

1 DAVID R. ZARO (BAR NO. 124334)  
NORMAN M. ASPIS (BAR NO. 313466)  
2 ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
3 865 South Figueroa Street, Suite 2800  
Los Angeles, California 90017-2543  
4 Phone: (213) 622-5555  
Fax: (213) 620-8816  
5 E-Mail: dzaro@allenmatkins.com  
naspis@allenmatkins.com

6 EDWARD G. FATES (BAR NO. 227809)  
7 ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
8 One America Plaza  
600 West Broadway, 27th Floor  
9 San Diego, California 92101-0903  
Phone: (619) 233-1155  
10 Fax: (619) 233-1158  
E-Mail: tfates@allenmatkins.com

11 Attorneys for Receiver  
12 KRISTA FREITAG

13 UNITED STATES DISTRICT COURT  
14 SOUTHERN DISTRICT OF CALIFORNIA

15  
16 SECURITIES AND EXCHANGE  
COMMISSION,  
17 Plaintiff,  
18  
19 v.  
20 GINA CHAMPION-CAIN and ANI  
DEVELOPMENT, LLC,  
21 Defendants,  
22 AMERICAN NATIONAL  
INVESTMENTS, INC.,  
23 Relief Defendant.  
24  
25  
26  
27  
28

Case No. 3:19-cv-01628-LAB-AHG  
**RECEIVER'S NOTICE OF MOTION  
AND MOTION FOR APPROVAL OF  
SALE OF 3415 MISSION  
BOULEVARD PROPERTY FREE  
AND CLEAR OF FEDERAL TAX  
LIEN**

Date: August 3, 2020  
Time: 2:00 p.m.  
Courtroom: TBD  
Mag. Judge: Hon. Allison H. Goddard

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **NOTICE IS HEREBY GIVEN** that on August 3, 2020, at 2:00 p.m. in a  
3 Courtroom to be determined of the United States District Court, Southern District of  
4 California, located at 221 West Broadway, San Diego, California 92101, Krista  
5 Freitag ("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 3415 Mission Boulevard Property Free and  
9 Clear of Federal Tax Lien ("Motion").

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

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

21  
22 Dated: June 24, 2020

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

23  
24 By:           s/Edward G. Fates          

25 DAVID R. ZARO  
26 EDWARD G. FATES  
27 NORMAN M. ASPIS  
28 Attorneys for Receiver  
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