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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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26
27
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Case No. 3:19-cv-01628-LAB-AHG

**RECEIVER'S NOTICE OF MOTION
AND MOTION TO APPROVE
PARTIAL SETTLEMENTS OF
RELATED CLAWBACK ACTION
AGAINST LA JOLLA BRIDGE, LLC**

Date: October 11, 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 October 11, 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
7 their subsidiaries and affiliates ("Receivership Entities"), will, and hereby does,
8 move this Court to Approve Partial Settlements of Related Clawback Action
9 Against La Jolla Bridge, LLC ("Motion").

10 This Motion is based upon this notice, the accompanying Memorandum of
11 Points and Authorities, the Declaration of Krista L. Freitag, and all pleadings and
12 papers on file in this action, and upon such other matters as may be presented to the
13 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).

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22 Dated: September 7, 2022

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

23
24 By: s/Edward G. Fates

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