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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 v.

28 GINA CHAMPION-CAIN and ANI  
DEVELOPMENT, LLC,

Defendants,

AMERICAN NATIONAL  
INVESTMENTS, INC.,

Relief Defendant.

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

**RECEIVER'S NOTICE OF MOTION  
AND MOTION FOR APPROVAL OF  
SALE OF 812 SAN RAFAEL PLACE  
PROPERTY**

Date: November 30, 2020

Time: 9:30 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 November 30, 2020, at 9:30 a.m. in  
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 812 San Rafael Place Property ("Motion").

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

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

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21 Dated: October 8, 2020

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

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By:           s/Edward G. Fates          

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KRISTA FREITAG

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