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12 Attorneys for Receiver  
KRISTA FREITAG

13 UNITED STATES DISTRICT COURT  
14 SOUTHERN DISTRICT OF CALIFORNIA  
15

16 SECURITIES AND EXCHANGE  
17 COMMISSION,

18 Plaintiff,

19 v.

20 GINA CHAMPION-CAIN and ANI  
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  
**NOTICE OF HEARING ON  
INTERIM APPLICATIONS FOR  
APPROVAL AND PAYMENT OF  
COMPENSATION TO THE  
RECEIVER AND HER  
PROFESSIONALS**

Date: April 29, 2024  
Time: 11:30 a.m.  
Courtroom: 14A  
Judge: Hon. Larry Alan Burns

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

**NOTICE IS HEREBY GIVEN** that on April 29, 2024 at 11:30 a.m. in Courtroom 14A of the United States District Court, Southern District of California, located at 333 West Broadway, San Diego, California 92101, the Court will consider the interim fee applications ("Fee Applications") of Krista L. 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"), and Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), the Receiver's counsel.

The following table summarizes the fees and costs requested by the Receiver and Allen Matkins for the period July 1, 2023, through December 31, 2023:

| <b>Applicant</b>            | <b>Fees Incurred</b> | <b>Interim Payment Requested</b> | <b>Costs</b> | <b>Total Payment Requested</b> |
|-----------------------------|----------------------|----------------------------------|--------------|--------------------------------|
| Krista L. Freitag, Receiver | \$70,086.10          | \$56,068.88<br>(80%)             | \$7,388.38   | \$63,457.26                    |
| Allen Matkins               | \$326,147.40         | \$260,917.92<br>(80%)            | \$13,539.69  | \$274,457.61                   |

This notice along with the full fee applications are posted on the Receiver's website, [www.ethreadvisors.com](http://www.ethreadvisors.com) (see the "SEC Case Docs" tab). A hard copy of the applications can also be obtained by emailing a request to the Receiver through the website or by sending a written request to the Receiver at 501 West Broadway, Suite 290, San Diego, California 92101.

**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

1 days prior to the hearing date. An opposing party's failure to file an opposition to  
2 any motion may be construed as consent to the granting of the motion pursuant to  
3 Civil Local Rule 7.1(f)(3)(c).

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5 Dated: March 22, 2024

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

6  
7 By:           s/ Edward G. Fates          

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