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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

HOOMAN ABEDI KARAMIAN a/k/a NIK LAMAS-RICHIE,

Plaintiff,

v.

EVANDER KANE,

Defendant.

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

DEFENDANT EVANDER KANE'S NOTICE OF MOTION AND MOTION FOR SANCTIONS AGAINST PLAINTIFF AND HIS COUNSEL UNDER THE COURT'S INHERENT AUTHORITY AND 28 U.S.C. § 1927; MEMORANDUM OF POINTS AND AUTHORITIES

[Filed concurrently with Declarations of Evander Frank Kane and Ryan F. Coy; Request for Judicial Notice; and [Proposed] Order]

Hearing:
Date: February 3, 2027
Time: 9:00 a.m.
Place: Courtroom 3, 5th Floor
San Jose Federal Courthouse

Complaint Filed: June 25, 2026
Dismissed: Sept. 21, 2026 (ECF No. 39)

NOTICE OF MOTION AND MOTION

TO PLAINTIFF AND HIS ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on February 3, 2027, at 9:00 a.m., or as soon thereafter as the matter may be heard, in Courtroom 3, 5th Floor, of the United States District Court for the Northern District of California, San Jose Courthouse, 280 South 1st Street, San Jose, California 95113, before the Honorable Noël Wise, specially appearing Defendant Evander Kane ("Defendant" or "Kane") will and hereby does move for sanctions against Plaintiff Hooman Abedi Karamian a/k/a Nik Lamas-Richie ("Plaintiff" or "Richie") and his counsel of record, Marc J. Randazza and Alex J. Shepard of Randazza Legal Group, PLLC.

Mr. Kane respectfully requests an order (1) finding that Richie brought and maintained this action in bad faith and for an improper purpose, and imposing sanctions against him under the Court's inherent authority; (2) finding that Mr. Randazza and Mr. Shepard unreasonably and vexatiously multiplied these proceedings within the meaning of 28 U.S.C. § 1927 and acted in bad faith, and imposing sanctions against them under § 1927 and the Court's inherent authority; (3) awarding Mr. Kane the reasonable attorneys' fees and costs caused by that conduct, in the categories identified in Section V.C below, jointly and severally against Richie, Mr. Randazza, and Mr. Shepard—or, in the alternative, all fees and costs Mr. Kane incurred in this action (or, at a minimum, since July 22, 2026); (4) directing Mr. Kane to file, within 21 days of the order, a supplemental declaration and the fee chart required by Section M of the Court's Standing Order for All Civil Cases, with a schedule for any response; and (5) granting such further relief as the Court deems just, including, if the Court considers it necessary to resolve any factual dispute, an evidentiary hearing on the returns of service filed at Docket Nos. 11 and 12.

This Motion is made pursuant to the Court's inherent-power authority, 28 U.S.C. § 1927, and Civil Local Rule 7-8. It is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, the Declaration of Evander Kane ("Kane Decl."), the Declaration of Ryan F. Coy and the exhibits thereto ("Coy Decl."), the Request for Judicial Notice

("RJN"), the pleadings and papers on file in this action, including ECF Nos. 1, 1-2, 11, 12, 20, 23, 23-1, 23-2, 28, 30, 31, 31-1, 34, 34-1, 37, and 39; and such argument as the Court may permit.

This Motion complies with Civil Local Rule 7-8; it is separately filed, noticed under Civil Local Rule 7-2, and brought as soon as practicable—within 14 days after Plaintiff's September 21, 2026 notice of voluntary dismissal. Civ. L.R. 7-8(a)-(d). Counsel met and conferred by telephone on September 24, 2026. (Coy Decl. ¶ 21.) Plaintiff's counsel did not agree to any of the relief requested and disagreed with the allegations. (*Id.*)

Mr. Kane appears specially. By bringing this Motion—which seeks relief collateral to the merits—he does not consent to the Court's personal jurisdiction, waive service of process, or waive any defense asserted in ECF No. 23. *See Willy v. Coastal Corp.*, 503 U.S. 131, 137-39 (1992).

BLANK ROME LLP

DATED: September 30, 2026

By: */s/ Ryan F. Coy*
Joseph J. Mellema
Ryan F. Coy

Attorneys for Defendant
EVANDER FRANK KANE

TABLE OF CONTENTS

Page

MEMORANDUM OF POINTS AND AUTHORITIES 1

I. INTRODUCTION 1

II. STATEMENT OF ISSUES TO BE DECIDED 3

III. STATEMENT OF FACTS 3

A. Before Suing, Richie and His Counsel Knew the Orders Bound Only Ms. Kane—and Knew About the Santa Clara Order. 3

B. With No Restraint in Place, Richie Sued in this Court and Turned the Suit into Content. 4

C. Richie and His Counsel Turned Service of This Court's Process into a Weapon. 5

D. The State Court Rejected Richie's "Journalism" Framing, and Richie Attacked the Court. 7

E. Plaintiff Demanded Discovery, Obtained the Opportunity, and Took None. 8

F. Richie Publicly Blamed His Source, Dismissed the Case, and Declared Victory. 8

IV. LEGAL STANDARD 9

V. ARGUMENT 10

A. Plaintiff Brought and Maintained This Action in Bad Faith 11

1. Plaintiff announced the improper purpose publicly in his own words, with his counsel beside him. 11

2. The timing, forum, and content of this action confirm it was an "angle," used for leverage, instead of a legitimate remedy. 11

3. Plaintiff used this Court's process to direct his followers at Mr. Kane's family, including minor children. 12

4. The returns of service were false, publicized, and maintained after notice. 13

5. The timing and way Plaintiff left confirms the case was never about adjudication. 13

6. Richie's September 21 admissions confirm his recklessness and lack of candor. 15

B. Mr. Randazza and Mr. Shepard Are Independently Sanctionable. 15

1. Counsel unreasonably and vexatiously multiplied these proceedings. 15

2. The Court's inherent authority reaches counsel's role in the service campaign and related conduct. 16

C. Mr. Kane Should Be Awarded the Fees Caused by the Misconduct. ..17

1. Primary request: fees caused by the sanctionable conduct. 17

2. Alternative request: all fees, or at a minimum all fees from July 22, 2026 forward. 18

3. Allocation and procedure. 18

VI. CONCLUSION 18

TABLE OF AUTHORITIES

Page(s)

Cases

B.K.B. v. Maui Police Dep't,
276 F.3d 1091 (9th Cir. 2002) 10, 15

Brockmeyer v. May,
383 F.3d 798 (9th Cir. 2004) 12

Buckhannon Bd. & Care Home, Inc. v. W. Va. Dep't of Health & Human Res.,
532 U.S. 598 (2001) 13

Chambers v. NASCO, Inc.,
501 U.S. 32 (1991) 9, 10, 12, 17

Cooter & Gell v. Hartmarx Corp.,
496 U.S. 384 (1990) 2, 9

Fink v. Gomez,
239 F.3d 989 (9th Cir. 2001) 9, 11, 13, 15

In re Girardi,
611 F.3d 1027 (9th Cir. 2010) 10, 15

Goodyear Tire & Rubber Co. v. Haeger,
581 U.S. 101 (2017) 10, 17

Kaass Law v. Wells Fargo Bank, N.A.,
799 F.3d 1290 (9th Cir. 2015) 10

In re Keegan Mgmt. Co., Sec. Litig.,
78 F.3d 431 (9th Cir. 1996) 9, 10

Lackey v. Stinnie,
145 S. Ct. 659 (2025) 13

Lahiri v. Universal Music & Video Distrib. Corp.,
606 F.3d 1216 (9th Cir. 2010) 10

Lee v. City of Los Angeles,
250 F.3d 668 (9th Cir. 2001) 12

Primus Auto. Fin. Servs., Inc. v. Batarse,
115 F.3d 644 (9th Cir. 1997) 9, 11

Roadway Express, Inc. v. Piper,
447 U.S. 752 (1980) 9, 16

Willy v. Coastal Corp.,
503 U.S. 131 (1992) 9

Wisconsin v. Mitchell,
508 U.S. 476 (1993) 11

Statutes

28 U.S.C. § 1927 ..... *passim*

Cal. Civ. Proc. Code § 527.6 (2025) 4

N.D. Cal. Civil L.R. 3-3(c) 18

Other Authorities

Fed. R. Evid. 801(d)(2)(A) 10

U.S. Const. amend. I 1, 11

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

Plaintiff and his counsel's admitted behavior has been so outrageous and egregious that rarely has a situation arisen that is this ripe for sanctions. Not only has Plaintiff stated that his intention was to financially drain Mr. Kane as litigation strategy, as his attorney seemingly acquiesced to, but Plaintiff also brought the underlying SPEECH Act lawsuit without any basis in law. The clear lack of legal support and authority (and lack of service) are detailed in Mr. Kane's motion to dismiss, filed on August 10, 2026 (ECF No. 23).

To wit, Plaintiff Nik Richie told his audience why he was litigating against Evander Kane before he had even claimed effective service in this case. Seated beside his counsel of record, Marc Randazza, on his own podcast on July 7, 2026, twelve days after filing this action, Richie described the plan: "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]f we can keep going on this and he's . . . just financially drained, he's going to come to the table and he's going to be like, I'm over it." Mr. Randazza did not disavow the plan. He cautioned his client that "it's not a good idea to talk about your settlement strategy on camera," confirming the strategy's purpose. (ECF No. 23-1, Ex. E at 58:07–58:32.)

This lawsuit was one of those "angle[s]." Some context is necessary. Mr. Kane is a professional hockey player who lives in Edmonton, Alberta. Richie runs a social-media platform with more than 500,000 followers. In May 2026, Richie published an interview in which Mr. Kane's former wife, Deanna "Anna" Kane, accused Mr. Kane of kidnapping his daughter. The next day, Mr. Kane's counsel sent Richie court orders that contradicted that accusation—indeed, Mr. Kane was granted full custody of his daughter by the court. When Mr. Kane then sought a civil harassment restraining order against Richie in Orange County Superior Court, Richie did not simply defend that case. He also filed this one, asking this Court to declare that a Canadian judgment entered against Ms. Kane could not be enforced against him. He filed it a week *after* the Orange County temporary restraining order had been dissolved, in a district Mr. Kane left in 2023, while the identical First Amendment arguments were already pending in Richie's anti-SLAPP motion in state court. And

his own Complaint pleaded, four times over, that the Canadian judgment was entered against someone else. Glaringly, the Orange County court denied Richie's anti-SLAPP motion—and stated in pertinent part that Richie's conduct was "not protected speech." (RJN, Ex. 1.)

Richie then turned the litigation into content and the service of this Court's process into a spectacle. He promoted the Complaint as a Dirty Army website feature with the promise of "[m]ore to come," advertised the state-court hearings with an AI-generated fight poster ("NIK RICHIE VS EVANDER KANE"), and kept a running "3-0 . . . not that I'm keeping score" tally credited "Legal: @marcorandazza." Richie's counsel warned that Richie's followers would be enlisted to find Mr. Kane; Richie then told those followers to "test the Dirty Army" by photographing Mr. Kane and his children within thirty minutes. He announced that Mr. Kane had been "SERVED BY THE DIRTY ARMY" with an image bearing an "AI info" label, and his counsel filed returns attesting to personal service in Los Angeles on a day Mr. Kane was in Edmonton. Told the returns were false, and faced with Mr. Kane's sworn declaration, Plaintiff's counsel neither withdrew nor corrected them.

How this case ended confirms why it was brought. On September 14, Plaintiff's counsel refused to stipulate to continue the case management conference, accused Kane of "delaying this litigation," and insisted on discovery into service. Plaintiff never took that discovery. Instead, over the next week Richie began publicly blaming his own source, Ms. Kane ("Man I was an idiot to believe Anna," saying "I got scammed," and saying he got the greenlight from his counsel to expose her. On September 21—over three weeks since Richie's state court anti-SLAPP motion was denied where the judge told him that his conduct is not constitutionally protected—Richie dismissed this case, declaring in the notice that he had "prevailed." Within hours he told his followers: "Now that I have obtained victory as a journalist . . . I can admit that I was misled by Anna Kane and the Judge was giving weight to a confidential Santa Clara order that I knew nothing about." That claimed ignorance is not true. The Santa Clara order was attached to the May 22, 2026 demand letter that Richie himself filed in support of his Complaint (ECF No. 1-2); his counsel analyzed the order in writing on June 5, 2026; and Richie attacked it by name in Richie's own state-court filing on June 15.

