Marc J. Randazza, SBN 269535
Alex J. Shepard, SBN 295058
RANDAZZA LEGAL GROUP, PLLC
8991 W. Flamingo Rd., Ste. B
Telephone: 702-420-2001
ecf@randazza.com
Attorneys for Hooman Abedi Karamian a/k/a Nik Lamas-Richie

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

HOOMAN ABEDI KARAMIAN a/k/a NIK LAMAS-RICHIE, Plaintiff, vs. EVANDER KANE, Defendant.	Case No.: JUDGE: **COMPLAINT FOR DECLARATORY JUDGMENT** **JURY TRIAL DEMANDED**

Plaintiff Hooman Abedi Karamian a/k/a Nik Lamas-Richie ("Richie") brings this Complaint against Defendant Evander Kane for a declaratory judgment and alleges as follows:

INTRODUCTION

Defendant Evander Kane is an NHL player surrounded by public controversies involving sexual assaults, violence against women, excessive gambling debts, and fixing NHL games. These public controversies have been widely reported on in the press. Plaintiff Nik Richie has been a journalist and commentator for more than twenty years.

Richie interviewed Anna Kane (Evander Kane's ex-wife). Anna and Richie had a one-on-one interview where Anna Kane discussed what she knew and thought about Evander Kane for 72 minutes. *See* https://www.youtube.com/watch?v=ztm4xF9h92U. Evander Kane was very unhappy about this. He wanted to do what he could to censor it. So, his attorneys came up with a creative solution – they would rely on a foreign judgment to get a prior restraint.

RANDAZZA | LEGAL GROUP

You see, Evander Kane has a judgment, from a Canadian court, that prohibits Anna Kane from "posting anything to social media about" Defendant Evander Kane and his family, bars "disparaging him or his family" on "any form of social media," and states that it "remains in effect permanently and will not expire." Ms. Kane may not speak about her ex-husband, their family, their court proceedings, or even the Canadian courts. *See* **Exhibit 1**.

No American court would ever grant an injunction this broad. In fact, the American mind recoils at the thought of it. An injunction that stops someone from even talking about court proceedings? Do they concern matters of national security? No, they do not. This is just two ex-spouses hating each other. Pretty commonplace stuff, except for the celebrity element to it.

Mr. Kane is trying to enforce this Canadian judgment (*now this part is going to be hard to believe*) against Mr. Richie – to suppress his journalism. Specifically, Evander Kane wants to censor Nik Richie's interview with Ms. Kane. He first did so by sending threats to enforce it. Richie responded by educating Kane and his counsel about the existence of the First Amendment, the Fourteenth Amendment, and the SPEECH Act. But Evander persisted that the Canadian court's restriction on free speech as to Ms. Kane (which is of dubious enforceability itself) could also be enforced against an American journalist.

Where it gets even harder to believe is that Evander Kane *succeeded* (temporarily) in using this Canadian judgment to secure a gag order. It didn't last long, but the fact that it existed at all is repulsive to the First and Fourteenth Amendments. Orange County, California Superior Court entered an unlawful prior restraint against Richie, based on an ex parte application by Evander, in part relying on the Canadian judgment.

That prior restraint was vacated. However, Evander Kane continues to maintain that the Canadian judgment's restrictions on free speech are enforceable against third parties, in the United States of America. He has, for some unknown reason, domesticated that judgment in Santa Clara County, despite the fact that Ms. Kane lives in Michigan.

Mr. Richie requires declaratory relief that the Canadian injunction, domesticated or not, cannot be enforced to suppress his First Amendment rights in any forum, for any reason. A foreign

RANDAZZA | LEGAL GROUP

judgment arising from speech may neither be recognized nor enforced against an American in the United States. A judgment restraining speech, entered under foreign law that does not provide the protections guaranteed by the First Amendment, is inconsistent with the Constitution and laws of the United States and of California. No judgment or injunction can be enforced against someone who was neither a party to the proceedings nor was given an opportunity to be heard in them.

Evander Kane's "libel tourism," the practice of securing judgments against Americans' speech in foreign jurisdictions that afford lesser protection for speech, and then invoking those judgments in the United States, has the pernicious effect of chilling Americans' lawful, constitutionally protected speech. In 2010, Congress enacted the Securing the Protection of our Enduring and Established Constitutional Heritage Act (the "SPEECH Act"), 28 U.S.C. §§ 4101-05, to protect against that chilling effect. The SPEECH Act provides that foreign judgments arising from speech are not enforceable in the United States unless they satisfy American constitutional and legal standards, and it permits Americans to seek declaratory relief from foreign judgments that offend those standards. Richie seeks a declaration that the Canadian Judgment is repugnant to the Constitution and laws of the United States and the State of California and may not be recognized or enforced against him.

PARTIES

1. Plaintiff Richie is a natural person. He is, and at all relevant times was, a citizen of the United States and of the State of California. Richie is an American media personality, author, and commentator who publishes commentary to the public through online platforms, including his Instagram account and YouTube channel. As a citizen of the United States, Richie is a "United States person" within the meaning of 28 U.S.C. § 4101(6).

2. Defendant Evander Frank Kane is a natural person and a citizen of Canada. Mr. Kane is a professional ice hockey player in the National Hockey League and presently plays for the Vancouver Canucks. Mr. Kane maintains substantial and continuing contacts with the State of California, including but not limited to having obtained a permanent restraining order from the Superior Court of California, County of Santa Clara (Case No. 21FL002586) (the "DVRO"), as

RANDAZZA | LEGAL GROUP

well as previously playing for the San Jose Sharks. Mr. Kane is an applicant and judgment-creditor under a default judgment entered May 14, 2025, by the Court of King's Bench of Alberta, Canada (Court File No. 2403 24820) (the "Alberta Judgment"). *See* Alberta Judgment, attached as **Exhibit 1**. Through counsel, and as further alleged below, Mr. Kane sent a demand letter (the "Demand Letter") demanding that Richie remove published content from U.S.-based platforms and has threatened to pursue legal remedies against Mr. Richie in connection with that content, including on the basis of the Alberta Judgment. *See* Demand Letter, attached as **Exhibit 2**. On June 10, 2026, Mr. Kane registered the Alberta Judgment with the Superior Court of California, County of Santa Clara, showing an intent to attempt to enforce the judgment against Richie specifically, because Anna Kane—the only person actually enjoined by the Alberta Judgment—does not live in California.

JURISDICTION AND VENUE

3. This action arises and is brought under the SPEECH Act, 28 U.S.C. §§ 4101-05, and the Declaratory Judgment Act, 28 U.S.C. §§ 2201-02. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1332(a)(2), and 4101-05.

4. Venue is appropriate in this District pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to the claim occurred in this District.

5. Mr. Kane's contacts with California and this District subject him to this Court's jurisdiction. As set forth in further detail below, Mr. Kane:

a. Through counsel, emailed the Demand Letter to Richie in California on May 22, 2026, demanding that Richie take certain actions to benefit Mr. Kane, including removing and retracting published content concerning Mr. Kane from Richie's Instagram account, YouTube channel, and other platforms;

b. Invoked against Richie the DVRO against Anna Kane and the Alberta Judgment, asserting that Richie's publications in California violate those orders;

c. On or about June 5, 2026, filed a Request for Civil Harassment Restraining Orders against Richie in the Superior Court of California, County of Orange,

RANDAZZA | LEGAL GROUP

captioned *Kane v. Karamian*, Case No. 30-2026-01575619-CU-HR-CJC (the "Harassment Case");

d. Obtained, ex parte and without any appearance by Richie, a Temporary Restraining Order against Mr. Richie in the Harassment Case on June 8, 2026, restraining Mr. Richie's personal conduct and speech, including a 100-yard stay-away order and an order to cease specified social-media postings concerning Mr. Kane (*see* TRO in Harassment Case, attached as **Exhibit 3**);

e. Caused the court in the Harassment Case to set an Order to Show Cause re Civil Harassment, and an Order to Show Cause re Firearms Compliance, for hearing in Orange County on June 30, 2026;

f. Has threatened to pursue, and has pursued, legal remedies against Mr. Richie in connection with his published speech, including a threatened civil suit for defamation and aiding and abetting the violation of court orders, and the recovery of "all available damages"; and

g. Has registered the Alberta Judgment in a California state court in this District, despite Anna Kane, the only person enjoined by that judgment, not living in California.

