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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.: 5:26-cv-06348-NW Judge: Noel Wise **PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS THE COMPLAINT** [Civil L.R. 7-3(a)] Hearing Date: TBD Hearing Time: TBD Courtroom: 3 – 5th Floor

Plaintiff Nik Lamas-Richie opposes Defendant Evander Kane's Motion to Dismiss (ECF No. 23).

STATEMENT OF ISSUES TO BE DECIDED

1. Whether Richie has standing to bring a claim under the U.S. SPEECH Act against Defendant Evander Kane ("Kane") where Kane currently seeks enforcement of a foreign judgment against Richie in a California court and has registered that judgment in a California court.

2. Whether this Court may assert personal jurisdiction over Kane where Kane sent a demand letter alleging violation of a foreign judgment to Richie, a California resident and citizen, filed an action in a California court that is still pending in which he seeks enforcement of the

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foreign judgment against Richie, and registered the foreign judgment in a California court, specifically in this particular district.

3. Whether the Court may dismiss the Complaint for insufficient process or service of process where Kane claims he was not in the United States, a process server swore under penalty of perjury that she served him in California, and Kane failed to provide any corroborating evidence.

4. Whether this Court has subject matter jurisdiction over this action, which is brought under the federal U.S. SPEECH Act.

5. Whether the Complaint states a claim when Kane currently seeks enforcement of a foreign final judgment for defamation against Richie in a California court and has registered that judgment in a California court.

6. Whether there is any basis to impose sanctions under 28 U.S.C. § 1927 or the Court's inherent authority for (1) filing a complaint that has already in part succeeded by Kane materially conceding most of the requested relief or (2) not withdrawing returns of service that Kane alleges are false, but for which he provided no evidence of falsehood.

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MEMORANDUM OF POINTS AND AUTHORITIES

1.0 INTRODUCTION AND FACTUAL BACKGROUND

For months, Kane told an Orange County court that an Alberta Judgment should gag Nik Richie's journalism. He attached it to his petition for a civil harassment restraining order. *See* Kane petition for civil harassment restraining order, attached as **Exhibit 1**.[1] He asked that court to take judicial notice of it, and the court did. ECF No. 23-1 at 25. His petition specifically requested an injunction providing that Richie:

> must immediately remove all existing posts, videos, interviews, and content concerning Petitioner, Kensington Kane, and Petitioner's family from all platforms that is threatening, harassing, defamatory, or otherwise in violation of the United States and **Canadian protective orders against Deanna Kane a/k/a Anna Kane** [and]
>
> . . . [Richie] must not encourage, solicit, or assist Deanna Kane a/k/a Anna Kane in making, publishing, or disseminating statements about Petitioner, Kensington Kane, or Petitioner's family that are threatening, harassing, defamatory, or otherwise in violation of the United States or **Canadian protective orders against Ms. Kane**.

Exhibit 1 at 8 and Kane Declaration ¶ 23 (emphasis added).

Kane obtained a temporary restraining order that, on its face, barred Richie from posting "anything to social media … regarding petitioner or his daughter Kensington as described or relayed to respondent by Deanna Kane." ECF No. 23-1 at 25. This was an order the court entered after finding that Richie had been "assisting in the violation of this [Alberta] order." *Id*. When Richie moved to vacate, Kane defended that restraint, told the court that 28 U.S.C. § 4102 was "immaterial and beside the point," and pointed out that the Alberta Judgment "has been domesticated by the Superior Court of California, County of Santa Clara." Kane opposition to

[1] In deciding a motion to dismiss, the Court may consider documents subject to judicial notice, and court filings are subject to judicial notice under Federal Rule of Evidence 201. *See Reyn's Pasta Bella, LLC v. Visa USA, Inc.*, 442 F.3d 741, 746 n.6 (9th Cir. 2006). Judicial notice of proceedings in another court is also appropriate "if those proceedings have a direct relation to matters at issue." *U.S. ex rel. Robinson Rancheria Citizens Council v. Borneo, Inc.*, 971 F.2d 244, 248 (9th Cir. 1992). Accordingly, all filings in the civil harassment restraining order case filed by Kane are properly subject to judicial notice in deciding Kane's motion to dismiss.

motion to vacate TRO, attached as **Exhibit 2**, at 10.

Kane now wants this Court to act as if none of that happened. His Motion represents that "[n]o one has sought recognition or enforcement of the Alberta Judgment against Plaintiff," that the judgment "imposes no obligation on" Richie, and that it was offered only as "circumstantial evidence of a course of conduct." ECF No. 23 at 19–21.

Richie does not dispute that a party may abandon a theory. He disputes that a party may abandon it in one court and then represent to another *that it never existed*. And the record shows the abandonment is recent: on August 5, 2026 — six weeks after this action was filed, and five days before the Motion — Kane filed a second *ex parte* application in Orange County expressly disclaiming reliance on "the Canadian judgment against Ms. Deanna 'Anna' Kane," and offering a proposed order that "omits terms that previously gave the Court pause." *See* Kane application for order reinstating and continuing TRO, attached as **Exhibit 3**, at 8.[2] That is the main relief this action seeks. Kane concedes the merits of this action and then asks this Court to hold that Richie was never injured by the position Kane abandoned only after being sued. And he only abandoned it (half-heartedly at that) in that state proceeding. In this parallel proceeding, he has not disclaimed it. His request for an injunction as to statements that violate the Alberta Judgment is set for an evidentiary hearing in September 2026. There is still a live controversy.

The Motion should be denied. Alternatively, if the Court finds any pleading defect, Richie requests leave to amend.

2.0 ARGUMENT

2.1 Richie Has Article III Standing

Kane's standing argument rests on a single premise: because the Alberta Judgment names Ms. Kane and not Richie, it cannot injure Richie. ECF No. 23 at 19. The premise would be sound if the Alberta Judgment had stayed in Alberta. And that premise would also be sound if the Alberta

[2] Despite this request, Kane never filed an amended petition for a civil harassment restraining order and the court in that matter denied his application to reinstate the TRO, meaning his original June 5 application is still the operative pleading there. He is still requesting that Richie be required to remove content that violates the Alberta Judgment.

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Judgment had been cabined to Ms. Kane. But neither of those conditions existed. Evander Kane put a lot of effort into trying to get California courts to recognize this foreign judgment and enforce it against Richie. The fact that Kane *now* says the judgment against Ms. Kane should not be enforced against Richie is welcome. Had he taken that reasonable position before being sued, we might not be here. But here we are.

2.1.1 A California court restrained Californian Richie's California-based speech because of the Alberta Judgment

Richie's injury is not hypothetical. The state court TRO reads in relevant part:

> *The court also takes judicial notice of Court of King's Bench of Alberta case no. 2403 24820 in which 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 … regarding petitioner or his daughter Kensington as described or relayed to respondent by Deanna Kane.*

ECF No. 23-1 at 25. The Alberta Judgment was not merely incidental to entry of the TRO. It was the specific basis for an unconstitutional prior restraint because the court found Richie was "assisting in the violation of this order." The TRO did not last long, but that was only due to Richie promptly moving to vacate it. At Kane's request, a court censored an American's speech based on a Canadian injunction. That is a concrete and particularized injury.

When Richie moved to vacate the TRO, Kane defended it and noted that the Alberta Judgment had been domesticated in California. **Exhibit 2** at 10. Kane briefed 28 U.S.C. § 4102 in defense of an order restraining Richie's speech and sought to domesticate it, but now tells this Court that no one ever sought recognition of the judgment. He is not just guilty of a lack of candor, but a lack of candor that is embarrassingly easy to reveal. Kane notes that the June 8, 2026, TRO was vacated. ECF No. 23 at 21. Vacatur of that interim order does not moot Richie's claims, particularly given that the operative petition in that proceeding specifically requests an injunction requiring removal and prospective restraint on speech because it allegedly violates the Alberta

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Judgment. An evidentiary hearing on that requested relief is set for September 8–10, 2026. If Kane wishes to disclaim that relief, now, in that proceeding, it will still not moot this action. A defendant's decision to stop the challenged conduct moots a case only if it is "absolutely clear that the allegedly wrongful behavior could not reasonably be expected to recur," and the burden of showing that is "formidable." *Friends of the Earth, Inc. v. Laidlaw Envtl. Servs. (TOC), Inc.*, 528 U.S. 167, 189–90 (2000). Kane disclaimed the Alberta Judgment in an interim application while leaving the operative petition untouched, thus invoking this foreign and unconstitutional order to be wielded whenever he sees fit. That is not a formidable showing. That is a panicked reaction to a lawsuit.

Finally, the injury is capable of repetition yet evading review. A temporary restraining order under Cal. Code Civ. Proc. § 527.6 (the statute under which Kane obtained the state-court TRO) expires at a subsequent evidentiary hearing, typically a few weeks later. If each expiration moots the federal question, a foreign judgment could be used to restrain American speech indefinitely, one short *ex parte* order at a time, without ever being tested by the federal courts applying the federal statute entrusted to protect Americans from this kind of abuse. Furthermore, proceedings under Section 527.6 permit an applicant to seek a TRO without any ability of the restrained party to present their case, which is what happened in the parallel state court proceeding. While this issue remains unresolved, there is nothing to stop Kane from once again obtaining a secret TRO based on the Alberta Judgment without an opportunity to explain to a court how it is unenforceable.

Kane argues that this dispute is not ripe, but his reliance on *Yahoo! Inc. v. La Ligue Contre Le Racisme et L'Antisemitisme*, 433 F.3d 1199 (9th Cir. 2006) (en banc), is misplaced. The plurality there found the controversy unripe because the French plaintiffs "[had] not sought enforcement in the United States" and it was uncertain whether they ever would. *Id.* at 1211–12. Kane ignores the fact that he *successfully* sought enforcement of the Alberta Judgment against Richie. The state court restrained Richie's speech, which is *per se* a constitutional injury. *Elrod v. Burns*, 427 U.S. 347, 373 (1976); *accord Associated Press v. U.S. Dist. Court*, 705 F.2d 1143,

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1147 (9th Cir. 1983) (unconstitutional order in place for only 48 hours was "a total restraint on the public's first amendment right of access even though the restraint is limited in time"). *Yahoo!* is of no assistance to Kane.

2.1.2 Kane's disclaimer concedes the merits and does not support dismissal

Richie welcomes Kane's new position that all of a sudden, now that it serves his interests in this case, the Alberta Judgment doesn't reach Richie. If the Alberta Judgment does not apply to Richie, cannot be enforced against him, and was never offered for that purpose, then Kane agrees with the Complaint. But he did not adopt this position until August 5, 2026 — after a temporary restraining order had issued against Richie relying in part on the Alberta Judgment, after Richie had moved to vacate it, after Kane had opposed that motion, and after Richie filed this action.

A defendant who concedes the substance of the relief sought does not defeat jurisdiction. If Kane's position is genuine, he can end this case in a paragraph: a stipulated declaration that the Alberta Judgment is not entitled to recognition or enforcement against Richie in the United States, and that Kane will not seek relief in any court for the enforcement of any of its terms as applied to Richie. Until Kane offers such a stipulation, however, the dispute Kane created is one this Court must resolve.

2.2 This Court Has Personal Jurisdiction Over Kane

2.2.1 Kane domesticated the foreign judgment in this District

On June 10, 2026, Kane registered the Alberta Judgment in the Superior Court of California, County of Santa Clara. ECF No. 23 at 14; ECF No. 23-1 at ¶ 6 & pp. 7–16. That is why we are here. Santa Clara County is in this District. Registration of a judgment is an affirmative application to a California court to make a foreign order enforceable in California, and it is the step that allows a U.S. court to act upon the foreign order.

Kane argues that, despite his taking affirmative steps to enforce the Alberta Judgment in the U.S., Richie is not affected because he was not identified in the form he submitted to register the Judgment. ECF No. 23 at 23. That is true, but beside the point. The question under *Schwarzenegger v. Fred Martin Motor Co.*, 374 F.3d 797, 802 (9th Cir. 2004), is whether Kane

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purposefully directed conduct at the forum and whether the claim arises out of that conduct. Kane purposefully used a California court to domesticate a foreign judgment that he has already used to harm Richie. Richie's claims are based on the assertion that the same judgment cannot be recognized or enforced against an American speaker. The connection is neither attenuated nor merely fortuitous.

When opposing vacatur of the TRO in the state-court action, Kane noted the Alberta Judgment had been registered. He offered that domestication as a reason the TRO should stand. **Exhibit 2** at 10. He may not rely on it there and disown it here.

2.2.2 The "wrong district" argument confuses jurisdiction with venue

Kane devotes a section of his Motion to the proposition that his Orange County filings are "contacts with the Central District, not this one." ECF No. 23 at 23–24. That is not the test. Under Rule 4(k)(1)(A), we look to California's long-arm statute, which is co-extensive with constitutional due process. Cal. Code Civ. Proc. § 410.10; *Schwarzenegger*, 374 F.3d at 800–01. The relevant forum is the State of California, not the Northern District. Kane cites *Schwarzenegger* for the standard and then invents a different one.

If Kane dislikes this *venue*, that is another story. But Kane has not moved under Rule 12(b)(3), and having failed to do so, has waived that argument. His contacts with California are a petition filed and prosecuted in Orange County, a foreign judgment registered in Santa Clara County, a demand letter directed to a California resident about California publications, and damage visited upon a known California resident who was expressly targeted. That is enough.

2.2.3 The demand letter and the petition are purposefully directed conduct

Kane characterizes the demand letter as a mere notice sent by New York counsel. ECF No. 23 at 24. But the letter did not merely inform Richie that an order existed as to someone else. It demanded that Richie retract and cease publishing, otherwise Kane would sue him for violating the foreign judgment. Kane made good on this threat, though in dishonorable fashion; he snuck into an *ex parte* proceeding, affording Richie neither notice nor an opportunity to be heard until after the prior restraint issued. But whether Kane filed a "suit" or a petition is irrelevant. Under

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Calder v. Jones, 465 U.S. 783, 789–90 (1984), conduct aimed at the forum and causing harm the defendant knows will be suffered there supports jurisdiction. Kane filed an action in California and obtained an order restraining a California resident's speech. Purposeful direction is met.

2.3 Service Has Been Effected, and Any Defect is Curable

Kane's Rule 12(b)(4) and 12(b)(5) arguments turn on a disputed question of fact: whether Kane was personally served on July 19, 2026. A process server has sworn that he was. Kane has sworn that he was not. Kane claims to be in exclusive possession of "irrefutable evidence" showing that he could not have been served on that date but, for reasons unknown, refuses to share such evidence. ECF No. 23-1 at 27–28.

Resolving this factual dispute would be welcome, but it is unnecessary. Richie's renewed motion for alternative service under Rule 4(f)(3) asks this Court to authorize service by means no one can dispute. ECF Nos. 8, 20. Kane opposes that motion while simultaneously arguing that the case must be dismissed because service has not been made. ECF No. 28. Yet he has not argued that insufficient service of process has prejudiced him in any way, meaning he is not entitled to dismissal on this ground. *BHPH Cap. LLC v. JV Wholesalers LLC*, 2024 U.S. Dist. LEXIS 20310, *8 (D. Ariz. Feb. 5, 2024) (citing *UFCW, Locals 197 & 373 v. Alpha Beta Co.*, 736 F.2d 1371, 1382 (9th Cir. 1984) (dismissal under Fed. R. Civ. P. 4 "is generally not justified absent a showing of prejudice")). Even if he were prejudiced, "[d]ismissal for insufficient service of process is disfavored." *State Farm Fire & Cas. Co. v. Amazon.com Inc.*, 2018 U.S. Dist. LEXIS 82469, *4 (D. Ariz. May 16, 2018) (citing *Alpha Beta Co.*, 736 F.2d at 1382).[3]

Kane also attempts to ascribe significance to an obvious typo appearing in the process server's declaration, but Kane's own declaration describes both returns as stating that service occurred "on July 19, 2026." ECF No. 23-2 at ¶ 8. He read them as everyone else did.

[3] Kane rests part of his argument on the allegation that Richie has made no service attempts in compliance with the Hague Service Convention (ECF No. 23 at 18, 31) but, as explained in the previously filed Reply in support of Richie's Motion for Alternative Service, the Hague Service Convention is not the exclusive means by which a foreign party may be served. ECF No. 29 at 2–4.

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2.4 This Court Has Subject Matter Jurisdiction

Kane argues that the Declaratory Judgment Act is procedural and that a federal defense to a state claim creates no federal question, meaning this Court lacks subject matter jurisdiction. ECF No. 23 at 25. Both propositions are correct but neither applies, because Richie does not rely on the Declaratory Judgment Act for jurisdiction. He relies on the SPEECH Act.

The SPEECH Act supplies an express federal cause of action, and it places that action in federal court: a covered person "may bring an action in district court, under section 2201(a)." 28 U.S.C. § 4104(a)(1). While the statute makes reference to Section 2201, the Declaratory Judgment Act, a claim for relief under the SPEECH Act establishes federal question jurisdiction. *See Elec. Frontier Found. v. Global Equity Mgmt. (SA) Pty Ltd*, 290 F. Supp. 3d 923, 933 (N.D. Cal. 2017) (finding federal question jurisdiction existed where only claim for relief was a declaration under the SPEECH Act); *see also Joude v. WordPress Found.*, 2014 U.S. Dist. LEXIS 91345, *11 (N.D. Cal. July 3, 2014) (acknowledging that claim under the SPEECH Act established federal question jurisdiction). A claim resting on a federal statute that creates a cause of action and designates the forum for that action arises under federal law for purposes of 28 U.S.C. § 1331. Because federal question jurisdiction exists, the amount in controversy is immaterial.

Technically, Kane limits his argument on this point to the first two causes of action, which do not specifically mention the SPEECH Act. But even if there were a question as to whether these claims arise under federal law, there is no dispute that the third cause of action does. This means the Court may exercise supplemental jurisdiction over non-federal claims under 28 U.S.C. § 1367.

2.5 Abstention is Not Available and Would Be Inappropriate

Kane argues the Court should exercise its discretion under 28 U.S.C. § 2201(a) and abstain from exercising jurisdiction. But his primary cases for this argument, *Brillhart v. Excess Insurance Co. of America*, 316 U.S. 491 (1942), and *Wilton v. Seven Falls Co.*, 515 U.S. 277 (1995), govern only the discretionary exercise of declaratory jurisdiction. They do not authorize a district court to decline to exercise jurisdiction over a claim Congress created and assigned to the federal courts. Where a declaratory action is joined with claims that do not rest on the Declaratory Judgment Act's

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discretion, *Brillhart* does not control. *Gov't Emps. Ins. Co. v. Dizol*, 133 F.3d 1220, 1225 & n.6 (9th Cir. 1998) (en banc).