Richie did not prevail. He lost in state court, obtained nothing from this Court, and walked away. He knew that the December 9, 2026 hearing on Mr. Kane's motion to dismiss would bring accountability. Rule 41(a)(1) allowed him to abandon his claims. It does not allow him or his counsel to walk away from how they brought and maintained them. *See Cooter & Gell v. Hartmarx Corp.*, 496 U.S. 384, 395-96 (1990). The Court should find that Richie litigated this case in bad faith and that his counsel unreasonably and vexatiously multiplied it, and the Court should award Mr. Kane the fees that conduct caused.

II. STATEMENT OF ISSUES TO BE DECIDED

1. Whether the Court retains authority to impose sanctions after Plaintiff's voluntary dismissal under Rule 41(a)(1)(A)(i).
2. Whether Plaintiff brought and maintained this action in bad faith and for an improper purpose, warranting sanctions under the Court's inherent authority.
3. Whether Mr. Randazza and Mr. Shepard unreasonably and vexatiously multiplied these proceedings under 28 U.S.C. § 1927 and acted in bad faith.
4. What fees and costs were caused by the sanctionable conduct and should be awarded.

III. STATEMENT OF FACTS

A. Before Suing, Richie and His Counsel Knew the Orders Bound Only Ms. Kane—and Knew About the Santa Clara Order.

Richie publishes to more than 500,000 Instagram followers under @nikrichie and to a "Dirty Army" broadcast channel of roughly 8,200 members. (Coy Decl. ¶ 3, Ex. 1.) On May 21, 2026, he published an interview with Mr. Kane's former wife, Deanna "Anna" Kane. (Compl. ¶ 10.) The next day, May 22, 2026, Mr. Kane's counsel sent Richie a demand letter identifying two orders against Ms. Kane: a permanent domestic violence restraining order entered July 10, 2024 by the Santa Clara County Superior Court in Case No. 21FL002586 (the "Santa Clara Order," RJN at Ex. 6), and a May 14, 2025 default judgment of the Alberta Court of King's Bench (the "Alberta Judgment"). The May 22 letter attached both. (ECF No. 1-2 at 2-5.) The Santa Clara Order states on its face that it does "[n]ot expire" and that "[j]urisdiction over [c]ustody and [v]isitation has

transferred to Canada." (*Id.* at 7, 14; RJN, Ex. 6.) Richie later filed the letter from Mr. Kane's counsel and both orders as an exhibit to his own Complaint. (Compl., Ex. 2, ECF No. 1-2.)

On June 5, 2026, Mr. Randazza responded with a total lack of professionalism: "No. Mr. Richie will not comply." (Coy Decl. ¶ 6, Ex. 4 at 1.) Acknowledging Mr. Kane's counsel's advance notice of a restraining-order petition, he wrote "Ok, lets dance" and "Dude. You think that will work? Then lets roll." (*Id.* at 1, 3.) He analyzed both orders, conceding that the restraining order "does not extend to anyone other than [Ms. Kane]" and that the Alberta Judgment "again does not extend to anyone other than Mrs. Kane." (*Id.* at 2.) He represented that Richie "stands by all his and Mrs. Kane's statements" and "has never had any reason to doubt her story." (*Id.* at 3.)

On June 5, 2026, Mr. Kane filed a civil harassment petition under Code of Civil Procedure section 527.6 in Orange County Superior Court. On June 8, 2026, the court issued a temporary restraining order that took judicial notice of the Santa Clara Order and found that it made Richie's postings accusing Kane of kidnapping his daughter "**false on their face**." (RJN, Ex. 3; ECF No. 23-1 at 25 [emphasis added].) On June 15, 2026, Richie—through Mr. Randazza and Mr. Shepard—sought to vacate the TRO, devoting an argument section to the "2024 California family court domestic violence restraining order (the 'DVRO')," quoting its terms, and contending it was "no longer in effect" because custody jurisdiction had transferred to Canada. (RJN, Ex. 4; ECF No. 31-1 at 17, 32.) He filed an anti-SLAPP motion on June 16. (*Id.* at 5.) The TRO was dissolved on June 18, 2026. (RJN, Ex. 5; ECF No. 23-1 ¶ 7.)

B. With No Restraint in Place, Richie Sued in this Court and Turned the Suit into Online Content to Promote His Social Media Accounts and Sell Merchandise.

Richie filed this action on June 25, 2026, seeking three declarations that the Alberta Judgment could not be enforced against him. (ECF No. 1.) By then no order restrained him (RJN, Ex. 5); his Complaint acknowledged that the TRO "was vacated." (*Id.* at 2.) The Complaint pleaded that the Alberta Judgment "was entered against Anna Kane," that Richie "was not a party," that Ms. Kane was "the only person actually enjoined," and that Richie was "a stranger to the proceeding." (*Id.* ¶¶ 2, 17, 27, 43.) It also pleaded that the demand letter "purported to place Richie on formal

notice" of the Santa Clara Order. (*Id.* ¶ 15; *see id.* ¶ 5(b).) Richie sued in San Jose, although Mr. Kane—a Canadian citizen residing in Edmonton—has not lived in this District or anywhere in the United States since early 2023. (ECF No. 23-2 ¶¶ 3–6.)

Richie immediately programmed and commercialized the case. On July 7—the same day as the podcast quoted above—he posted an image labeled "AI content," styled as a fight card advertising the Orange County hearing dates—"TRIAL DATES SET," "NIK RICHIE VS EVANDER KANE"—captioned "Dirty Army is welcome to attend." (Coy Decl. ¶ 16, Ex. 7.) On July 12, he published the Complaint as a Dirty Army website feature, "Nik Richie Sues Evander Kane in Federal Court," captioned: "More to come. The Dirty Army Foundation (DAF) is coming for all the MONSTERS. @nhl @espn #EvanderKane . . . Link in Bio to read full story." (*Id.*) On August 24, the day his opposition to Kane's motion to dismiss was filed, he posted it with the caption: "3-0 . . . not that I'm keeping score or anything. . . . For you legal junkies, you're welcome for the tutorial on how to defeat a narcissist . . . . Legal: @marcorandazza." (*Id.*)

The podcast made the objective explicit. Beyond the "papering" passage, Richie explained that "[w]e need to lose sometimes . . . because it gets louder, it gets bigger. The wave gets larger," and "that's why I want to lose. I want to appeal." (ECF No. 23-1, Ex. E at 52:24–53:00.) Mr. Randazza falsely told the audience that Mr. Kane's counsel had obtained a "secret injunction without even telling you that it was happening," although a month earlier in his June 5 letter he had quoted, verbatim, the email in which Mr. Kane's counsel told Richie about the petition the night before it was filed. He also said he was "doing this case so much"—that is, litigating it as aggressively as he was—because he did not like Mr. Kane's counsel. (*Id.* at 56:54–57:15; Coy Decl. Ex. 4 at 3.)

C. Richie and His Counsel Turned Service of This Court's Process into a Weapon.

On June 18, 2026, Mr. Kane's counsel advised Plaintiff's counsel that they were not authorized to accept service. (ECF No. 23-1 at 33 ¶ 5.) On July 9, Mr. Randazza threatened in an email to Mr. Kane's counsel that, absent a response, "Richie and his counsel would seek to employ the assistance of Richie's social media followers to locate Kane." (*Id.* at 34 ¶ 10 (Shepard Decl.).)

The next day, Richie publicly posted the family's location and told his followers: "Let's test the Dirty Army. Can anyone grab a pic in next 30 minutes." (Coy Decl. ¶ 11, Ex. 5; ECF No. 31-1 at 13-14.) Followers photographed Mr. Kane and his family, including his fiancée and their minor children (frightening the family for security reasons), and Richie published the photographs. (Coy Decl. ¶ 11, Ex. 5; RJN, Ex. 1; ECF No. 31-1 at 13-14.) The Orange County court later found that Richie "*already knew Petitioner's location when the challenged post was made*," that the service rationale did not explain inviting followers to "test the Dirty Army," and that the conduct "**exceeded any legitimate litigation-related purpose and instead constituted the use of Respondent's social media platform to direct third parties toward Petitioner and his family in a manner reasonably calculated to intimidate and harass them**." (RJN, Ex. 1; ECF No. 31-1 at 13-14 [emphasis added].) It added that "advance notice that one intends to engage in such conduct does not immunize the conduct from legal scrutiny." (*Id.*) Richie has since confirmed the purpose himself: the Dirty Army photo campaign was because "I am trying to serve him for the SPEECH Act." (Coy Decl. ¶ 17, Ex. 8.)

On July 19, Richie posted—jointly with Ms. Kane's account—an image carrying Instagram's "AI info" label, captioned: "Another step forward for the Dirty Army today as we served Monster Evander Kane in the middle of his backswing. . . . This service has nothing to do with our current trial litigation as we have more lawsuits coming. As my lawyer @marcorandazza would say, 'let's dance.'" (ECF No. 23-1 at 30; *see also* Coy Decl., Ex. 4 at 1.) On July 22 and 23, Plaintiff's counsel filed a Declaration of Personal Service attesting that Mr. Kane was personally served at the Bel-Air Country Club in Los Angeles on July 19, 2026, and a process server's declaration dating the same service July 19, 2025. (ECF Nos. 11, 12; ECF No. 23-1 ¶ 9.)

Mr. Kane was not in the United States on July 19, 2026. He was in Edmonton. He was not at the Bel-Air Country Club at any time in July 2026, and he has never been served in this action. (ECF No. 23-2 ¶¶ 9–11; Kane Decl. ¶¶ 4-10, Exs. A-C.) The person in Richie's image is not Mr. Kane. (ECF No. 23-2 ¶ 13.) On July 30, Mr. Kane's counsel so advised Mr. Randazza in writing and asked that the returns be withdrawn by August 3. (ECF No. 23-1 at 26–30.) Counsel's response

was to demand that Mr. Kane produce evidence. (*Id.* ¶ 11.) On August 3, counsel renewed Plaintiff's motion for alternative service while standing on the returns. (ECF No. 20; ECF No. 23-1 ¶ 11.) On August 5, Mr. Shepard swore in the state court that "a process server successfully served Kane at the Bel Air Country Club"—assigning the service yet another date—and that no one at his firm had "any reason to believe there was anything inaccurate about the declarations of service." (ECF No. 23-1 at 35 ¶¶ 15, 17.) In this Court, Plaintiff's opposition represented that "Kane was personally served on July 19, 2026," resting on nothing but the return, and dismissed the conflicting year as "an obvious typo." (ECF No. 30 at 12.) Neither return was ever withdrawn or corrected—not even the "typo." Regardless, a typo on a proof of service is something counsel corrects—instead, it was ignored and when shown to them, the error was waved away. The typo itself is not the real problem—the point is that a sworn proof of service that could not get the year right was a reason for counsel to investigate before vouching for it in this Court and doubling down.

The real problem is that Mr. Kane was at his home in Edmonton, Canada, not at the Bel-Air Country Club on July 19, 2026. (Kane Decl. ¶¶ 4-10, Exs. A-C.) And despite being repeatedly warned of the false returns of service, Plaintiff and his counsel have chosen to ignore those warnings, and instead they doubled down in order to turn this case into a spectacle for their social media following. (*See* ECF No. 23-1 ¶ 13, Ex. E; Coy Decl. ¶¶ 15-19, Exs. 7-10.)

D. The State Court Rejected Richie's "Journalism" Framing, and Richie Attacked the Court.

On August 6, 2026, the Orange County court rejected Richie's characterization of his conduct as protected journalism and made the findings described above. (RJN, Ex. 2; ECF No. 31-1, Ex. 2 at 13–14.) On August 26, the court denied Richie's anti-SLAPP motion on both prongs, giving "great weight" to the "Family court order Santa Clara July 10, 2024" and finding that Richie's conduct focused on an assertion that Mr. Kane had kidnapped his daughter "despite the Respondent's knowledge of the Santa [Clara] County Superior Court Order of July 10, 2024 to the contrary." (RJN, Ex 1; ECF No. 31-1, Ex. 1.) Richie responded with a video to his followers: "This judge just hates my guts"; "we never wanted to be here anyways. We wanted to get to a higher court,

we wanted to appeal from the get-go"; the Orange County system is "corrupt"; "you're a waste of time. We wasted time today"; and "I am not going to stop. If you tried to stop me today, Judge, you [expletive] failed." (Coy Decl. ¶ 17, Ex. 8.) On September 10, he posted the page of the hearing transcript on which the court described the weight it gave the Santa Clara Order, captioned: "Make it make sense? . . . I have zero to do with Santa Clara." (*Id.* ¶ 16, Ex. 7.)

