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12 KRISTA FREITAG

13 UNITED STATES DISTRICT COURT
14 SOUTHERN DISTRICT OF CALIFORNIA

15
16 SECURITIES AND EXCHANGE
COMMISSION,

17 Plaintiff,

18 v.

19 GINA CHAMPION-CAIN and ANI
20 DEVELOPMENT, LLC,

21 Defendants,

22 AMERICAN NATIONAL
23 INVESTMENTS, INC.,

24 Relief Defendant.
25
26
27
28

Case No. 3:19-cv-01628-LAB-AHG

**RECEIVER'S NOTICE OF MOTION
AND MOTION FOR APPROVAL OF
SALE OF PARKING LOT
PROPERTY**

Date: April 27, 2020

Time: 2:00 p.m.

Courtroom: 5B

Mag. Judge: Hon. Allison H. Goddard

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**
2 **NOTICE IS HEREBY GIVEN** that on April 27, 2020, at 2:00 p.m. in
3 Courtroom 5B of the United States District Court, Southern District of California,
4 located at 221 West Broadway, San Diego, California 92101, Krista Freitag
5 ("Receiver"), the Court-appointed permanent receiver for Defendant ANI
6 Development, LLC, Relief Defendant American National Investments, Inc., and
7 their subsidiaries and affiliates ("Receivership Entities"), will, and hereby does,
8 move this Court for Approval of Sale of Parking Lot Property ("Motion").

9 This Motion is based upon this notice, the accompanying Memorandum of
10 Points and Authorities and Declaration of Krista L. Freitag, all pleadings and papers
11 on file in this action, and upon such other matters as may be presented to the Court
12 at the time of hearing.

13 **Procedural Requirements:** If you oppose the Motion, you are required to
14 file your written opposition with the Office of the Clerk, United States District
15 Court, Southern District of California, 333 West Broadway, Suite 420, San Diego,
16 California 92101, and serve the same on the undersigned no later than 14 calendar
17 days prior to the hearing date. An opposing party's failure to file an opposition to
18 any motion may be construed as consent to the granting of the motion pursuant to
19 Civil Local Rule 7.1(f)(3)(c).

20
21 Dated: March 30, 2020

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

22
23 By: s/Edward G. Fates

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25 EDWARD G. FATES
26 NORMAN M. ASPIS
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