The *Brillhart* factors would not favor abstention in any event. There is no needless determination of state law: the question here is whether a foreign judgment may be recognized or enforced in the United States under 28 U.S.C. § 4102, which is a question of federal law that the Orange County court is not being asked to decide, nor is it competent to do so. There is no duplicative litigation on that question, because Kane has *now* told the Orange County court that he does not rely on the Alberta Judgment *there*, while continuing to seek relief specifically requesting enforcement of the Alberta Judgment. Kane cannot claim to have removed the issue from the state proceeding and then argue that the state proceeding will resolve it.

On forum shopping, the chronology is unhelpful to Kane. Richie did not select this forum to escape an adverse state ruling; he filed after a California court had entered a prior restraint against him based in part on a Canadian judgment, and he filed the one claim Congress made available for exactly that circumstance.

2.6 The Complaint Sufficiently States a Claim for Relief

2.6.1 The Alberta Judgment Triggers the SPEECH Act

Kane argues that the Alberta Judgment is a family violence order and does not adjudicate the truth of any statements. ECF No. 23 at 28. The SPEECH Act's scope is not determined by the caption of the foreign proceeding. Section 4101(1) defines defamation to include "any action or other proceeding for defamation, libel, slander, or similar claim alleging that forms of speech are false, have caused damage to reputation or emotional distress, have presented any person in a false light, or have resulted in criticism, dishonor, or condemnation of any person."

The operative paragraph of the Alberta Judgment prohibits Ms. Kane from "posting anything to social media about the Plaintiffs … or the Defendant's parenting arrangements, about the court system, or about these or past legal proceedings *or disparaging him or his family*." ECF No. 23-1 at 15. A judgment restraining disparagement is a judgment addressed to speech that "result[s] in criticism, dishonor, or condemnation," and is thus a judgment for defamation.

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The Alberta Judgment is a default judgment that imposes a permanent injunction, meaning it is a "final judgment rendered by a foreign court," and thus a "foreign judgment" under 28 U.S.C. § 4101(4). Kane argues that this is not actually a final judgment because the amount of damages has not yet been determined (ECF No. 23 at 28), but he ignores that the injunction provisions that do violence to rights protected by the U.S. and California constitutions are final and not contingent on any future event or judicial determination. *See Global Equity Mgmt.*, 290 F. Supp. 3d at 942 (finding that "[a]lthough no final judgment has been issued in the case in the Supreme Court of South Australia, the injunction itself is a final reviewable order under U.S. First Amendment law . . . Accordingly, the injunction is a qualifying order under the SPEECH Act").

Kane also argues that Richie is not a "person against whom a foreign judgment is entered" under 28 U.S.C. § 4104(a)(1), and thus cannot bring a claim under the SPEECH Act, because the Alberta Judgment was only entered against Anna Kane. ECF No. 23 at 27–28. There do not appear to be any cases discussing the situation here, where the beneficiary of a foreign judgment attempts to enforce that judgment against a third party. It is not surprising that this is an issue of first impression. Most lawyers would have told their client "no" if they tried to enforce a judgment against a third party in order to suppress that third party's speech. But Kane must answer for having attempted to enforce the Alberta Judgment in precisely that way and only disclaiming it upon being sued.

2.7 The Declaratory Claims Are Properly Pleaded

Kane argues that the First and Second Causes of Action fail because he is a private party. ECF No. 23 at 27. Richie does not plead claims under 42 U.S.C. § 1983 and does not allege that Kane is a state actor. The constitutional questions arise because Kane asked a court to act, and judicial enforcement of a private party's demand is state action. *Shelley v. Kraemer*, 334 U.S. 1, 14–20 (1948); *N.Y. Times Co. v. Sullivan*, 376 U.S. 254, 265 (1964). The relief sought is a declaration concerning the enforceability of a judgment, not damages against Kane for constitutional torts. To the extent the Court reads the First and Second Causes of Action as pleading § 1983 claims, Richie requests leave to amend to clarify that they do not.

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2.8 Sanctions are Not Warranted

2.8.1 The fees Kane seeks were not caused by the returns of service

28 U.S.C. § 1927 authorizes only the "excess costs, expenses, and attorneys' fees reasonably incurred because of" the sanctionable conduct, and the party seeking sanctions must establish a causal link. *Goodyear Tire & Rubber Co. v. Haeger*, 581 U.S. 101, 108–09 (2017). Kane's theory is that the allegedly fraudulent returns of service "manufactured a response deadline that does not exist" and that the Motion to Dismiss was prepared to avoid default. ECF No. 23 at 31. This is incompatible with Kane's position that he was never served, meaning there was no deadline to respond and no possibility of default. The alleged need for a Motion to Dismiss at the specific time Kane filed one could have been obviated if Kane's counsel had provided one shred of the "irrefutable evidence" they claimed to possess on July 30 showing that Kane could not have been served on July 19, which Richie's counsel requested the same day. ECF No. 23-1 at 3, ¶ 11. Kane *still* has not provided this purported evidence. Either it exists, and Kane finds it humorous to withhold it, or it does not exist, and Kane is not being truthful. If this "irrefutable evidence" were provided, and was indeed "irrefutable," Richie would act accordingly. But Kane and his counsel prefer to play games and then have the audacity to claim that someone else is unnecessarily multiplying the proceedings.

In any event, Kane is only complaining about the timing of his motion to dismiss and the Rule 12(b)(4) and (5) components. Even if Richie had withdrawn the returns of service, Kane still would have eventually filed a motion to dismiss on all other grounds.

2.8.2 Section 1927 does not reach the filing of a complaint, and Kane has not made a sufficient showing for inherent power sanctions

Kane concedes that § 1927 applies only to the multiplication of proceedings after suit begins, citing *In re Keegan Mgmt. Co. Sec. Litig.*, 78 F.3d 431, 435 (9th Cir. 1996), and then asks the Court to reach the filing of the Complaint through its inherent power. Inherent-power sanctions require a finding of bad faith or conduct tantamount to it. *Chambers v. NASCO, Inc.*, 501 U.S. 32, 45–46 (1991); *Fink v. Gomez*, 239 F.3d 989, 993–94 (9th Cir. 2001). Richie filed this suit because

Kane was explicitly seeking enforcement of a foreign defamation judgment against him in a California court. Through his Motion to Dismiss, Kane has now disclaimed any attempt to enforce the judgment against him. Kane's abrupt about-face demonstrates the merits of Richie's claims here and precludes a finding of bad faith. Kane may try to change his position again upon realizing this, but he cannot change what is already in the record.

Kane's only evidence of alleged bad faith is a podcast excerpt. The transcript he filed contains the context his Motion omits. In the same episode, counsel described the case as concerning "an absolutely grave first amendment violation" arising from an attempt "to stop [Richie] from broadcasting that interview." ECF No. 23-1 at 37, 42:33–43:45. The remark about losing at the trial level is about the benefit of taking a case with important issues to the appellate level, thus creating binding case law on those issues so that other parties and attorneys who might engage in such un-American activities would have binding guidance. ECF No. 23-1 at 38, 52:34–53:05.

2.9 The Court Should Grant Leave to Amend

Leave to amend should be freely granted, *DeSoto v. Yellow Freight Sys., Inc.*, 957 F.2d 655, 658 (9th Cir. 1992), and a court should only deny leave to amend following the grant of a motion to dismiss if further amendment would be futile. *Rutman Wine Co. v. E. & J. Gallo Winery*, 829 F.2d 729, 738 (9th Cir. 1987). If the Court is inclined to grant any part of Kane's Motion to Dismiss or finds that any greater detail in the Complaint's allegations is needed, it should grant leave to amend.

3.0 CONCLUSION

Kane asked a California court to restrain an American journalist's speech by invoking a Canadian judgment, and that court did so. He defended the injunction. He registered the judgment in this District. Only after this action was filed did he tell *any* court that the judgment might not be enforceable against Richie. Even now, in the proceeding where he specifically seeks enforcement of that foreign judgment against Richie, Kane only provided a limited disclaimer in an application for a TRO. The Court should deny Kane's Motion in its entirety.

RANDAZZA | LEGAL GROUP

Dated: August 24, 2026.

Respectfully submitted,

RANDAZZA LEGAL GROUP, PLLC

/s/ Marc J. Randazza

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

RANDAZZA | LEGAL GROUP

Case No. 5:26-cv-06348-NW

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 24, 2026, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF.

Respectfully submitted,

/s/ Marc J. Randazza
Marc J. Randazza

RANDAZZA | LEGAL GROUP

EXHIBIT 1

Petition for Civil Harassment Restraining Order
Evander Kane v. Nik Richie
Superior Court of California, County of Orange
(Case No. 30-2026-01575619-CU-HR-CJC)

Electronically Filed by Superior Court of California, County of Orange, 06/05/2026 12:41:35 PM.
30-2026-01575619-CU-HR-CJC - ROA # 2 - DAVID H. YAMASAKI, Clerk of the Court By S. Flores, Deputy Clerk.
Case 5:26-cv-06348-NW Document 36-1 Filed 08/24/26 Page 2 of 64

CH-100 Request for Civil Harassment Restraining Orders

Clerk stamps date here when form is filed.

Read *Can a Civil Harassment Restraining Order Help Me?* (form CH-100-INFO) before completing this form. Also fill out *Confidential CLETS Information* (form CLETS-001) with as much information as you know.

Fill in court name and street address:

Superior Court of California, County of
Orange
Central Justice Center
700 Civic Center Drive West
Santa Ana, CA 92701

Court fills in case number when form is filed.

Case Number:
30-2026-01575619-CU-HR-CJC

1 Person Seeking Protection

a. Your Full Name:
Evander Frank Kane Age: 34

Your Lawyer *(if you have one for this case)*
Name: Ryan F. Coy State Bar No.: 324939
Firm Name: Blank Rome LLP

b. Your Address *(If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or email.)*
Address: 2029 Century Park East, 6th Floor
City: Los Angeles State: CA Zip: 90067
Telephone: 424-285-2194 Fax: 424-329-3434
Email Address: ryan.coy@blankrome.com

2 Person From Whom Protection Is Sought

Full Name: Hooman Abedi Karamian a/k/a Nik Richie Age: 47
Address *(if known)*: 1 Rue Renoir
City: Trabuco Canyon State: CA Zip: 92679

3 Additional Protected Persons

a. Are you asking for protection for any other family or household members? ☒ Yes ☐ No *If yes, list them:*

Full Name	Gender	Age	Lives with you?	How are they related to you?
Kensington Kane	F	5	☒ Yes ☐ No	Daughter
			☐ Yes ☐ No	
			☐ Yes ☐ No	
			☐ Yes ☐ No	

☐ *Check here if there are more persons. Attach a sheet of paper and write "Attachment 3a—Additional Protected Persons" for a title. You may use form MC-025,* Attachment.

b. Why do these people need protection? *(Explain below):*

☒ *Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 3b—Why Others Need Protection" for a title.*

K. Kane is Petitioner's daughter, of whom he has full legal and physical custody. Respondent has repeatedly identified K. Kane by name in his public social media posts, falsely portraying her as a kidnapping victim, as described in the attached declaration. By naming and targeting my child in front of his 500,000 followers, Respondent has created a foreseeable and serious risk that one or more of his followers will attempt to locate. . .

This is not a Court Order.

Case Number:
30-2026-01575619-CU-HR-CJC

4 Relationship of Parties

How do you know the person in 2? *(Explain below):*

☒ *Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 4—Relationship of Parties" for a title.*

Petitioner has no personal, familial, dating, or business relationship with Respondent. Respondent is . . .

5 Venue

Why are you filing in this county? *(Check all that apply):*

a. ☒ The person in 2 resides in this county.
b. ☒ I was harassed by the person in 2 in this county.
c. ☐ I reside or am temporarily located in this county.
d. ☒ Other *(specify):* The person's conduct is through his media company, which is headquartered in this county.

6 Other Court Cases

a. Have you or any of the persons named in 3 been involved in another court case with the person in 2?

☐ Yes ☒ No *(If yes, check each kind of case and indicate where and when each was filed.)*

Kind of Case	Filed in *(County/State)*	Year Filed	Case Number *(if known)*
(1) ☐ Civil Harassment			
(2) ☐ Domestic Violence			
(3) ☐ Divorce, Nullity, Legal Separation			
(4) ☐ Paternity, Parentage, Child Custody			
(5) ☐ Elder or Dependent Adult Abuse			
(6) ☐ Eviction			
(7) ☐ Guardianship			
(8) ☐ Workplace Violence			
(9) ☐ Small Claims			
(10) ☐ Criminal			
(11) ☐ Other *(specify):*			

b. Are there now any protective or restraining orders in effect relating to you or any of the persons in 3 and the person in 2? ☒ No ☐ Yes *(If yes, attach a copy if you have one.)*

7 Description of Harassment

Harassment means violence or threats of violence against you, or a course of conduct that seriously alarmed, annoyed, or harassed you and caused you substantial emotional distress. A course of conduct is more than one act.

a. Tell the court about the last time the person in 2 harassed you.

(1) When did it happen? *(Provide date or estimated date):* June 1, 2026

(2) Who else was there?
This conduct occurred online and was published publicly to Respondent's approximately 500,000 Instagram followers. Respondent reposted a video of me and my family, including K. Kane, to his Instagram account, with harassing and false content portraying my custody of K. Kane as unlawful and inciting his followers.

This is not a Court Order.

Case Number:
30-2026-01575619-CU-HR-CJC

7 a. (3) How did the person in 2 harass you? *(Explain below):*

☒ *Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(3)—Describe Harassment" for a title.*

Respondent has engaged in a sustained, deliberate campaign of harassment by publishing and amplifying false accusations that I committed violent crimes, including rape, and that I kidnapped my own daughter, to his nearly 500,000 followers. He has named and targeted my minor daughter, branded her a kidnapping victim through a "#FreeKensington" campaign, profits from "FREE KENSINGTON" merchandise, and — after receiving a formal demand to stop — publicly refused, stating a retraction was "a hard pass," and continued to publish new content. This conduct serves no legitimate purpose, has caused me substantial emotional distress, and is designed to provoke his audience to take action against me and my daughter.

(4) Did the person in 2 use or threaten to use a gun or any other weapon?

☐ Yes ☒ No *(If yes, explain below):*

☐ *Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(4)—Use of Weapons" for a title.*

(5) Were you harmed or injured because of the harassment?

☒ Yes ☐ No *(If yes, explain below):*

☒ *Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(5)—Harm or Injury" for a title.*

Yes. As a result of Respondent's harassment I have suffered substantial emotional distress and serious fear for my safety and the safety of my daughter. I have been required to take additional security precautions in my personal and professional life, at significant expense, to protect myself and Kensington. See Kane Decl. attached.

(6) Did the police come? ☐ Yes ☒ No

If yes, did they give you or the person in 2 an Emergency Protective Order? ☐ Yes ☐ No

If yes, the order protects *(check all that apply):*

☐ Me ☐ The person in 2 ☐ The persons in 3.

(Attach a copy of the order if you have one.)

b. Has the person in 2 harassed you at other times?

☒ Yes ☐ No *(If yes, describe prior incidents and provide dates of harassment below):*

☒ *Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7b—Previous Harassment" for a title.*

Yes. The June 1, 2026 post is the most recent incident in an ongoing campaign. Prior incidents are included on the Attachment Page hereto and the Kane Decl. attached.

This is not a Court Order.

Case Number:
30-2026-01575619-CU-HR-CJC

Check the orders you want. ☑

(8) ☒ Personal Conduct Orders

I ask the court to order the person in (2) **not** to do any of the following things to me or to any person to be protected listed in (3):

a. ☒ Harass, intimidate, molest, attack, strike, stalk, threaten, assault (sexually or otherwise), hit, abuse, destroy personal property of, or disturb the peace of the person.

b. ☒ Contact the person, either directly or indirectly, in **any** way, including, but not limited to, in person, by telephone, in writing, by public or private mail, by interoffice mail, by email, by text message, by fax, or by other electronic means.

c. ☒ Other *(specify):*

☒ *Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 8c—Other Personal Conduct Orders" for a title.*

The other requested personal conduct orders are on the attached Attachment Page. See Kane Decl. at ¶ 23.

The person in (2) will be ordered not to take any action to get the addresses or locations of any protected person unless the court finds good cause not to make the order.

(9) ☒ Stay-Away Orders

a. I ask the court to order the person in (2) to stay at least 100 yards away from *(check all that apply):*

(1) ☒ Me.
(2) ☒ The other persons listed in (3).
(3) ☒ My home.
(4) ☒ My job or workplace.
(5) ☒ My school.
(6) ☒ My children's school.
(7) ☒ My children's place of child care.
(8) ☒ My vehicle.
(9) ☐ Other *(specify):*

b. If the court orders the person in (2) to stay away from all the places listed above, will they still be able to get to their home, school, or job? ☒ Yes ☐ No *(If no, explain below):*

☐ *Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 9b—Stay-Away Orders" for a title.*

(10) Firearms (Guns), Firearm Parts, and Ammunition

Does the person in (2) have firearms (guns), firearm parts, or ammunition? (This includes firearm receivers and frames, and any item that may be used as or easily turned into a receiver or frame (see Penal Code section 16531).)

a. ☒ I don't know

b. ☐ No

c. ☐ Yes *(If you have information, complete the section below.)*

This is not a Court Order.

Case Number:
30-2026-01575619-CU-HR-CJC

(10) Describe Firearms (Guns), Firearm Parts, or Ammunition | Number or Amount | Location, if known

(1) _____ _____ _____
(2) _____ _____ _____
(3) _____ _____ _____
(4) _____ _____ _____
(5) _____ _____ _____
(6) _____ _____ _____

If the judge grants a protective order, the person in (2) will be prohibited from owning, possessing, purchasing, receiving, or attempting to purchase or receive firearms (guns), firearm parts, and ammunition while the protective order is in effect. The person in (2) will also be ordered to turn in to law enforcement, or sell to or store with a licensed gun dealer, any firearms (guns), firearm parts, and ammunition within their immediate possession or control. If an order is granted, the person in (2) will also be prohibited from owning, possessing, or buying body armor and would have to relinquish any they have.

