

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 v.

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

21 Defendants,

22 AMERICAN NATIONAL
23 INVESTMENTS, INC.,

24 Relief Defendant.
25
26
27
28

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

**RECEIVER'S NOTICE OF MOTION
AND MOTION FOR APPROVAL OF
SALE OF 1775 DIAMOND
PROPERTY**

Date: July 8, 2021

Time: 2:00 p.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 July 8, 2021, at 2:00 p.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 1775 Diamond 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).

20
 21 Dated: June 8, 2021

ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP

22
 23 By: s/Edward G. Fates

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