DIVISIONAL ASSIGNMENT

6. This Action is assigned to the San Jose Division of this Court pursuant to L.R. 3-2(c) and (e), as it arises in Santa Clara County.

FACTUAL BACKGROUND

Nik Richie and his reporting on matters of public concern

7. Richie is an American media personality, author, and commentator. For two decades he has published commentary, reporting, and opinions to a national audience, and he publishes through online platforms including his Instagram account and YouTube channel.

8. Richie's commentary frequently concerns public figures and matters of public interest. His publications include interviews with individuals who have personal knowledge of

RANDAZZA | LEGAL GROUP

newsworthy events, together with Richie's own reporting and opinion. The publication of such commentary, including commentary critical of public figures, lies at the core of the protections afforded by the First Amendment to the United States Constitution and the law of California.

Richie's publications concerning Mr. Kane

9. Defendant Evander Frank Kane is a professional ice hockey player in the National Hockey League and a public figure.

10. On or about May 21, 2026, Mr. Richie published an interview with Anna Kane, the former wife of Mr. Kane, together with related commentary, on his Instagram account and YouTube channel (collectively, the "Publications"). The interview was titled "Nik Richie Sits Down With Anna Kane | The Ex-Wife of Disgraced NHL Star Evander Kane."

11. The Publications addressed Mr. Kane and matters of public concern. Mr. Kane contends that certain statements in the Publications are false and defamatory, and that they accuse him of criminal and immoral conduct, of having a contagious disease, and of sexual misconduct. The Publications are not actionable and are protected under the First Amendment and applicable law. Indeed, many of the statements of which Mr. Kane complained were mere recitations of allegations in other lawsuits previously filed against Mr. Kane.

Mr. Kane's demand and threats

12. On May 22, 2026, Mr. Kane, through his counsel, transmitted the Demand Letter to Richie.

13. The Demand Letter demanded that Richie issue a retraction, permanently remove the Publications, including the interview, from all platforms on which they appeared, and cease and desist from further publication concerning Mr. Kane.

14. The Demand Letter stated that, if Richie did not comply, Mr. Kane would commence a civil suit against him for, among other things, defamation *per se* and aiding and abetting the violation of court orders, and would seek to recover all available damages.

15. The Demand Letter asserted that statements in the Publications violate the DVRO and the Alberta Judgment, and purported to place Richie on formal notice of those orders.

RANDAZZA | LEGAL GROUP

The Alberta Judgment

16. On May 14, 2025, the Court of King's Bench of Alberta, Canada, entered the Alberta Judgment.

17. The Alberta Judgment was entered against Anna Kane. Richie was not a party to the Alberta proceeding, was not served in it, and no judgment was entered against Richie therein.

18. Among other things, the Alberta Judgment prohibits Ms. Kane from "posting anything to social media about" Mr. Kane, his children, or the parties' family dynamics, and from "disparaging him or his family" on "any form of social media." The Alberta Judgment states that it "remains in effect permanently and will not expire."

19. The Alberta Judgment arose from speech and was entered under the law of Canada, which does not provide as much protection for freedom of speech and of the press as is guaranteed by the First Amendment to the United States Constitution and by the constitution and law of the State of California.

20. The Alberta Judgment is a 'foreign judgment for defamation' within the meaning of 28 U.S.C. § 4101(1). It arises from Anna Kane's social media speech about Evander Kane and was entered in response to claims that this speech was harmful to Kane's reputation, and constituted harassment — all quintessential defamation allegations. It is defamation in disguise.

21. The fact that the relief granted was injunctive rather than a damages award does not remove it from the SPEECH Act's scope; § 4101(1) expressly encompasses injunctive and declaratory relief as well as damages.

22. The Alberta court's permanent prohibition on 'disparaging' Kane and discussing 'past legal proceedings' is speech-restrictive relief arising from allegedly defamatory statements.

The Harassment Case and the ex parte TRO

23. Rather than file a civil complaint, out in the open, in an adversary proceeding, Evander Kane scurried in the shadows to seek a Civil Harassment restraining order against Richie in an Orange County Court, ex parte. He did this on or about June 5, 2026.

RANDAZZA | LEGAL GROUP

24. On June 8, 2026, the court in the Harassment Case granted, ex parte and without any appearance by Richie, a Temporary Restraining Order against Richie. The court set an Order to Show Cause re Civil Harassment and an Order to Show Cause re Firearms Compliance for hearing on June 30, 2026.

25. The Temporary Restraining Order restrained Richie's speech: in an attachment to the order, the court ordered Mr. Richie to cease specified social-media postings concerning Mr. Kane. It did so in part out of deference to the Alberta judgment.

26. The Orange County court took judicial notice of the Alberta Judgment and, relying upon it, prohibited Richie from posting to social media content "as described or relayed to" Richie by Ms. Kane. The court thereby gave effect, against Richie, a non-party to the Alberta proceeding, to the speech restraints contained in the Alberta Judgment.

27. Mr. Kane also registered the Alberta Judgment with the Superior Court of Santa Clara County, California, despite Anna Kane, the only person enjoined by that judgment, not living in California.

28. The only purpose that could be served by domesticating the Alberta Judgment in California would be to try and shut down Richie's speech in the future, as Anna Kane resides in Michigan and Evander Kane has taken no known actions in Michigan.

The Alberta Judgment's effects on Richie

29. Through the Demand Letter, the Harassment Case, and registering the Alberta Judgment in a California court, Mr. Kane has invoked and obtained or sought to obtain the speech restrictive applications of the Alberta Judgment against Richie, a United States citizen, on the basis of the content of Richie's published speech.

30. The Alberta Judgment, and Mr. Kane's invocation and threatened further enforcement of it, have cast a shadow over the lawfulness of Richie's speech concerning Mr. Kane and are chilling his further speech on these matters of public concern, because not only has at least one state court judicial officer given it weight, but Mr. Kane clearly intends to keep using it to try and stifle Richie's reporting.

RANDAZZA | LEGAL GROUP

31. Richie reasonably apprehends that Mr. Kane will continue to invoke the Alberta Judgment, a foreign judgment arising from speech, to restrain and penalize Richie's speech in the United States, including by seeking its recognition or enforcement against him.

32. An actual and justiciable controversy therefore exists between Richie and Mr. Kane concerning whether the Alberta Judgment is repugnant to the Constitution and laws of the United States and the State of California and may be recognized or enforced against Mr. Richie in the United States.

FIRST CAUSE OF ACTION
Declaratory Judgment – First Amendment (28 U.S.C. §§ 2201-02)

33. Plaintiff re-alleges and incorporates Paragraphs 1–32 of this Complaint.

34. There is an actual justiciable controversy between Richie and Mr. Kane concerning whether the Alberta Judgment may be recognized or enforced against Richie in the United States. Mr. Kane has invoked the Alberta Judgment against Richie, has obtained an order in this District giving effect to its speech restraints against Richie, has threatened to enforce his asserted rights and to recover damages, and has registered the judgment in a court in this District.

35. It is abundantly clear from the face of the Alberta Judgment, and from the proceeding that led to its entry, that the law applied by the Court of King's Bench of Alberta does not provide a modicum of the protection for freedom of speech and press as the First Amendment to the United States Constitution. For example, and without limitation, the injunction does not protect a state interest of the highest order, nor is it narrowly tailored to achieve that objective, as would be necessary in the United States for such a prior restraint order to pass constitutional muster. Mr. Kane has not met, will not meet, and cannot meet these fundamental First Amendment requirements. Moreover, the injunction is facially overbroad: it permanently prohibits all future speech by Ms. Kane (and now Richie) about Mr. Kane and his family, and even entire court systems and legal proceedings.