(11) ☒ Temporary Restraining Order

I request that a Temporary Restraining Order (TRO) be issued against the person in (2) to last until the hearing. I am presenting form CH-110, *Temporary Restraining Order*, for the court's signature together with this *Request*.

Has the person in (2) been told that you were going to go to court to seek a TRO against them?

☒ Yes ☐ No *(If you answered no, explain why below):*

☐ *Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 11—Temporary Restraining Order" for a title.*

_____
_____
_____

(12) ☐ Request to Give Less Than Five Days' Notice of Hearing

You must have your papers personally served on the person in (2) at least five days before the hearing, unless the court orders a shorter time for service. *(Form CH-200-INFO explains* What Is "Proof of Personal Service"? *Form CH-200*, Proof of Personal Service, *may be used to show the court that the papers have been served.)*

If you want there to be fewer than five days between service and the hearing, explain why below:

☐ *Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 12—Request to Give Less Than Five Days' Notice" for a title.*

_____
_____
_____
_____
_____

This is not a Court Order.

Case Number:
30-2026-01575619-CU-HR-CJC

(13) ☒ No Fee for Filing or Service

a. ☒ There should be no filing fee because the person in (2) has used or threatened to use violence against me, has stalked me, or has acted or spoken in some other way that makes me reasonably fear violence.

b. ☐ The sheriff or marshal should serve (notify) the person in (2) about the orders for free because my request for orders is based on unlawful violence, a credible threat of violence, or stalking.

c. ☐ There should be no filing fee and the sheriff or marshal should serve the person in (2) for free because I am entitled to a fee waiver. *(You must complete and file form FW-001,* Application for Waiver of Court Fees and Costs.*)*

(14) ☒ Lawyer's Fees and Costs

I ask the court to order payment of my ☒ lawyer's fees ☒ court costs.

The amounts requested are:

Item	Amount	Item	Amount
Attorney Fees	$ TBD	Costs	$ TBD
	$		$
	$		$

☐ *Check here if there are more items. Put the items and amounts on the attached sheet of paper or form MC-025 and write "Attachment 14—Lawyer's Fees and Costs" for a title.*

(15) ☐ Possession and Protection of Animals

I ask the court to order the following:

a. ☐ That I be given the sole possession, care, and control of the animals listed below, which I own, possess, lease, keep, or hold, or which reside in my household.
(Identify animals by, e.g., type, breed, name, color, sex.)

I request sole possession of the animals because *(specify good cause for granting order):*

☐ *Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 15a—Possession of Animals" for a title.*

b. ☐ That the person in (2) must stay at least _____ yards away from, and not take, sell, transfer, encumber, conceal, molest, attack, strike, threaten, harm, or otherwise dispose of, the animals listed above.

This is not a Court Order.

Case Number:
30-2026-01575619-CU-HR-CJC

16 ☐ **Additional Orders Requested**

I ask the court to make the following additional orders *(specify):*

☐ *Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 16—Additional Orders Requested" for a title.*

17 Number of pages attached to this form, if any: 56

Date: June 4, 2026

Ryan F. Coy
Lawyer's name (if any)

Lawyer's signature

I declare under penalty of perjury under the laws of the State of California that the information above and on all attachments is true and correct.

Date: June 4, 2026

Evander Frank Kane
Type or print your name

Sign your name

This is not a Court Order.

SHORT TITLE:	CASE NUMBER:
Kane v. Karamian	30-2026-01575619-CU-HR-CJC

ATTACHMENT *(Number)*: 3b, 4, 7a, 7b, 8c

(This Attachment may be used with any Judicial Council form.)

Attachment 3b--Why Others Need Protection (cont'd)
. . . confront, or "rescue" K. Kane by force, placing her safety in immediate danger. K. Kane therefore requires the protection of this Court. Additional facts are set forth in the attached Declaration of Evander Frank Kane ("Kane Decl.").

Attachment 4--Relationship of Parties (cont'd)
. . . a social media personality who operates an Instagram account and the website dirtyarmy.org, with a following he calls the "Dirty Army." Respondent inserted himself into my life by soliciting, publishing, and amplifying false and defamatory statements about me and my daughter--including statements originating from my ex-wife, who is subject to existing protective orders prohibiting such statements--and directing that content to his nearly 500,000 followers. See Kane Decl. attached.

Attachment 7a(3)--Describe Harassment
See Kane Decl. attached.

Attachment 7a(5)--Harm or Injury
See Kane Decl. attached.

Attachment 7b--Previous Harassment
Prior incidents include:
• On various dates in 2025–2026, Respondent solicited, published, and disseminated on his Instagram account and YouTube channel multiple false and defamatory statements about me and Kensington — including statements he elicited from my ex-wife (who is subject to existing protective orders barring such statements) and his own false accusations that I committed rape and kidnapped my daughter.
• On or about May 22, 2026, after my attorneys sent Respondent a formal cease-and-desist demand placing him on notice of the existing protective orders, Respondent publicly and defiantly refused to retract any statements, stating a retraction was "a hard pass," and invited me to "come sit down" with him to "record" (Ex. D to Kane Decl.).
• Continuing through the present, Respondent has advertised and sold "FREE KENSINGTON" merchandise on dirtyarmy.org, commercially profiting from the harassment.

See Kane Decl. attached.

Attachment 8c--Other Personal Conduct Orders
• The Respondent must immediately remove all existing posts, videos, interviews, and content concerning Petitioner, Kensington Kane, and Petitioner's family from all platforms that is threatening, harassing, defamatory, or otherwise in violation of the United States and Canadian protective orders against Deanna Kane a/k/a Anna Kane.
• The Respondent must not encourage, solicit, or assist Deanna Kane a/k/a Anna Kane in making, publishing, or disseminating statements about Petitioner, Kensington Kane, or Petitioner's family that are threatening, harassing, defamatory, or otherwise in violation of the United States or Canadian protective orders against Ms. Kane.
See Kane Decl. at ¶ 23.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

(Add pages as required)

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Attorneys for Petitioner
EVANDER FRANK KANE

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

EVANDER FRANK KANE,

Petitioner,

v.

HOOMAN ABEDI KARAMIAN A/K/A NIK RICHIE,

Respondent.

Case No. _____

DECLARATION OF EVANDER FRANK KANE IN SUPPORT OF APPLICATION FOR CIVIL RESTRAINING ORDERS

I, **Evander Frank Kane**, declare as follows:

1. I make this declaration in support of my application for temporary restraining orders, and restraining orders after hearing, against respondent Hooman Abedi Karamian a/k/a Nik Richie ("Respondent"). I am seeking these orders to protect myself and my minor child, Kensington Kane, as well as others around me, from the increasingly frightening and disturbing threats, harassment, defamation, and incitement by Respondent. I have personal knowledge of the facts stated herein, and, if called as a witness at trial, I would and could competently testify thereto.

BACKGROUND

2. I am a well-known Canadian professional ice hockey player. I played for the Atlanta Thrashers, Winnipeg Jets, Buffalo Sabres, San Jose Sharks, Edmonton Oilers, and Vancouver Canucks of the National Hockey League. I was selected fourth overall by the Thrashers in the first round of the 2009 NHL entry draft.

3. My daughter, Kensington, was born on July 3, 2020. I have been awarded full custody of Kensington, and she currently resides with me. As her father and custodial parent, I am responsible for her safety, security, and well-being.

4. Due to a history of domestic violence and harassment by my ex-wife, Deanna Kane a/k/a Anna Kane ("Ms. Kane"), I have been granted various protective orders in the United States and Canada. On July 10, 2024, the Superior Court of California, County of Santa Clara, granted a Permanent Restraining Order against Ms. Kane. A true and correct copy is attached hereto as **Exhibit A**. That Permanent Restraining Order provides that Ms. Kane "must not do the following things to [me] … annoy by phone or other electronical means (including repeatedly contact), or disturb the peace." The Permanent Restraining Order further defines that "'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." The Permanent Restraining Order also

provides that Ms. Kane "must not contact [me] …, directly or indirectly, by any means, including by telephone, mail, email, or other electronic means." The Permanent Restraining Order is "PERMANENTLY EXTENDED" and "DOES NOT EXPIRE."

5. On May 14, 2025, the Court of King's Bench of Alberta granted a Default Judgment against Ms. Kane. A true and correct copy is attached hereto as **Exhibit B**. That Default Judgment provides that she "is hereby prohibited from posting anything to social media about the Plaintiffs [me and my fiancée, Mara Teigen], the Plaintiffs' children, about the parties' family dynamics, about KENSINGTON KANE, or the Defendant's [Ms. Kane'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." The Default Judgment "remains in effect permanently and will not expire."

6. These court orders were issued to protect me, my fiancée Mara Teigen, and my children, including Kensington, from ongoing threats, harassment, and defamation by Ms. Kane. Despite these orders, Ms. Kane has continued her campaign of harassment, and has now enlisted Respondent, Nik Richie, as a willing instrument to circumvent and violate these protective orders.

THE REPEATED THREATENING AND HARASSING SOCIAL MEDIA POSTS AND CEASE AND DESIST LETTER

7. I recently learned that Respondent has published and disseminated multiple false and defamatory statements made by Ms. Kane about me on his Instagram account and YouTube channel. Respondent also has made his own threatening, harassing, and defamatory statements concerning me and my 5-year-old daughter. Respondent maintains a large social media following, including nearly 500,000 followers on Instagram which he refers to as the "Dirty Army," which

dramatically amplifies the reach and harm of the threatening, harassing, and defamatory content he publishes.

8. The utterly false and defamatory statements made and/or published by Respondent about me and my minor child include, but are not limited to, the following:

a. Respondent: "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";

b. Respondent: "WE WILL NOT let her [Mara Teigen] and her R-Ape addict baby daddy [me] get away with this";

c. Ms. Kane (published by Respondent): "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";

d. Ms. Kane (published by Respondent): "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";

e. Respondent: "Her husband's cheating cost her baby's life";

f. Ms. Kane (published by Respondent): "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";

g. Ms. Kane (published by Respondent): "I took a pregnancy test on September 28th and we got married September 11th. It's a form of control";

h. Ms. Kane (published by Respondent): "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";

i. Ms. Kane (published by Respondent): "I found out now that he was he had all these girls every day in our apartment";

j. Respondent: "Kidnapped from Mom's Arms";

k. Respondent: "This was the plan to … kidnap Kensington"; and

l. Ms. Kane (published by Respondent): "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."

9. The statements described above are manifestly untrue and constitute defamation *per se* under relevant law, as they falsely accuse me of having committed crimes, including rape and kidnapping. The defamatory statements made by Ms. Kane—which Respondent actively elicited, published, and disseminated—also violate both the Permanent Restraining Order and the Default Judgment described above and put my minor child and fiancée at significant risk.

10. Of particular concern to me and to the safety of my daughter Kensington are Respondent's repeated statements implying and expressly stating that I have "kidnapped" Kensington and that I "stole" her. These statements are not only false—I have lawful custody of my daughter—but they are extraordinarily dangerous because they are designed to incite Respondent's nearly 500,000 Instagram followers, and the broader public, to believe that a child is being held unlawfully and is in danger. Such statements create a foreseeable and grave risk that one or more of Respondent's followers may attempt to "rescue" Kensington from me by force, or may take violent action against me based on the false belief that I am a kidnapper and abuser of a child. Respondent's use of inflammatory language such as "Kidnapped from Mom's Arms" and "This was the plan to … kidnap Kensington" is calculated to maximize public outrage and to endanger both me and my daughter.

11. On May 22, 2026, my attorneys at Blank Rome LLP sent a formal notice and demand letter to Respondent, demanding that he immediately issue a retraction, correction, and repudiation of the statements on all platforms on which they were published. A true and correct copy is attached hereto as **Exhibit C**. The letter also demanded that Respondent permanently remove the interview between himself and Ms. Kane from all platforms, including Instagram and YouTube, and that Respondent cease and desist from making, publishing, and disseminating any further such statements. The letter specifically advised Respondent that the statements made by Ms. Kane—which he actively elicited, published, and disseminated—violate both the

Permanent Restraining Order and the Default Judgment, and placed the Respondent on formal notice of those court orders.

12. The Respondent ignored the cease and desist letter. Rather than complying with the demands set forth therein, Respondent responded defiantly by stating: "If Evander Kane wants to clear up anything. He is more than welcome to come sit down with me and record. As far as a retraction… it's a hard pass." A true and correct copy is attached hereto as **Exhibit D**. Respondent also publicly posted his response on his Instagram account. Respondent's refusal to retract his statements, his refusal to cease his harassment, and his invitation for me to "come sit down" with him to "record" demonstrate that Respondent has no intention of stopping his harmful conduct. To the contrary, Respondent's response makes clear that he intends to continue and escalate his campaign of harassment and incitement against me and, by extension, against my daughter.

13. Indeed, on or about June 1, 2026, Respondent reposted a video of me and my family, including Kensington, on his Instagram account with the caption: "[L]ook at Kensington in the pink pants. Something is not right ….. #FreeKensington," and the voiceover: "Evander is trying to do this picture perfect family. I'm kind of worried about Kensington as you can see she's being kind of like uh dragged along. I don't I don't understand what's going on with her feet. I hope she's okay uh, but but something weird is happening. … I'm like really worried about Kensington. Free Kensington."

14. And recently, I learned that Respondent is selling "FREE KENSINGTON" t-shirts on his website, dirtyarmy.org. This demonstrates that Respondent is commercially profiting from his campaign of harassment against me and my daughter.

15. Respondent's social media posts are not isolated incidents. They represent a sustained and deliberate campaign, conducted in coordination with my ex-

wife Ms. Kane, to circumvent the Permanent Restraining Order and Default Judgment by using Respondent as a conduit and amplifier for Ms. Kane's prohibited statements. Respondent has actively elicited these statements from Ms. Kane, packaged them for maximum sensationalism, and disseminated them to his large audience. Respondent is not merely a passive publisher; he has added his own inflammatory commentary, including his own false accusations of kidnapping and rape, and has used provocative captions and framing to maximize public outrage and potential danger to me and my daughter.

THE NEED FOR RESTRAINING ORDERS

16. I believe that Respondent intends to continue to threaten, harass, and endanger me and my daughter based on the content and persistence of his social media posts, his defiant refusal to comply with the cease and desist demand, his direct and public statement that a retraction is "a hard pass," and his continued publication of new content after receiving that demand.

17. I am seriously alarmed and distressed by Respondent's conduct because his statements are not merely defamatory—they are designed to incite action by his nearly 500,000 followers. Respondent's repeated assertions that I have "kidnapped" my own daughter and that I am a violent criminal create a foreseeable risk that one or more individuals in his audience may attempt to locate me or my daughter, confront me, or take matters into their own hands to "save" Kensington from what they have been falsely led to believe is an abusive and unlawful situation. This places both my life and Kensington's life in real and immediate danger.

18. Respondent has demonstrated that he will not voluntarily cease his conduct. He was formally notified of the existing court orders, was provided with a detailed cease and desist demand, and responded with contempt and defiance. His public statement that he refuses to retract any of his statements, and his invitation for me to "come sit down" with him and "record," confirm that he views this situation as

an opportunity to generate further sensational content at my expense and at the expense of my daughter's safety.

19. Respondent's conduct has already caused me to take additional security precautions in my personal and professional life, at significant cost, to protect myself and Kensington. I am concerned that Respondent, or individuals acting at his instigation or encouragement, may attempt to locate my residence, my daughter's school or daycare, or other locations where Kensington and I may be found. Respondent's social media posts have made my daughter a target by name and have falsely characterized her as a kidnapping victim.

20. I am also gravely concerned about the effect of Respondent's statements on the ongoing safety and emotional well-being of my daughter. Kensington is a young child who deserves to live free from the threat that strangers, inflamed by the Respondent's false statements, may approach, confront, or attempt to take her from me under the false belief that they are "rescuing" a kidnapped child.

21. The Respondent has shown no willingness to respect the boundaries of the law. He was placed on notice of the Permanent Restraining Order and the Default Judgment—both of which prohibit Ms. Kane from making or disseminating the very statements that Respondent has been amplifying—and he has deliberately continued to publish and promote those statements in knowing violation of the spirit and purpose of those orders. His conduct in aiding and abetting Ms. Kane's violations of the court orders further demonstrates that only a direct restraining order against the Respondent himself will be sufficient to protect me and my daughter.

22. I believe that Respondent will continue to attempt to threaten, harass, and endanger me and my daughter if he is not restrained by this Court. Respondent's defiant refusal to retract his statements, his continued publication of new defamatory content, and the dangerous nature of his false accusations of kidnapping and child abuse make clear that judicial intervention is urgently necessary.

23. I am therefore requesting that the Court issue the restraining orders sought in the petition, including that Respondent: (i) not contact me or Kensington, directly or indirectly, by any means, including by telephone, mail, email, social media, or other electronic means; (ii) not come within a specified distance of me, Kensington, my residence, Kensington's school or daycare, or any other location where I or Kensington may be found; (iii) immediately remove all existing posts, videos, interviews, and content concerning me, Kensington, and my family from all platforms that is threatening, harassing, defamatory, or otherwise in violation of the U.S. and Canadian protective orders against Ms. Kane; (iv) not encourage, solicit, or assist Ms. Kane in making, publishing, or disseminating statements about me, Kensington, or my family that are threatening, harassing, defamatory, or otherwise in violation of the U.S. or Canadian protective orders against Ms. Kane; and (v) such other and further relief as the Court deems just and proper.

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I declare under penalty of perjury and under the laws of the State of California that the foregoing is true and correct.

Executed on June 4, 2026

By: _____
Evander Frank Kane

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.

1 Protected Person

Name: Evander Kane

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

2 Restrained Person

Full Name: Deanna Sara Jeanne Kane
Address: 15411 Collinson Ave
City: East Pointe State: MI Zip: 48021

Fill in case number:

Case Number:
21FL002586

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

—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 three 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: 21FL002586

14 ☑ Stay-Away Order

a. You **must** stay at least *(specify)*: 300 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)*:~~ Jurisdiction over Custody and Visitation has transferred to Canada.

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: 21FL002586

19 ☐ 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:
21FL002586

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.*

29 ☐ 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.

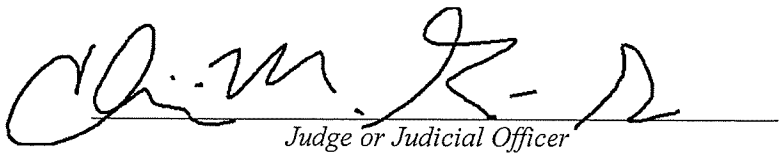
a. Number of pages attached to this 10-page form: _____

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

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

Judge's Signature

Date: 7/9/2024



Judge or Judicial Officer

This is a Court Order.

