

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
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
SETTLEMENT AGREEMENT WITH
CHICAGO TITLE COMPANY AND
CHICAGO TITLE INSURANCE
COMPANY**

Date: TBD
Time: TBD
Courtroom: 14A
Judge: Hon. Larry Alan Burns

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **NOTICE IS HEREBY GIVEN** that on a date and time to be determined by
3 the Court in Courtroom 14A of the United States District Court, Southern District of
4 California, located at 333 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 Settlement Agreement with Chicago Title
9 Company and Chicago Title Insurance Company ("Motion").

10 This Motion is based upon this notice, the accompanying Memorandum of
11 Points and Authorities, the Declaration of Krista L. Freitag, the Request for Judicial
12 Notice, and all pleadings and papers on file in this action, and upon such other
13 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 by the deadline to be set by
18 the Court (further notice will be provided). An opposing party's failure to file an
19 opposition to any motion may be construed as consent to the granting of the motion
20 pursuant to Civil Local Rule 7.1(f)(3)(c).

21
22 Dated: May 23, 2022

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

23
24
25 By: s/Edward G. Fates
26 DAVID R. ZARO
27 EDWARD G. FATES
28 MATTHEW D. PHAM
Attorneys for Receiver
KRISTA FREITAG