

1 DAVID R. ZARO (BAR NO. 124334)
MATTHEW D. PHAM (BAR NO. 287704)
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
mpham@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
INVESTMENTS, INC.,
23
Relief Defendant.

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

**RECEIVER'S NOTICE OF MOTION
AND MOTION FOR APPROVAL OF
SETTLEMENT OF PENDING
LITIGATION IN FLORIDA**

Date: January 18, 2022
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 January 18, 2022, 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 their
7 subsidiaries and affiliates ("Receivership Entities"), will, and hereby does, move this
8 Court for approval of settlement of the litigation in Florida and of the Settlement
9 Agreement.

10 This Motion is based upon this notice, the accompanying Memorandum of
11 Points and Authorities and Declaration of Krista L. Freitag, all pleadings and papers
12 on 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 file
15 your written opposition with the Office of the Clerk, United States District Court,
16 Southern District of California, 333 West Broadway, Suite 420, San Diego,
17 California 92101, and serve the same no later than 14 days prior to the hearing date
18 stated above. An opposing party's 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: December 13, 2021

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: s/Edward G. Fates

DAVID R. ZARO
EDWARD G. FATES
MATTHEW D. PHAM
Attorneys for Receiver
KRISTA FREITAG

23
24
25
26
27
28