36. The law applied by the Court of King's Bench of Alberta did not provide as much protection for freedom of speech as the constitution and law of the State of California would

RANDAZZA | LEGAL GROUP

provide. For example, and without limitation, the Alberta court did not afford the substantive protections that California's anti-SLAPP statute, Cal. Code Civ. Proc. § 425.16, provides to speech on matters of public interest, nor the heightened constitutional protections that California law affords to speech concerning public figures.

37. To the extent the Alberta Judgment is invoked or enforced against Richie, the speech at issue was not adjudicated under, and would be protected by, well-established First Amendment and California standards that the Alberta court did not apply, because, among other things: (a) Mr. Kane is a public figure who may not recover for speech concerning him absent clear and convincing proof of actual malice, a standard the Alberta court did not require; (b) certain of the challenged statements are constitutionally protected expressions of opinion or rhetorical hyperbole; (c) the challenged speech was not adjudicated to have been made with the requisite degree of fault under the governing constitutional standard; and/or (d) the Alberta Judgment was entered by default, without any adjudication of these constitutional protections.

38. The exercise of jurisdiction in the Alberta proceeding did not comport with the due process requirements imposed on domestic courts by the United States Constitution insofar as the Alberta Judgment is now sought to be applied against Richie. For example, and without limitation, Richie was not a party to the Alberta proceeding, was not served in it, and was afforded no notice and no opportunity to be heard before the Alberta Judgment was entered, yet Mr. Kane seeks to apply that judgment against him.

39. Therefore, Richie seeks a declaratory judgment that the Alberta Judgment is repugnant to the public policy and laws of the State of California and of the United States and is therefore not recognizable or enforceable against Richie in the United States.

The Alberta Judgment contains provisions that restrain speech in a manner that is inconsistent with the First Amendment, and thus those provisions cannot be enforced against Mr. Richie, nor any other third party, in the United States, and thus the domestication of the judgment must be declared unenforceable against Mr. Richie with respect to those provisions.

RANDAZZA | LEGAL GROUP

SECOND CAUSE OF ACTION
Declaratory Judgment - Fourteenth Amendment

40. Plaintiff re-alleges and incorporates Paragraphs 1–32 of this Complaint.

41. The Alberta Judgment was reached without due process, and thus must be declared invalid in the United States.

42. Even if due process was met in the first instance, the Alberta Judgment was entered without due process for Mr. Richie nor any other third party.

43. Given that Mr. Richie was a stranger to the proceeding, the Alberta Judgment cannot be enforced against Mr. Richie, nor any other third party, in the United States, and thus the domestication of the judgment must be declared unenforceable against Mr. Richie.

THIRD CAUSE OF ACTION
Declaratory Judgment Under the SPEECH Act (28 U.S.C. §§ 4101-05)

44. Plaintiff re-alleges and incorporates Paragraphs 1–32 of this Complaint.

45. The Alberta Judgment is a "foreign judgment for defamation" under the definitions provided by 28 U.S.C. § 4102.

46. It is apparent from the face of the Alberta Judgment that the law applied by the Canadian Court when it entered the injunction against Ms. Kane does not provide as much protection for freedom of speech and press as the First Amendment to the United States Constitution or the California Constitution. For example, and without limitation, the injunction does not protect a state interest of the highest order, nor is it narrowly tailored to achieve that objective, as would be necessary in the United States for such a prior restraint order to pass constitutional muster. Mr. Kane has not met – and cannot meet – these fundamental First Amendment requirements. Moreover, the injunction is facially overbroad: It prohibits *all* future speech by Ms. Kane about Mr. Kane or his fiancée, their children, Mr. and Ms. Kane's "family dynamics," Mr. and Ms. Kane's daughter, Ms. Kane's "parenting arrangements, about the court system, or about these or past legal proceedings or disparaging him or his family."

RANDAZZA | LEGAL GROUP

47. The law applied by the Canadian court when it entered the injunction against Ms. Kane did not provide as much protection for freedom of speech as California state and constitutional law would provide. For example, and without limitation, the Canadian Court did not grant the protections from Mr. Kane's baseless claims that would have been afforded by California's Anti-SLAPP statute, Cal. Code Civ. Proc. § 425.16.

48. Therefore, Richie seeks a declaratory judgment that the Alberta Judgment is repugnant to the Constitution and laws of the United States and California and cannot be recognized or enforced in the United States.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Nik Lamas-Richie respectfully requests that the Court:

1. Declare that the Alberta Judgment is repugnant to the United States Constitution and the laws of California and the United States;

2. Declare that the Alberta Judgment cannot be recognized or enforced in the United States;

3. Declare that any further state action by Mr. Kane based on the same speech would be subject to anti-SLAPP protection under California law;

4. Declare that the Alberta Judgment cannot be recognized or enforced in the United States, at least as to Mr. Richie; and

5. Grant Richie such further relief as the Court deems appropriate, including awarding Richie his attorneys' fees and costs.

DEMAND FOR JURY TRIAL

Plaintiff Nik Lamas-Richie demands a trial by jury on all issues so triable.

RANDAZZA | LEGAL GROUP

Dated: June 25, 2026.

Respectfully Submitted,

RANDAZZA LEGAL GROUP, PLLC

/s/ Marc J. Randazza

Marc J. Randazza, SBN 269535
Alex J. Shepard, SBN 295058
8991 W. Flamingo Rd., Ste. B
Las Vegas, Nevada 89147
Telephone: 702-420-2001
ecf@randazza.com

Attorneys for Hooman Abedi Karamian
a/k/a Nik Richie

RANDAZZA | LEGAL GROUP

Exhibit 1

Alberta Judgement

Attachment 5a(4)

Although posting to social media is usually not harassment as defined in Code of Civil Procedure 527.6, the court takes judicial notice of Santa Clara Superior Court case no. 21FL002586 in which the court issued a permanently extended domestic violence restraining order protecting both the present petitioner and his minor daughter Kensington. This makes the postings by respondent stating that petitioner has kidnapped Kensington false on their face and brings respondent's actions within the definition of a course of conduct that meets the definition of harassment under Code of Civil Procedure 527.6. Respondent's alleged conduct appears to be intended to persuade his social media followers to act against and to further harass petitioner. The court also finds the allegations meet the criteria set forth in People v. Planchard (2025) 109 Cal.App.5th 157 regarding social media posts that meet the definition of stalking under Penal Code 646.9, which in turn constitutes harassment as defined in Code of Civil Procedure 527.6. Respondent is therefore ordered to cease any posting to social media alleging petitioner has kidnapped his daughter.

The court also takes judicial notice of Court of King's Bench of Alberta case no. 2403 24820 in which Deanna Kane aka Anna Kane aka Deanna Snowball aka Deanna Nystead ("Deanna Kane") was specifically restrained by the court from "posting anything to social media" about the petitioner or his children or "disparaging him or his family." Based on the allegations made in the petition, respondent has been assisting in the violation of this order by posting or reposting such content by the party prohibited from doing so. Respondent is therefore prohibited from posting anything to social media (including but not limited to Instagram, Facebook, X (formerly Twitter), or any other social media platform) regarding petitioner or his daughter Kensington as described or relayed to respondent by Deanna Kane.

As to petitioner's claim that respondent has defamed petitioner by false allegations of rape or transmission of a sexually transmitted disease, petitioner may pursue his claim for monetary damages or other injunctive relief in a court of competent jurisdiction (although as noted in the preceding paragraph to the extent respondent is posting or reposting such allegations made by Deanna Kane, he is prohibited from doing so by the terms of this TRO).

Exhibit 2

Demand Letter

BLANKROME
1271 Avenue of the Americas | New York, NY 10020
blankrome.com

Phone: *(212) 885-5000*
Fax: *(212) 885-5001*
Email: *craig.weiner@blankrome.com*

May 22, 2026

BY EMAIL

Nik Richie
nik@wn-agency.com

Re: Notice of Defamation *Per Se* and Demand for Immediate Retraction

Dear Mr. Richie:

We represent Evander Kane in the above-referenced matter, and write regarding the false and defamatory statements you recently made, published, and disseminated on social media concerning our client.

