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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.
25
26
27
28

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

**RECEIVER'S NOTICE OF MOTION
AND MOTION FOR (A) APPROVAL
OF SALE OF REAL PROPERTY
LOCATED AT 132 KELLER FREE
AND CLEAR OF MECHANIC'S
LIEN; AND (B) AUTHORITY TO
PAY BROKER'S COMMISSION**

Date: December 9, 2019
Time: 11:15 a.m.
Courtroom: 14A (14th Flr)
Judge: Hon. Larry Alan Burns

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

2 **NOTICE IS HEREBY GIVEN** that on December 9, 2019, at 11:15 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 (A) Approval of Sale of Real Property Located at 132 Keller
9 Street Free and Clear of Mechanic's Lien; and (B) Authority to Pay Broker's
10 Commission ("Motion").

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

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

22
23 Dated: October 31, 2019

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

24
25 By: s/Edward G. Fates

26 DAVID R. ZARO
27 EDWARD G. FATES
28 NORMAN M. ASPIS
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 KRISTA FREITAG