E. Plaintiff Demanded Discovery, Obtained the Opportunity, and Took None.

Mr. Kane moved to dismiss on August 10, 2026, raising standing, personal jurisdiction, service, and failure to state a claim, and requesting sanctions. (ECF No. 23.) Mr. Kane sought an October hearing; it was set for December 9 to accommodate Mr. Randazza's and the Court's schedule. (Coy Decl. ¶ 14, Ex. 6 at 1.) After the parties' September 1 Rule 26(f) conference (*see* ECF No. 34-1 ¶ 2), Mr. Shepard wrote on September 14 that Plaintiff would not stipulate to continue the case management conference because "Mr. Kane is interested primarily in delaying this litigation. He has not taken a reasonable position regarding service, and we would like to take some discovery into his claim that he was not (and could not have been) served with the Complaint and Summons." (Coy Decl. ¶ 14, Ex. 6 at 2.) Mr. Kane filed an administrative motion (ECF No. 34). On September 16, the Court continued the conference and declined to defer discovery. (ECF No. 37.)

F. Richie Publicly Blamed His Source, Dismissed the Case, and Declared Victory.

While his counsel was insisting on discovery and refusing to stipulate on a routine continuance—likely realizing that Richie's claims had little to no merit after reviewing Mr. Kane's motion to dismiss pleadings—Richie was publicly distancing himself from Ms. Kane. On September 11, he texted Ms. Kane's mother: "Deb can you please check on Anna. I'm really worried about her." (*See* Coy Decl. ¶ 18, Ex. 9.) He later posted that text to his channel alongside a Dirty Army graphic identifying Ms. Kane as its "Director of Marketing." (*See id.*) On Friday, September 18, he posted: "All the messages coming in. Man I was an idiot to believe Anna." (*Id.*) On Saturday, September 19, he posted a screenshot of his Google search, "when a mother signs global custody

resolution order what does it mean," followed by: "Anna Kane - Why didn't you tell me the truth?" (*Id.*)

On Monday, September 21, Plaintiff filed a notice of voluntary dismissal under Rule 41(a)(1)(A)(i). (ECF No. 39.) The notice did not simply dismiss. It called Mr. Kane's position "one of the most bizarre legal theories one could imagine," accused him of a "tuck and run," asserted that "by the mere act of filing this lawsuit, Richie materially changed the relationship between the parties," declared that "Richie has prevailed," and reserved the right to refile "in the event Kane changes his position once more." (*Id.* at 1-2.) Within hours Richie had posted the notice to his 500,000-plus followers as both a post on his page and as a story:

> Now that I have obtained victory as a journalist. I want to take a moment to personally apologize to Mara Teigen. . . . Now that I have seen the Global Settlement agreement which was not disclosed to me, I can admit that I was misled by Anna Kane and the Judge was giving weight to a confidential Santa Clara order that I knew nothing about.

(Coy Decl. ¶ 19, Ex. 10.) He posted the notice to his channel and his story as well, adding: "FREE BIRD... literally." (*Id.*) The "confidential Santa Clara order that I knew nothing about" is the order attached to ECF No. 1-2 (*see* RJN, Ex. 6).

IV. LEGAL STANDARD

Plaintiff's voluntary dismissal does not end the Court's authority to address how this case was litigated. "It is well established that a federal court may consider collateral issues after an action is no longer pending," including sanctions and attorneys' fees, and a Rule 41(a)(1) voluntary dismissal does not divest the court of that authority. *Cooter & Gell*, 496 U.S. at 395-96. The Court may impose sanctions even if it lacked subject-matter jurisdiction over the underlying claims. *Willy v. Coastal Corp.*, 503 U.S. 131, 137-39 (1992). Mr. Kane seeks sanctions under two sources of authority: the Court's inherent power, which reaches both Richie and his counsel, and 28 U.S.C. § 1927, which reaches counsel alone..

The Court's inherent power permits an award of attorneys' fees against a party or an attorney who has "acted in bad faith, vexatiously, wantonly, or for oppressive reasons," and bad faith "may be found, not only in the actions that led to the lawsuit, but also in the conduct of the litigation."

Chambers v. NASCO, Inc., 501 U.S. 32, 45-46 (1991) (citations omitted); *Roadway Express, Inc. v. Piper*, 447 U.S. 752, 766-67 (1980). The power is not displaced by Rule 11 or § 1927. *Chambers*, 501 U.S. at 46-50. In this circuit, bad faith "includes a broad range of willful improper conduct," and sanctions are available for "recklessness when combined with an additional factor such as frivolousness, harassment, or an improper purpose." *Fink v. Gomez*, 239 F.3d 989, 992-94 (9th Cir. 2001). A colorable claim is no defense: sanctions are warranted where a party "argues a meritorious claim for the purpose of harassing an opponent." *Primus Auto. Fin. Servs., Inc. v. Batarse*, 115 F.3d 644, 649 (9th Cir. 1997) (quoting *In re Keegan Mgmt. Co., Sec. Litig.*, 78 F.3d 431, 436 (9th Cir. 1996)). Before imposing sanctions under its inherent power, the Court must make an express finding of bad faith. *Primus Auto.*, 115 F.3d at 648.

Section 1927 separately provides that an attorney "who so multiplies the proceedings in any case unreasonably and vexatiously may be required by the court to satisfy personally the excess costs, expenses, and attorneys' fees reasonably incurred because of such conduct." 28 U.S.C. § 1927. The statute reaches only individual attorneys, not parties or law firms, *Kaass Law v. Wells Fargo Bank, N.A.*, 799 F.3d 1290, 1293–95 (9th Cir. 2015), and only conduct after the complaint is filed, *Keegan*, 78 F.3d at 435. It requires subjective bad faith, which is present when an attorney knowingly or recklessly raises a frivolous argument, or argues a meritorious claim for the purpose of harassing an opponent. *B.K.B. v. Maui Police Dep't*, 276 F.3d 1091, 1107 (9th Cir. 2002); *see Lahiri v. Universal Music & Video Distrib. Corp.*, 606 F.3d 1216, 1219 (9th Cir. 2010) (recklessness suffices); *In re Girardi*, 611 F.3d 1027, 1061 (9th Cir. 2010) (reckless or intentional misleading of the court).

Any fee award under the inherent power must be compensatory: it may include only the fees the moving party would not have incurred *but for* the misconduct. *Goodyear Tire & Rubber Co. v. Haeger*, 581 U.S. 101, 108-09 (2017). In exceptional cases, for example, where a plaintiff "initiates a case in complete bad faith"—the court may "shift all of a party's fees, from either the start or some midpoint of a suit, in one fell swoop." *Id.* at 110.

V. ARGUMENT

A. Plaintiff Brought and Maintained This Action in Bad Faith.

1. *Plaintiff announced the improper purpose publicly in his own words, with his counsel beside him.*

Improper purpose ordinarily must be inferred. Here it was publicly admitted and broadcast. Twelve days after filing this action, Richie described the objective of "papering so hard" and "coming from every single angle": to impose costs—a "goal" of "2.5"—until Kane was "financially drained" and would "come to the table" and say "I'm over it." (ECF No. 23-1, Ex. E at 58:07–58:32.) That is litigation pursued to exhaust an opponent rather than to resolve a controversy—the prime example of a suit maintained "for oppressive reasons." *Chambers*, 501 U.S. at 45-46. The statements are Richie's own and are admissible against him. Fed. R. Evid. 801(d)(2)(A).

Mr. Randazza's reaction confirms the point. He did not correct his client or disclaim the plan; he called it "your settlement strategy" and warned against discussing it "on camera." Also, it does not matter that Richie professes a First Amendment grievance. A litigant may believe in his cause and still wield it to harass; that is precisely why a "meritorious claim" pursued "for the purpose of harassing an opponent" is sanctionable. *Primus*, 115 F.3d at 649. And using Richie's statements as evidence of purpose raises no First Amendment concern. *Wisconsin v. Mitchell*, 508 U.S. 476, 489 (1993) (First Amendment "does not prohibit the evidentiary use of speech . . . to prove motive or intent"). Mr. Kane asks the Court to sanction litigation conduct, not speech.

2. *The timing, forum, and content of this action confirm it was an "angle," used for leverage, instead of a legitimate remedy.*

The objective record matches Richie's July 7 description of his purpose. When Richie filed on June 25, nothing restrained him: the TRO had been dissolved a week earlier, and his Complaint said so. Every First Amendment argument he pleaded was already before the Orange County court in the anti-SLAPP motion he had filed nine days earlier. He chose a district Kane had left three years before. And his Complaint pleaded the fact that defeated its own premise—that the Alberta Judgment bound Ms. Kane and no one else—four separate times, a point Mr. Randazza had conceded in writing twenty days before filing. (Coy Decl. ¶ 7, Ex. 4 at 2.) A second forum opened

to press arguments already pending in the first serves only to multiply the target's expense. Filing in one court "to gain tactical advantage in another case" is a recognized improper purpose. *Fink*, 239 F.3d at 994.

Richie then used the case as programming for his social media content. The fight-card poster, the website feature promising "[m]ore to come" and a Foundation "coming for all the MONSTERS," the "3-0" scorekeeping credited to "Legal: @marcorandazza," the September 10 "zero to do with Santa Clara" post—each converted this litigation into material for his platform. (Coy Decl. ¶ 16, Ex. 7.) Richie's own descriptions of what he wanted from the courts complete the picture: he wanted to "lose" so that "[t]he wave gets larger," and, after losing in state court, he said "we never wanted to be here anyways." (ECF No. 23-1, Ex. E at 52:24–53:00; Coy Decl. ¶ 17, Ex. 8.) A litigant who does not want adjudication—who wants expense for his opponent, volume for his audience, and a stage—is not using the courts for a proper purpose.

3. Plaintiff used this Court's process to direct his followers at Mr. Kane's family, including minor children.

Richie used the need to serve the summons in this case as a means for further harassment and used the occasion to call for a public manhunt. After Mr. Randazza warned Mr. Kane's counsel on July 9 that Richie's followers would be enlisted to "locate Kane," Richie posted the family's location, told his followers to "test the Dirty Army" by photographing them within thirty minutes, and published the resulting photographs of Mr. Kane with his minor children. (*See* Section III.C, *supra*.) The Orange County court found that Richie already knew where Mr. Kane was, that the service rationale could not explain the conduct, and that it was "reasonably calculated to intimidate and harass" Mr. Kane. (ECF No. 31-1 at 14.) Mr. Kane does not ask this Court to give those findings preclusive effect. *See Lee v. City of Los Angeles*, 250 F.3d 668, 689-90 (9th Cir. 2001). He does not need to: Richie has confirmed in his own voice that the Dirty Army campaign was his method of serving *this* Complaint—"I am trying to serve him for the SPEECH Act." (Coy Decl. ¶ 17, Ex. 8.) Using the service of federal process as cover to direct an audience of hundreds of thousands at a litigant's children is bad faith in the conduct of the litigation. *Chambers*, 501 U.S. at 46.

4. *The returns of service were false, publicized, and maintained after notice.*

Plaintiff bears the burden of establishing valid service. *Brockmeyer v. May*, 383 F.3d 798, 801 (9th Cir. 2004). Plaintiff instead filed two returns that could not both be true on their face; publicized the "service" with an image bearing an artificial-intelligence label, co-published with his source (Ms. Kane) and promising "more lawsuits coming"; and, after being told on July 30 that Mr. Kane was not in the country, refused to withdraw or correct the returns. Mr. Kane has corroborated his sworn testimony with his flight and hotel receipt from his family trip to Southern California, which show that he left California on July 13, 2026 and flew back to Edmonton, and a photograph taken on July 19, 2026 in his home, reflecting that he was in Edmonton on July 19, 2026. (Kane Decl. ¶¶ 4-8, Exs. A-C.) Plaintiff never offered anything beyond the return itself. He instead demanded that Mr. Kane disprove it (ECF No. 30 at 16), and then—having told Kane's counsel he needed discovery into service—took none.