This letter demands that you issue a prompt retraction, correction, and repudiation of the statements identified in this letter. The accusations you made, published, and disseminated are serious and have caused and will continue to cause significant damage to Mr. Kane's valuable reputation unless withdrawn. Additionally, this letter demands that you immediately cease and desist from further publication or dissemination of such false and defamatory statements.

Background

As you are aware, Mr. Kane is a well-known Canadian professional ice hockey player. He played for the Atlanta Thrashers, Winnipeg Jets, Buffalo Sabres, San Jose Sharks, Edmonton Oilers, and Vancouver Canucks of the National Hockey League (NHL). He was selected fourth overall by the Thrashers in the first round of the 2009 NHL entry draft.

Mr. Kane has been granted various orders in the United States and Canada against his ex-wife Deanna Kane a/k/a Anna Kane, including: (i) a Permanent Restraining Order, granted July 10, 2024, by the Superior Court of California, and (ii) a Default Judgment, granted May 14, 2025, by the Court of King's Bench of Alberta. A copy of the Permanent Restraining Order is attached hereto as **Exhibit A** and a copy of the Default Judgment is attached hereto as **Exhibit B**.

The Permanent Restraining Order provides: "You [Ms. Kane] must not do the following things to [Mr. Kane] … annoy by phone or other electronical means (including repeatedly contact), or disturb the peace." Exhibit A at 7 ("Order to Not Abuse"). "'Disturb the peace' means to destroy someone's mental or emotional calm. This can be done directly or indirectly, such as through someone else. This can also be done in any way, such as by phone, over text, or online." *Id.* The

Permanent Restraining Order also provides: "You [Ms. Kane] must not contact [Mr. Kane] …, directly or indirectly, by any means, including by telephone, mail, email, or other electronic means." *Id.* ("No-Contact Order"). The Permanent Restraining Order is "PERMANENTLY EXTENDED" and "DOES NOT EXPIRE." *Id.* at 4.

The Default Judgment provides: "The Defendant [Ms. Kane] is hereby prohibited from posting anything to social media about the Plaintiffs [Mr. Kane and Mara Teigen], the Plaintiffs' children, about the parties' family dynamics, about KENSINGTON KANE, or the Defendant's parenting arrangements, about the court system, or about these or past legal proceedings or disparaging him or his family. The Defendant may not post about these topics on any form of social media, including but not limited to Instagram, Facebook X (formerly Twitter), or any other social media platform." Exhibit B § 2.B. The Default Judgment "remains in effect permanently and will not expire." *Id.* § 2.G.

Nevertheless, Mr. Kane has recently learned that you have published and disseminated multiple false and defamatory statements made by Ms. Kane about Mr. Kane on your Instagram account and YouTube channel. You yourself have also made false and defamatory statements concerning Mr. Kane. The statements at issue include, *but are not limited to*, the following:

(i) You: "This man used a cancer victim a child cancer victim and used the child to get to the mother to r-ape the mother …. He went to take pictures and befriend a young girl who's dying of cancer and ended up r-aping the mother of that child …. Not only that he stole his daughter kidnapped his daughter," https://www.instagram.com/reel/DXxthGvspGU/;

(ii) You: "WE WILL NOT let her [Mara Teigen] and her R-Ape addict baby daddy get away with this," https://www.instagram.com/reel/DYYAKPdyrOD/;

(iii) Ms. Kane: "He shoves her [third party] down … locks the door and brutally rapes her where she after the rape she had to go to the hospital because she was bleeding she was gonna bleed to death because of what he did to her …. Her parents had to come to the hospital because of her um the damage that … he had done to her body. She had to have emergency surgery on her ," https://www.instagram.com/reel/DYlFtnfurFv/?igsh=YmM3MmdkdDVvaTdm;

(iv) Ms. Kane: "He is like the … serial rapists that have raped 50 to 100 women. I think he wakes up every day and looks for prey. I think he he needs to be incarcerated," *id.*;

(v) You: "Her husband's cheating cost her baby's life," https://www.instagram.com/reel/DYk8p9fhpNN/?igsh=MWM4dW51N2c2Y3U4cQ==;

(vi) Ms. Kane: "Eva passed away because at 28 weeks um because Evander was cheating on me and he gave me gonorrhea when I was pregnant and my baby's brain got infected and my baby's brain stopped developing and I had to basically give birth to my child that was not alive," *id.*;

(vii) Ms. Kane: "I took a pregnancy test on September 28th and we got married September 11th. It's a form of control," *id.*;

(viii) Ms. Kane: "I went to the hospital by myself and he didn't come because he was golfing. I was bleeding like a murder scene … it was just a lot of blood and very painful and I'm in the hospital room by myself … he didn't come. He no-showed so they couldn't do surgery on me, so I had to wait there for two days to get the surgery because I couldn't drive home after the surgery and none of nobody in his family and him would come and help me," *id.*;

(ix) Ms. Kane: "I found out now that he was he had all these girls every day in our apartment," *id.*;

(x) You: "Kidnapped from Mom's Arms," https://www.instagram.com/reel/DYm-QdGp94w/?igsh=MTBsOTV3M2Rpa3Fucw==;

(xi) You: "This was the plan to … kidnap Kensington," *id.*;

(xii) Ms. Kane: "This was his plan to take Kensington … he ripped her from my arms. He ripped her screaming out of my arms …. I was pregnant in when he left me for Mara Mara Teigen his fiancé so I decided and he told me to get an abortion because she was pregnant at the same time …. He did this to me because he saw me after Eva died … and he saw me cry every day and so he knew if I take Kensington she's gonna I mean what mother wouldn't go crazy…. So oh I'm gonna I'm gonna take this child away this child is a pawn and we are going to watch her lose her mind," *id.*; and

(xiii) Multiple statements made by both you and Ms. Kane throughout the YouTube interview titled "Nik Richie Sits Down With Anna Kane | The Ex-Wife of Disgraced NHL Star Evander Kane" and posted on May 21, 2026, https://www.youtube.com/watch?v=ztm4xF9h92U.

(collectively, the "Defamatory Statements").

The Defamatory Statements have significantly harmed Mr. Kane's personal and professional reputation. The Defamatory Statements are manifestly untrue and clearly defamation *per se* under relevant law as they falsely accuse Mr. Kane of having committed a crime and immoral conduct; having a contagious, infectious, and "loathsome" disease; and engaging in

BLANKROME

sexual misconduct and being unchaste; the statements are also harmful to his profession as a public figure and professional athlete. The Defamatory Statements made by Ms. Kane—that you actively elicited, published, and disseminated—also violate both the Permanent Restraining Order and the Default Judgment, of which you are now on formal notice.

Demand for Retraction

On behalf of Mr. Kane, we demand that you immediately issue a retraction, correction, and repudiation of the Defamatory Statements on all platforms that you published them to in order to prevent further irreparable harm to Mr. Kane and his reputation. For the avoidance of doubt, we demand that you permanently remove the interview between you and Ms. Kane from all platforms that it was published to, including Instagram and YouTube. We also demand that you cease and desist from making, publishing, and disseminating any such further statements. We are available to discuss an appropriate method by which a retraction can be issued.

If no retraction is undertaken immediately, we are authorized to take any and all action necessary to protect Mr. Kane's rights, clear his name, and prevent further harm to his reputation. We will file a civil suit for, among other things, defamation *per se* and aiding and abetting the violation of court orders, and seek to recover all available damages.

This letter is not intended to be a complete statement of the facts or law, and nothing herein shall be deemed a waiver of any of Mr. Kane's rights or remedies, all of which are expressly reserved.

Sincerely,

/s/ Craig Weiner

Craig Weiner

Exhibit A

DV-730 Order to Renew Domestic Violence Restraining Order

Clerk stamps date here when form is filed.

Filed
July 10, 2024
Clerk of the Court
Superior Court of CA
County of Santa Clara
21FL002586
By: lcastillo

Instructions: *Restraining Order After Hearing* (form DV-130, JV-255, or JV-265) must be attached to this form.

