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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 v.

19 GINA CHAMPION-CAIN and ANI  
20 DEVELOPMENT, LLC,

21 Defendants,

22 AMERICAN NATIONAL  
23 INVESTMENTS, INC.,

24 Relief Defendant.

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

**RECEIVER'S NOTICE OF MOTION  
AND MOTION FOR ORDER**

- 1) **APPROVING PROCEDURES FOR THE ADMINISTRATION OF CLAIMS AGAINST THE RECEIVERSHIP ESTATE;**
- 2) **SETTING CLAIMS BAR DATE; AND**
- 3) **APPROVING CLAIMS BAR DATE NOTICE AND PROOF OF CLAIM FORMS.**

Date: August 2, 2021  
Time: 11:30 a.m.  
Courtroom: 14A  
Judge: Hon. Larry Alan Burns

1           **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**  
2           **NOTICE IS HEREBY GIVEN** that on August 2, 2021, at 11:30 a.m. in  
3 Courtroom 14A of the United States District Court, Southern District of California,  
4 located at 333 West Broadway, San Diego, California 92101, Krista Freitag  
5 ("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 Order (1) Approving Procedures for the Administration of  
9 Claims Against the Receivership Estate; (2) Setting Claims Bar Date; and (3)  
10 Approving Claims Bar Date Notice and Proof of Claim Forms ("Motion").

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

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

21  
22 Dated: June 3, 2021

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

23  
24 By:           s/Edward G. Fates          

25           DAVID R. ZARO  
26           EDWARD G. FATES  
27           NORMAN M. ASPIS  
28           Attorneys for Receiver  
                  KRISTA FREITAG