

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

IN RE:)
) Chapter 11
ATA HOLDINGS CORP., et al.¹) Case No. 04-19866-BHL-11
) (Jointly Administered)
Debtors.)
_____)

**NOTICE OF DEBTORS' MOTION FOR AUTHORITY TO
ENTER INTO 1110(a) ELECTIONS AND 1110(b) STIPULATIONS
AND REQUEST TO FILE STIPULATIONS AND AIRCRAFT AGREEMENT
MODIFICATIONS UNDER SEAL**

TO: U.S. Trustee, counsel for the Official Unsecured Creditors' Committee, Core Group,
2002 Service List, and potential 1110 parties

YOU ARE HEREBY NOTIFIED that ATA Airlines, Inc. and Chicago Express Airlines, Inc., debtors-in-possession (collectively, the "Airlines" and, with the other debtors-in-possession in the above-captioned cases, the "Debtors"), have filed a motion seeking authority to enter into 1110(a) elections under § 1110 of the Bankruptcy Code to cure defaults and perform under specified aircraft and aircraft engines financing documents. The Airlines further request authority to enter into 1110(b) stipulations under § 1110 of the Bankruptcy Code extending the time the Airlines have to comply with 11 U.S.C. § 1110 (the "1110(b) Stipulations"). Finally, the Airlines request authority to file any 1110(b) Stipulations and corresponding modifications in agreements between the Airlines and their aircraft financiers under seal so as to protect the confidential commercial information contained therein from the Airlines' competitors and other aircraft financiers.

YOU ARE HEREBY FURTHER NOTIFIED that any objections to the motion must be filed, in writing, with the U.S. Bankruptcy Clerk, P.O. Box 44978, Indianapolis, IN 46204, with a copy to counsel for the Debtors, Jerald I. Ancel and Michael P. O'Neil, Sommer Barnard Attorneys, PC, One Indiana Square, Suite 3500, Indianapolis, IN 46204 and James M. Carr and Terry Hall, Baker & Daniels, 300 North Meridian Street, Suite 2700, Indianapolis, IN 46204, **on or before 4:00 p.m. (EST) on Wednesday, December 15, 2004.**

YOU ARE HEREBY FURTHER NOTIFIED that the Court will conduct a hearing on the relief requested in the motion on **Thursday, December 16, 2004 at 1:30 p.m. (EST) in Room 310 of the U.S. Courthouse, 46 East Ohio Street, Indianapolis, IN 46204.**

DATE: December 6, 2004

JOHN A. O'NEAL
UNITED STATES BANKRUPTCY CLERK

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¹ The Debtors are the following entities: ATA Holdings Corp., ATA Airlines, Inc., Ambassador Travel Club, Inc., ATA Leisure Corp., Amber Travel, Inc., American Trans Air ExecuJet, Inc., ATA Cargo, Inc. and Chicago Express Airlines, Inc.

