

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 American 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

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16 SECURITIES AND EXCHANGE
COMMISSION,
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Plaintiff,
18
v.
19 GINA CHAMPION-CAIN and ANI
20 DEVELOPMENT, LLC,
21
Defendants.
22 AMERICAN NATIONAL
INVESTMENTS, INC.,
23
Relief Defendant.
24

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

Ctrm: 14A
Judge Hon. Larry Alan Burns

**NOTICE OF MOTION AND
MOTION FOR APPROVAL OF
SETTLEMENT WITH CON & COOP
BEACH RENTALS, LLC**

Date: August 9, 2021
Time: 11:30 a.m.
Courtroom: 14A
Judge: Hon. Larry Alan Burns

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1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**
 2 **PLEASE TAKE NOTICE** that on August 9, 2021, at 11:30 a.m. in
 3 Courtroom 14A of the United States District Court, Southern District of California,
 4 located at 221 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 Approval of Settlement with Con & Coop Beach Rentals, LLC
 9 (the "Motion").

10 This Motion is based upon this notice, the accompanying Memorandum of
 11 Points and Authorities and Declaration of Krista Freitag, all pleadings and papers on
 12 file in this action, and upon such other matters as may be presented to the Court at
 13 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. Failure to file an opposition to any motion may be
 19 construed as consent to the granting of the motion pursuant to Civil Local
 20 Rule 7.1(f)(3)(c).

21
 22 Dated: June 17, 2021

ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP

By: s/Edward G. Fates
 DAVID R. ZARO
 EDWARD G. FATES
 NORMAN M. ASPIS
 Attorneys for Receiver
 KRISTA FREITAG