

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,
26 Plaintiff,
27
28 v.
29 GINA CHAMPION-CAIN and ANI
30 DEVELOPMENT, LLC,
31 Defendants,
32 AMERICAN NATIONAL
33 INVESTMENTS, INC.,
34 Relief Defendant.

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

**NOTICE OF RECEIPT OF
QUALIFIED OVERBID
REGARDING MOTION FOR
APPROVAL OF SALE OF 7565-7571
UNIVERSITY AVENUE PROPERTY**

Date: September 18, 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 7565-7571 University Avenue Property
8 ("Motion").

9 In her Motion, the Receiver proposed a deadline for submission of qualified
10 overbids for the 7565-7571 University Avenue Property no later than August 24,
11 2020. The Receiver posted the sale motion on the receivership website,
12 www.anireceivership.com, published notice of the sale in the San Diego Union-
13 Tribune as required by 28 U.S.C. section 2002, and has, through her broker,
14 continued to market the assets and notify potential purchasers about the opportunity
15 to submit an overbid and the proposed deadline to do so. As a result, a qualified
16 overbid has been received.

17 The Receiver, through her broker, has obtained the consent of the original
18 buyer and the qualified overbidder to conduct the live auction via Zoom call on
19 August 27, 2020. Once the auction has been completed, the Receiver will file a
20 notice of the auction results and request that the sale to the winning bidder be
21 approved.

22
23 Dated: August 26, 2020

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

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25 By: s/Edward G. Fates

EDWARD G. FATES
Attorneys for Receiver
KRISTA FREITAG