Fill in court name and street address:

Superior Court of California, County of
Santa Clara
201 N. First St.
191 N. First St.
San Jose, CA 95113
Family Justice Center

Fill in case number:

Case Number:
21FL002586

1 Protected Person

Name: Evander Kane

2 Restrained Person

Full Name: Deanna Sara Jeanne Kane

Address: 15411 Collinson Ave

City: East Pointe State: MI Zip: 48021

3 Renewal and Expiration

The request to renew the attached restraining order is:

a. ☉ **Granted.**

The attached restraining order is renewed and will *(check one):*

(1) ☐ Expire on *(must be renewed for at least five years)*
(date): _____ *(time):* _____ ☐ a.m. ☐ p.m. ☐ midnight

(2) ☉ Not expire (permanent order)

*(*Child custody and visitation, property, and support orders may have been changed (modified) and may be different from those issued on the attached restraining order.)*

b. ☐ **Denied.** The attached restraining order expires as stated in that order.

This is a Court Order.

Case Number: 21FL002586

4 Hearing

There was a hearing on *(date):* 7/09/2024 at *(time):* 9:00 ☑ a.m. ☐ p.m.

These people were at the hearing *(check all that apply):*

☑ The person in 1 ☑ The lawyer for the person in 1 *(name):* Karlina Paredes

☐ The person in 2 ☐ The lawyer for the person in 2 *(name):* _____

5 Lawyer's Fees and Costs

The person ☐ in 1 ☐ in 2 must pay the following lawyer's fees and costs:

Pay to: _____ For: _____ Amount: $ _____ Due date: _____

Pay to: _____ For: _____ Amount: $ _____ Due date: _____

6 Service by Person in

(Check a or b.)

a. ☐ **No other proof of service is needed.** The people in 1 and 2 attended the hearing, either physically or remotely (by telephone or videoconference), or agreed in writing to this order.

b. ☑ **The person in 2 was not present.** The person in 1 must have person in 2 served with a copy of this order by *(check all that apply):*

(1) ☑ Mail (at the address listed on form DV-710)

(2) ☑ Other: Email to annakane0112@gmail.com

(3) ☐ The court has scheduled a firearms and ammunition compliance hearing. The person in 1 must have person in 2 served with a copy of this order by:

(a) ☐ Personal service by *(date):* _____

(b) ☐ Mail at the person in 2 's last known address by *(date):* _____

This is a Court Order.

Case Number:
21FL002586

7 No Fee to Serve (Notify) Restrained Person

The sheriff or marshal will serve this order for free. If you want the sheriff to serve your papers, (1) complete form SER-001, *Request for Sheriff to Serve Court Papers,* and (2) give form SER-001 and a copy of this order to the sheriff.

8 Attached Pages

All of the attached pages are part of this order.

a. Number of pages attached to this three-page form: 10

b. Attachments include forms *(check all that apply):*

☐ DV-820 ☒ Other: DV130 7/9/2024 4:49:04 PM

Judge's Signature

Date: 7/9/2024

Judge or Judicial Officer

Certificate of Compliance With VAWA

This restraining (protective) order meets all "full faith and credit" requirements of the Violence Against Women Act, 18 U.S.C. section 2265 (1994) (VAWA) upon notice of the restrained person. This court has jurisdiction over the parties and the subject matter; the restrained person has been or will be afforded notice and a timely opportunity to be heard as provided by the laws of this jurisdiction. This order is valid and entitled to enforcement in each jurisdiction throughout the 50 states of the United States, the District of Columbia, all tribal lands, and all U.S. territories, commonwealths, and possessions and shall be enforced as if it were an order of that jurisdiction.

(The clerk will fill out this part.)

Clerk's Seal, if any

—Clerk's Certificate—

I certify that this *Order on Request to Renew Restraining Order (form DV-730)* is a true and correct copy of the original on file in the court.

Date: 7/10/2024 Clerk, by lcastillo, Deputy

This is a Court Order.

DV-130 Restraining Order After Hearing (Order of Protection)

☐ Original Order ☑ First Amended Order

Clerk stamps date here when form is filed.

Filed
July 10, 2024
Clerk of the Court
Superior Court of CA
County of Santa Clara
21FL002586
By: lcastillo

Fill in court name and street address:

Superior Court of California, County of
Santa Clara
201 N. First St.
191 N. First St.
San Jose, CA 95113
Family Justice Center

Clerk fills in case number when form is filed.

Case Number:
21FL002586

1 Protected Person *(name):*

Evander Kane

2 Restrained Person

***Full Name:** Deanna Sara Jeanne Kane
***Gender:** ☐ M ☑ F ☐ Nonbinary ***Race:** White
***Age:** 38 *(estimate, if age unknown.)* Date of Birth: 1/12/1986
Height: 5'4" Weight: 125
Hair Color: Blonde Eye Color: Brown
Relationship to person in 1: Ex-Wife

Address of restrained person: 15411 Collinson Ave
City: East Pointe State: MI Zip: 48021

(**Information that has a star (*) next to it is required** to add this order into a California police database. Give all the information you know.)

3 ☑ Other Protected People

In addition to the person in 1, the following persons are protected by orders as indicated in items 11 through 14.

Full name	Relationship to person in 1	Age
Mara Teigen [d.o.b. 8/23/1994]	Girlfriend	29
Kensington Kane [d.o.b. 7/3/2020]	Daughter	4
Iverson Kane [d.o.b. 5/25/2022]	Son	2
Hendrix Kane [d.o.b. 6/20/2023]	Son	1

☐ Check here if you need to list more people. List them on a separate piece of paper, write "DV-130, Other Protected People" at the top, and attach it to this form.

4 Expiration Date

This restraining order, except the orders noted below,* end on: *PERMANENTLY EXTENDED PER DV730

(date): DOES NOT EXPIRE at *(time):* DOES NOT EXPIRE ☐ a.m. ☐ p.m. or ☐ midnight

***Custody, visitation, child support, and spousal support orders remain in effect after the restraining order ends. Custody, visitation, and child support orders usually end when the child is 18.**

- If no date is written, the restraining order ends five years after the date of the hearing in item 5.
- If no time is written, the restraining order ends at midnight on the expiration date.

This order must be enforced throughout the United States. See page 9.

This is a Court Order.

Case Number: 21FL002586

5 Hearing

a. The hearing was on *(date):* 7/9/2024 with *(name of judicial officer):* Hon. Christine Garcia-Sen

b. These people were at the hearing *(check all that apply):*

- ☑ The person in 1 ☑ The lawyer for the person in 1 *(name):* Karlina Paredes
- ☐ The person in 2 ☐ The lawyer for the person in 2 *(name):* _____

6 ☐ Future Court Hearing

The ☐ person in 1 ☐ person in 2 must attend court on:

Date: _____ Department: _____

Time: _____ ☐ a.m. ☐ p.m. to review *(list issues):* _____

_____

To the Person in 2

The court has granted a long-term restraining order. See 7 through 29. If you do not obey these orders, you can be charged with a crime, go to jail or prison, and/or pay a fine. It is a felony to take or hide a child in violation of this order.

7 No Firearms (Guns), Firearm Parts, or Ammunition

a. You cannot own, possess, have, buy or try to buy, receive or try to receive, or in any other way get any prohibited item listed below in b.

b. **Prohibited items are**

(1) Firearms;

(2) Firearm parts, meaning receivers, frames, and any item that may be used as or easily turned into a receiver or frame (see Penal Code section 16531); and

(3) Ammunition.

c. Within 24 hours of receiving this order, you must sell to or store with a licensed gun dealer, or turn in to law enforcement, any prohibited items you have in your immediate possession or control.

d. If law enforcement asks you for your prohibited items, you must turn them over immediately.

e. Within 48 hours of receiving this order, you must file a receipt with the court that proves all prohibited items have been turned in, sold, or stored. (You may use form DV-800/JV-270, *Receipt for Firearms, Firearm Parts, and Ammunition.*) If law enforcement served you with the restraining order, you must give a copy of the receipt to that law enforcement agency.

f. ☐ Limited Exemption: The judge has made the necessary findings to grant an exemption under Family Code section 6389(h). Under California law, the person in 2 is not required to relinquish this firearm *(make, model, and serial number of firearm):* _____ but must only have it during scheduled work hours and to and from their place of work. Even if exempt under California law, the person in 2 may be subject to federal prosecution for possessing or controlling a firearm.

