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12 KRISTA FREITAG

13 UNITED STATES DISTRICT COURT
14 SOUTHERN DISTRICT OF CALIFORNIA

15
16 SECURITIES AND EXCHANGE
COMMISSION,
17 Plaintiff,
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19 v.
20 GINA CHAMPION-CAIN and ANI
DEVELOPMENT, LLC,
21 Defendants,
22 AMERICAN NATIONAL
INVESTMENTS, INC.,
23 Relief Defendant.
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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: April 16, 2026
Time: 1:30 p.m.
Courtroom: 14A
Judge: Hon. Todd W. Robinson

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that on April 16, 2026 at 1:30 p.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, 2025, through December 31, 2025:

| Applicant | Fees Incurred | Interim Payment Requested | Costs | Total Payment Requested |
|-----------------------------|----------------------|----------------------------------|--------------|--------------------------------|
| Krista L. Freitag, Receiver | \$24,948.75 | \$19,959.00 (80%) | \$1,716.06 | \$21,675.06 |
| Allen Matkins | \$156,737.70 | \$125,390.16 (80%) | \$7,857.26 | \$133,247.42 |

The Allen Matkins application also seeks approval and payment of \$827,910.45 in fees associated with the Chicago Title litigation, in which Allen Matkins represented the Receiver in her state court action against Chicago Title on behalf of the receivership estate, which directly led to the Court-approved global settlement of \$24,359,133.64 (all appeals of which have now been denied).

This notice along with the full fee applications are posted on the Receiver's website, 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.

1 **Procedural Requirements:** If you oppose the Motion, you are required to file
2 your written opposition with the Office of the Clerk, United States District Court,
3 Southern District of California, 333 West Broadway, Suite 420, San Diego,
4 California 92101, and serve the same on the undersigned no later than 14 calendar
5 days prior to the hearing date. An opposing party's failure to file an opposition to
6 any motion may be construed as consent to the granting of the motion pursuant to
7 Civil Local Rule 7.1(f)(3)(c).

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9 Dated: March 4, 2026

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

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11 By: s/ Edward G. Fates

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