

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 OF AMBASSADAIR TRAVEL CLUB, INC. AND  
AMBER TRAVEL, INC. TO DISMISS PROCEEDINGS**

Ambassadors Travel Club, Inc. ("Ambassadors") and Amber Travel, Inc.

("Amber" and together with Ambassadors, the "Debtors") respectfully move the Court to dismiss the chapter 11 proceedings designated as Case Nos. 04-19869 and 04-19871 ("Chapter 11 Cases") and enter an order in a form substantially attached as Exhibit A and state in support:

1. On October 26, 2004 (the "Petition Date"), the Debtors filed their respective voluntary petitions for relief under chapter 11 of the United States Bankruptcy Code. Debtors' cases are being jointly administered as captioned above for procedural purposes. Debtors have, since the filing, operated as debtors-in-possession pursuant to 11 U.S.C. §§ 1107 and 1108 and no trustee or examiner was appointed in the Debtors' cases.

2. An Official Committee of Unsecured Creditors (the "Committee") was appointed by the United States Trustee and is represented by counsel, Akin Gump Strauss Hauer & Feld LLP and Greenebaum Doll & McDonald PLLC.

3. Substantially all the assets of the Debtors were sold pursuant to a court authorized process and an order approving the sale was entered on November 18, 2005. The Debtors are no longer conducting business and have been dissolved.

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<sup>1</sup> The following cases are administratively consolidated as captioned above: 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).

4. Following the payment of all allowed administrative claims filed against the Debtors' estates other than the claim of the Debtors' affiliate, ATA Airlines, Inc. ("ATA"), and subject to final payments to the Debtors' professionals, Ambassador's books showed a \$211,789.25 balance and Amber's books showed a \$16,580.85 balance. Professional fees attributable to services provided to Ambassador and Amber but paid by ATA are estimated to be more than the book balances remaining in the accounts and such balances have been transferred to the books of ATA. In addition, according to the books of the Debtors, Ambassador has a post-petition payable to ATA Airlines, Inc. of not less than \$2 million and Amber has a post-petition receivable due from ATA Airlines, Inc. of \$168,000. ATA has filed a subsequent chapter 11 petition and any receivable due Amber from ATA shall be treated as a prepetition claim against the ATA estate.

5. The Debtors request that an order dismissing these proceedings will not affect any of the orders of this Court previously entered which have served to fully administer all of the assets, rights and interests of the Debtors.

WHEREFORE Ambassador Travel Club, Inc. And Amber Travel, Inc. request this Court to dismiss their Chapter 11 Cases and for all other relief as may be appropriate.

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 25<sup>th</sup> day of August 2008 by electronic mail transmission on the U.S. Trustee, the Committee of Unsecured Creditors, and counsel of record.

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