This is a Court Order.

Case Number: 21FL002586

8 ☐ Restrained Person Has Prohibited Items

The court finds that you have the following prohibited items:

a. **Firearms and/or firearm parts**

Description *(include serial number, if known)*	Location, if known	Proof of compliance received by the court
(1) _____	_____	☐ *(date):* _____
(2) _____	_____	☐ *(date):* _____
(3) _____	_____	☐ *(date):* _____
(4) _____	_____	☐ *(date):* _____

b. **Ammunition**

Description	Amount, if known	Location, if known	Proof of compliance received by the court
(1) _____	_____	_____	☐ *(date):* _____
(2) _____	_____	_____	☐ *(date):* _____
(3) _____	_____	_____	☐ *(date):* _____
(4) _____	_____	_____	☐ *(date):* _____

☐ Check here to list additional items. List them on a separate piece of paper, write "DV-130, Restrained Person Has Prohibited Items" at the top, and attach it to this form.

9 ☐ Restrained Person Has Not Complied With Surrendering Prohibited Items

a. The court finds that you have not fully complied with the orders previously granted on *(date):* _____
The court has not received a receipt or proof of compliance for all the items listed 8.

b. Notify Law Enforcement
The court will immediately notify the following law enforcement agency of this violation
(law enforcement agency or agencies): _____

c. Notify Prosecutor
The court will immediately notify the following prosecuting agency of this violation
(prosecuting agency): _____

10 ☐ Court Hearing to Review Firearms (Guns), Firearm Parts, and Ammunition Compliance

You must attend the court hearing in 6 to prove that you have properly turned in, sold, or stored all prohibited items (described in 7 b) you still have or own, including any items listed in 8. If you do not attend the court hearing listed in 6, a judge may find that you have violated the restraining order and notify law enforcement and a prosecuting attorney of the violation.

This is a Court Order.

Case Number:
21FL002586

11 Cannot Look for Protected People

You must not take any action to look for any person protected by this order, including their addresses or locations.

☐ If checked, this order was not granted because the judge found good cause not to make the order.

12 ☑ Order to Not Abuse

You must not do the following things to the person in (1) and any person listed in (3):

- Harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, molest, destroy personal property, keep under surveillance, impersonate (on the internet, electronically, or otherwise), block movements, annoy by phone or other electronic means (including repeatedly contact), or disturb the peace.
- "Disturb the peace" means to destroy someone's mental or emotional calm. This can be done directly or indirectly, such as through someone else. This can also be done in any way, such as by phone, over text, or online. Disturbing the peace includes coercive control.
- "Coercive control" means a number of acts that unreasonably limit the free will and individual rights of any person protected by this restraining order. Examples include isolating them from friends, relatives, or other support; keeping them from food or basic needs; controlling or keeping track of them, including their movements, contacts, actions, money, or access to services; and making them do something by force, threat, or intimidation, including threats based on actual or suspected immigration status. Coercive control includes reproductive coercion meaning controlling someone's reproductive choices, such as using force, threat, or intimidation to pressure someone to be or not be pregnant, and to control or interfere with someone's contraception, birth control, pregnancy, or access to health information.

13 ☑ No-Contact Order

a. You must **not contact** ☑ the person in (1), ☑ the persons in (3), directly or indirectly, by any means, including by telephone, mail, email, or other electronic means.

b. ☑ Exception to 13a:
   (1) ☑ You may have brief and peaceful contact with the person in (1) to only communicate about your children for court-ordered visits.
   (2) ☑ You may have contact with your children only during court-ordered contact or visits.
   (3) ☐ Other *(explain)*: _____

c. Peaceful written contact through a lawyer or process server or another person for service of legal papers related to a court case is allowed and does not violate this order.

This is a Court Order.

Case Number:

14 Stay-Away Order

a. You **must** stay at least *(specify):* _____ yards away from *(check all that apply):*

- ☑ Person in (1).
- ☑ Home of person in (1).
- ☑ Job or workplace of person in (1).
- ☑ Vehicle of person in (1).
- ☐ School of person in (1).
- ☑ Persons in (3).
- ☑ Children's school or child care.
- ☐ Other *(specify):* _____

b. ☑ Exception to 14a:

The stay-away orders do not apply:

(1) ☑ For you to exchange your children for court-ordered visits. You must do so briefly and peacefully.

(2) ☑ For you to visit with your children for court-ordered contact or visits.

(3) ☐ Other *(explain):* _____

15 Order to Move Out

You must move out immediately from *(address):*

_____

16 Other Orders

_____

_____

17 Child Custody and Visitation Order

The judge has granted orders regarding minor children. The orders are included on **form DV-140**, and *(list other form):* _____

18 Protect Animals

a. ☐ You must stay at least _____ yards away from the animals listed below.

b. ☐ You must not take, sell, hide, molest, attack, strike, threaten, harm, get rid of, transfer, or borrow against the animals.

c. ☐ The person in (1) is given the sole possession, care, and control of the animals listed below.

Name *(or other way to ID animal)*	Type of animal	Breed *(if known)*	Color

This is a Court Order.

Case Number:

1 ☐ Control of Property

Only the person in (1) can use, control, and possess the following property:

20 ☐ Health and Other Insurance

The person ☐ in (1) ☐ in (2) is ordered **not** to cash, borrow against, cancel, transfer, dispose of, or change the beneficiaries of any insurance or coverage held for the benefit of the parties, or their children, if any, for whom support may be ordered, or both.

21 ☉ Record Communications

The person in (1) may record communications made by the person in (2) that violate this order.

22 ☐ Property Restraint

The person ☐ in (1) ☐ in (2) must not transfer, borrow against, sell, hide, or get rid of or destroy any property, including animals, except in the usual course of business or for necessities of life. In addition, each person must notify the other of any new or big expenses and explain them to the court. (If the court granted the order in (13), the person in (2) must not contact the person in (1). To notify the person in (1) of new or big expenses, have a server mail or personally give the information to the person in (1) or contact their lawyer, if they have one.)

23 ☐ Pay Debts (Bills) Owed for Property

a. You must make these payments until this order ends:

(1) Pay to: _____ For: _____ Amount: $_____ Due date: _____

(2) Pay to: _____ For: _____ Amount: $_____ Due date: _____

(3) Pay to: _____ For: _____ Amount: $_____ Due date: _____

b. ☐ The court finds that the debt or debts listed above in ☐ a(1) ☐ a(2) ☐ a(3) were the result of abuse in this case, and made without the person in (1)'s agreement.

This is a Court Order.

Case Number:

24 ☐ Pay Expenses Caused by the Abuse

You must pay the following:

Pay to: _____ For: _____ Amount: $ _____ Due date: _____
Pay to: _____ For: _____ Amount: $ _____ Due date: _____
Pay to: _____ For: _____ Amount: $ _____ Due date: _____

25 ☐ Child Support

Child support is ordered on the attached form FL-342, *Child Support Information and Order Attachment* or *(list other form):* _____

26 ☐ Spousal Support

Spousal support is ordered on the attached form FL-343, *Spousal, Partner, or Family Support Order Attachment* or *(list other form):* _____

27 ☐ Lawyer's Fees and Costs

You must pay the following lawyer's fees and costs:

Pay to: _____ For: _____ Amount: $ _____ Due date: _____
Pay to: _____ For: _____ Amount: $ _____ Due date: _____

28 ☐ Batterer Intervention Program

a. The person in (2) must go to and pay for a probation certified 52-week batterer intervention program and show proof of completion to the court.

b. The person in (2) must enroll by *(date):* _____ or if no date is listed, must enroll within 30 days after the order is made.

c. The person in (2) must complete, file, and serve form DV-805, *Proof of Enrollment for Batterer Intervention Program.*

2 ☐ Transfer of Wireless Phone Account

The court has made an order transferring one or more wireless service accounts from you to the person in (1). These orders are contained on form DV-900, *Order Transferring Wireless Phone Account.*

This is a Court Order.

