

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

In re:	)	Chapter 11
	)	
ATA Holdings Corp., et al., <sup>1</sup>	)	Case No. 04-19866
	)	(Jointly Administered)
Debtors.	)	

**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 DECEMBER 10, 2007**

Chicago Express Airlines, Inc., n/k/a C8 Airlines, Inc. (the "Debtor") moves the Court (this "Motion") on shortened notice 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 December 10, 2007 (the "Order"). A proposed form of the Order is attached as Exhibit 1.

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").

<sup>1</sup> 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).

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 entry of the Order on shortened notice extending the Claims Objection Deadline through December 10, 2007.

5. The Debtor requests that the Court consider the Motion on shortened notice due to the fact that a hearing is scheduled in the cases for September 4, 2007 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. If no objections to this Motion are filed on or before September 4, 2007, the Debtor requests that the Court enter the Final Order without a hearing. If any objections to this Motion are filed on or before September 4, 2007, the Debtor requests that this Motion be heard at the Court's convenience but before the expiration of the current Claim Objection Deadline.

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 September 11, 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 on shortened notice, 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 consider the Motion on shortened notice establishing a response deadline of September 4, 2007 and enter the Order extending the Claims Objection Deadline through December 10, 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 30<sup>th</sup> day of August, 2007 by electronic mail on the Core Group, 2002 List (post-confirmation), and Appearance List (post-confirmation).

/s/ Terry E. Hall \_\_\_\_\_