Case Number:
21FL002586

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

—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

Clerk's Stamp

JUDICIAL CENTRE OF EDMONTON
FILED
May 14, 2025
TG ent
by Email
CLERK OF THE COURT

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

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

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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 C

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

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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

30-2026-01575619-CU-HR-CJC

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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.

30-2026-01575619-CU-HR-CJC

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, by SEAL OF THE STATE OF CALIFORNIA

—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.

CEB Essential Forms ceb.com

Kane, Evander

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

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.)

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

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.

30-2026-01575619-CU-HR-CJC

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.

Case Number: 21FL002586

14 Stay-Away Order

a. You **must** stay at least *(specify):* 300 yards away from *(check all that apply):*

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

b. [x] Exception to 14a:

The stay-away orders do not apply:

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

(2) [x] 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):*~~ Jurisdiction over Custody and Visitation has transferred to Canada.

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:
21FL002586

19 ☐ 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:
21FL002586

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.*

29 ☐ 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.

30-2026-01575619-CU-HR-CJC

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.

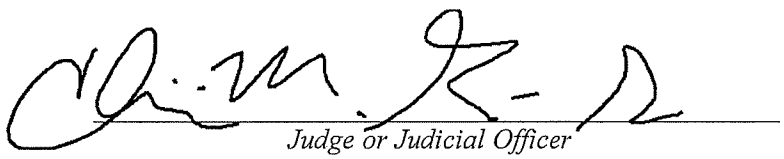
a. Number of pages attached to this 10-page form: _____

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

☐ DV-140 ☐ DV-145 ☐ DV-900 ☐ DV-214(C) ☐ FL-342 ☐ FL-343 ☐ Other: _____

Judge's Signature

Date: 7/9/2024



Judge or Judicial Officer

This is a Court Order.

Case Number:
21FL002586

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.

Kane, Evander

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

—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

Clerk's Stamp

JUDICIAL CENTRE OF EDMONTON
FILED
May 14, 2025
TG ent
by Email
CLERK OF THE COURT

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

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. shall not constitute a breach of this Order.

kb 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. shall not constitute a breach of this Order.

kb 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 D

30-2026-01575619-CU-HR-CJC

Jain, Reena

From: Nik Richie <nik@wn-agency.com>
Sent: Friday, May 22, 2026 11:55 AM
To: Jain, Reena
Cc: Weiner, Craig; mjr@randazza.com
Subject: Re: Notice of Defamation Per Se and Demand for Immediate Retraction

If Evander Kane wants to clear up anything. He is more thank welcome to come sit down with me and record. As far as a retraction... it's a hard pass.

Craig are you related to Anthony? The Carlos Danger guy... you might want to drop the Weiner. It's a bad look for your client, all facts considering.

Nik

> On May 22, 2026, at 5:29 AM, Jain, Reena <reena.jain@blankrome.com> wrote:
>
> Mr. Richie,
>
> On behalf of our client Evander Kane, please see the attached Notice of Defamation *Per Se* and Demand for Immediate Retraction, dated May 22, 2026.
>
> Best,
> Reena
>
> **Reena Jain** | BLANKROME
> 1271 Avenue of the Americas | New York, NY 10020
> +1.212.885.5381 | reena.jain@blankrome.com | bio
>
> **********
> This message and any attachments may contain confidential or privileged information and are only for the use of the intended recipient of this message. If you are not the intended recipient, please notify the Blank Rome LLP or Blank Rome Government Relations LLC sender by return email, and delete or destroy this and all copies of this message and all attachments. Any unauthorized disclosure, use, distribution, or reproduction of this message or any attachments is prohibited and may be unlawful.
> **********

<2026.05.22 Notice Letter to Nik Richie(158141134.1).pdf>

EXHIBIT 2

Opposition to Ex Parte Application for an Order Vacating Temporary Restraining Order

Evander Kane v. Nik Richie

Superior Court of California, County of Orange

(Case No. 30-2026-01575619-CU-HR-CJC)

Electronically Filed by Superior Court of California, County of Orange, 06/16/2026 01:38:00 PM.
30-2026-01575619-CU-HR-CJC - ROA # 31 - DAVID H. YAMASAKI, Clerk of the Court By E. ehlinguser, Deputy Clerk.

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Facsimile: 424.239.3434

Attorneys for Petitioner
EVANDER FRANK KANE

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

EVANDER FRANK KANE,

Petitioner,

v.

HOOMAN ABEDI KARAMIAN A/K/A NIK RICHIE,

Respondent.

Case No. 30-2026-01575619-CU-HR-CJC

PETITIONER EVANDER KANE'S OPPOSITION TO RESPONDENT'S EX PARTE APPLICATION FOR AN ORDER VACATING TEMPORARY RESTRAINING ORDER

Ex Parte Hearing:
Date: June 17, 2026
Time: 1:30 p.m.
Dept: C64

Petitioner Evander Frank Kane ("Petitioner") hereby opposes the *Emergency Ex Parte Application for an Order Vacating Unconstitutional Harassment Restraining Order Against Nik Richie* ("Application") filed on June 15, 2026 by Respondent Hooman Abedi Karamian *aka* Nik Richie ("Respondent").

Inexplicably, and with reckless disregard, Respondent tries to hide behind the manufactured veil of "protected speech" and distract from the real issue at hand—**ensuring the safety of a minor child**. The narrowly tailored TRO does just that. While not impugning any free speech rights, the limited TRO merely protects the minor child from Respondent's posts which clearly are directed to incite his followers. Alleging that the minor child was "kidnapped" by her father (completely false as full custody was awarded to Petitioner) is akin to falsely yelling fire in a crowded theater. Harm is anticipated and has occurred. Furthermore, Respondent has assisted in circumventing the California domestic violence restraining order and the Canadian declaratory judgment—both of which the Court has taken judicial notice of—restraining the mother of the minor child from harassing behavior,. The TRO does nothing more than prevent the continuing violation of those orders. The TRO should remain in place, if no reason other than to protect this child.

On June 8, 2026, the Court issued a narrowly focused *Temporary Restraining Order* ("TRO") protecting Petitioner and his minor daughter from further conduct by Respondent, including but not limited to, conduct that harasses, intimidates, stalks, and disturbs the peace of Petitioner and his daughter. (TRO at p. 2, ¶ 5.) The TRO further ordered Respondent "to cease any posting to social media alleging petitioner had kidnapped his daughter" and "prohibited [Respondent] from posting anything to social media . . . regarding petitioner or his daughter Kensington as described or relayed to respondent by Deanna Kane." (TRO at p. 8, Attachment 5a(4).)

For the reasons set forth herein, the Court should deny the Application in its entirety. The June 30, 2026 hearing is when and where the Court should decide the merits of the TRO by clear and convincing evidence on a complete record.

/ / /

/ / /

I. INTRODUCTION

Respondent's *emergency* Application attacks an order that does not exist. The Court's TRO is narrow and conduct-focused. It does not, as the Application repeatedly insists, forbid Respondent from blanket "reporting" on Petitioner. The TRO in its limited scope specifically restrains Respondent from two discrete things: (1) publishing the demonstrably false claim that Petitioner "kidnapped" his own minor daughter, of whom Petitioner has sole legal and physical custody; and (2) serving as the publication conduit for Deanna Kane *aka* Anna Kane, who is independently restrained by court order from posting about Petitioner and the child. Respondent remains free to criticize Petitioner. However, Respondent is not free to manufacture a false kidnapping narrative aimed at a five-year-old or to knowingly launder a restrained party's prohibited speech through his own platform. The Respondent's posts are clearly designed to incite Respondent's followers and has put the minor child at significant risk that someone will act upon this false narrative of kidnapping.

The Application is the wrong motion at the wrong time. Even if they are without merit, the arguments in the Application can and should be made at the June 30, 2026 hearing. The full evidentiary hearing on the TRO—fifteen days away—is when and where the statute requires the Court to decide the merits by clear and convincing evidence on a complete record. Code of Civ. Proc. ("CCP"), § 527.6(i). Restraining orders for good cause are constitutional and speech that harasses and stalks persons is not protected. *Huntingdon Life Sciences, Inc. v. Stop Huntingdon Animal Cruelty USA, Inc.* (2005) 129 Cal.App.4th 1228, 1250 ("In California, speech that constitutes 'harassment' within the meaning of section 527.6 is not constitutionally protected, and the victim of the harassment may obtain injunctive relief."); *see Virginia v. Black* (2003) 538 U.S. 343, 359-60 (stating that threats and intimidation are not protected by freedom of speech and free press).

Respondent does not identify any irreparable harm, especially considering the short, and presently temporary, duration; indeed, Respondent has continued to make social media posts about Petitioner in apparent disregard of the TRO. (*See, e.g.*, Instagram, @nikrichie,

https://www.instagram.com/reel/DZkpeMQR21V/ (retrieved June 16, 2026).) There is no emergency; the TRO is constitutional; and thus the Court should deny the Application in its entirety and let the noticed hearing proceed as scheduled on June 30, 2026. Moreover, Petitioner would ask the Court to hold Respondent in contempt for violation of the TRO.

II. RELEVANT BACKGROUND

Petitioner holds sole legal and physical custody of his daughter, Kensington, age five. (Kane Decl. ¶ 3.)[1] Petitioner's ex-wife, Deanna Kane, is restrained by court order from posting on social media about Petitioner, his fiancée, and his children, including Kensington. (Kane Decl. ¶¶ 4-6, Exs. A, B.) Both of those orders were attached to the petition and placed before the Court. (Kane Decl. Ex. A, B.)

On May 21, 2026, Respondent published an interview with Deanna Kane on YouTube and promoted it on Instagram and his website, dirtyarmy.org, with commentary asserting that Petitioner "kidnapped" or "stole" Kensington. (*See* Kane Decl. at ¶¶ 7-9.) He also offers for sale and sells "FREE KENSINGTON" merchandise tied to that narrative. (*Id.* at ¶ 14; *see also* https://dirtyarmy.org (retrieved June 16, 2026).) After Petitioner's counsel demanded that the conduct stop, Respondent refused and escalated his misconduct—even going so far as to publicly taunt Petitioner and his counsel. (Kane Decl. at ¶¶ 11-13, Exs. C, D.)

On June 4, 2026, Petitioner's counsel emailed Respondent to advise him that Petitioner would be seeking a civil harassment restraining order against him on June 5, 2026. (*See* Proof of Service filed June 12, 2026, Ex. A.) The Application's repeated statements that Respondent was not informed of the request for a restraining order before it was filed are false. Indeed, on June 5, 2026, Respondents' counsel sent a response letter, stating in relevant part: "We are … in receipt of Mr. Coy's threat to seek an injunction against Mr. Richie today (sent last night). … I presume that if you were not bluffing, the court laughed at you today when you tried to get a prior restraint. I've seen **idiot judges** give them out in other states, and even then, they don't last long. If you managed

[1] All references herein to "Kane Decl." mean the Declaration of Evander Frank Kane filed on June 5, 2026 with the Request for Civil Harassment Restraining Orders.

to secure an injunction, go ahead and email it to me. We'll make short work of that." (Exhibit 1 attached hereto (emphasis added).)

On June 8, 2026, the Court issued the TRO, supported by written findings (TRO at p. 8, Attachment 5a(4)), and set a noticed hearing for June 30, 2026. The Court expressly took judicial notice of both the California domestic violence restraining order and the Canadian default judgment—recognizing the latter as a Canadian order—and was free to, and did, consider their terms.

On June 11, 2026, upon receipt of the issued TRO, Petitioner's counsel served the relevant papers on Respondent's counsel. (*See* Proof of Service filed June 12, 2025; *see also* Ex. 1 at p. 3 ("No need to trouble yourself with formal service.").) On June 12, 2026, Respondent posted the Notice of Court Hearing to his Instagram account, stating: "YESSSSSSSSS!!!!! Let's dance [] Time to show the world what I can do. Thank you Evander Kane… this is going to be so much fun …." (Instagram, @nikrichie, https://www.instagram.com/p/DZf0j8hv09y/?ig_mid=BD93F96B-0D1D-4B71-AC0D-A4EE6EA43764&utm_source=igweb (retrieved June 16, 2026).)

On June 15, 2026, Petitioner's counsel was informed that the Superior Court of California, County of Santa Clara, ordered that the Canadian default judgment is registered and enforceable in California.[2]

III. ARGUMENT

A. The Application is procedurally improper; these issues belong at the June 30 hearing.

Ex parte relief requires an affirmative showing of irreparable harm, immediate danger, or another statutory basis for bypassing a noticed motion. Cal. Rules of Court, rule 3.1202(c). Respondent makes no such showing. The TRO is interim by design and expires at the June 30 hearing, where Respondent may file a response (form CH-120) and litigate every issue he raises

[2] Upon receipt of the signed order, Petitioner's counsel will provide the Court and Respondent's counsel with a copy.

there on a full record under the clear-and-convincing-evidence standard of Code of Civil Procedure section 527.6(i).

Respondent's own papers concede the proper course here. He asks that the Court, in the alternative, treat the Application as his opposition to the TRO and to proceed at the hearing. (App. at p. 10 n.6.) That is exactly what the Application is—an opposition to the TRO—and these arguments belong at the imminent, already-calendared evidentiary hearing, where the Court decides these issues in accordance with the Code of Civil Procedure.

The claimed "emergency" is further undercut by Respondent's own conduct: he has continued to make social media posts about Petitioner in violation of the TRO. A party who is disregarding the order he considers intolerable cannot credibly claim that fifteen days' delay will irreparably harm him. Moreover, Respondent misrepresents the notice procedures for restraining orders under California law—Respondent was properly put on notice and the June 30 hearing is his opportunity to be heard.

B. The TRO is a narrow, conduct-based order, not a prior restraint on journalism.

The Application is a strawman. Despite Respondent's histrionics, the TRO does not enjoin blanket reporting on Petitioner. Respondent's recurring premise that he is "restrained from talking about" various subjects is simply false. Sections 2.1.1 through 2.1.6 of the Application are irrelevant as to the issue of the TRO because the order does not prohibit Respondent from completely commenting, posting, or talking about Petitioner. Rather, the order restrains a far narrower course of conduct: posting that Petitioner "kidnapped" his minor child (a statement the Court found false on its face in light of Petitioner's lawful custody) and republishing content and statements that Deanna Kane is herself enjoined from posting pursuant to court order.

Balboa Island Village Inn, Inc. v. Lemen (2007) 40 Cal.4th 1141, a defamation case, demonstrates that the TRO should not be vacated if the relief is narrowly tailored. *See id.* at 1159-60. Here, the TRO does not purport to adjudicate defamation; it is an interim section 527.6 order, which the statute expressly authorizes pending the noticed hearing at which the merits are decided. *See* CCP § 527.6(d)-(g). To the extent Respondent contends the TRO's findings should be tested or

its scope refined, that is the function of the June 30 hearing—not an emergency *ex parte* application. The "kidnapping is false" finding, moreover, rests on the undisputed fact of Petitioner's custody, not on any contested defamation ruling. Respondent himself provides no evidence to dispute Petitioner's custody. *Balboa Island* confirms that narrowly tailored relief is permissible; accordingly, the TRO should not be vacated.

People v. Peterson (2023) 95 Cal.App.5th 1061, on which Respondent relies, is distinguishable—it is a far more attenuated "course of conduct." The conviction there rested on generalized political criticism and a "confusing" letter—pure protected commentary. *See id.* at 1065, 1067. Here, the case involves a targeted campaign asserting a specific false fact (kidnapping) about a custodial parent, coupled with the amplification of a restrained party's prohibited speech. A reasonable person would understand Respondent's speech to be a deliberate continued course of conduct that involved more than a mere mention of Petitioner or his minor daughter. *See id.* at 1069 ("Direct threats of violence are not necessary, but something more than the mere mention of the [protected person] was required."). Respondent made Petitioner and his daughter the focus of his social media account and webpage—based directly on the premise that Petitioner's daughter was kidnapped and needs to be "rescued" by one of Respondent's nearly 500,000 followers, of which he calls the "Dirty Army." (*See* Kane Decl. ¶¶ 8, 10, 13-14; https://dirtyarmy.org (retrieved June 16, 2026) (stating on the top banner of Respondent's website: "**FREE KENSINGTON . . . CALLING ON THE DIRTY ARMY . . . LET'S BRING THEM HOME**").)

Respondent's repeated assertions that Petitioner has "kidnapped" his own daughter create a foreseeable risk that one or more individuals in his audience may attempt to locate Petitioner or his daughter, confront him, or take matters into their own hands to "save" his daughter from what they have been falsely led to believe is an abusive and unlawful situation. Respondent's website literally "call[s]" on his followers to "free" Kensington and "bring [her] home." (*See id.*) This places both Petitioner's life and his daughter's life in real and immediate danger and a real fear of that danger. More egregiously, Respondent is profiting from his "kidnapping" narrative by offering for sale and

selling "FREE KENSINGTON" merchandise. (*See id.*) That is not analogous to *Peterson* and is not protected speech.[3]

Respondent misses the point on the Court's citation in the TRO to *People v. Planchard* (2025) 109 Cal.App.5th 157. The case does not set the standard for what *must* happen for conduct to be considered harassment; rather, it is simply an example. The Court, instead, looks to the definition under section 527.6 and compares that with Respondent's conduct, which meets the harassment definition. *See* CCP § 527.6(b)(3). Under section 527.6, the totality of Respondent's conduct—the full-length interview with Deanna Kane, the sharing of interview clips on social media with inflammatory language, the publication and amplification of statements designed to paint Petitioner as a kidnapper, calling on his followers to take action and "free" Kensington, the selling of "FREE KENSINGTON" merchandise, and the continued refusal to remove harmful and harassing content—constitutes a pattern of conduct that would cause a reasonable person to experience substantial emotional distress. (CCP § 527.6(b)(3) (defining "harassment").)