Case Number:
21FL002586

30 Service

(Check a, b, or c)

a. ☐ **No other proof of service is needed.** The people in 1 and 2 attended the hearing, either physically or remotely (by telephone or videoconference), or agreed in writing to this order.

b. ☐ **The person in 2 was not present.** Proof of service of form DV-109 and form DV-110 (if issued) was presented to the court. *(Check all that apply):*

(1) ☐ This order can be served by mail. The judge's orders in this form are the same as in form DV-110 except for the expiration date. The person in 2 must be served, either by mail or in person.

(2) ☐ This order must be personally served. The judge's orders in this form are different from the orders in form DV-110, or form DV-110 was not issued. The person in 2 must be personally served (given) a copy of this order.

(3) ☐ The court has scheduled a firearms and ammunition compliance hearing. The person in 1 must have a copy of this order served on the person in 2 by:

(A) ☐ Personal service by *(date):* _____

(B) ☐ Mail at the person in 2's last known address by *(date):* _____

c. ☒ **Proof of service of form FL-300 to modify the orders in form DV-130 was presented to the court.**

(1) ☐ The people in 1 and 2 attended the hearing or agreed in writing to this order. No other proof of service is needed.

(2) ☒ The person ☐ in 1 ☒ in 2 did not attend the hearing and must be personally served (given) a copy of this amended (modified) order. shall be served as set forth on the attached DV730.

31 No Fee to Serve (Notify) Restrained Person

The sheriff or marshal will serve this order for free. If you want the sheriff to serve your papers, (1) complete form SER-001, *Request for Sheriff to Serve Court Papers*, and (2) give the completed form and a copy of this order to the sheriff.

32 ☐ Attached pages

All of the attached pages are part of this order.

a. Number of pages attached to this 10-page form: _____

b. Attachments include forms *(check all that apply):*

☐ DV-140 ☐ DV-145 ☐ DV-900 ☐ DV-314(C) ☐ FL-342 ☐ FL-343 ☐ Other: _____

7/9/2024 4:50:18 PM

Judge's Signature

Date: 7/9/2024

Judge or Judicial Officer

This is a Court Order.

Case Number:

Certificate of Compliance With VAWA

This restraining (protective) order meets all "full faith and credit" requirements of the Violence Against Women Act, 18 U.S.C. section 2265 (1994) (VAWA) upon notice of the restrained person. This court has jurisdiction over the parties and the subject matter; the restrained person has been or will be afforded notice and a timely opportunity to be heard as provided by the laws of this jurisdiction. **This order is valid and entitled to enforcement in each jurisdiction throughout the 50 states of the United States, the District of Columbia, all tribal lands, and all U.S. territories, commonwealths, and possessions and shall be enforced as if it were an order of that jurisdiction.**

Instructions for Law Enforcement

Start Date and End Date of Orders

This order starts on the earlier of the following dates:

- The hearing date in item (5)(a) on page 2; or
- The date next to the judge's signature on this page.

This order ends on the expiration date in (4). If no date is listed, they end three years from the hearing date.

Duties of Officer Serving This Order

The officer who serves this order on the Restrained Person must do the following:

- Ask if the Restrained Person is in possession of any of the prohibited items listed in (7)b, or has custody or control of any that they have not already turned in.
- Order the Restrained Person to immediately surrender to you all prohibited items.
- Issue a receipt to the Restrained Person for all prohibited items that have been surrendered.
- Complete a proof of personal service and file it with the court. You may use form DV-200 for this purpose.
- Within one business day of service, submit the proof of service directly into the California Restraining and Protective Order System (CARPOS), including the serving officer's name and law enforcement agency.

Enforcing the Restraining Order in California

Any law enforcement officer in California who receives, sees, or verifies the orders on a paper copy, in the California Law Enforcement Telecommunications System (CLETS), or in an NCIC Protection Order File must enforce the orders.

Notice Proof of Service

Law enforcement must first determine if the restrained person had notice of the orders. If notice cannot be verified, the restrained person must be advised of the terms of the orders. If the restrained person then fails to obey the orders, the officer must enforce them. (Family Code, section 6383.)

Consider the restrained person "served" (notified) if:

- The officer sees a copy of the *Proof of Service* or confirms that the *Proof of Service* is on file; *or*
- The restrained person attended the hearing (see (30)) or was informed of the order by an officer. (Family Code section 6383; Penal Code section 836(c)(2).) An officer can obtain information about the contents of the order in the California Restraining and Protective Order System (CARPOS). (Family Code section 6381(b)-(c).)

This is a Court Order.

Case Number:
21FL002586

Arrest Required if Order Is Violated

If an officer has probable cause to believe that the restrained person had notice of the order and has disobeyed the order, the officer must arrest the restrained person. (Penal Code sections 836(c)(1), 13701(b).) A violation of the order may be a violation of Penal Code section 166 or 273.6.

If the Protected Person Contacts the Restrained Person

Even if the protected person invites or consents to contact with the restrained person, the orders remain in effect and must be enforced. The protected person cannot be arrested for inviting or consenting to contact with the restrained person. The orders can be changed only by another court order. (Penal Code section 13710(b).)

Child Custody and Visitation

Child custody and visitation orders are listed on form DV-140 or another attached form. If the judge made these orders, look at (13) and (14) of this order to see if the judge granted an exception for brief and peaceful contact with the person in (1) as needed to follow court-ordered visits. Contact by the person in (2) that is **not** brief and peaceful is a violation of this order.

Conflicting Orders—Priorities for Enforcement

If more than one restraining order has been issued protecting the protected person from the restrained person, the orders must be enforced in the following priority (see Penal Code, section 136.2 and Family Code, sections 6383(h)(2), 6405(b)):

1. **Emergency Protective Order (EPO):** If one of the orders is an *Emergency Protective Order* (form EPO-001), provisions (e.g., stay away order) that are more restrictive than in the other restraining/protective orders must be enforced. Provisions of another order that do not conflict with the EPO must be enforced.
2. **No-Contact Order:** If a restraining/protective order includes a no-contact order, the no-contact order must be enforced. Item (13) is an example of a no-contact order.
3. **Criminal Protective Order (CPO):** If none of the orders include an EPO or a no-contact order, the most recent CPO must be enforced. (Family Code sections 6383(h)(2) and 6405(b)). Additionally, a CPO issued in a criminal case involving charges of domestic violence, Penal Code sections 261, 261.5, or former 262, or charges requiring sex offender registration must be enforced over any civil court order. (Penal Code section 136.2(e)(2)). All provisions in the civil court order that do not conflict with the CPO must be enforced.
4. **Civil Restraining Orders:** If there is more than one civil restraining order (e.g., domestic violence, juvenile, elder abuse, civil harassment), then the order that was issued last must be enforced. Provisions that do not conflict with the most recent civil restraining order must be enforced.

(The clerk will fill out this part.)

Clerk's Certificate (DV-130)

—Clerk's Certificate—

I certify that this *Restraining Order After Hearing (Order of Protection)* is a true and correct copy of the original on file in the court.

Date: 7/10/2024 Clerk, by lcastillo, Deputy

This is a Court Order.