The returns mattered and are the direct and proximate cause for the expense and cost that Mr. Kane has incurred from this action. Without Richie and his counsel claiming service was effectuated, no response to the Complaint was due; *with* them on file, Mr. Kane had to litigate against a deadline measured from a service date that never occurred, or risk default. Maintaining a false return after notice, while renewing a motion premised on the absence of service and publicly celebrating the "service" as a Dirty Army victory, is at minimum reckless disregard of the truth combined with an improper purpose. *Fink*, 239 F.3d at 993-94. Should the Court consider any factual dispute material, Mr. Kane requests an evidentiary hearing at which Plaintiff produces the process server and the original, unedited photograph with its metadata.

5. *The timing and way Plaintiff left confirms the case was never about adjudication.*

The clearest evidence of bad faith is how Plaintiff left. On September 14, 2026, counsel refused a routine stipulation, accused Mr. Kane of "delaying this litigation," and insisted that Plaintiff needed discovery into service. (Coy Decl. ¶ 14, Ex. 6.) A week later, Plaintiff dismissed,

reserving the right to refile and claiming "victory." (ECF No. 39; Coy Decl. ¶ 19, Ex. 10.) Plaintiff never took that discovery. The timing supports a straightforward inference: the stated need for discovery was a reason to refuse the stipulation, not a plan Plaintiff meant to carry out. Mr. Kane was left to seek the continuance by administrative motion, which the Court granted. And the moment the case threatened to require Plaintiff to substantiate or support his own filings, he abandoned it.

The notice's claim that Richie "prevailed" is false as a matter of law and fact. (*See* ECF No. 39.) A party prevails only through a "judicially sanctioned change in the legal relationship of the parties." *Buckhannon Bd. & Care Home, Inc. v. W. Va. Dep't of Health & Human Res.*, 532 U.S. 598, 605 (2001) (rejecting the "catalyst theory"); *Lackey v. Stinnie*, 145 S. Ct. 659, 668-69 (2025). Richie obtained no relief from this Court. And the "concessions" he claims to have extracted by suing—that the Alberta Judgment binds only Ms. Kane and was offered as evidence, not enforced against him—were his own counsel's position on June 5, stated in his own pleading on June 25, and were Mr. Kane's position throughout. (Coy Decl. ¶ 7, Ex. 4 at 2; Compl. ¶¶ 2, 17, 27, 43; ECF No. 23 at 12.) Kane has never disputed that the June 8 TRO referred to the Alberta Judgment; that order rested first on the Santa Clara Order and Richie's own course of conduct, referred to the Alberta Judgment as evidence of what Ms. Kane was barred from doing, and was dissolved a week before this suit was filed. (RJN, Exs. 3, 5; ECF No. 23-1 at 25.) "Richie has prevailed" was not a legal statement—it was a caption drafted into a filing that required only notice, and published to his followers within hours to rebrand his abandonment as "victory." (Coy Decl. ¶ 17, Ex. 6.)

Richie's posts in the days before the dismissal show what was actually happening. At that By then, the fees Richie intended to cause from "papering so hard" had been incurred (*see* ECF No. 23-1, Ex. E)—the motion to dismiss, the reply, the case-management motion—the content had been published, and the hearing was approaching. At that point, Richie began publicly casting himself as a victim of his own source ("Man I was an idiot to believe Anna"); to her: "Why didn't you tell me the truth?" (Coy Decl. ¶18, Ex. 9.) He then dismissed this case and declared victory while claiming he had been "misled." (*Id.* ¶ 19, Ex. 10.) As shown below, that claimed ignorance is contradicted by his own filings. The sequence is not the conduct of a litigant who filed to obtain a declaration of

rights. It is the conduct of one who filed to impose cost and generate content, and who exited—with a ready-made story for his audience—when the case stopped serving either purpose and began to threaten accountability.

6. Richie's September 21 admissions confirm his recklessness and lack of candor.

Richie now says the state court gave weight to "a confidential Santa Clara order that I knew nothing about." (Coy Decl. ¶ 19, Ex. 10.) The record refutes him at every step. The Santa Clara Order was attached to the May 22 demand letter; Mr. Randazza analyzed it in writing on June 5; the June 8 TRO relied on it; Richie's June 15 application argued at length that it was invalid; Richie filed it in this Court as part of ECF No. 1-2 and pleaded that it put him on "formal notice"; and the state court found on August 26 that he acted "despite . . . knowledge" of it. (ECF No. 1-2 at 2-19; Coy Decl. Ex. 4 at 2; RJN, Exs. 3, 4; ECF No. 23-1 at 25; ECF No. 31-1 at 10, 32; Compl. ¶ 15.) His September 10 claim to have "zero to do with Santa Clara" and his September 21 claim to have "known nothing about" its order are simply untrue and not credible. (Coy Decl., Exs. 7, 10.)

The "misled" story is no excuse. It is a face-saving account for his audience, which fails on its own terms. Richie had in hand from May 22, 2026 a court order stating that custody jurisdiction had transferred to Canada, and his counsel told Mr. Kane's counsel on June 5 that Richie "has never had any reason to doubt her story." (ECF No. 1-2 at 14; Coy Decl. Ex. 4 at 3.) Only after four months, a federal lawsuit, and two adverse state-court rulings did he post a Google search purporting to show that he was just learning what a global custody resolution means. (Coy Decl. ¶ 18, Ex. 9.) And the "source" he now says misled him was, according to his own channel, Dirty Army's "Director of Marketing." (*Id.*) Either Richie knew the truth all along, as the record shows, or he chose not to test an account that court orders in his own hands contradicted. Either way, that is at least reckless disregard of the truth, and combined with the purpose he announced, it is bad faith. *Fink*, 239 F.3d at 993-94.

B. Mr. Randazza and Mr. Shepard Are Independently Sanctionable.

1. Counsel unreasonably and vexatiously multiplied these proceedings.

Richie directed this campaign and is sanctionable for it under the Court's inherent power (Section V.A, *supra*), but counsel carried out the filings that multiplied this case after the Complaint and is independently accountable for them under § 1927. Counsel (1) filed returns of service that were inconsistent on their face and asserted a service that did not occur; (2) refused to withdraw or correct them after written notice on July 30 of their falsity; (3) renewed a motion for alternative service while standing on the validity of the returns (ECF No. 20); (4) opposed dismissal by representing that Kane "was personally served on July 19, 2026," resting on nothing but the return (ECF No. 30 at 12); (5) refused a routine stipulation on the stated ground that Plaintiff needed discovery into service (Coy Decl., Ex. 6), which counsel then never pursued, requiring Mr. Kane's administrative motion—the continuance portion of which the Court granted (ECF Nos. 34, 37); and (6) filed an argumentative dismissal notice that falsely declared Richie had "prevailed," which Richie published to his followers within hours (ECF No. 39; Coy Decl. ¶ 19, Ex. 10). Each forced Mr. Kane to respond to positions counsel knew, or recklessly disregarded, were unsupported. *B.K.B.*, 276 F.3d at 1107; *Girardi*, 611 F.3d at 1061.

Counsel's knowledge is not in doubt. Mr. Randazza sat beside his client as he described the "papering" strategy. He authored the July 9 email announcing that Richie's followers would be enlisted to locate Kane. His name is the credit line on his client's litigation content—"As my lawyer @marcorandazza would say, 'let's dance'" (echoing his own June 5 letter), and "Legal: @marcorandazza." (ECF No. 23-1 at 30; Coy Decl., Ex. 4.) Mr. Shepard wrote the September 14 emails demanding discovery Plaintiff never took, swore after notice that service "successfully" occurred and that he had no "reason to believe there was anything inaccurate," and signed the dismissal notice. (Coy Decl., Ex. 6; ECF No. 23-1 at 35; ECF No. 39.) Mr. Shepard's state-court declaration is not itself sanctionable under § 1927; it is evidence of what counsel knew and chose to disregard in this Court.

2. *The Court's inherent authority reaches counsel's role in the service campaign and related conduct.*

The inherent power reaches attorneys who act in bad faith. *Roadway Express*, 447 U.S. at 766-67. Counsel's announcement that a litigant's whereabouts would be crowd-sourced through a social-media following, followed the next day by the "test the Dirty Army" post, was not a service strategy; the state court found it was not, and that advance notice of the tactic "does not immunize" it. (ECF No. 31-1 at 14.) Counsel's public statements—"lets dance," "[t]hen lets roll," a "secret injunction" that counsel knew was preceded by written notice, and a case pursued "so much" out of animus toward opposing counsel—are not sanctioned here for their incivility. They are evidence that counsel shared and advanced the client's improper purpose. Not that Mr. Randazza is a stranger to being sanctioned—he is well experienced.[1]

C. Mr. Kane Should Be Awarded the Fees Caused by the Misconduct.

1. *Primary request: fees caused by the sanctionable conduct.*

Applying *Haeger*'s but-for standard, Mr. Kane requests the fees and costs he incurred in the following categories, each of which he would not have incurred *but for* the conduct described above:

(a) **Service.** The July 30, 2026 letter and related correspondence; the service-related portions of the motion to dismiss, reply, and supporting declarations; Mr. Kane's response to the renewed motion for alternative service (ECF No. 28); and the Supplemental Kane Declaration.

(b) **The motion to dismiss and reply** (ECF Nos. 23, 31), which Mr. Kane was compelled to prepare and file by the deadline the false returns manufactured.

(c) **Case management** made necessary by Plaintiff's refusal to stipulate, including the Rule 26(f) and joint-statement work and the administrative motion (ECF No. 34).

(d) **This motion,** which Plaintiff's conduct made necessary.

[1] Given Plaintiff's lead counsel's extensive history of public disciplinary proceedings, the Court should give further scrutiny to self-serving statements describing the reasonableness of counsel's purpose. *See* Disciplinary Proceedings against M. Randazza before the State Bar of California (discipline, probation; Case No. 19-J-30338; dated Jan. 10, 2010); and Nevada Bar No. 12265 (12-month suspension, stayed on conditions, admitted to two violations in plea agreement with seven counts dismissed; Case No. 76453; Oct. 10, 2018) (other states/jurisdictions issued suspension/probation based on the Nevada violations, including Mass. Disc. Pro. No. BD-2018-110, Ari. Disc. Pro. No. PDJ-2018-9110, Flo. Disc. Pro. No. 201500718).

2. *Alternative request: all fees, or at a minimum all fees from July 22, 2026 forward.*

In the alternative, this is the exceptional case in which the Court may shift all of Kane's fees. *Haeger*, 581 U.S. at 110; *Chambers*, 501 U.S. at 56-58. Richie filed this action after the restraint it challenged had been lifted, pleading facts that defeated it on its face, as one "angle" of a campaign he described as designed to drain Mr. Kane financially; maintained it through false returns of service and a discovery demand he never acted on; and abandoned it the moment it no longer served that end. Where the suit itself was the instrument of the improper purpose, every dollar spent defending it was caused by that purpose. At a minimum, because the returns of service placed every subsequent step of Mr. Kane's defense on a false footing, the Court should award all fees incurred from July 22, 2026—the date the first return was filed—forward. *Haeger*, 581 U.S. at 110 (fees may be shifted "from . . . some midpoint of a suit").

3. *Allocation and procedure.*

Mr. Kane requests that the award run jointly and severally against Richie (under inherent power) and Mr. Randazza and Mr. Shepard (under § 1927 and inherent power), with any apportionment among them left to the Court's discretion. Mr. Kane requests leave to file, within 21 days of the Court's order, a supplemental declaration and the chart required by Section M of the Court's Standing Order, with any response due 14 days later. The harm Richie's campaign caused Mr. Kane's family is offered as evidence of purpose, not as a separate basis for compensation. Finally, because Richie reserved the right to refile, Mr. Kane notes that any refiled action is subject to Rule 41(d) and must be related to this one under Civil Local Rule 3-3(c).