C. Respondent's conduct is an unprotected "course of conduct" under section 527.6.

Section 527.6 reaches not only credible threats but also a "knowing and willful course of conduct directed at a specific person that seriously alarms, annoys, or harasses the person, and that serves no legitimate purpose." (CCP § 527.6(b)(3).) The totality of Respondent's conduct is what decides—not a single interview viewed in isolation. Respondent conducted the interview with Deanna Kane, promoted clips of the interview on Instagram with inflammatory language, refused to remove the interview or social media posts, sells "FREE KENSINGTON" merchandise, and continues to publish and amplify the kidnapping narrative—all directed at Petitioner and his minor child by name, and all serving no legitimate purpose. This course of conduct by Respondent would cause a reasonable person to suffer substantial emotional distress and actually causes substantial emotional distress to Petitioner. (*See* Kane Decl. at ¶¶ 19-22; CCP § 527.6(b)(3).) Indeed, selling

[3] And contrary to Respondents' attempted analogy, the Pentagon Papers case involved the classification of government secrets—not false accusations about the custody (and kidnapping) of a minor child. (*New York Times Co. v. United States* (1971) 403 U.S. 713, 730 (Stewart, J., concurring) ("I cannot say that disclosure of any of them [the documents] will surely result in direct, immediate, and irreparable damage to our Nation or its people.")).

merchandise and calling on hundreds of thousands of people to "free" a minor child goes beyond "journalism" and serves no legitimate purpose under section 527.6(b)(3).

Respondent's "journalist" label—though plainly overstated—does not immunize this course of conduct. Promoting clips on Instagram with one's own commentary and selling branded merchandise is not "newsgathering;" it is a monetized campaign built around a false narrative directed at Petitioner and his minor daughter. The Application ignores the Respondent's repeated inflammatory and false commentary about the legal custody of a child and conflates it with traditional journalism. Whether some press privilege applies or not does not authorize a person to act as the conduit for a party who is under a court order not to speak. Respondent's self-serving declaration that he "intended no harm" does not control either; section 527.6 turns on the objective course of conduct and its foreseeable effect, not on the actor's self-serving stated intent. Broadcasting a kidnapping accusation to a mass audience while merchandising "FREE KENSINGTON" speaks for itself.[4] (*See* Kane Decl. ¶¶ 8, 10, 13-14; https://dirtyarmy.org (retrieved June 16, 2026).)

D. The orders restraining Deanna Kane were fully disclosed and confirm Respondent's conduit role.

There was no concealment, and Respondent's Rule 3.3(d) accusation collapses on the face of the record. Petitioner attached both the California domestic violence restraining order and the Canadian declaratory judgment to the petition. (Kane Decl., Exs. A, B.) The Court took judicial notice of each, expressly recognized the Canadian order as a Canadian order, and was free to examine the orders directly. A party who attached the very orders he is accused of hiding has not misled anyone.

With respect to the California domestic violence restraining order, Respondent's "jurisdiction transferred to Canada" argument conflates two distinct things: the transfer of custody and visitation jurisdiction, on the one hand, and the order's independent personal-conduct restraints,

[4] The Application's argument analogizing Respondent's speech to political assassination attempts undermines Respondent's arguments by conceding that repeated inflammatory speech *can* inspire violence. (*See* App. at p. 7 n.4.)

on the other. (App. at p. 14.) A transfer of custody jurisdiction does not dissolve the other provisions in that same order. (*See* Kane Decl., Ex. A.)

And with respect to the Canada default judgment, the TRO does not enforce the Canadian judgment against Respondent. Instead, it is evidence that Deanna Kane is a restrained party whose prohibited speech Respondent is knowingly republishing and amplifying in violation of the default judgment. Indeed, Deanna Kane has publicly thanked Respondent for giving her a "platform," demonstrating that Respondent is knowingly and willfully amplifying Deanna Kane's prohibited speech that he knows—*at least* as to the kidnapping narrative—is false. (Kane Decl. at ¶ 14; Exhibit 2 attached hereto.) The SPEECH Act, which governs the recognition and enforcement of foreign *defamation* judgments, is therefore immaterial and beside the point. In any event, the Canadian default judgment has been domesticated by the Superior Court of California, County of Santa Clara. But even if the Court was to ignore the Canadian order, the TRO was properly granted as it rests on Respondent's own conduct, including the false kidnapping narrative he is perpetrating and profiting from.

E. The Court's interest in protecting a five-year-old is legitimate and substantial.

Respondent's papers say almost nothing about Petitioner's minor daughter, Kensington—understandably, because the Respondent's repeated focus on the child by name is the most damaging fact for his position. Branding a custodial parent a "kidnapper" to a large audience, and selling merchandise calling on followers to "free" the child, is not ordinary public commentary nor newsgathering. It foreseeably exposes a five-year-old to risk and serves no legitimate purpose. The Court's interest in protecting a minor from a course of conduct of this kind is well established and independently supports the narrow relief the Court ordered.

F. There is no basis for sanctions or fees.

Finally, Respondent's request for sanctions and fees should be wholesale rejected. A petition that was facially supported, that attached the very orders Respondent claims were concealed, and that the Court granted on written findings is the antithesis of frivolous or bad-faith conduct. Respondent's request under section 527.6(s) is, in any event, premature: it presupposes a prevailing

party, and there is none, especially not Respondent. On this record—where Petitioner's counsel fully disclosed the governing orders—the request for sanctions is itself improper and should be denied. Even if there was some duty to disclose that was violated (not so), any alleged omissions are curable through Respondent's presentation at the hearing on the TRO. Furthermore, ethical allegations are not a basis for vacating a lawfully issued TRO. Respondent's counsel, however, should understand ethical issues better, given their long list of disciplinary proceedings.

IV. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Court deny Respondent's Application in its entirety. The temporary restraining order should remain in full force and effect, and Respondent should present his arguments, if any, at the noticed hearing on June 30, 2026.

DATED: June 16, 2026

BLANK ROME LLP

By: */s/ Ryan F. Coy*
Joseph J. Mellema
Ryan F. Coy
Attorneys for Petitioner
EVANDER FRANK KANE

EXHIBIT 1

RANDAZZA
LEGAL GROUP

Marc J. Randazza, JD, MAMC, LLM
Licensed in AZ, CA, FL, MA, NV

5 June 2026

Via Email Only
Craig Weiner
<craig.weiner@blankrome.com>

Ryan Coy
<Ryan.coy@blankrome.com>

Re: Nik Richie adv. Evander Kane | Response to Demand Letter

Dear Attorneys Weiner and Coy:

This firm has the honor and privilege of representing Nik Lamas Richie. We are in receipt of your letter dated May 22, 2026, in which you request that Mr. Richie remove statements about your client, Evander Kane—including an interview between Mr. Richie and Mr. Kane's ex-wife, Deanna Kane ("Mrs. Kane")—issue a retraction, and not make further similar statements.

No.

Mr. Richie will not comply.

We are also in receipt of Mr. Coy's threat to seek an injunction against Mr. Richie today (sent last night).

Ok, lets dance.

This is a dispute about public allegations of rape against Mr. Kane, and how Mr. Kane's infidelity while he was married to Mrs. Kane caused Mrs. Kane to develop an STI, resulting in a traumatic stillbirth.

The statements mentioned in your letter are not the first instances of the public hearing about Mr. Kane's sexual misconduct; there has been reporting and discussion about the topic for the past decade. *See, e.g.,* Michael Mroziak, "Sabres' Evander Kane cleared in sex investigation," BUFFALO TORONTO PUBLIC MEDIA (Mar. 11, 2016);[1] Curtis Pashelka, "Evander Kane's wife Anna alleges physical, sexual abuse in restraining order filing," THE MERCURY NEWS (Sept. 22, 2021).[2]

You identify several statements by Mr. Richie and Mrs. Kane, most of which are from Mr. Richie's interview with her, published on YouTube. You claim that these statements are

[1] Available at: https://www.btpm.org/local/2016-03-11/sabres-evander-kane-cleared-in-sex-investigation.
[2] Available at: https://www.mercurynews.com/2021/09/22/evander-kanes-wife-anna-alleges-physical-sexual-abuse-in-reported-filing-for-restraining-order/.

"manifestly untrue," but you don't provide any specific denials of any statement or otherwise give Mr. Richie any reason to doubt the truth of the statements.

Instead, it appears you rely on a restraining order and default judgment against Mrs. Kane. The restraining order prohibits Mrs. Kane from "disturbing the peace" and contacting protected persons. It is, to say the least, a stretch to claim that this language prohibits her from informing the public about how Mr. Kane, a "well-known Canadian professional ice hockey player" and recipient of years of media scrutiny for his sexual misconduct, is a rapist. Even if it did, your grievance would be with Mrs. Kane alone, since the restraining order does not extend to anyone other than her.

The default judgment does prohibit Mrs. Kane from posting about Mr. Kane on social media, but it again does not extend to anyone other than Mrs. Kane. More fundamentally, it was issued by a Canadian court.

A Canadian court.

LOL

Not only does Mr. Richie have no respect for a Canadian court, but he doesn't really have all that much respect for anything in Canada.

Mr. Richie is a U.S. citizen and lives in the U.S. He is not a Canadian citizen, nor does he have any connection of any kind to Canada. No Canadian court may exercise jurisdiction over him, and no Canadian court has the power to enjoin him from doing anything. Furthermore, both the restraining order and default judgment were entered without Mrs. Kane's input, and there are no findings in these orders that any of Mrs. Kane's statements about Mr. Kane are false. They have no bearing on any claims your client could bring against Mr. Richie.

You threaten a defamation claim against Mr. Richie. I doubt that will go well for your client. Let's assume Mr. Kane files suit in California, where Mr. Richie lives. He would need to establish that the statements at issue are false, and I see nothing in your letter indicating that. Assuming you could prove they are false, Mr. Kane is a public figure and there has been online discussion about his sexual misconduct for years, meaning he would need to satisfy the actual malice standard. He would need to provide clear and convincing evidence that Mr. Richie published his statements and the interview with actual knowledge of falsity or reckless disregard for falsity. *Reader's Digest Assn. v. Superior Court*, 37 Cal.3d 244, 256 (1984); *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 344–45 (1974). To say this is a difficult standard to meet is an understatement. Any suit in California would also be met with a special motion to strike under California's Anti-SLAPP law, Cal. Code Civ. Proc. § 425.16. This law would not only allow Mr. Richie to dismiss such a lawsuit quickly, but also to recover his costs and attorneys' fees once the suit fails.

Bringing suit in Canada would not work any better for Mr. Kane, even if such a court could exercise jurisdiction over Mr. Richie. This is because any judgment rendered by a Canadian court would be unenforceable under the U.S. SPEECH Act, 28 U.S.C. § 4101, *et seq*., unless

the court applied speech protections consistent with U.S. law and the First Amendment to the U.S. Constitution. 28 U.S.C. § 4102(a)(1). Courts that have dealt with the SPEECH Act and Canada have found that a Canadian defamation judgment is not enforceable in the U.S. *See Trout Point Lodge, Ltd. v. Handshoe*, 729 F.3d 481 (5th Cir. 2013); *InvestorsHub.com, Inc. v. Mina Mar Group, Inc.*, 2011 U.S. Dist. LEXIS 87566, *6-7 (N.D. Fla. June 20, 2011 (finding that "Canadian law does not provide as much protection of speech as the First Amendment, federal law, and Florida law"); *see also Minority Television Project, Inc. v. F.C.C.*, 736 F.3d 1192, 1211 (9th Cir. 2013) ("No other nation—not even freedom-loving countries like Canada, England, Australia, New Zealand, and Israel—has protections of free speech and free press like those enshrined in the First Amendment") (Kozinski, J., dissenting). It is also possible to enforce a foreign judgment not based on such principles, but you would essentially have to litigate your claims from square one in a U.S. court to do so. 28 U.S.C. § 4102(a)(B).

With respect to your threat sent by Mr. Coy, I will just provide the whole thing here:

> *As you know, our firm represents Evander Kane. Please be advised that on behalf of Mr. Kane, we will seek a temporary restraining order against you in Orange County Superior Court tomorrow at the Central Justice Center in Santa Ana. The request will seek orders that prevent you from contacting, whether directly or indirectly, Mr. Kane and his daughter; require you to remove statements from your social media platforms that concern Mr. Kane and his daughter that are threatening, harassing, defamatory, or otherwise violate the protective orders against Deanna Kane a/k/a Anna Kane; and prohibit you from encouraging, soliciting, or assisting Ms. Kane in making or disseminating such statements.*

Dude.

You *think* that will work? Then lets roll.

Mr. Richie stands by all his and Mrs. Kane's statements noted in your letter. He has relied on Mrs. Kane, an eyewitness to Mr. Kane's misconduct, and has never had any reason to doubt her story. Mr. Richie will continue to make such statements about Mr. Kane. A California court will not order him to stop or find him liable for these statements, and a Canadian court would not have the ability to issue an enforceable injunction or damages award against him.

If you would like to be so utterly stupid as to seek a prior restraint against Mr. Richie, I am authorized to accept service of the complaint by email. No need to trouble yourself with formal service.

I presume that if you were not bluffing, the court laughed at you today when you tried to get a prior restraint. I've seen idiot judges give them out in other states, and even then, they don't last long. If you managed to secure an injunction, go ahead and email it to me. We'll make short work of that. If you have a hearing set for today, we will be happy

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LEGAL GROUP

to get on Zoom or a phone hearing to listen to your presumably remarkable new theory as to how you can get an injunction in this circumstance.

If you would like to set a hearing for this on Monday or Tuesday, we would be thrilled to come to court to hear you articulate why you think you can get a prior restraint against Mr. Richie, or against anyone, anywhere, ever.

Your move. The smartest move is to chill out and tell your sex pest client about the First Amendment. If you don't, then we will.

Your Pal,



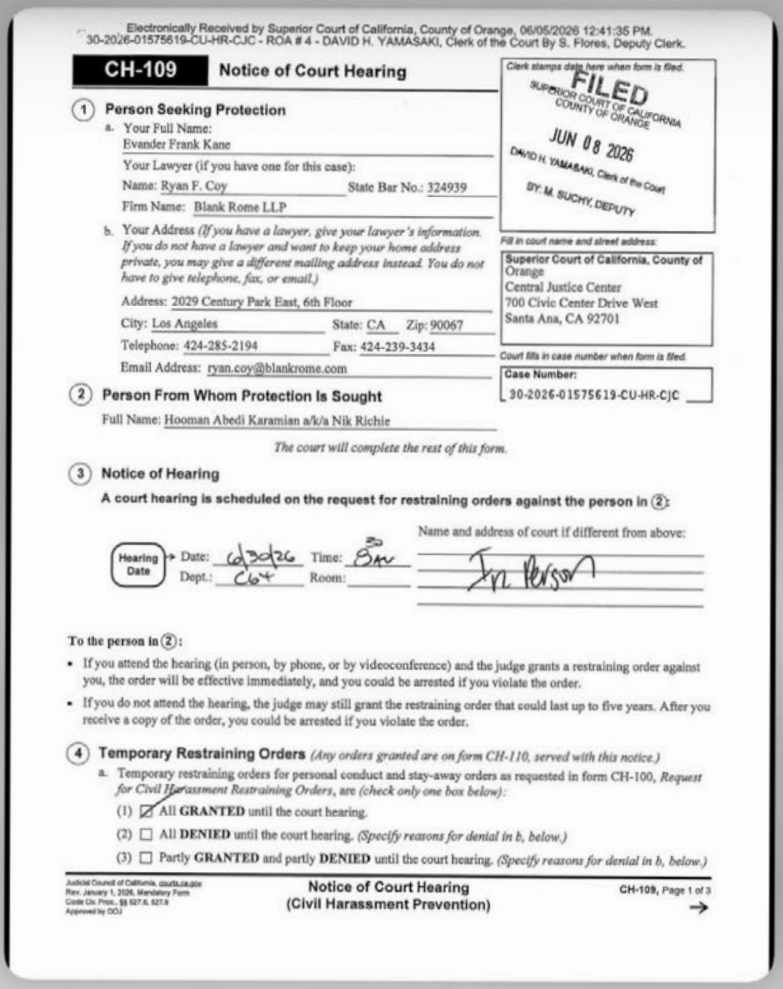
Marc J. Randazza

cc: Alex J. Shepard

EXHIBIT 2

5:03

annaavakane 1h



Electronically Received by Superior Court of California, County of Orange, 06/05/2026 12:41:35 PM.
30-2026-01575619-CU-HR-CJC - ROA # 4 - DAVID H. YAMASAKI, Clerk of the Court By S. Flores, Deputy Clerk.

CH-109 **Notice of Court Hearing**

Clerk stamps date here when form is filed.
FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
JUN 08 2026
DAVID H. YAMASAKI, Clerk of the Court
BY: M. SUCHY, DEPUTY

(1) **Person Seeking Protection**

a. Your Full Name:
Evander Frank Kane

Your Lawyer (if you have one for this case):
Name: Ryan F. Coy State Bar No.: 324939
Firm Name: Blank Rome LLP

b. Your Address *(If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or email.)*
Address: 2029 Century Park East, 6th Floor
City: Los Angeles State: CA Zip: 90067
Telephone: 424-285-2194 Fax: 424-239-3434
Email Address: ryan.coy@blankrome.com

Fill in court name and street address:
Superior Court of California, County of Orange
Central Justice Center
700 Civic Center Drive West
Santa Ana, CA 92701

Court fills in case number when form is filed.
Case Number:
30-2026-01575619-CU-HR-CJC

(2) **Person From Whom Protection Is Sought**
Full Name: Hooman Abedi Karamian a/k/a Nik Richie

The court will complete the rest of this form.

(3) **Notice of Hearing**

A court hearing is scheduled on the request for restraining orders against the person in (2):

Hearing Date → Date: 6/30/26 Time: 8:30 AM
Dept.: C64 Room:

Name and address of court if different from above:
In Person

To the person in (2):

- If you attend the hearing (in person, by phone, or by videoconference) and the judge grants a restraining order against you, the order will be effective immediately, and you could be arrested if you violate the order.
- If you do not attend the hearing, the judge may still grant the restraining order that could last up to five years. After you receive a copy of the order, you could be arrested if you violate the order.

(4) **Temporary Restraining Orders** *(Any orders granted are on form CH-110, served with this notice.)*

a. Temporary restraining orders for personal conduct and stay-away orders as requested in form CH-100, *Request for Civil Harassment Restraining Orders*, are *(check only one box below)*:

(1) ☑ All **GRANTED** until the court hearing.
(2) ☐ All **DENIED** until the court hearing. *(Specify reasons for denial in b, below.)*
(3) ☐ Partly **GRANTED** and partly **DENIED** until the court hearing. *(Specify reasons for denial in b, below.)*

Judicial Council of California, courts.ca.gov
Rev. January 1, 2026, Mandatory Form
Code Civ. Proc., §§ 527.6, 527.9
Approved by DOJ

Notice of Court Hearing
(Civil Harassment Prevention)

CH-109, Page 1 of 3 →

Trying to Silence @nikrichie now for standing up for me and giving me a platform to speak my truth - Evander every single word I said was 💯 factual

Send message...

