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12 Attorneys for Receiver
 13 KRISTA FREITAG

14 UNITED STATES DISTRICT COURT
 15 SOUTHERN DISTRICT OF CALIFORNIA

17 SECURITIES AND EXCHANGE
 COMMISSION,

18 Plaintiff,

19 v.

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

22 Defendants,

23 AMERICAN NATIONAL
 INVESTMENTS, INC.,

24 Relief Defendant.
 25
 26
 27
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Case No. 3:19-cv-01628-LAB-AHG

Ctrm: 14A
 Judge Hon. Larry Alan Burns

**NOTICE OF MOTION AND
 MOTION FOR AUTHORITY TO
 PURSUE CLAIMS AGAINST
 CHICAGO TITLE**

Date: July 13, 2020
 Time: 11:15 a.m.

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**
 2 **NOTICE IS HEREBY GIVEN** that on July 13, 2020, at 11:15 a.m. in
 3 Courtroom 14A 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 ("ANI Development"), Relief Defendant American National
 7 Investments, Inc. ("American National Investments"), and their subsidiaries and
 8 affiliates ("Receivership Entities"), will and hereby does move this Court for an
 9 order authorizing the Receiver to pursue claims against Chicago Title Company and
 10 Chicago Title Insurance Company ("Motion").

11 This Motion is based on this Notice of Motion and Motion, the concurrently
 12 filed Memorandum of Points and Authorities and Declaration of Krista L. Freitag,
 13 the documents and pleadings already on file in this action, and upon such further
 14 oral and documentary evidence as may be presented at the time of the hearing.

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

22 Dated: June 5, 2020

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By: s/ Edward G. Fates

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