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

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

Date: November 1, 2021

Time: 3:00 p.m.

Courtroom: TBD

Mag. Judge: Hon. Allison H. Goddard

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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that on November 1, 2021, at 3:00 p.m. in Courtroom to be determined of the United States District Court, Southern District of California, located at 221 West Broadway, San Diego, California 92101, Krista Freitag ("Receiver"), the Court-appointed permanent receiver for Defendant ANI Development, LLC, Relief Defendant American National Investments, Inc., and their subsidiaries and affiliates ("Receivership Entities"), will, and hereby does, move this Court for Approval of Sale of 1775 Diamond Property ("Motion").

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

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

Dated: September 22, 2021

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: s/Edward G. Fates

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