VI. CONCLUSION

Richie told his audience what this case was for, used this Court's process to aim his followers at a family with minor children, filed and defended returns of service that were not true, and walked away declaring victory the moment the case threatened to hold him to account. The Court should find that Richie brought and maintained this action in bad faith; that Mr. Randazza and Mr. Shepard unreasonably and vexatiously multiplied the proceedings and acted in bad faith; and that Kane is

entitled to the fees and costs caused by that conduct, in an amount to be established by supplemental declaration.

Respectfully Submitted,
BLANK ROME LLP

DATED: September 30, 2026

By: */s/ Ryan F. Coy*
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

HOOMAN ABEDI KARAMIAN a/k/a NIK LAMAS-RICHIE,

Plaintiff,

v.

EVANDER KANE,

Defendant.

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

DECLARATION OF RYAN F. COY IN SUPPORT OF DEFENDANT EVANDER KANE'S MOTION FOR SANCTIONS AGAINST PLAINTIFF AND HIS COUNSEL

[Filed concurrently with Notice of Motion and Motion for Sanctions; Declaration of Evander Frank Kane; Request for Judicial Notice; and [Proposed] Order]

Hearing:
Date: February 3, 2027
Time: 9:00 a.m.
Place: Courtroom 3, 5th Floor
San Jose Federal Courthouse

Complaint Filed: June 25, 2026
Dismissed: Sept. 21, 2026 (ECF No. 39)

DECLARATION OF RYAN F. COY

I, Ryan F. Coy, declare as follows:

1. I am an attorney licensed to practice law in the State of California and admitted to practice before this Court. I am an associate at Blank Rome LLP, counsel of record for specially appearing Defendant Evander Frank Kane ("Kane") in this action. I have personal knowledge of the facts stated in this declaration and, if called as a witness, could and would testify competently to them.

2. I submit this declaration in support of Kane's Motion for Sanctions Against Plaintiff and His Counsel. Neither this declaration nor the motion it supports constitutes a general appearance, an acceptance of service of process, or a submission to the jurisdiction of this Court on Kane's behalf.

Plaintiff's Platforms and the Screenshots Attached to This Declaration

3. I personally viewed each Instagram post and channel post described in this declaration on my mobile phone and personally captured the screenshots attached as Exhibits 1, 2, 3, 6, 8, and 9 on the dates stated below. Instagram displays the date of a post in relative terms (for example, "2 hours ago") or, for channel posts within the preceding week, by day of the week (for example, "FRI 8:55 PM"). Where I identify a calendar date for such a post, I have derived it from the date on which I captured the screenshot. Each screenshot is a true and correct copy of what appeared on my screen, except that, pursuant to Federal Rule of Civil Procedure 5.2(a)(3), I have obscured the name of Kane's minor daughter with a black box wherever it appears. I made no other alteration.

4. Plaintiff Hooman Abedi Karamian a/k/a Nik Lamas-Richie ("Richie") publishes on Instagram through the verified account "@nikrichie." When I viewed the account on September 28, 2026, it displayed more than 508,000 followers. Attached as **Exhibit 1** is a true and correct copy of a screenshot I took on September 28, 2026 of Richie's Instagram profile page. Richie also operates an Instagram broadcast channel titled "Dirty Army," which displays that it was "created by nikrichie" and, during the period I viewed it in September 2026, displayed approximately 8,200 to 8,300 members. Attached as **Exhibit 2** are true and correct copies of screenshots I took on

September 21 and 22, 2026 of Richie's "Dirty Army" Instagram channel. The posts described below from the "Dirty Army" channel appear under the "nikrichie" account name and profile image.

5. When I viewed Richie's Instagram account on June 11, 2026, his "Dirty Army" channel only had about 3,200 subscribers and Richie's Instagram account had about 492,000 followers. Attached as **Exhibit 3** is a true and correct copy of a screenshot I took on June 11, 2026 of Richie's Instagram profile page.

Pre-Suit Correspondence

6. On the evening of June 4, 2026, I sent Richie an email advising that Kane would seek a temporary restraining order against him the next day in Orange County Superior Court and describing the orders Kane would request. The full text of my email is quoted in Mr. Randazza's June 5, 2026 letter, at page 3 of Exhibit 1.

7. Attached as **Exhibit 4** is a true and correct copy of the letter dated June 5, 2026 from Marc J. Randazza to Craig Weiner and me, which I received by email on or about that date.

8. The May 22, 2026 demand letter from Blank Rome to Richie, with its Exhibit A (the July 10, 2024 Order to Renew Domestic Violence Restraining Order and Restraining Order After Hearing entered by the Superior Court of California, County of Santa Clara, in Case No. 21FL002586) and Exhibit B (the May 14, 2025 Alberta default judgment), is in the record as ECF No. 1-2, which Plaintiff filed with his Complaint.

Service of Process

9. The facts concerning the returns of service filed at Docket Nos. 11 and 12, my July 30, 2026 letter to Mr. Randazza, Plaintiff's counsel's response, Plaintiff's August 3, 2026 renewal of his motion for alternative service, and Mr. Shepard's August 5, 2026 declaration in the Orange County proceeding are set forth in my prior declaration, ECF No. 23-1 ¶¶ 9–12 and Exhibits C and D, which I incorporate by reference. From July 30, 2026 through the dismissal of this action on September 21, 2026, Plaintiff did not withdraw, correct, or amend either return of service, and neither Plaintiff nor his counsel provided us with any information supporting the claimed service beyond the returns themselves.

10. The facts concerning Richie's July 7, 2026 podcast appearance with Mr. Randazza, and the transcription of the relevant portions of that episode, are set forth in my prior declaration, ECF No. 23-1 ¶ 13 and Exhibit E, which I incorporate by reference.

11. On July 10, 2026, Richie posted on his "Dirty Army" Instagram channel and on his Instagram story about Mr. Kane and his family being in the United States. In the posts, he identifies that Mr. Kane, his fiancée, and their kids are in Los Angeles and that they are at Disneyland, posting a photo, and then in the story, Richie says "Looking for Monster Kane & Co." and "Let's test the Dirty Army. Can anyone grab a pic in next 30 minutes." Attached as **Exhibit 5** are true and correct copies of Richie's channel and story posts on Instagram on July 10, 2026.

Scheduling, the Rule 26(f) Conference, and Discovery

12. Mr. Kane sought to have his motion to dismiss (ECF No. 23) heard before the end of October 2026. Because of Mr. Randazza's schedule and the Court's availability, the hearing was set for December 9, 2026.

13. My account of the parties' September 1, 2026 Rule 26(f) conference is set forth in my prior declaration, ECF No. 34-1 ¶ 2, which I incorporate by reference.

14. Attached as **Exhibit 6** is a true and correct copy of my email exchange with Alex J. Shepard dated September 14 and 15, 2026. On September 14, 2026, Mr. Shepard emailed me and my co-counsel and stated that he and Mr. Randazza talked about my proposal on "holding off on a proposed discovery schedule or case management statement until after Kane's motion to dismiss is decided, and we don't think that approach is a good idea." (Ex. 2.) In response, I asked if there is any reason for why Mr. Randazza does not think it is a good idea, and asked "[w]hat is the harm with a stipulation to continue the case management hearing to December 9, to be heard with the other motions?" (*Id.*) Mr. Shepard replied stating that they believed Mr. Kane is interested in delaying this litigation, stating "we would like to take some discovery into [Mr. Kane's] claim that he was not (and could not have been) served with the Complaint and Summons," and stating "[we] would like to get the case moving along." (*Id.*) In my September 15 email response, I provided redlined and clean versions of the joint case management statement and authorized Plaintiff's

counsel to file it with my electronic signature. Plaintiff's counsel did not respond to that email and never filed the fully drafted joint case management statement.

15. Because Plaintiff's counsel refused to stipulate to continue the case management conference while there is a dispositive motion with substantive issues pending, Mr. Kane moved this Court to continue the case management conference. On September 16, 2026, the Court granted in part Mr. Kane's motion to continue the case management conference, which vacated the September 29, 2026 case management conference and continued it to February 2027. (ECF No. 37.) After this Court granted in part Mr. Kane's motion to continue the case management conference, on September 21, 2026, Plaintiff filed the notice of voluntary dismissal of this action.

Richie's Posts About This Litigation

16. Attached as **Exhibit 7** are true and correct copies of screenshots I captured on September 23, 2026 of the following posts on the @nikrichie Instagram account: (a) a post dated July 7, 2026, labeled "AI content," depicting a poster titled "TRIAL DATES SET" and "NIK RICHIE VS EVANDER KANE," with the caption beginning "Dates are set. Dirty Army is welcome to attend."; (b) a post dated July 12, 2026, showing a Dirty Army webpage titled "Nik Richie Sues Evander Kane in Federal Court, Says Canadian Gag Order Can't Be Used to Silence U.S. Press," dated July 12, 2026, displaying the first page of the Complaint in this action, with the caption beginning "More to come. The Dirty Army Foundation (DAF) is coming for all the MONSTERS," and a comment from the account "annaavakane"; (c) a post dated August 24, 2026, displaying page 6 of Plaintiff's opposition to Kane's motion to dismiss (ECF No. 30), with the caption beginning "3-0 . . . not that I'm keeping score or anything" and ending "Legal: @marcorandazza"; and (d) a post dated September 10, 2026, displaying page 42 of a reporter's transcript of the August 26, 2026 hearing in the Orange County proceeding, with the caption beginning "Finally received the transcript of the Judge's statements in the courtroom." Posts (b) and (d) display the location tag "Edmonton, Alberta, Canada."

17. Attached as **Exhibit 8** is (a) a true and correct copy of a screenshot of an Instagram video that Richie posted on the @nikrichie account on August 26, 2026, the day the Orange County

court denied his anti-SLAPP motion, and (b) a transcription of the relevant portions of that video. I viewed the video on September 23, 2026. I have compared the transcription to the video, and the transcription accurately reflects Richie's statements in the portions quoted. A copy of the video file will be uploaded online pursuant to the Court's Civil Local Rule 5-1(g)(4) and in accordance with the Court's Digital Exhibits Submission Form at www.cand.uscourts.gov/attorneys.

Richie's Channel Posts, September 11–19, 2026

18. Attached as **Exhibit 9** are true and correct copies of screenshots I captured of posts in the "Dirty Army" channel: (a) a screenshot captured on September 22, 2026 at 11:15 p.m. showing a post of a text-message exchange that includes a message dated "Fri, Sep 11 at 12:32 PM" reading "Deb can you please check on Anna. I'm really worried about her." and marked "Read 9/11/26," followed by Richie's commentary beginning "Anna's mother Deb who I warned prior to her breakdown," followed by an image identifying "Anna Kane" as "Director of Marketing" with the email address "anna@dirtyarmy.org"; (b) a screenshot captured on September 22, 2026 at 11:16 p.m. showing a post timestamped "FRI 8:55 PM"—which, based on the capture date, was posted on Friday, September 18, 2026—reading "All the messages coming in. Man I was an idiot to believe Anna."; and (c) a screenshot captured on September 21, 2026 at 2:56 p.m. showing a post timestamped "SAT 4:46 PM"—Saturday, September 19, 2026—consisting of a screenshot of a Google search for "when a mother signs global custody resolution order what does it mean," followed by a post reading "Anna Kane - Why didn't you tell me the truth? Stop ignoring the real questions and respond. Thank you."

Richie's September 21, 2026 Posts

19. Attached as **Exhibit 10** are true and correct copies of screenshots I captured on September 21, 2026 of: (a) a two-image post on the @nikrichie account displaying both pages of the Notice of Voluntary Dismissal (ECF No. 39), which, at approximately 2:45 p.m. when I captured it, showed that it had been posted "2 hours ago" and had 126 comments, with the caption beginning "Now that I have obtained victory as a journalist"; (b) a screenshot captured at 2:56 p.m. of the "Dirty Army" channel showing a post at 12:21 p.m. that day displaying the first page of ECF No.

39 with the caption "Now that I have obtained victory as a journalist....," followed by a post reading "FREE BIRD... literally"; and (c) a screenshot captured at 2:55 p.m. on September 21, 2026 of Richie's Instagram story, showing the same post shared on his Instagram story. These posts were all made within less than a few hours of the filing of the Notice of Dismissal that was filed in this action.

20. The only Santa Clara County order in this record is the July 10, 2024 order in Case No. 21FL002586, which is Exhibit A to the May 22, 2026 demand letter that Plaintiff attached in support of his Complaint filed as ECF No. 1-2 (at pages 6–19).

