

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.
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27
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Case No. 3:19-cv-01628-LAB-AHG
**RECEIVER'S NOTICE OF MOTION
AND MOTION FOR APPROVAL OF
SALE OF PERSONAL PROPERTY,
LIQUOR LICENSE, AND
ASSIGNMENT OF COMMERCIAL
LEASE ASSOCIATED WITH THE
OCEAN BEACH SURF RIDER
RESTAURANT**
Date: October 26, 2020
Time: 9:00 a.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 October 26, 2020, at 9:00 a.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 Personal Property, Liquor License, and
 9 Assignment of Commercial Lease Associated with the Ocean Beach Surf Rider
 10 Restaurant ("Motion").

11 This Motion is based upon this notice, the accompanying Memorandum of
 12 Points and Authorities and Declaration of Krista L. Freitag, all pleadings and papers
 13 on file in this action, and upon such other matters as may be presented to the Court
 14 at the time of 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
 23 Dated: September 16, 2020

ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP

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 25 By: s/Edward G. Fates
 26 DAVID R. ZARO
 27 EDWARD G. FATES
 28 NORMAN M. ASPIS
 Attorneys for Receiver
 KRISTA FREITAG