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11 Attorneys for Receiver
12 KRISTA FREITAG

13 UNITED STATES DISTRICT COURT
14 SOUTHERN DISTRICT OF CALIFORNIA

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16 SECURITIES AND EXCHANGE
COMMISSION,
17 Plaintiff,
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19 v.
20 GINA CHAMPION-CAIN and ANI
DEVELOPMENT, LLC,
21 Defendants,
22 AMERICAN NATIONAL
INVESTMENTS, INC.,
23 Relief Defendant.
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Case No. 3:19-cv-01628-LAB-AHG

**RECEIVER'S NOTICE OF MOTION
AND MOTION FOR APPROVAL OF
SALE OF 140 KELLER STREET
PROPERTY**

Date: April 30, 2021
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 April 30, 2021, 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 140 Keller Street 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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Dated: March 9, 2021

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: s/Edward G. Fates

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