Meet and Confer and Hearing Reservation

21. On September 23, 2026, I sent Mr. Randazza and Mr. Shepard an email requesting a telephone meet-and-confer on Mr. Kane's forthcoming motion for sanctions. On September 24, 2026, I met and conferred by telephone with Mr. Shepard for approximately 30 minutes. During my call with Mr. Shepard, I identified the bases for the motion and the corresponding request for sanctions. Mr. Shepard stated that he disagreed with Mr. Kane's positions—Richie did not agree to any relief requested, and they did not agree to withdraw Dkt. Nos. 11 and 12 without further proof of their falsity. Towards the end of my meet-and-confer discussion on Mr. Kane's motion for sanctions, Mr. Shepard stated that if Mr. Kane proceeds with filing his motion for sanctions, then Mr. Richie is going to file a motion for sanctions against Mr. Kane in response also under 18 U.S.C. § 1927 for vexatiously multiplying this proceeding. After I asked Mr. Shepard for examples of sanctionable conduct, he said that Mr. Kane's refusal to accept service of process through counsel, Mr. Kane's challenge of effective service through his motion to dismiss, and filing this motion for sanctions. During the call, I also conferred regarding mutually agreeable hearing dates, and I stated that unless there was any issue I intended to request the December 9, 2026 hearing date for which Mr. Kane's motion to dismiss was set for hearing before the voluntary dismissal of the action. On September 29, 2026, I contacted the Courtroom Deputy, who confirmed a hearing reservation for December 9, 2026 at 9:00 a.m.

Attorney's Fees

22. Mr. Kane has incurred attorneys' fees and costs in this action, including in connection with my July 30, 2026 letter and related correspondence; the motion to dismiss (ECF No. 23) and supporting declarations; the response to Plaintiff's renewed motion for alternative service (ECF No. 28); the reply (ECF No. 31) and request for judicial notice; the Rule 26(f) conference, joint case management statement, and administrative motion (ECF No. 34); and this motion. Blank Rome LLP maintains contemporaneous time records for this matter. If the Court grants the motion, Kane will submit a supplemental declaration attaching the relevant records, allocating time among the categories identified in the motion, and including the chart required by Section M of the Court's Standing Order.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 30, 2026, at Los Angeles, California.

/s/ Ryan F. Coy
Ryan F. Coy

Exhibit 1

10:20

nikrichie

Nik Richie him

928 posts | 508K followers | 749 following

Producer

DirtyArmy.org supports families and children facing abuse, crisis, and hardship by providing advocacy, resources, and a voice.

www.youtube.com/watch?v=3... and 4 more

Baxter Muse | Dirty Army

Followed by tylerbailey24 and liljon

Follow | Message | Subscribe

Dirty Army... | Free Bird | WNA | KIDS 3 | Me | St

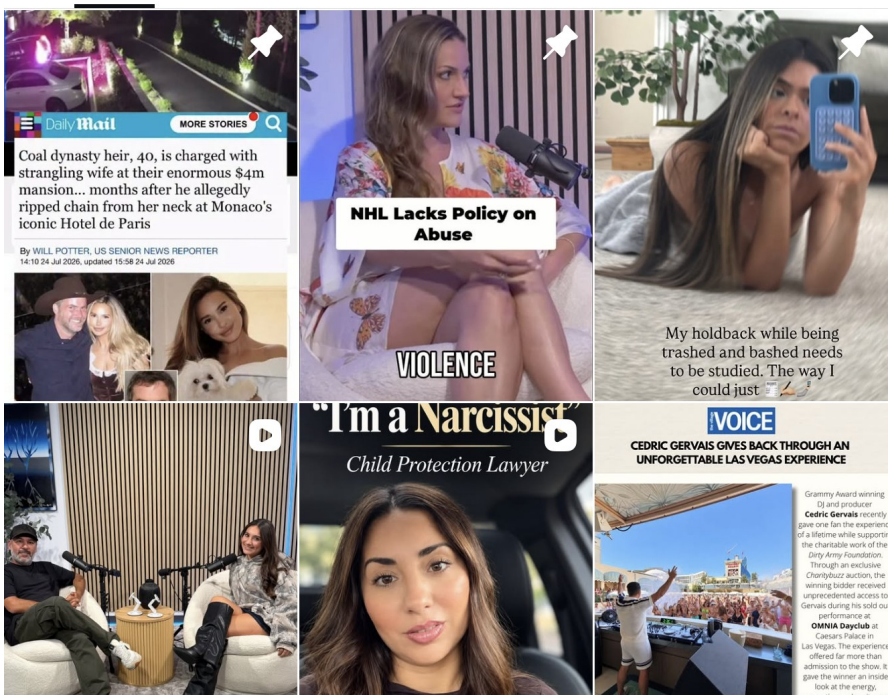


Exhibit 2

September 21
2:56 PM

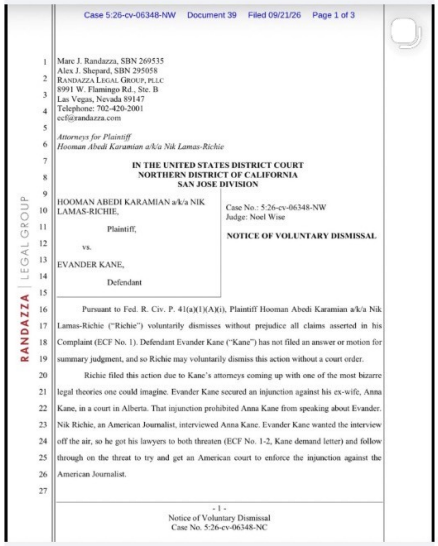
2:56

Dirty Army
nikrichie · 8.3K members

Welcome to the Dirty Army.

12:21 PM

nikrichie



Case 5:26-cv-06348-NW Document 39 Filed 09/21/26 Page 1 of 3

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

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

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

HOOMAN ABEDI KARAMIAN a/k/a NIK LAMAS-RICHIE,

Plaintiff,

vs.

EVANDER KANE,

Defendant

Case No.: 5:26-cv-06348-NW
Judge: Noel Wise

NOTICE OF VOLUNTARY DISMISSAL

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), Plaintiff Hooman Abedi Karamian a/k/a Nik Lamas-Richie ("Richie") voluntarily dismisses without prejudice all claims asserted in his Complaint (ECF No. 1). Defendant Evander Kane ("Kane") has not filed an answer or motion for summary judgment, and so Richie may voluntarily dismiss this action without a court order.

Richie filed this action due to Kane's attorneys coming up with one of the most bizarre legal theories one could imagine. Evander Kane secured an injunction against his ex-wife, Anna Kane, in a court in Alberta. That injunction prohibited Anna Kane from speaking about Evander. Nik Richie, an American Journalist, interviewed Anna Kane. Evander Kane wanted the interview off the air, so he got his lawyers to both threaten (ECF No. 1-2, Kane demand letter) and follow through on the threat to try and get an American court to enforce the injunction against the American Journalist.

- 1 -
Notice of Voluntary Dismissal
Case No. 5:26-cv-06348-NC

RANDAZZA | LEGAL GROUP

nikrichie Now that I have obtained victory as a journalist....

❤️ 12

FREE BIRD... literally.

3 ❤️ 16

Decline Join

Anyone can join this channel created by nikrichie. If you join, this channel will be added to your inbox and you'll be able to receive notifications.

September 22
1:43 PM

1:43
◀ Facebook
5G 70

Dirty Army
nikrichie · 8.2K members

Welcome to the Dirty Army.

Thank you @villagevoice ❤️

1 ❤️ 1

1:40 PM



1 ❤️ 2 😮 2

The desperation today is real 🤣. Anna Snowball knows I signed an NDA and I'm in the litigation where Lucia admits we communicate. Like I said in my post today, please MOVE ON. Put this energy into getting your daughter back.

❤️ 1

Seen by 36

Is Anna Kane Pay-4-Play?
Vote

Exhibit 3

June 11
5:16 PM

5:16 5GUW 42

nikrichie

Nik Richie him

754 posts | 492K followers | 654 following

Producer
Founder & CEO of @warriornetworkagency
CMO @buffalo.life 20+ Countries
Management: @zillmedia
DIRTYARMY.ORG
gofund.me/0b831a238 and 4 more

Dirty Army 3.2K members

Followed by tylerbailey24 and liljon

Follow | Message | Contact

Free Bird | PeePee Pro... | WNA | KIDS 3 | Me | Sty

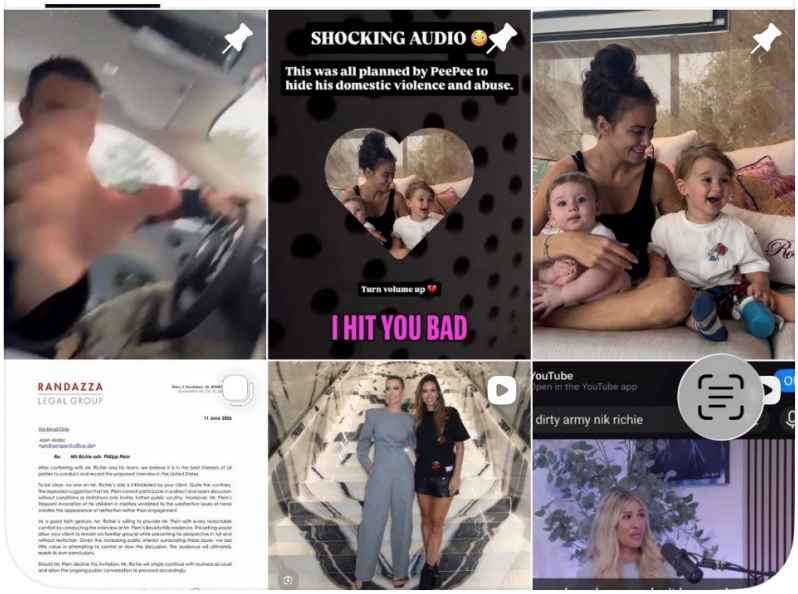


Exhibit 4

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

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.

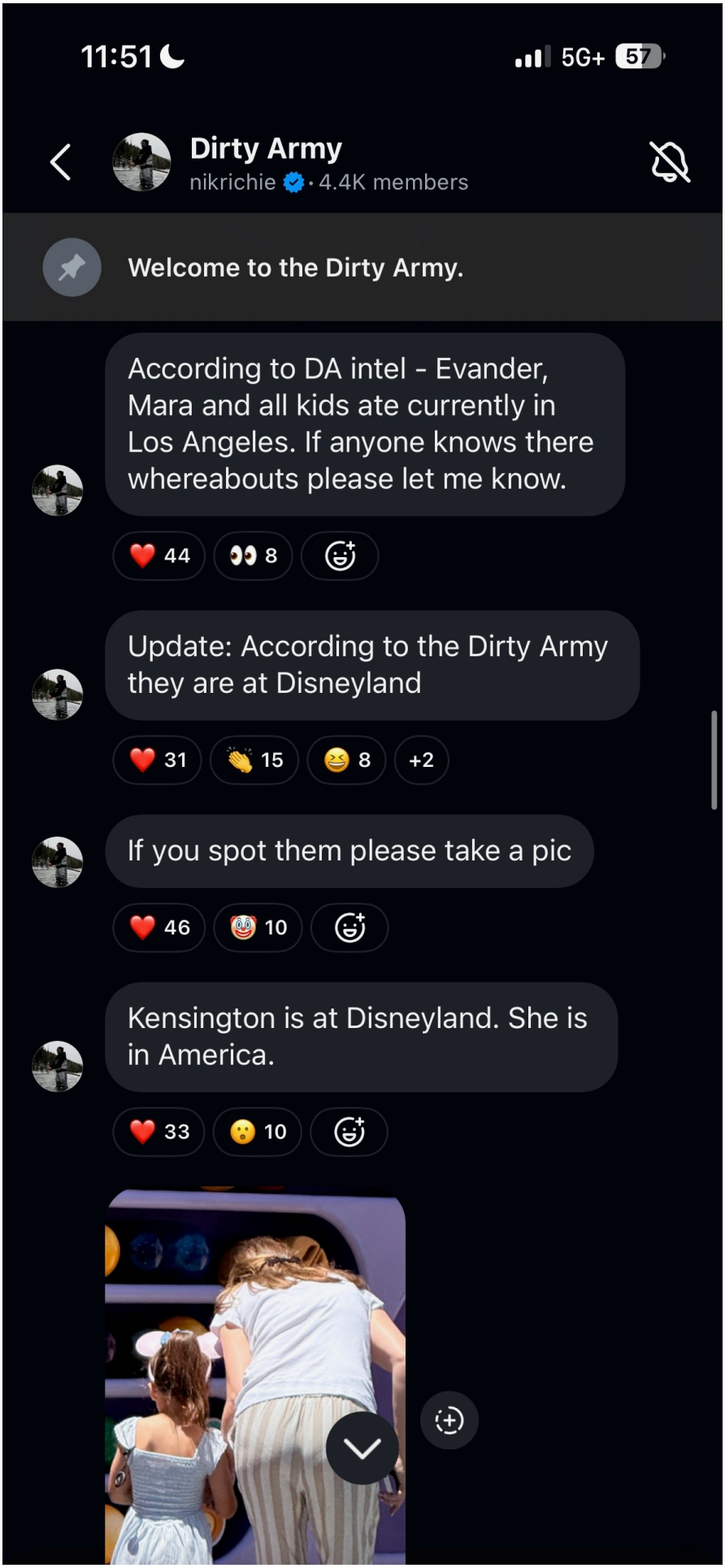
Your Pal,



Marc J. Randazza

cc: Alex J. Shepard

Exhibit 5


11:51
5G+
57
Dirty Army
nikrichie · 4.4K members
Welcome to the Dirty Army.
According to DA intel - Evander, Mara and all kids ate currently in Los Angeles. If anyone knows there whereabouts please let me know.
44
8
Update: According to the Dirty Army they are at Disneyland
31
15
8
+2
If you spot them please take a pic
46
10
Kensington is at Disneyland. She is in America.
33
10