Exhibit B

COURT FILE NUMBER	2403 24820
COURT	COURT OF KING'S BENCH OF ALBERTA
JUDICIAL CENTRE	Edmonton
APPLICANT(S)	EVANDER KANE and MARA TEIGEN
RESPONDENT(S)	DEANNA KANE, also known as ANNA KANE, also known as DEANNA SNOWBALL, also known as DEANNA NYSTEAD
DOCUMENT	DEFAULT JUDGMENT
ADDRESS FOR SERVICE AND CONTACT INFORMATION OF PARTY FILING THIS DOCUMENT	MICHELE J. REEVES, KC Attia Reeves Barristers & Solicitors #200, 10525 Jasper Avenue, Edmonton, AB T5J 1Z4 T: 780-424-3334/F: 780-424-4252 Email: angi@reeveslaw.ca File: 9587

Clerk's Stamp

TG ent

DATE ON WHICH ORDER WAS PRONOUNCED: May 14, 2025

LOCATION OF HEARING: **Edmonton Law Courts, Edmonton, Alberta**

NAME OF JUSTICE WHO GRANTED THIS JUDGMENT: K. L. Becker Brookes

UPON HAVING HEARD representations by counsel for the Plaintiffs;

AND ON NOTING the Protection Order of Justice G.R. Fraser granted October 6, 2023, filed;

AND ON NOTING the permanent Restraining Order granted July 10, 2024 in the Superior Court of California, County of Santa Clara, USA;

AND UPON NOTING the Permanent Restraining Order of Justice J. C. Leonard granted December 18, 2024;

AND UPON NOTING the Order of Justice J.S. Little granted February 10, 2025;

AND UPON NOTING the Defendant has not filed nor served a Statement of Defence and has been Noted in Default;

IT IS HEREBY ORDERED AND ADJUDGED THAT:

1. The Plaintiffs are hereby granted Judgement against the Defendant for damages, such damages to be assessed by a Justice of the Court of King's Bench on a date set by the Plaintiff without the necessity of notice to the Defendant or the Defendant's consent pursuant to Rule 6.4 of the Alberta Rules of Court.

2. The Plaintiffs shall have Judgment against the Defendant such that:

A. The Defendant(s) DEANNA KANE, also known as ANNA KANE, also known as DEANNA SNOWBALL, also known as DEANNA NYSTEAD is specifically restrained from being within 300 yards of (275 metres) of:

i. Evander Kane, Mara Teigen, Kensington Kane, and all children of Mara Teigen and Evander Kane;

ii. the Plaintiffs' residence;

iii. the Plaintiffs' places of employment: Any NHL Arena, or public space in which the Plaintiffs are required to attend for the purposes of their occupation;

iv. the Plaintiffs' other addresses: Any school or daycare being attended by the Plaintiffs' children, including Kensington Kane;

or from being within 275 metres of the Plaintiffs, or the above children as set out in paragraph 2(a)(i) above, anywhere else in the Province of Alberta, or within elsewhere in Canada.

B. The Defendant is hereby prohibited from posting anything to social media about the Plaintiffs, the Plaintiffs' children, about the parties' family dynamics, about KENSINGTON KANE, or the Defendant's parenting arrangements, about the court system, or about these or past legal proceedings or disparaging him or his family. The Defendant may not post about these topics on any form of social media, including but not limited to Instagram, Facebook X (formerly Twitter), or any other social media platform.

C. The Defendant is/are restrained from harassing, molesting, watching, following, telephoning, or otherwise interfering with or contacting the Plaintiffs, or their children, including Kensington Kane, either directly or indirectly, or by agent, including social media, anywhere in the Province of Alberta or anywhere else in Canda.

D. On the Defendant being in breach of any of the terms of this Order:

a. The Defendant may be charged under s. 13.1(1) of the *Protection Against Family Violence Act;* or any such other applicable statute in the Peace Officer's discretion.

b. If the Defendant is not charged under s. 13.1(1) of the *Protection Against Family Violence Act,* or any such other applicable statute in the Peace Officer's discretion, any Police Officer is authorized to forthwith arrest that Respondent, and bring that Respondent, as soon as possible, before a Justice of the Court of King's Bench of Alberta to show reason why there should not be a finding of civil contempt.

c. The Despondent shall not be arrested unless that Despondent has previously been served with a copy of this Order, or if not served, is shown a copy of this Order by the Police Officer and, on being given an opportunity to do so, does not then obey it.

E. In making an arrest under this Order, a Police Officer is authorized to do anything necessary to carry out the arrest, including the use of as much reasonable force as may be necessary to make the arrest, and without warrant to enter any place where, on reasonable and probable grounds, the Police Officer believes that the Defendant may be found.

F. This Order is sufficient authority for the keeper of a correctional institution to hold a Defendant in custody pending appearance before a Justice of the Court of King's Bench of Alberta or such other superior Court jurisdiction should this Judgment be reciprocally enforced.

G. This Order remains in effect permanently and will not expire.

H. The Defendant shall not be in breach of this Order in the following circumstances:

Any contact between the Defendant and the Plaintiff for the purpose of:

i) Arranging existing court-ordered parenting time to Kensington Kane;

ii) Exercising parenting time agreed to between the parties through mediation or through their counsel in writing;

I. The exercise of any parenting time granted to the Defendant in relation to KENSINGTON KANE by Order of a Court of competent jurisdiction granted after this Judgment. kb shall not constitute a breach of this Order. kb

J. Any contact between the Plaintiff and the Defendant for the purpose of arranging and attending court (including arranging for service of documents through a third party or service by email), mediation, counselling, meetings with legal counsel present, or any contact required for legal proceedings. kb shall not constitute a breach of this Order. kb

K. Costs shall be reserved until the Assessment of Damages set out in Clause 1 herein.

_____
Justice of the Court of King's Bench of Alberta

Exhibit 3

TRO in Harassment Case

SUPERIOR COURT OF CALIFORNIA,
COUNTY OF ORANGE
CENTRAL JUSTICE CENTER

YOUR FILE COPY

MINUTE ORDER

DATE: 06/08/2026 TIME: 08:30:00 AM DEPT: C64

COMMISSIONER: Glenn Mondo
CLERK: M. Suchy
REPORTER/ERM: None
BAILIFF/COURT ATTENDANT: S. Hill

CASE NO: **30-2026-01575619-CU-HR-CJC** CASE INIT.DATE: 06/05/2026
CASE TITLE: **Kane vs. Karamian**
CASE CATEGORY: Civil - Unlimited CASE TYPE: Harassment

EVENT ID/DOCUMENT ID: 74872817

EVENT TYPE: Ex Parte Temporary Restraining Order
MOVING PARTY: Evander Frank Kane
CAUSAL DOCUMENT/DATE FILED: Request for Civil Harassment Restraining Orders, 06/05/2026

APPEARANCES

There are no appearances by any party.

Ex-Parte application for Request for civil harassment restraining order is requested by petitioner.

Ex parte application is read and considered.

The Court orders temporary restraining order granted as to Hooman Abedi Karamian aka Nik Richie. Order to Show Cause re: Civil Harassment set for 06/30/2026 at 08:30AM in C64. All orders to remain in full force and effect pending date of hearing with a 100 yards stay away order.

The Order to Show Cause re: Firearms Compliance is scheduled for 06/30/2026 at 08:30 AM in Department C64.

Temporary Restraining Order is filed by Court

Notice of court hearing is filed by Court

SERVICE INSTRUCTIONS
Petitioner is required to ensure that the respondent is personally served with a copy of this Minute Order, in addition to all other specified documents listed on the second page of the Notice of Court Hearing, Form CH-109. The individual executing personal service upon the respondent (excluding the petitioner or any other protected parties) must subsequently complete a written Proof of Personal Service, Form CH-200, or an alternative approved form.

The Respondent must receive personal service no less than 5 days prior to the scheduled hearing. Proof of service must be electronically filed (E-FILED) or may be physically submitted to the Civil Clerk's Office at the Central Justice Center.

This hearing will be conducted in person at the following location: Central Justice Center Dept. C64 700

CASE TITLE: Kane vs. Karamian CASE NO: **30-2026-01575619-CU-HR-CJC**

Civic Center Drive West Santa Ana, CA 92701 Phone number: 657-622-5264

EXHIBITS AND WITNESS INSTRUCTIONS

Parties are required to present witnesses and physical copies of exhibits during courtroom proceedings.

In the case of video evidence, parties must furnish a thumb drive and their personal device for playback, excluding cellphones. Should any audio or video recordings be submitted for consideration by the judicial officer, a transcript, preferably certified, must accompany the recording.

Example: providing a thumb drive with a personal laptop, along with the necessary cables for connectivity, exemplifies compliance with this requirement.

The Court orders Clerk's office to give notice of service copies to petitioner.