electronic mail on the Core Group, 2002 List (post-confirmation), and Appearance List (post-confirmation).

/s/ Terry E. Hall