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is **BLANK ROME LLP**, 2029 Century Park East, 6th Floor, Los Angeles, California 90067.

On **June 16, 2026,** I served the foregoing document(s): **PETITIONER EVANDER KANE'S OPPOSITION TO RESPONDENT'S EX PARTE APPLICATION FOR AN ORDER VACATING TEMPORARY RESTRAINING ORDER** on the interested parties in this action addressed and sent as follows:

☐ **BY ENVELOPE:** by placing ☐ the original ☐ a true copy thereof enclosed in sealed envelope(s) addressed as indicated and delivering such envelope(s):

☐ **BY MAIL:** I caused such envelope(s) to be deposited in the mail at Los Angeles, California with postage thereon fully prepaid to the office or home of the addressee(s) as indicated. I am "readily familiar" with this firm's practice of collection and processing documents for mailing. It is deposited with the U.S. Postal Service on that same day, with postage fully prepaid, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

☐ **BY PERSONAL SERVICE:** I caused such envelope to be hand-delivered to the office or home of the addressee(s) as indicated. A proof of service will be executed by process server upon completion.

☒ **BY E-MAIL OR ELECTRONIC TRANSMISSION (EMAIL):** Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document(s) listed above to be transmitted to the person(s) at the e-mail address(es) as indicated. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was incomplete or unsuccessful.

☒ **STATE:** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **June 16, 2026**, at Los Angeles, California.

Anne O. Salano

SERVICE LIST

Evander Frank Kane v. Hooman Abedi Karamian a/k/a Nik Richie
Orange County Superior Court Case No.: 30-2026-01575619-CU-HR-CJC

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

EXHIBIT 3

Ex Parte Application for Orders Reinstating and Continuing Temporary Restraining Order

Evander Kane v. Nik Richie

Superior Court of California, County of Orange

(Case No. 30-2026-01575619-CU-HR-CJC)

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Attorneys for Petitioner
EVANDER FRANK KANE

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

EVANDER FRANK KANE,

Petitioner,

v.

HOOMAN ABEDI KARAMIAN A/K/A NIK RICHIE,

Respondent.

Case No. 30-2026-01575619-CU-HR-CJC

[*Assigned for All Purposes to: Hon. Amber Poston, Dept. C65*]

PETITIONER EVANDER KANE'S EX PARTE APPLICATION FOR ORDERS: (1) REINSTATING AND CONTINUING TEMPORARY RESTRAINING ORDER; (2) EXPANDING PROTECTED PERSONS PURSUANT TO CODE OF CIVIL PROCEDURE § 527.6(c); AND, IN THE ALTERNATIVE, (3) EXPANDING THE SCOPE OF THE EVIDENTIARY HEARING; MEMORANDUM OF POINTS AND AUTHORITIES

[Filed Concurrently with Declarations of Evander Frank Kane, Mara Teigen, and Ryan F. Coy; and [Proposed] Orders]

Hearing (will be ruled on without hearing):
Date: August 6, 2026
Time: 1:45 p.m.
Dept: C65

TO THE COURT, TO RESPONDENT, AND TO HIS ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that by August 6, 2026, at 1:45 p.m., or as soon thereafter as the matter may be heard, in Department C65 of the above-entitled Court, located at 700 Civic Center Drive West, Santa Ana, California 92701, Petitioner Evander Frank Kane ("Petitioner" or "Mr. Kane") will and hereby does apply ex parte for orders:

1) Reinstating the temporary restraining order previously issued against Respondent Hooman Abedi Karamian *aka* Nik Richie ("Respondent") in this proceeding as to Petitioner and his six-year-old daughter, Kensington Kane, and continuing that order in effect through the conclusion of the continued evidentiary hearing pursuant to Code of Civil Procedure section 527.6, subdivisions (c), (d), (f), and (p)(2);
2) Expanding the protected persons under the temporary restraining order, on a showing of good cause pursuant to Code of Civil Procedure section 527.6, subdivision (c), to include Petitioner's fiancée and household member Mara Teigen and their three additional minor children, Iverson Kane (age 4), Hendrix Kane (age 3), and Penelope Kane (age 1); and
3) Advancing the evidentiary hearing on the petition, presently set for September 8-10, 2026, to the earliest available date, and in no event later than the week of August 26, 2026, so that hearing occurs within the period contemplated by Code of Civil Procedure section 527.6, subdivisions (f) and (g), and so that Petitioner's statutory right to a prompt hearing is not further deferred by Respondent's motion practice and to prevent further stalking and harassment by Respondent; and
4) In the alternative, if the Court declines to expand the temporary restraining order at the ex parte stage, ordering that the scope of the evidentiary hearing presently set for September 8-10, 2026 be expanded to include Ms. Teigen and the three additional minor children as additional protected persons.

This Application is made on the grounds that, since the temporary restraining order was dissolved on June 18, 2026, Respondent has escalated his conduct in a manner that places

Petitioner's entire household—including four children under the age of seven—in immediate danger of irreparable harm. Respondent has now expressly directed his audience of more than 500,000 followers to locate Petitioner's family in real time, set a thirty-minute deadline for them to do so, and then publicly celebrated the surveillance photograph his followers delivered. Petitioner seeks only conduct-based relief. He does not seek any order restricting Respondent's general commentary about Petitioner or this litigation.

This Application is based on this Notice and Application; the accompanying Memorandum of Points and Authorities; the concurrently filed Declarations of Evander Frank Kane, Mara Teigen, and Ryan F. Coy and the exhibits thereto; the [Proposed] Orders lodged herewith, substantially in the form of Exhibit A attached hereto; all pleadings, papers, and records on file in this action; and such further evidence and argument as may be presented.

Notice of this Application was given to Respondent's counsel of record, Marc J. Randazza and Alex J. Shepard of Randazza Legal Group, PLLC, on August 5, 2026 at 9:46 a.m. by telephone and on August 5, 2026 at 9:57 a.m. by email, in accordance with California Rules of Court, rules 3.1203 and 3.1204, and Code of Civil Procedure §§ 527, 527.6. (Coy Decl. ¶ 17, Ex. 18.)

DATED: August 5, 2026

BLANK ROME LLP

By: _____
Joseph J. Mellema
Ryan F. Coy
Attorneys for Petitioner
EVANDER FRANK KANE

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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

On June 16, 2026, Respondent swore under penalty of perjury that he had "no reason to think anyone would harm Mr. Kane, or his daughter Kensington," and that the very suggestion was "ludicrous." (Anti-SLAPP Motion, Richie Decl. ¶ 9.) He swore that in 22 years of reporting, his work had "never resulted in any violence perpetrated against the subjects of my reporting." (*Id.* ¶ 13.) Twenty-four days later, Respondent published this to his followers:

> "*Looking for Monster Kane & Co.* . . . Let's test the Dirty Army. Can anyone grab a pic in next 30 minutes[.]"

Within minutes, one of them delivered. Respondent posted the photograph his follower had taken—a picture of Mr. Kane, his fiancée Mara Teigen, and their one-year-old daughter, taken without their knowledge at Disneyland—above the caption: "That was fast. DA Strong!" (Kane Decl. ¶¶ 9-10; Teigen Decl. ¶¶ 14-15; Coy Decl. ¶¶ 6-7, Exs. 5-6.)

That is not reporting. Respondent did not comment on Mr. Kane; he issued an operational instruction to a half-million-person audience and the public at large to physically locate a family with four children under seven, imposed a deadline, and then congratulated the follower who ran them down, posting the picture of the family. He has now demonstrated, in his own words, that he can mobilize strangers to find this family anywhere in North America within half an hour. Whatever the Court ultimately concludes about Respondent's commentary, it cannot be that a man may demonstrate that capability against four minor children and the law will leave them without any protective order at all while the case is briefed and delayed by the Respondent.[1]

And Mr. Kane and his family are without protection. When the temporary restraining order ("TRO") was dissolved on June 18, 2026, the family lost even the limited protection it had from the TRO. Ms. Teigen and the three younger children have never been protected persons—a gap Respondent has exploited, as he has increased his conduct towards Ms. Teigen. Due to Respondent's

[1] Petitioner filed this case and was entitled to a hearing on his petition within a specific statutory timeframe (§ 527.6, subd. (g)). Now, due to Respondent's own litigation tactics and insistence that his meritless motion to strike be heard first, Petitioner has to wait months for a hearing on the civil harassment restraining order while Respondent continues his monetization campaign of stalking and harassment towards Petitioner and his family.

conduct, strangers have called Ms. Teigen a "kidnapper" in public in front of her children. A man sat in a parked car and screamed Respondent's own merchandise slogan—"FREE KENSINGTON"—at her while she buckled her one-year-old into a car seat. Over the past two months, the toll on her has been severe: she largely stopped leaving the house with her children, and the physical and emotional effects have been significant enough to require professional care she never needed before Respondent's campaign began. (Teigen Decl. ¶¶ 10-13, 21-27.)

Petitioner therefore applies ex parte as described above: reinstatement as to Mr. Kane and Kensington; expansion of the protected persons under section 527.6(c) to include Ms. Teigen and the three younger children; advancement of the hearing; and alternatively, expansion of the scope of the evidentiary hearing. Petitioner seeks only conduct-based relief: no contact, stay-away, no publication of the family's location or whereabouts, and no soliciting or directing third parties to locate, follow, or photograph them. He does not ask this Court to restrict what Respondent may say about him, to order any content removed, or to prohibit any commentary. And Petitioner does not rest this Application on the 2024 domestic violence restraining order or the Canadian judgment against Ms. Deanna "Anna" Kane. This Application rests on section 527.6 and on what Respondent has done and continued to do since June 18, 2026. The proposed order is deliberately narrower than the order the Court dissolved and omits terms that previously gave the Court pause.

The balance of harms here weighs heavily in Petitioner and his family's favor. A TRO at this stage costs Respondent nothing he has a right to—he keeps publishing, keeps the podcast—while the family gets protection from further direct stalking and harassment during the gap period until a final hearing is held.

II. FACTUAL BACKGROUND

A. The Court Dissolved the Temporary Restraining Order on June 18, 2026, Without Vindicating Respondent's Free Speech Defense.

Petitioner filed his petition for a civil harassment restraining order on June 5, 2026. On June 8, 2026, the Court issued a *Temporary Restraining Order* ("TRO") protecting Petitioner and Petitioner's daughter from further conduct by Respondent, including but not limited to, conduct that

harasses, intimidates, stalks, and disturbs the peace of Petitioner and his daughter. (TRO at p. 2, ¶ 5.) The TRO further ordered Respondent "to cease any posting to social media alleging petitioner had kidnapped his daughter," and it "prohibited [Respondent] from posting anything to social media . . . regarding petitioner or his daughter Kensington as described or relayed to respondent by Deanna Kane." (TRO at p. 8, Attachment 5a(4).)

Respondent applied ex parte to vacate. The Court described the question as a "very close call," denied Respondent's requests for fees and sanctions, and stated expressly that the dissolution "should not be interpreted as a vindication of respondent's free speech arguments." (*See* Minute Order dated June 17, 2026 ("June 17 Minute Order").) On June 18, 2026, the Court dissolved the TRO, preserved the hearing on the petition, and directed the parties to meet and confer on a briefing schedule. (Minute Order dated June 18, 2026 ("June 18 Minute Order").) In the June 18 Minute Order, the Court stated that it "deeply disagrees with respondent's claim that petitioner's fear is ludicrous," and restated that deciding to dissolve the TRO "should not be interpreted as a vindication of respondent's free speech arguments." (*See id.* at pp. 2-3.)

On June 16, 2026, Respondent filed a special motion to strike under the anti-SLAPP statute (the "Anti-SLAPP Motion"). The Anti-SLAPP Motion is currently set for hearing on August 26, 2026, and the evidentiary hearing on the petition is currently set for September 8–10, 2026.

B. Respondent's Motion for an Undertaking Under Section 1030 was Denied.

One day after the Anti-SLAPP Motion was filed, on June 17, 2026, Respondent filed a *Motion for Order Requiring Plaintiff to Furnish an Undertaking Pursuant to [CCP] § 1030* ("Undertaking Motion") to compel Mr. Kane—the petitioner in a civil harassment proceeding—to post a $100,000 undertaking based on the alleged violation of Respondent's rights. Respondent filed the Undertaking Motion without the affidavit section 1030(b) makes a mandatory predicate. When Petitioner's opposition identified that defect, Respondent moved on June 30, 2026 to supplement the record with a declaration executed that same day. On July 7, 2026, the Court ruled in Petitioner's favor, denying

the Undertaking Motion, and finding that even considering Respondent's supplemental evidence, Respondent failed to demonstrate a reasonable possibility of success on his Anti-SLAPP Motion.[2]

C. Respondent Escalated His Conduct After the TRO was Dissolved.

In support of the Anti-SLAPP Motion, Respondent submitted a sworn declaration stating that he had "never stated nor even suggested that anyone, follower or not, engage in any violent conduct directed at Evander Kane, Kensington Kane, or anyone even remotely connected to them," that he "had no reason to think anyone would harm Mr. Kane, or his daughter Kensington," and that in twenty-two years his reporting had never resulted in violence against a subject. (Anti-SLAPP Motion, Richie Decl. ¶¶ 9, 12, 13.)

On July 9, 2026, Respondent's counsel wrote to Petitioner's counsel stating that he could have his client "ask his audience to find Kane," that they could "locate him within a matter of hours," that "there is no legal nor moral reason to refrain from doing so," and threatening to "crowdsource his location." (Coy Decl. ¶ 2, Ex. 1.)

On July 10, 2026, one day after his counsel's email, Respondent published a publicly available post on his Instagram account with a copy of his counsel's email and a picture of Ms. Teigen, claiming that Mr. Kane and Ms. Teigen "are on the run from legal service" and directing his followers to identify "where [Mr. Kane] is located." (*Id.* ¶ 3–4, Exs. 2–3.)

That same day, Respondent executed the threat and published directives across several distinct channels. On his "Dirty Army" channel on Instagram—a subscription-based channel with currently more than 5,200 members who have affirmatively opted in to receive his updates—where he asked those members to tell him where in the Los Angeles area Mr. Kane, Ms. Teigen, and "all kids" could be found, and where he later published a photograph of six-year-old Kensington captioned "Kensington is at Disneyland. She is in America." (Coy Decl. ¶¶ 3-5, Exs. 2-4.) Then, unsatisfied with a photo of one of the children, he published an Instagram story publicly stating that he was "Looking for Monster Kane & Co.," reporting that "[a]ccording to the Dirty Army they are at Disneyland," and directing his followers: "Let's test the Dirty Army. Can anyone grab a pic in

[2] Thus, the Court has twice declined to treat Respondent as a party likely to prevail: declining his request for fees and sanctions in his ex parte application to vacate and declining to require a security for the fees he says he will recover.

next 30 minutes[.]" (Kane Decl. ¶ 9; Teigen Decl. ¶ 14; Coy Decl., Ex. 5.) Respondent's so-called "army" performed. A stranger photographed the family and Respondent published the photograph, which included Mr. Kane's one-year-old child, with the caption "That was fast. DA Strong!" (Kane Decl. ¶ 10; Teigen Decl. ¶ 15; Coy Decl., Ex. 6.)

The family has largely stopped appearing in public together, but July 10 was a rare exception, made for Mr. Kane's mother's sixtieth birthday, and the venue was chosen precisely because the family believed that Disneyland's extensive private security and camera coverage would make it one of the few places they could still go safely. (Teigen Decl. ¶¶ 14, 16; Kane Decl. ¶¶ 9, 11.) They were wrong.

Respondent does not operate alone. Deanna "Anna" Kane—Kensington's biological mother, who has no custodial rights, who is subject to permanent orders in the United States and Canada prohibiting precisely these publications, and who is the subject of a July 2024 Alberta warrant arising from her online harassment—appears throughout Respondent's content as his "collaborator," as their shared Instagram posts frequently demonstrate, including as recently as July 23, 2026. (Coy Decl. ¶¶ 8-12, Exs. 7-15.) She publicly thanks him for continuing to publish about the family. She republishes his material to her own accounts. On or about July 15, 2026, she published multiple photographs of Mr. Kane taken covertly by strangers, broadcasting where he had been "spotted." (Kane Decl. ¶¶ 3, 12; Teigen Decl. ¶¶ 8, 12; Coy Decl., Exs. 7-8.) And on July 29, 2026, she published a message reporting the reach of their collaboration to her, with the note that "the clip is still going." (Coy Decl. ¶ 12, Ex. 15.) The orders entered against Ms. Kane were supposed to end this. Respondent has made himself the instrument by which they are defeated—and the surveillance network he built now features and feeds her.

Despite the Court's comment that "[t]here appears to be real issue [with Respondent's] crass commercialization . . . [and] arguably inciting his followers to action" (June 18 Minute Order at p. 4), Respondent continues to profit from his misconduct, offering and selling "FREE KENSINGTON" t-shirts and hats bearing the name of the six-year-old child at issue on Instagram and dirtyarmy.org. (Kane Decl. ¶ 5; Teigen Decl. ¶ 6.)

D. Respondent Explained Why His Conduct Escalated.

Respondent has explained himself. On or about July 7, 2026, after the hearing in this case, he appeared on his own podcast with his counsel and described what this litigation is for: "[Mr. Kane] has no idea because we're papering so hard and go and coming from every single angle. This thing's going to cost him. ***Like my goal is 2.5. I think … if we can keep going on this and he's he (sic) just financially drained, he's going to come to the table and he's going to be like, I'm over it***." (Coy Decl. ¶ 13, Ex. 16 at 58:07–58:32.) Mr. Randazza's response was that it "is not a good idea to talk about your settlement strategy on camera." (*Id.*)

Earlier in the same episode, the two discussed their preference for vexatious litigation. Respondent: "We need to lose sometimes … because it gets louder, it gets bigger. The wave gets larger." Counsel: "I love that I lose at the trial level;" "I'm thrilled to lose." Respondent: "that's why I want to lose. I want to appeal. So, let's lose and get to a higher court." And near the end: "frankly, it probably doesn't matter which one of us wins. We're going to the appellate court . . . anyway." (*Id.* ¶ 13, Ex. 16 at 52:24–53:37, 58:52–59:11.)