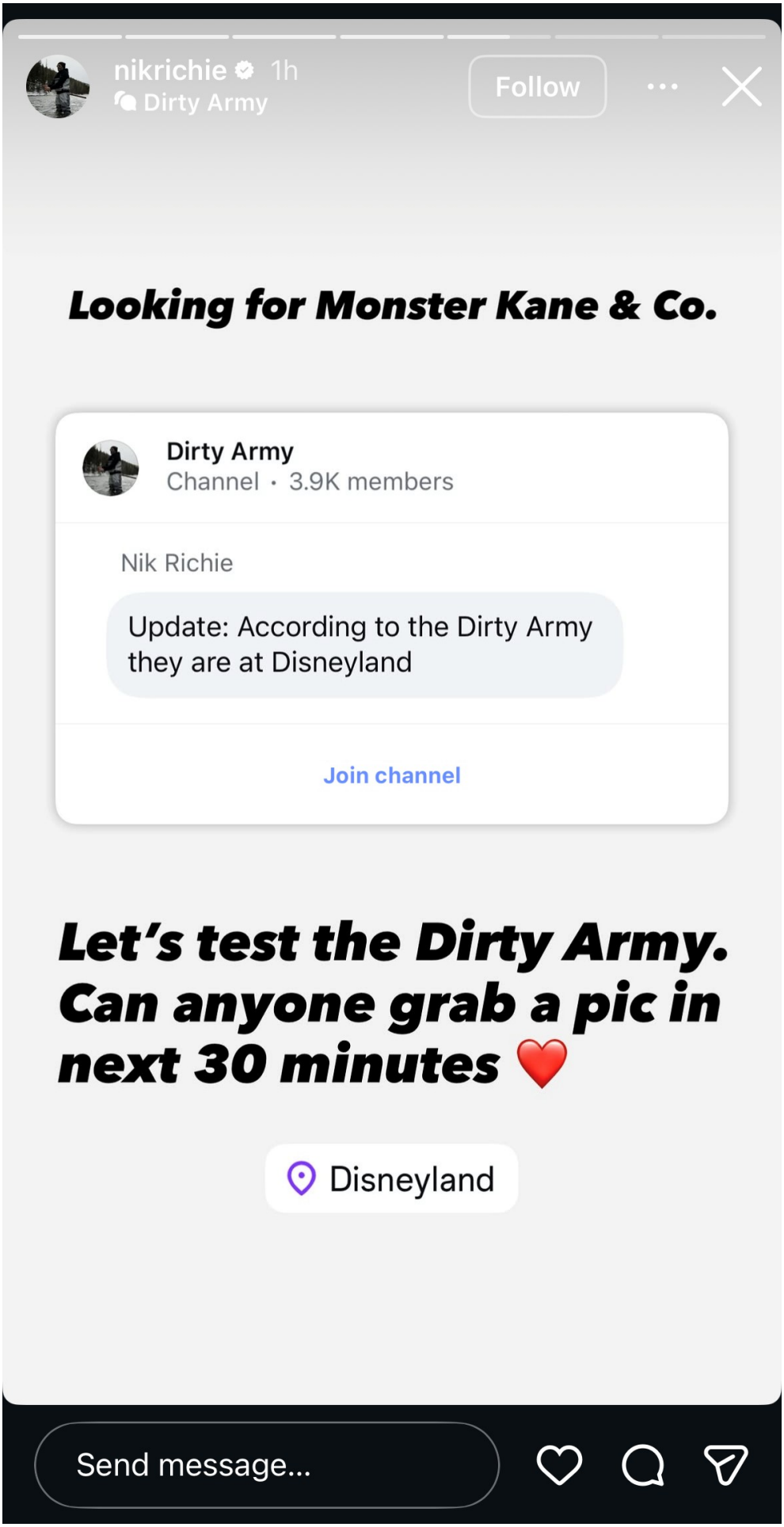

nikrichie 1h
Dirty Army
Follow
Looking for Monster Kane & Co.
Dirty Army
Channel · 3.9K members
Nik Richie
Update: According to the Dirty Army they are at Disneyland
Join channel
Let's test the Dirty Army. Can anyone grab a pic in next 30 minutes ❤️
Disneyland
Send message...

Exhibit 6

Coy, Ryan

From: Coy, Ryan
Sent: Tuesday, September 15, 2026 2:29 PM
To: 'Alex Shepard'
Cc: Mellema, Joseph; Marc Randazza; Marc J.Randazza; Weiner, Craig; Jain, Reena; Coyle, Lisa M.
Subject: RE: Karamian v. Kane | 5:26-cv-06348-NW | Joint Case Management Statement
Attachments: 2026.09.15 - Joint Case Management Statement_RC edits(159305077.1).docx; 2026.09.15 - Joint Case Management Statement_clean.docx

Alex/Marc,

We strongly disagree that Mr. Kane is looking to unjustifiably delay anything—again, remember that we wanted the motion to dismiss heard earlier before the end of October, and due to Marc's schedule conflicts, the hearing time had to be delayed into December.

Regardless, Mr. Kane's position is reasonable—the Court does not have subject-matter or personal jurisdiction for the case, and it is inappropriate and inefficient to issue discovery with these key jurisdictional issues unresolved. Thus, given Mr. Richie's stated position and refusal to agree to stipulate, we are proceeding with filing an administrative motion to continue the CMC and to defer discovery until after the continued conference.

As far as the joint case management statement, please see attached for the redlined changes/additions on the statement. If there are no further edits/changes, then you have my authorization to file the joint case management statement with my e-signature (clean copy with all changes saved is attached and has my e-signature). However, if Plaintiff has any additional changes or additions, please send those redlines promptly for final approval of the joint statement before filing.

Thank you,
-Ryan

Ryan F. Coy | BLANKROME
2029 Century Park East | 6th Floor | Los Angeles, CA 90067
direct: +1.424.285.2194 | mobile: +1.517.376.0350
ryan.coy@blankrome.com | bio

From: Alex Shepard <ajs@randazza.com>
Sent: Monday, September 14, 2026 1:23 PM
To: Coy, Ryan <ryan.coy@blankrome.com>
Cc: Mellema, Joseph <joseph.mellema@blankrome.com>; Marc Randazza <mjr@randazza.com>; Marc J.Randazza <staff@randazza.com>; Weiner, Craig <craig.weiner@blankrome.com>; Jain, Reena <reena.jain@blankrome.com>; Coyle, Lisa M. <lisa.coyle@blankrome.com>; 903a4502e+matter1882890125@maildrop.clio.com
Subject: Re: Karamian v. Kane | 5:26-cv-06348-NW | Joint Case Management Statement

From our perspective, it looks like Mr. Kane is interested primarily in delaying this litigation. He has not taken a reasonable position regarding service, and we would like to take some discovery into his claim that he was not (and could not have been) served with the Complaint and Summons. I appreciate that you are confident your motion to dismiss will be granted, but we have a different opinion as to the merits of that motion and would like to get the case moving along. There is a reason that a pending motion to dismiss does not automatically stay discovery.

On Mon, Sep 14, 2026 at 1:00 PM Coy, Ryan <ryan.coy@blankrome.com> wrote:

> Alex,
>
> Is there any reason for why Marc does not think it is a good idea? What is the harm with a stipulation to continue the case management hearing to December 9, to be heard with the other motions? When you and I spoke, you said you did not see any issue with that proposal to do a stipulation to continue the case management hearing, and your email does not indicate any basis for the change. During our call, I specifically referenced the judge's standing order which, to us, indicates that the judge prefers to set deadlines "once the case is at issue, meaning the Defendant has answered." (ECF No. 27 at lines 14-15.) This case is not at issue.
>
> It does not seem like a good approach to waste time and money when there is a dispositive motion, and when the court has indicated that it prefers to wait until the case is at issue.
>
> We would appreciate clarification for why a stipulation is not agreeable.
>
> Thank you,
>
> -Ryan
>
> **Ryan F. Coy** | BLANKROME
> 2029 Century Park East | 6th Floor | Los Angeles, CA 90067
> direct: +1.424.285.2194 | mobile: +1.517.376.0350
> ryan.coy@blankrome.com | bio
>
> ---
>
> **From:** Alex Shepard <ajs@randazza.com>
> **Sent:** Monday, September 14, 2026 12:44 PM
> **To:** Coy, Ryan <ryan.coy@blankrome.com>

Cc: Mellema, Joseph <joseph.mellema@blankrome.com>; Marc Randazza <mjr@randazza.com>; Marc J.Randazza <staff@randazza.com>; Weiner, Craig <craig.weiner@blankrome.com>; Jain, Reena <reena.jain@blankrome.com>; Coyle, Lisa M. <lisa.coyle@blankrome.com>; 903a4502e+matter1882890125@maildrop.clio.com
Subject: Karamian v. Kane | 5:26-cv-06348-NW | Joint Case Management Statement

Hello, Ryan,

I've talked with Marc about your proposal during our 26(f) call about holding off on a proposed discovery schedule or case management statement until after Kane's motion to dismiss is decided, and we don't think that approach is a good idea.

Attached is a draft joint case management statement. Given the fact that discovery is likely to be pretty limited in this case, I think the proposed discovery schedule still gives us time for discovery after the motion to dismiss is heard.

Please review the draft statement, fill in the blank sections on the defendant's statements regarding certain issues, and let me know if you have any other proposed revisions.

