

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  
19 v.  
20 GINA CHAMPION-CAIN and ANI  
DEVELOPMENT, LLC,  
21 Defendants,  
22 AMERICAN NATIONAL  
INVESTMENTS, INC.,  
23 Relief Defendant.  
24  
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Case No. 3:19-cv-01628-TWR-AHG

**NOTICE OF HEARING ON  
INTERIM APPLICATIONS FOR  
APPROVAL AND PAYMENT OF  
COMPENSATION TO THE  
RECEIVER AND HER  
PROFESSIONALS**

Date: July 1, 2025  
Time: 1:30 p.m.  
Courtroom: 14A  
Judge: Hon. Todd W. Robinson

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**  
2 **NOTICE IS HEREBY GIVEN** that on July 1, 2025 at 1:30 p.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, the Court will consider  
5 the interim fee applications ("Fee Applications") of Krista L. Freitag ("Receiver"),  
6 the Court-appointed permanent receiver for Defendant ANI Development, LLC,  
7 Relief Defendant American National Investments, Inc., and their subsidiaries and  
8 affiliates ("Receivership Entities"), and Allen Matkins Leck Gamble Mallory &  
9 Natsis LLP ("Allen Matkins"), the Receiver's counsel.

10 The following table summarizes the fees and costs requested by the Receiver  
11 and Allen Matkins for the period July 1, 2024, through December 31, 2024:

<b>Applicant</b>	<b>Fees Incurred</b>	<b>Interim Payment Requested</b>	<b>Costs</b>	<b>Total Payment Requested</b>
Krista L. Freitag, Receiver	\$24,901.20	\$19,920.96 (80%)	\$8,703.09	\$28,624.05
Allen Matkins	\$113,739.30	\$90,991.44 (80%)	\$13,709.09	\$104,700.53

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

23 **Procedural Requirements:** If you oppose the Motion, you are required to file  
24 your written opposition with the Office of the Clerk, United States District Court,  
25 Southern District of California, 333 West Broadway, Suite 420, San Diego,  
26 California 92101, and serve the same on the undersigned no later than 14 calendar  
27  
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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: May 8, 2025

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

6  
7 By:           s/ Edward G. Fates          

8 DAVID R. ZARO  
9 EDWARD G. FATES  
10 MATTHEW D. PHAM  
11 Attorneys for Receiver  
12 KRISTA FREITAG  
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