Those statements answer three questions the Court would otherwise have to speculate about: (1) purpose: the motion practice is not a defense of speech but a mechanism to exhaust Mr. Kane financially until he abandons the protection he seeks for his children; (2) method: volume and delay, from "every single angle;" and (3) permanence: Respondent is not litigating toward an end point but toward an appeal, and he has told his audience that losing makes the campaign larger. A respondent who has publicly announced that he wants to lose in this Court, who tells his followers "we are going to make change" and "I'll see everyone in August," and who on August 4, 2026 falsely announced that this Court had ordered testimony at those hearings—beneath a "FREE KENSINGTON" graphic and an arrow pointing to a solicitation for donations—is not a respondent who will voluntarily stop while the case is briefed. (Id. ¶¶ 11, 13–16, Exs. 14, 16–17.)

E. The Unprotected Family Members Being Confronted.

Ms. Teigen and the three younger children have never been protected persons under any order in this proceeding. They are, however, among the people Respondent has targeted and who

Respondent's audience has approached.

At Edmonton international airport on May 18, 2026, a woman asked to take a photograph with Ms. Teigen, then said, "Is it nice to have your kids with you when you stole someone else's kid?" (*Id.* ¶ 11.) Ms. Teigen's children heard this woman's comment. (*Id.*) At a shopping mall in West Edmonton on June 19, 2026, a woman who identified herself as a follower confirmed Ms. Teigen's identity, told her that what she had done was "horrific" and that she had "kidnapped her daughter," followed her as she tried to leave, and shouted "kidnapper" at her in a crowded public place—in front of Ms. Teigen's children and her own. (Teigen Decl. ¶ 10.) In a grocery store parking lot in early June 2026, a man sat watching Ms. Teigen from his car, then rolled down his window and screamed "FREE KENSINGTON" and "give Kensington back to Anna" at her while she was strapping her one-year-old daughter into a car seat. (*Id.* ¶ 13.) She felt incredibly intimidated and did not know whether he would get out of the car. She drove away and had to pull over because she was shaking too badly to continue. (*Id.*)

The phrase that man shouted is not a phrase he invented. It is the *slogan* Respondent posts on his social media, prints on merchandise, and sells for profit. When a stranger screams a respondent's trademark at a woman in a parking lot, the causal chain is not speculative. After all, that man is doing exactly what Respondent has directed his followers to do.

And at a shopping mall on June 26, 2026, a woman warned Mr. Kane that a man had been following him and his three oldest children for six or seven minutes and photographing them. Mr. Kane confronted the man, who at first denied it; but his phone contained photographs and videos of the children taken without consent. (Kane Decl. ¶ 8.)

F. The Harm Is Present, Ongoing, and Established by Admissible Evidence.

Ms. Teigen has largely stopped leaving her home with the children. Since Respondent's campaign began, she has experienced severe physical and emotional symptoms she had never experienced before, and she is receiving professional care for them.[3] (Teigen Decl. ¶¶ 21–22, 25.)

[3] Ms. Teigen has deliberately described the health effects of Respondent's conduct in general terms rather than in detail. Ms. Teigen should not be required to choose between establishing the harm Respondent has caused and delivering her private medical information to the audience he has assembled in commercializing this case. She is prepared to testify to these matters in greater detail at the evidentiary hearing, in camera, or under seal, as necessary.

She had none of these symptoms, and needed none of this care, before Respondent began publishing about her family. (*Id.*) She is seeking full-time security for the periods when Mr. Kane travels for work, because she does not feel safe alone in her home with four children. (*Id.* ¶ 25.)

The children have been withdrawn from summer camps and from soccer. The family surrendered its club membership. Kensington is permitted at exactly one friend's home. (Kane Decl. ¶ 17; Teigen Decl. ¶¶ 23, 24–27.) Mr. Kane's professional schedule is public, which means that Respondent's audience knows not only where the family lives but when Mr. Kane is away and Ms. Teigen is alone with the children. (Kane Decl. ¶ 15; Teigen Decl. ¶ 21.)

III. LEGAL STANDARD

A temporary restraining order under section 527.6 "may be issued with or without notice, based on a declaration that, to the satisfaction of the court, shows reasonable proof of harassment of the petitioner by the respondent, and that great or irreparable harm would result to the petitioner." (Code Civ. Proc., § 527.6, subd. (d).) That standard is materially lower than the clear-and-convincing standard governing the injunction after hearing. (*Id.*, subd. (i); *see Adler v. Vaicius* (1993) 21 Cal.App.4th 1770, 1775.) "In the discretion of the court, on a showing of good cause, a temporary restraining order or order after hearing issued under this section may include other named family or household members." (Code Civ. Proc., § 527.6, subd. (c).) An application for a temporary restraining order "shall be granted or denied on the same day that the petition is submitted to the court," unless it is filed too late in the day to permit effective review, in which case it shall be granted or denied on the next court day. (*Id.*, subd. (e).)

An ex parte application must be supported by an affirmative factual showing of irreparable harm, immediate danger, or another statutory basis for granting relief ex parte. (Cal. Rules of Court, rule 3.1202(c).) Notice must be given by 10:00 a.m. the court day before the ex parte appearance absent a showing of exceptional circumstances. (*Id.*, rules 3.1203, 3.1204.) Though this Application is titled and filed as an "ex parte" application, the ex parte request for a TRO under the civil harassment restraining order statute/procedure has different standards and rules, and notably, the Court may issue a TRO under the civil harassment restraining order statute without notice and

without a hearing. (Code Civ. Proc., § 527.6, subd. (d); Appearance and Procedure Information for Orange County Superior Court ¶ 5 (rev. Sept. 24, 2024).)

IV. ARGUMENT

A. Respondent's Post-Dissolution Conduct Independently Satisfies Section 527.6(d) and Warrants Reinstatement of the Order.

The showing required at this stage is reasonable proof of harassment and great or irreparable harm. Both are met on facts that did not exist when the Court ruled on June 18, 2026.

1. *Respondent directed third parties to locate Petitioner's family, and they did.*

Section 527.6 defines harassment to include "a knowing and willful course of conduct directed at a specific person that seriously alarms, annoys, or harasses the person, and that serves no legitimate purpose," and defines "course of conduct" to include "following or stalking an individual." (Code Civ. Proc., § 527.6, subds. (b)(1), (b)(3).)

Respondent will argue—as he does in his special motion to strike—that his posts are speech about Petitioner rather than conduct directed at him, and that under *Thomas v. Quintero* (2005) 126 Cal.App.4th 635, speech directed to third parties cannot constitute a course of conduct. (Anti-SLAPP Motion at 11-12 (citing *Quintero*, *supra* at 662-63).) That argument does not survive Respondent's conduct on July 10, 2026 or his continuing conduct targeting Mr. Kane's family.

Quintero concerned a respondent who distributed handbills and staged protests about the petitioner. The Court of Appeal held that speech about a person, addressed to an audience, is not qualitatively the conduct the statute contemplates. (*Quintero, supra* at 663.) Respondent did not publish handbills about Mr. Kane on July 10; he issued an instruction to his audience to find him and set a deadline for action; and his followers complied within a very short window. (*See* Section II.B *supra*; Kane Decl. ¶¶ 9–10; Coy Decl., Exs. 5-6.)

That distinction is the same one Respondent himself draws. In distinguishing *People v. Planchard* (2025) 109 Cal.App.5th 157, Respondent emphasizes that the defendant there enlisted a third party against his victim, while Respondent "did not assist Ms. Kane in threatening anyone" and never enlisted anyone against the Kanes. (Anti-SLAPP Motion at 10.) Whatever credibility that

argument may have had on June 16, it is plainly no longer credible or available, as Respondent directly recruited third parties to locate this family, set a deadline, and rewarded performance. (Coy Decl., Exs. 5-6.)

2. *The legitimate-purpose element is not satisfied as to conduct aimed at Ms. Teigen and the four children.*

Respondent's legitimate-purpose defense rests entirely on the public's interest in allegations against a professional athlete. (Anti-SLAPP Motion at 8-9, 12.) Assuming *arguendo* that interest is real, it does not extend to doxxing the physical location of Ms. Teigen and four children under seven at a theme park on a given afternoon. Telling half a million followers and the public at large where a family with four minor children can be photographed and then soliciting those people to deliver in the next thirty minutes does not serve any conception of public discourse. (*See E.G. v. M.L.* (2024) 105 Cal.App.5th 688, 701-02 (stating that conduct serving no legitimate purpose falls outside the constitutionally protected activity carve-out).) Nor is any legitimate purpose served by profiting from merchandise bearing a six-year-old's name with a statement to "free" her from her lawful custodial parent. (Kane Decl. ¶ 5.)

3. *The imminence Respondent says is absent has been demonstrated.*

In his special motion to strike, Respondent argues that Petitioner relies on "[h]ypothetical fanciful audience reaction," and that no court has ever accepted "so tenuous a connection" between speech and third-party action. (Anti-SLAPP Motion at 11 (citing *Brandenburg v. Ohio* (1969) 395 U.S. 444, 447-48).) The record was never hypothetical and Petitioner has made the connection between Respondent's calls to action and his Dirty Army's immediate response. Solicitation of surveillance is not protected commentary. A stranger has screamed Respondent's own slogan at Ms. Teigen while she held her infant. A man followed Mr. Kane and three of his children through a mall photographing them. (Teigen Decl. ¶ 13; Kane Decl. ¶ 8.) The connection between what Respondent publishes and what strangers do to this family is documented and demonstrates an imminency of harm that Respondent cannot simply explain away.

4. *Great or irreparable harm.*

The harm is ongoing as Respondent continues to post and torment the Kane-Teigen family. Respondent's deflection of not being responsible for behavior of third parties erodes when Respondent is literally rallying them to action. And that call to action is based on a lie—that Ms. Teigen and Mr. Kane are "kidnappers." Respondent's own recorded statements confirm that his purpose is not reporting. (*See* § II.D, *supra*; *E.G.*, *supra*, 105 Cal.App.5th at 702 ("[H]arassing speech . . . made with 'no legitimate purpose' may qualify the protected party for an injunction.") (quoting § 527.6, subd. (b)(1), (2)).) And, as in *E.G.*, Petitioner has documented through his own declaration and that of Ms. Teigen specific examples of "threats and harassment from unknown third parties" showing great or irreparable harm is imminent. (*Id.* at 696.) Similarly to the victim in *E.G.*, here, Petitioner, Ms. Teigen, and their children have all been exposed to threatening language from unknown third parties, but more egregiously, the threatening conduct was done *in person*, and in several instances, in a city over a thousand miles from where Respondent called his followers to action. Under the circumstances, this establishes great or irreparable harm.

B. Good Cause Exists to Add Ms. Teigen and the Three Younger Children as Protected Persons Under Section 527.6(c).

Section 527.6(c) permits the Court, in its discretion and on a showing of good cause, to include "other named family or household members" in a temporary restraining order. *Thomas v. Quintero*—the authority Respondent relies upon—confirms that this is properly done ex parte: "On an ex parte showing of good cause, the court also has the discretion to issue a TRO that includes other named family or household members who reside with the applicant." (126 Cal.App.4th at 652 (citing § 527.6, subd. (c)); *see Hansen v. Volkov* (2023) 96 Cal.App.5th 94, 104 ("After finding harassment, upon a showing of good cause, the court may include named family or household members in the restraining order.").)

Each element is satisfied here. Ms. Teigen is Mr. Kane's fiancée and resides with him; Iverson, Hendrix, and Penelope are their children and reside with them. (Kane Decl. ¶ 2; Teigen Decl. ¶ 3.) They are not incidental to Respondent's campaign; they are its objects. Respondent's

July 10 post sought to find "Monster Kane & Co."—the "& Co." being Ms. Teigen and the children. (Kane Decl. ¶ 9; Teigen Decl. ¶ 14; Coy Decl., Ex. 5.) The photograph he published and celebrated is of Ms. Teigen and a one-year-old. He has published photographs of the minor children, and he has told his audience that Ms. Teigen is complicit in a kidnapping. (Teigen Decl. ¶ 5.) The confrontations described above happened to Ms. Teigen, with the children present.

Given the circumstances, Petitioner submits that good cause exists under § 527.6(c) to include Ms. Teigen and the three other children (in addition to Mr. Kane and Kensington) in both the TRO request and in the request for an order after the evidentiary hearing.

C. There is Good Cause to Advance the Evidentiary Hearing Date to be Heard As Soon As Practicable to Prevent Further Harassment by Respondent.

Respondent has admitted that his motivation and goal is to gain financially from this case, drain Mr. Kane financially, and most egregiously, prevent Mr. Kane from protecting his family. (*See* Coy Decl. ¶ 13.) Meanwhile, he continues to carry out a campaign focused on profiting off of the distress and harm caused to a family that includes four minor children. Each day that Respondent continues to stalk and harass Mr. Kane, Ms. Teigen, and their children, is another day of extending the harm felt by this family.

If the Court declines to enter a TRO preventing the continued stalking and harassment by Respondent, then the Court should advance the hearing date to a date as soon as possible. Under the civil harassment restraining order statute, Petitioner is entitled to have had an evidentiary hearing on his petition within 21 days, or 25 days on a showing of good cause, after the TRO was granted or denied. (Code of Civ. Proc., § 527.6, subd. (g).) Petitioner filed his petition for a civil harassment restraining order on June 5, 2026, and instead of having a hearing by June 30, 2026—as required by the statute and originally scheduled by the Court—Respondent convinced the Court to usurp Petitioner's statutory right and delay the evidentiary hearing until after Respondent's baseless Anti-SLAPP Motion is decided. This manufactured reason for delay is without legal basis and does not align with common sense—after all, it cannot be that a stalker/harasser can avoid or delay an evidentiary hearing by filing an anti-SLAPP motion, especially when the harasser is literally

profiting from the continued harassment. (*See White v. Davis* (2023) 87 Cal.App.5th 270, 293-94 (finding that a trial court abused its discretion by declining to hear a restraining-order application together with the anti-SLAPP motion, when an appeal of the denial of an anti-SLAPP motion caused the delay in hearing the merits of the restraining-order petition).)[4] Petitioner has been unjustifiably forced to wait until September 2026, and the statute provides that Petitioner's hearing needs to happen sooner.

Therefore, in the absence of a TRO to protect Mr. Kane and his family, Petitioner respectfully requests that the Court advance the evidentiary hearing to a date that is as soon as practicable, but under no circumstances, to a date later than the end of August 2026.

D. The Court Should Expand the Scope of the Evidentiary Hearing on the Petition to Include Ms. Teigen and the three other minor children.

As an exercise of the Court's discretion under section 527.6(c), the Court should expand the evidentiary hearing on the petition to include all household family members of Mr. Kane, including Ms. Teigen and their four children. If the Court is unwilling to issue a new TRO adding protected persons on this ex parte record, Petitioner asks in the alternative that the Court order the scope of the evidentiary hearing be expanded to include Ms. Teigen, Iverson, Hendrix, and Penelope as additional protected persons under section 527.6(c). Such relief does not prejudice Respondent as he has notice and time to prepare, which will ensure the matter is decided on a full record with consideration of all persons affected by Respondent's conduct.

E. The Pending Special Motion to Strike Does Not Bar This Application.

Respondent may argue that the Court should await the August 26, 2026 hearing before ruling on this Application. Two independent reasons defeat that position.

First, the anti-SLAPP statute does not reach the temporary restraining order procedure. *Thomas v. Quintero* holds that section 425.16 applies to the petition for an injunction after hearing but not to the interim TRO procedure under section 527.6, which is "[s]o informal" that it is not the kind of adjudication the statute contemplates. (126 Cal.App.4th at 652 ("For example, no notice

[4] Respondent and his counsel have already directly stated that they will appeal a denial of Respondent's Anti-SLAPP Motion and stated on the record of the July 7, 2026 hearing that such appeal would delay the evidentiary hearing.

must be given to the person sought to be restrained before the TRO is issued.").) Respondent's own motion is directed at "all causes of action asserted in the Petition" (Anti-SLAPP Motion at p. ii)—not at the Court's continuing authority to issue interim protective relief.

Second, the automatic stay triggered by a special motion to strike reaches discovery only. (Code Civ. Proc., § 425.16, subd. (g).) Nothing in section 425.16 divests a court of authority to protect a household from stalking behavior and immediate threats of harm while the motion is briefed and heard. (*See White*, *supra*, 87 Cal.App.5th at 293-94 (finding the trial court abused its discretion when it prioritized an anti-SLAPP motion and failed to prevent the delay in hearing the merits of restraining order applications).)

Petitioner will address the merits of the Anti-SLAPP Motion in his opposition on the noticed schedule. This Application does not ask the Court to resolve it.

F. This Application Is Properly Made on New Facts and Satisfies Section 1008(b).

Petitioner anticipates the argument that this Application is an improper motion for reconsideration. It is not, for two reasons.

First, section 527.6(d) confers continuing statutory authority to issue a temporary restraining order on a sufficient showing. That authority is not exhausted because an earlier order was dissolved on an earlier record, especially when new facts and conduct gives rise to a basis for a TRO.

Second, and independently, this Application satisfies Code of Civil Procedure, section 1008(b), which permits a party whose application was previously ruled on to renew it "upon new or different facts, circumstances, or law," supported by a declaration stating what application was made before, what order or refusal was made, and what new or different facts are claimed to be shown. The concurrently filed Coy Declaration makes that showing. (Coy Decl. ¶ 18.) The operative facts—Respondent's July 9 threat through counsel, the July 10 directive and its execution, the July 15 republications, and the escalating public confrontations of Mr. Kane and Ms. Teigen—all postdate June 18, 2026, when the TRO was previously dissolved. Two of the confrontations described above—the May 18 airport incident and the early-June parking-lot incident—predate the dissolution, but neither was before the Court on June 18, 2026.

G. The Requested Terms Regulate Conduct, Are Narrowly Drawn, and Are Severable.

Petitioner requests the Court enter an order approving this Application and issue the proposed temporary restraining order, substantially in the form of **Exhibit A** attached hereto, with each term applying to each protected person identified in the Notice above.

