

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

11 EDWARD G. FATES (BAR NO. 227809)
 12 ALLEN MATKINS LECK GAMBLE
 13 MALLORY & NATSIS LLP
 14 One America Plaza
 15 600 West Broadway, 27th Floor
 16 San Diego, California 92101-0903
 17 Phone: (619) 233-1155
 18 Fax: (619) 233-1158
 19 E-Mail: tfates@allenmatkins.com

20 Attorneys for Receiver
 21 KRISTA FREITAG

22 UNITED STATES DISTRICT COURT
 23 SOUTHERN DISTRICT OF CALIFORNIA

24 SECURITIES AND EXCHANGE
 25 COMMISSION,
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 27 Plaintiff,
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 29 v.
 30 GINA CHAMPION-CAIN and ANI
 31 DEVELOPMENT, LLC,
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 33 Defendants,
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 35 AMERICAN NATIONAL
 36 INVESTMENTS, INC.,
 37
 38 Relief Defendant.

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

**NOTICE OF RECEIPT OF
 QUALIFIED OVERBID
 REGARDING MOTION FOR
 APPROVAL OF SALE OF 809 SAN
 RAFAEL PLACE PROPERTY**

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

1 **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR**
2 **COUNSEL OF RECORD:**

3 **PLEASE TAKE NOTICE** that Krista Freitag ("Receiver"), the Court-
4 appointed permanent receiver for Defendant ANI Development, LLC, Relief
5 Defendant American National Investments, Inc., and their subsidiaries and affiliates
6 ("Receivership Entities"), hereby submits this Notice of Receipt of Qualified Overbid
7 Regarding Motion for Approval of Sale of 809 San Rafael Property ("Motion").

8 In her Motion, the Receiver proposed a deadline for submission of qualified
9 overbids for the 809 San Rafael Property no later than July 27, 2020. The Receiver
10 posted the sale motion on the receivership website, www.anireceivership.com,
11 published notice of the sale in the San Diego Union-Tribune as required by 28 U.S.C.
12 section 2002, and has, through her broker, continued to market the assets and notify
13 potential purchasers about the opportunity to submit an overbid and the proposed
14 deadline to do so. As a result, a qualified overbid has been received.

15 The Receiver, through her broker, has obtained the consent of the original
16 buyer and the qualified overbidder to conduct the live auction via Zoom call on
17 July 30, 2020. Once the auction has been completed, the Receiver will file a notice
18 of the auction results and request that the sale to the winning bidder be approved.

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Dated: July 28, 2020

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: s/Edward G. Fates
EDWARD G. FATES
Attorneys for Receiver
KRISTA FREITAG