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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  
INVESTMENTS, INC.,  
23  
Relief Defendant.

Case No. 3:19-cv-01628-LAB-AHG  
Ctrm: 14A  
Judge Hon. Larry Alan Burns

**RECEIVER'S NOTICE OF MOTION  
AND MOTION FOR APPROVAL OF  
SETTLEMENT WITH ILLA  
DESIGNS, LLC, JOHN ERIC  
CHURILLA, AND NICOLE  
LORRAINE CHURILLA**

Date: April 10, 2023  
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           **NOTICE IS HEREBY GIVEN** that on April 10, 2023 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 for Approval of a Settlement with Illa Designs, LLC, John Eric  
 9 Churilla, and Nicole Lorraine Churilla. ("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).

21  
 22 Dated: March 6, 2023

ALLEN MATKINS LECK GAMBLE  
 MALLORY & NATSIS LLP

23  
 24 By:           s/Edward G. Fates          

25           DAVID R. ZARO  
 26           EDWARD G. FATES  
 27           MATTHEW D. PHAM  
 28           Attorneys for Receiver  
               KRISTA FREITAG