Each term regulates conduct rather than content. Petitioner does not seek removal of any existing content, does not seek any restriction premised on the truth or falsity of Respondent's statements, and does not seek to enforce the 2024 domestic violence restraining order or the Canadian judgment through this Application. Petitioner seeks to stop the operational conduct. The requested terms for the TRO are severable, and the Court may grant some and decline others. (*Huntingdon Life Sciences, Inc. v. Stop Huntingdon Animal Cruelty USA, Inc.* (2005) 129 Cal.App.4th 1228, 1252.)

V. CONCLUSION

Respondent told this Court under oath that the suggestion anyone might act on his posts was "ludicrous." While the Court already "deeply disagree[d]" with Respondent's characterization (*see* June 18 Minute Order at p. 2), three weeks later Respondent asked his audience to find this family within thirty minutes, and they did. Since then he has told that audience that "we are going to make change," and that he will "see everyone in August." The Court need not decide today whether Respondent's campaign is protected commentary or unlawful harassment; that is what the evidentiary hearing is for. It need only decide whether Ms. Teigen and four children under the age of seven should remain wholly unprotected while Respondent publishes their photographs and broadcasts their location to millions of people. Petitioner respectfully requests that the Court reinstate the temporary restraining order as to Mr. Kane and Kensington, add Ms. Teigen, Iverson, Hendrix, and Penelope as protected persons, advance the evidentiary hearing consistent with section 527.6, subdivisions (f) and (g), and, in the alternative, order that the household members' entitlement to protection be determined at that hearing.

DATED: August 5, 2026

BLANK ROME LLP

By: _____
Joseph J. Mellema
Ryan F. Coy
Attorneys for Petitioner
EVANDER FRANK KANE

EXHIBIT A

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Attorneys for Petitioner
EVANDER FRANK KANE

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

EVANDER FRANK KANE,

Petitioner,

v.

HOOMAN ABEDI KARAMIAN A/K/A NIK RICHIE,

Respondent.

Case No. 30-2026-01575619-CU-HR-CJC

[*Assigned for All Purposes to: Hon. Amber Poston, Dept. C65*]

PROPOSED ORDER APPROVING EX PARTE APPLICATION TO REINSTATE TEMPORARY RESTRAINING ORDER AND EXPANDING PROTECTED PERSONS PURSUANT TO CODE OF CIVIL PROCEDURE § 527.6(c)

Hearing:
Date: August __, 2026
Time: _____ p.m.
Dept: TBD

The Court having reviewed and considered the *E Parte Application for Orders: 1 Reinstating and Continuing Temporary Restraining Order; E panding Protected Persons Pursuant to Code of Civil Procedure § 5 .6 c ; and, in the alternative, 3 E panding the Scope of the Evidentiary Hearing* ("Application") filed on August 5, 2026 by Petitioner Evander Frank Kane, all related pleadings to the Application, and the record in this case, and good cause appearing therefor,

IT IS HEREBY ORDERED that:

1. The Application is granted.
2. The temporary restraining order ("TRO," attached) will issue against Respondent Hooman Abedi Karamian *aka* Nik Richie ("Respondent") in this proceeding as to Petitioner and his six-year-old daughter, Kensington Kane, and that order will continue in effect through the conclusion of the continued evidentiary hearing pursuant to Code of Civil Procedure section 527.6, subdivisions (c), (d), (f), and (p)(2).
3. The persons protected under the TRO is expanded to include Petitioner's other household members, including Mara Teigen, and their three additional children: Iverson Kane, Hendrix Kane, and Penelope Kane.
4. The evidentiary hearing on the petition for civil harassment restraining order is advanced from September 8-10, 2026 to August 26, 2026 at 8:30 a.m.
5. The following terms under the TRO will apply to each protected person:
    a. Respondent shall not contact the protected persons, directly or indirectly, personally or through any third party;
    b. Respondent shall stay at least 100 yards away from the protected persons, their residence, their vehicles, and the children's schools and childcare;
    c. Respondent shall not publish, post, or otherwise disseminate the protected persons' residence address, the children's school, or the protected persons' present or anticipated location, whereabouts, or travel (with the exception of publicly announced professional appearances);

d. Respondent shall not solicit, request, direct, encourage, or offer any inducement to any third party to locate, follow, surveil, photograph, film, or approach the protected persons; and

e. Respondent shall not publish or republish any photograph or recording of the minor children, or any photograph or recording obtained by a third party depicting the protected persons' location.

IT IS SO ORDERED.

DATED: _____

_____
The Honorable _____
Judge, Orange County Superior Court

CH-110 Temporary Restraining Order

Clerk stamps date here when form is filed.

Person in (1) must complete (1), (2), and (3) only.

(1) Protected Person

a. Your Full Name: Evander Frank Kane

Your Lawyer *(if you have one for this case)*:

Name: Ryan F. Coy State Bar No.: 324939

Firm Name: Blank Rome LLP

b. Your Address *(If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or email.)*:

Address: 2029 Century Park East, 6th Floor

City: Los Angeles State: CA Zip: 90067

Telephone: 424-285-2194 Fax: 424-239-3434

Email Address: ryan.coy@blankrome.com

Fill in court name and street address:

Superior Court of California, County of
Orange
Central Justice Center
700 Civic Center Drive West
Santa Ana, CA 92701

Court fills in case number when form is filed.

Case Number:
30-2026-01575619-CU-HR-CJC

(2) Restrained Person

(Give all the information you know. Information with a star (*) is required to add this order to the California police database. If age is unknown, give an estimate.)

*Full Name: Hooman Abedi Karamian a/k/a Nik Richie *Age: 47 Date of Birth: Feb 12, 1979

*Race: White Height: UNK Weight: UNK Hair Color: UNK Eye Color: UNK

*Gender: ☒ M ☐ F ☐ Nonbinary Home Address: 1 Rue Renoir

City: Trabuco Canyon State: CA Zip: 92679

Relationship to Protected Person: No relation.

(3) ☒ Additional Protected Persons

In addition to the person named in (1), the following family or household members of that person are protected by the temporary orders indicated below:

Full Name	Gender	Age	Household Member?	Relation to Protected Person
Mara Teigen	F	31	☒ Yes ☐ No	Fiancée
Kensington Kane	F	6	☒ Yes ☐ No	Daughter
Iverson Kane	M	4	☒ Yes ☐ No	Son
Hendrix Kane	M	3	☒ Yes ☐ No	Son

☒ *Check here if there are additional persons. List them on an attached sheet of paper and write "Attachment 3—Additional Protected Persons" as a title. You may use form MC-025*, Attachment.

The court will complete the rest of this form.

(4) Expiration Date

This order expires at the end of the hearing scheduled for the date and time below:

Date: _____ Time: _____ ☐ a.m. ☐ p.m.

This is a Court Order.

Case Number:
30-2026-01575619-CU-HR-CJC

To the Person in (2):

The court has granted the temporary orders checked as granted below. If you do not obey these orders, you can be arrested and charged with a crime. You may be sent to jail for up to one year, pay a fine of up to $1,000, or both.

(5) Personal Conduct Orders

☐ **Not Requested** ☐ **Denied Until the Hearing** ☐ **Granted as Follows:**

a. You must **not** do the following things to the person named in (1)
☐ and to the other protected persons listed in (3) :

(1) ☐ Harass, intimidate, molest, attack, strike, stalk, threaten, assault (sexually or otherwise), hit, abuse, destroy personal property of, or disturb the peace of the person.

(2) ☐ Contact the person, either directly or indirectly, in **any** way, including, but not limited to, in person, by telephone, in writing, by public or private mail, by interoffice mail, by email, by text message, by fax, or by other electronic means.

(3) ☐ Take any action to obtain the person's address or location. If this item (3) is not checked, the court has found good cause not to make this order.

(4) ☐ Other *(specify):*
☐ Other personal conduct orders are attached at the end of this order on Attachment 5a(4).

b. Peaceful written contact through a lawyer or a process server or other person for service of legal papers related to a court case is allowed and does not violate this order. However, you may have your papers served by mail on the person in (1).

(6) Stay-Away Order

☐ **Not Requested** ☐ **Denied Until the Hearing** ☐ **Granted as Follows:**

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

(1) ☐ The person in (1)
(2) ☐ Each person in (3)
(3) ☐ The home of the person in (1)
(4) ☐ The job or workplace of the person in (1)
(5) ☐ The school of the person in (1)
(6) ☐ The school of the children of the person in (1)
(7) ☐ The place of child care of the children of the person in (1)
(8) ☐ The vehicle of the person in (1)
(9) ☐ Other *(specify):*

b. This stay-away order does not prevent you from going to or from your home or place of employment.

(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 items listed in (7) b on the next page.

This is a Court Order.

Case Number:
30-2026-01575619-CU-HR-CJC

7 b. **Prohibited items are:**

(1) Firearms (guns);

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

(3) Ammunition.

c. You must:

(1) Sell to or store with a licensed gun dealer, or turn in to a law enforcement agency, any firearms (guns), firearm parts, and ammunition in your immediate possession or control. This must be done within 24 hours of being served with this order.

(2) File a receipt with the court within 48 hours of receiving this order that proves that your firearms (guns), firearm parts, and ammunition have been turned in, sold, or stored. (You may use *Receipt for Firearms, Firearm Parts, and Ammunition* (form CH-800) for the receipt.)

d. ☐ The court has received information that you own or possess a firearm (gun), firearm parts, or ammunition.

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 "CH-110, Restrained Person Has Prohibited Items" at the top, and attach it to this form.

9 No Body Armor

You cannot own, possess, or buy body armor (defined in Penal Code section 16288). You must relinquish any body armor you have in your possession.

This is a Court Order.

Case Number:
30-2026-01575619-CU-HR-CJC

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

In addition to the hearing listed on form CH-109, you must attend the court hearing listed below 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 below, a judge may find that you have violated the restraining order and notify law enforcement and a prosecuting attorney of the violation.

Name and address of court, if different than court address listed on page 1:

Date: _____ Dept.: _____
Time: _____ Room: _____

(11) Possession and Protection of Animals

☐ **Not Requested** ☐ **Denied Until the Hearing** ☐ **Granted as Follows** *(specify):*

a. ☐ The person in (1) is given the sole possession, care, and control of the animals listed below, which are owned, possessed, leased, kept, or held by them, or reside in their household.
(Identify animals by, e.g., type, breed, name, color, sex.)

b. ☐ The person in (2) must stay at least _____ yards away from, and not take, sell, transfer, encumber, conceal, molest, attack, strike, threaten, harm, or otherwise dispose of the animals listed above.

(12) Other Orders

☐ **Not Requested** ☐ **Denied Until the Hearing** ☐ **Granted as Follows** *(specify):*

☐ Additional orders are attached at the end of this order on Attachment 12.

To the Person in (1):

(13) Mandatory Entry of Order Into CARPOS Through CLETS

This order must be entered into the California Restraining and Protective Order System (CARPOS) through the California Law Enforcement Telecommunications System (CLETS). *(Check one):*

a. ☐ The clerk will enter this order and its proof-of-service form into CARPOS.

b. ☐ The clerk will transmit this order and its proof-of-service form to a law enforcement agency to be entered into CARPOS.

This is a Court Order.

Case Number:
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(13) c. ☐ By the close of business on the date that this order is made, the person in (1) or their lawyer should deliver a copy of the order and its proof-of-service form to the law enforcement agency listed below to enter into CARPOS:

Name of Law Enforcement Agency _____ Address *(City, State, Zip)* _____

_____ _____

☐ Additional law enforcement agencies are listed at the end of this order on Attachment 13.

(14) **No Fee to Serve (Notify) Restrained Person** ☐ **Ordered** ☐ **Not Ordered**

The sheriff or marshal will serve this order without charge because:

a. ☐ The order is based on unlawful violence, a credible threat of violence, or stalking.

b. ☐ The person in (1) is entitled to a fee waiver.

(15) Number of pages attached to this order, if any: _____

Date: _____ _____
Judicial Officer

Warnings and Notices to the Restrained Person in (2)

You Cannot Have Firearms (Guns), Firearm Parts, or Ammunition

You cannot own, have, possess, buy or try to buy, receive or try to receive, or otherwise get any prohibited items listed in (7)b on page 3 while this order is in effect. If you do, you can go to jail and pay a $1,000 fine. You must sell to or store with a licensed gun dealer, or turn in to a law enforcement agency, any firearms (guns), firearm parts, and ammunition that you have or control as stated in (7) above. The court will require you to prove that you did so.

Notice Regarding Nonappearance at Hearing and Service of Order

If you have been personally served with this Temporary Restraining Order and form CH-109, *Notice of Court Hearing,* but you do not appear at the hearing either in person or by a lawyer, and a restraining order that is the same as this Temporary Restraining Order except for the expiration date is issued at the hearing, a copy of the order will be served on you by mail at the address in (2).

If this address is not correct or you wish to verify that the Temporary Restraining Order was converted into a restraining order at the hearing without substantive change, or to find out the duration of the order, contact the clerk of the court.

After You Have Been Served With a Restraining Order

- Obey all the orders.
- Read form CH-120-INFO, *How Can I Respond to a Request for Civil Harassment Restraining Orders?*, to learn how to respond to this order.

This is a Court Order.

- If you want to respond, fill out form CH-120, *Response to Request for Civil Harassment Restraining Orders*, and file it with the court clerk. You do not have to pay any fee to file your response if the Request claims that you inflicted or threatened violence against or stalked the person in (1).
- You must have form CH-120 served by mail on the person in (1) or that person's attorney. You cannot do this yourself. The person who does the mailing should complete and sign form CH-250, *Proof of Service by Mail*. File the completed proof of service with the court clerk before the hearing date or bring it with you to the hearing.
- In addition to the response, you may file and have declarations served, signed by you and other persons who have personal knowledge of the facts. You may use form MC-030, *Declaration,* for this purpose. It is available from the clerk's office at the court shown on page 1 of this form or at courts.ca.gov/rules-forms/find-your-court-forms. If you do not know how to prepare a declaration, you should see a lawyer.
- Whether or not you file a response, you should attend the hearing. If you have any witnesses, they must also go to the hearing.
- At the hearing, the judge can make restraining orders against you that last for up to five years. Tell the judge why you disagree with the orders requested.

Instructions for Law Enforcement

Enforcing the Restraining Order

This order is enforceable by any law enforcement agency that has received the order, is shown a copy of the order, or has verified its existence on the California Restraining and Protective Orders System (CARPOS). If the law enforcement agency has not received proof of service on the restrained person, the agency must advise the restrained person of the terms of the order and then must enforce it. Violations of this order are subject to criminal penalties.

Start Date and End Date of Orders

This order *starts* on the date next to the judge's signature on page 4. The order *ends* on the expiration date in (4) on page 1.

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. (Pen. Code, §§ 836(c)(1), 13701(b).) A violation of the order may be a violation of Penal Code section 166 or 273.6. Agencies are encouraged to enter violation messages into CARPOS.

Notice/Proof of Service

The law enforcement agency must first determine if the restrained person had notice of the order. Consider the restrained person "served" (given notice) if (Pen. Code, § 836(c)(2)):

- The officer sees a copy of the proof of service or confirms that the proof of service is on file; or
- The restrained person was informed of the order by an officer.

An officer can obtain information about the contents of the order and proof of service in CARPOS. If proof of service on the restrained person cannot be verified, the agency must advise the restrained person of the terms of the order and then enforce it.

If the Protected Person Contacts the Restrained Person

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

This is a Court Order.

Case Number:
30-2026-01575619-CU-HR-CJC

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 Pen. Code, § 136.2; Fam. Code, §§ 6383(h)(2), 6405(b)); Code Civ. Proc., § 527.12(d)(2)):

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 also be enforced.

2. *o Contact Order:* If a restraining/protective order includes a no-contact order, the no-contact order must be enforced. (5) a(2) is an example of a no-contact order.

3. *Criminal Protective Order CPO :* If none of the orders includes an EPO or a no-contact order, the most recent CPO must be enforced. (Fam. Code, §§ 6383(h)(2), 6405(b); Code Civ. Proc., § 527.12(d)(2).) 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. (Pen. Code, § 136.2(e)(2).) All provisions in the civil court order that do not conflict with the CPO must also 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 also be enforced.

Clerk will fill out this part.

Clerk s Certificate
[seal]

—Clerk's Certificate—

I certify that this *Temporary Restraining Order* is a true and correct copy of the original on file in the court.

Date: _____ Clerk, by _____, Deputy

This is a Court Order.

For your protection and privacy, please press the Clear button after you have printed the form.

SHORT TITLE:	CASE NUMBER:
Kane v. Karamian	30-2026-01575619-CU-HR-CJC

ATTACHMENT r 3

d d r

Attachment 3 - Additional Protected Persons

Penelope Kane - F - 1yo - Household Member? Yes - Relation to Protected Person: Daughter

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is **BLANK ROME LLP**, 2029 Century Park East, 6th Floor, Los Angeles, California 90067.

On **August 5, 2026,** I served the foregoing document(s): **PETITIONER EVANDER KANE'S EX PARTE APPLICATION FOR ORDERS: (1) REINSTATING AND CONTINUING TEMPORARY RESTRAINING ORDER; (2) EXPANDING PROTECTED PERSONS PURSUANT TO CODE OF CIVIL PROCEDURE § 527.6(c); AND, IN THE ALTERNATIVE, (3) EXPANDING THE SCOPE OF THE EVIDENTIARY HEARING; MEMORANDUM OF POINTS AND AUTHORITIES** on the interested parties in this action addressed and sent as follows:

BY ENVELOPE: by placing the original a true copy thereof enclosed in sealed envelope(s) addressed as indicated and delivering such envelope(s):

BY MAIL: I caused such envelope(s) to be deposited in the mail at Los Angeles, California with postage thereon fully prepaid to the office or home of the addressee(s) as indicated. I am "readily familiar" with this firm's practice of collection and processing documents for mailing. It is deposited with the U.S. Postal Service on that same day, with postage fully prepaid, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

BY PERSONAL SERVICE: I caused such envelope to be hand-delivered to the office or home of the addressee(s) as indicated. A proof of service will be executed by process server upon completion.

BY E-MAIL OR ELECTRONIC TRANSMISSION (EMAIL): Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document(s) listed above to be transmitted to the person(s) at the e-mail address(es) as indicated. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was incomplete or unsuccessful.

STATE: I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **August 5, 2026**, at Los Angeles, California.

Charman S. Bee

Charman S. Bee

SERVICE LIST

Evander Frank Kane v. Hooman Abedi Karamian a k a ik Richie
Orange County Superior Court Case No.: 30-2026-01575619-CU-HR-CJC

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PROOF OF SERVICE