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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,
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 27 Plaintiff,
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 29 v.
 30 GINA CHAMPION-CAIN and ANI
 31 DEVELOPMENT, LLC,
 32
 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 3816
 MISSION BLVD. PROPERTY**

Date: February 26, 2021
 Time: 3:00 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 3816 Mission Blvd. Property ("Motion").

8 In her Motion, the Receiver proposed a deadline for submission of qualified
9 overbids for the 3816 Mission Blvd. Property no later than February 22, 2021. The
10 Receiver had the sale motion posted on the receivership website,
11 www.anireceivership.com, had the notice of the sale published in the San Diego
12 Union-Tribune as required by 28 U.S.C. section 2002, and has, through her broker,
13 continued to market the assets and notify potential purchasers about the opportunity
14 to submit an overbid and the proposed deadline to do so. As a result, one qualified
15 overbid has been received.

16 The Receiver, through her broker, has obtained the consent of the original
17 buyer and the qualified overbidder to conduct the live auction via Zoom call on
18 February 25, 2021. Once the auction has been completed, the Receiver will file a
19 notice of the auction results and request that the sale to the winning bidder be
20 approved.

21
22 Dated: February 23, 2021

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: s/Edward G. Fates

EDWARD G. FATES
Attorneys for Receiver
KRISTA FREITAG

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