

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 TO SHORTEN NOTICE ON  
DEBTORS' MOTION FOR ENTRY OF AN ORDER AUTHORIZING THE DEBTORS  
TO REJECT CERTAIN LEASED AIRCRAFT EQUIPMENT**

The above-captioned debtors and debtors in possession (collectively, the "Debtors") hereby move (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 Debtors' Motion For Entry Of An Order Authorizing The Debtors To Reject Certain Leased Aircraft Equipment filed on December 2, 2004 (the "Rejection Motion") and scheduling the Rejection Motion for hearing on December 21, 2004.

In support of the Motion, Debtors represent 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")

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<sup>1</sup> The Debtors are the following entities: ATA Holdings Corp. (04-19866), ATA Airlines, Inc. (04-19868), Ambassador 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).

commencing these Chapter 11 Cases. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

2. No trustee or examiner has been appointed. On November 1, 2004, the United States Trustee appointed an official committee of unsecured creditors (the "UCC") pursuant to § 1102(a)(1) of the Bankruptcy Code.

3. 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.

4. The statutory bases for the relief sought herein is Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 2002(m) and 9007.

#### **RELIEF REQUESTED**

5. The Debtors request that the Court enter an order shortening notice of the Rejection Motion and schedule such motion for hearing on December 21, 2004.

6. The Rejection Motion was filed on December 2, 2004, and the Debtors provided John Hancock Leasing Corporation, the lessor affected by the Rejection Motion, with notice of their intent to file the Rejection Motion in advance of December 2, 2004. Shortening the notice of the Rejection Motion and hearing such motion on December 21, 2004 will not prejudice the rights of any parties affected by the Rejection Motion.

#### **NO PRIOR REQUEST**

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

WHEREFORE, Debtors request that the Court shorten notice of the Rejection Motion as described herein and hear such motion on December 21, 2004.

Respectfully submitted,

BAKER & DANIELS

By: /s/ Jeffrey C. Nelson

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### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served this 8<sup>th</sup> day of December, 2004, by electronic mail, facsimile, or overnight mail on the Core Group, 2002 List, Appearance List, and John Hancock Leasing Corporation.

/s/ Jeffrey C. Nelson