-Alex

--

Alex James Shepard* | **Randazza Legal Group, PLLC**

720 Seneca St, Ste 107, Seattle, WA 98101

Tel: 702-420-2001 | Email: ajs@randazza.com

_____

* Licensed to practice law in California, Nevada, and Washington

****

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****
****

--

Alex James Shepard* | **Randazza Legal Group, PLLC**

720 Seneca St, Ste 107, Seattle, WA 98101

Tel: 702-420-2001 | Email: ajs@randazza.com

---

* Licensed to practice law in California, Nevada, and Washington

Exhibit 7

September 23
1:24 AM

nikrichie
AI content



1,058 196 21 925

nikrichie Dates are set. Dirty Army is welcome to attend. Monster Evander Kane will be taking the stand (mandatory) as well as others. This is big. Judge was upset he blew her off to go golfing. Let's go... 🦋

July 7

September 23
1:27 AM

1:27 5G 28

Posts
nikrichie

Follow

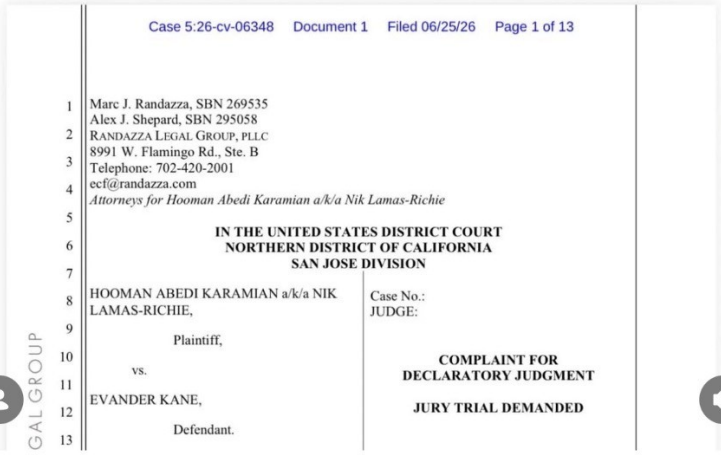
July 13

nikrichie and julie.m.anderson.holburn
Edmonton, Alberta, Canada
↗ Florence + The Machine · Dog Days Are Over

Dirty Army

Nik Richie Sues Evander Kane in Federal Court, Says Canadian Gag Order Can't Be Used to Silence U.S. Press

July 12, 2026



Case 5:26-cv-06348 Document 1 Filed 06/25/26 Page 1 of 13

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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.:
JUDGE:

COMPLAINT FOR DECLARATORY JUDGMENT

JURY TRIAL DEMANDED

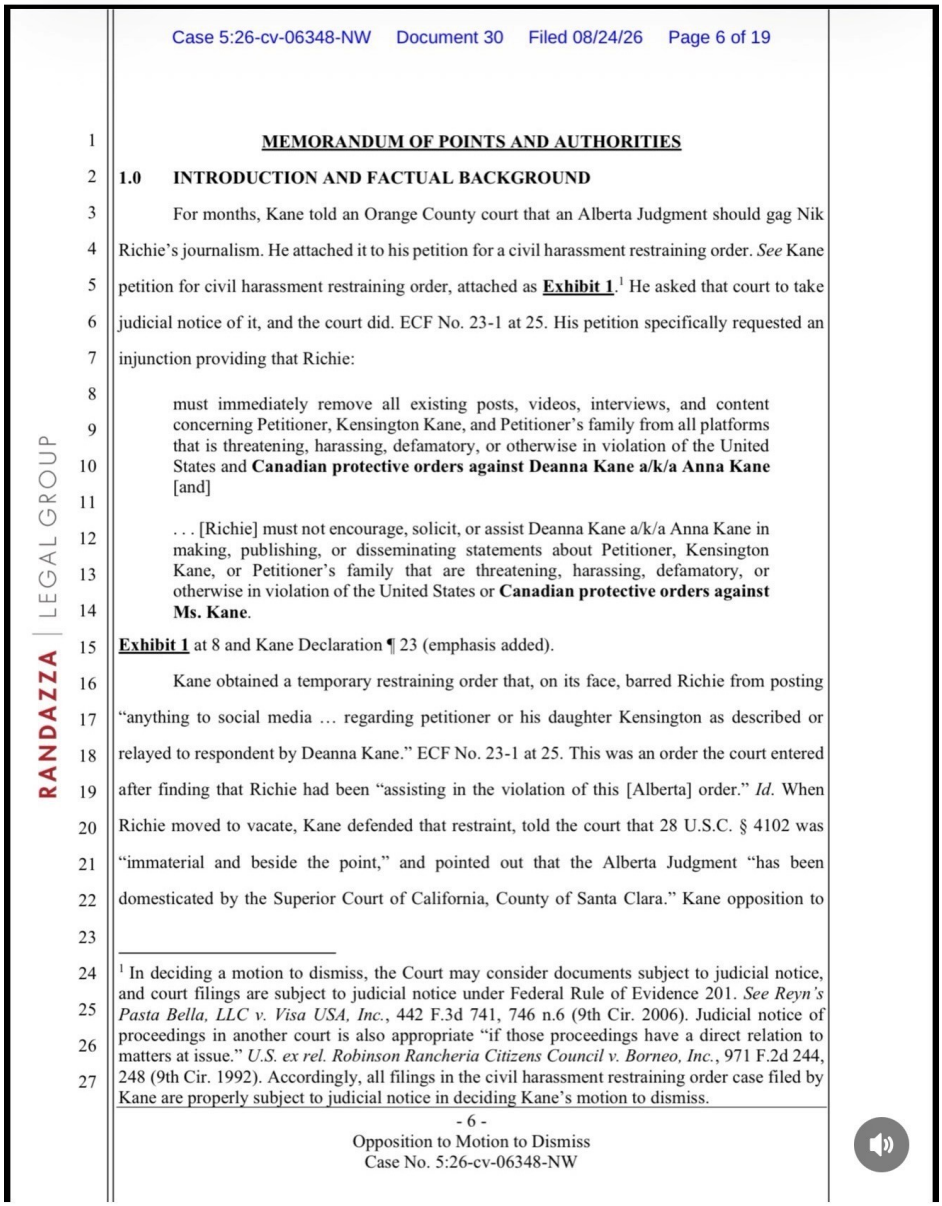
GAL GROUP

927 148 37 108

nikrichie More to come. The Dirty Army Foundation (DAF) is coming for all the MONSTERS. @nhl @espn #EvanderKane FREE KENSINGTON ❤️🇺🇸 Link in Bio to read full story.

annaavakane BRB crying happy tears

July 12



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.

RANDAZZA | LEGAL GROUP

334 54 5 7

nikrichie 3-0 … not that I'm keeping score or anything. Evander Kane please make up your mind. Now you are lying to multiple courts and look foolish. For you legal junkies, you're welcome for the tutorial on how to defeat a narcissist and a lesson in free speech.

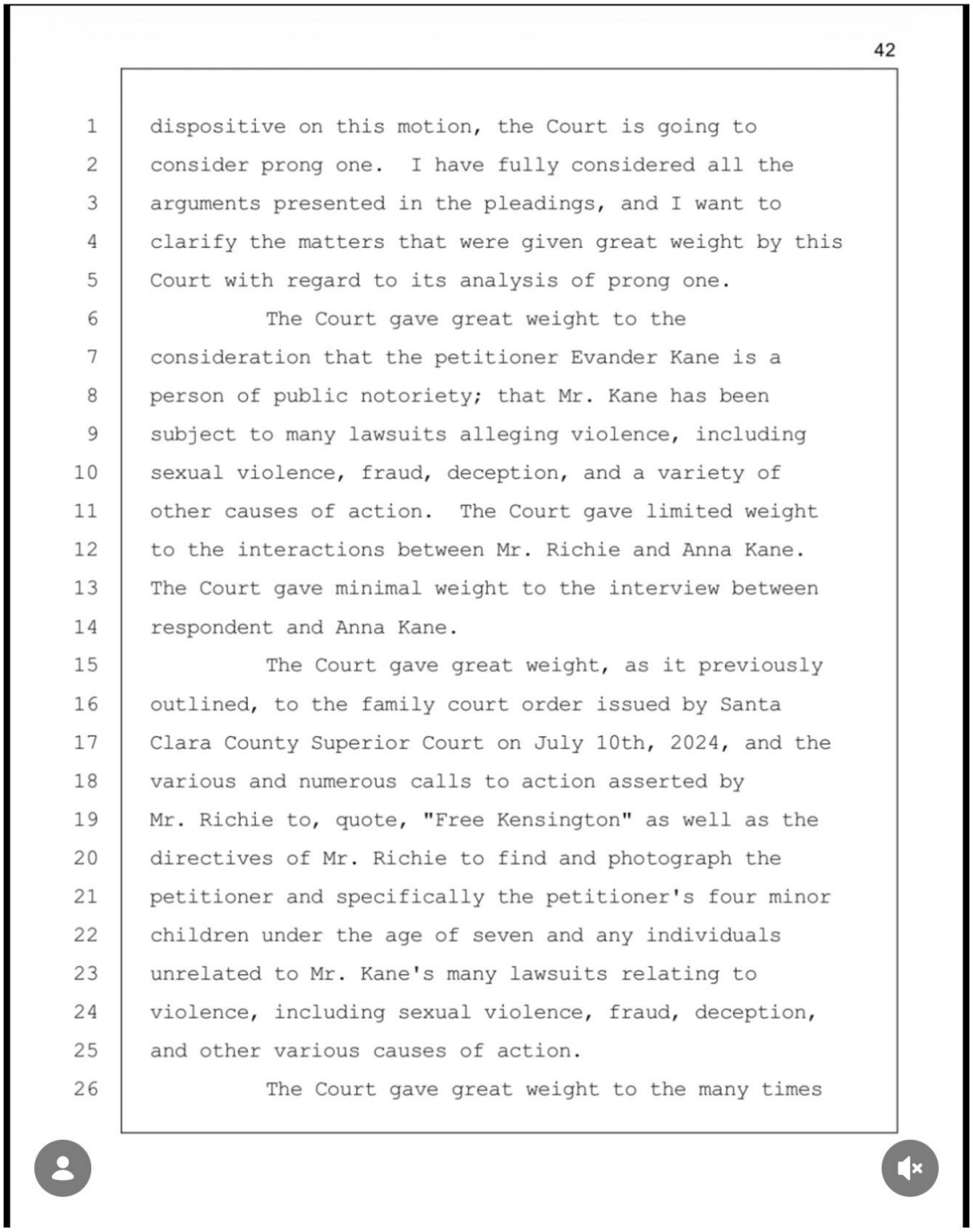
The last image is Evander's claim that he's living in fear of me (on the golf course).

Legal: @marcorandazza

August 24



nikrichie
Edmonton, Alberta, Canada



42

dispositive on this motion, the Court is going to consider prong one. I have fully considered all the arguments presented in the pleadings, and I want to clarify the matters that were given great weight by this Court with regard to its analysis of prong one.

The Court gave great weight to the consideration that the petitioner Evander Kane is a person of public notoriety; that Mr. Kane has been subject to many lawsuits alleging violence, including sexual violence, fraud, deception, and a variety of other causes of action. The Court gave limited weight to the interactions between Mr. Richie and Anna Kane. The Court gave minimal weight to the interview between respondent and Anna Kane.

The Court gave great weight, as it previously outlined, to the family court order issued by Santa Clara County Superior Court on July 10th, 2024, and the various and numerous calls to action asserted by Mr. Richie to, quote, "Free Kensington" as well as the directives of Mr. Richie to find and photograph the petitioner and specifically the petitioner's four minor children under the age of seven and any individuals unrelated to Mr. Kane's many lawsuits relating to violence, including sexual violence, fraud, deception, and other various causes of action.

The Court gave great weight to the many times

273 14 23

Liked by **life_style_sun** and **others**

nikrichie Finally received the transcript of the Judge's statements in the courtroom. Make it make sense? I never requested anyone to take photos of the kids or unrelated abuse victims and I have zero to do with Santa Clara. 🤔
#EvanderKane @nhl

September 10

Exhibit 8



1,491 321 71 249

nikrichie We lost. Congrats Evander Kane.

August 26

TRANSCRIPT OF VIDEO POSTED BY RESPONDENT HOOMAN ABEDI KARAMIAN ("NIK RICHIE") TO INSTAGRAM FOLLOWING THE AUGUST 26, 2026 HEARING

00:00:03 Speaker 1
I know everyone wants an update on what happened today. It kind of sucked. This judge just hates my guts. It was the most biased. I've been in a lot of courtrooms and I've never had a judge come after me like this. And Evander Kane didn't even show up. He didn't show up.

00:00:33 Speaker 1
And that didn't matter. Everything that the judge wanted, as far as witnesses and everything she claimed that she needed for this hearing, she just basically said, "I've already made up my mind." She said, "This guy is a rapist, sexual violent deviant like everything you can imagine."

00:01:01 Speaker 1
He's still the father of Kensington. How in the world does a judge say this man is a rapist, has gambling issues, has been sued for sexual violence, the whole thing. But you're the father of Kensington and says Nik is inciting the Dirty Army to find pictures of this man, and the only reason is because I am trying to serve him for the SPEECH Act. Just trying to serve him. I am just trying to find him to serve him because he is ducking service. Not good enough. The good news is that we are going to a higher court now. We are going to the appellate court, so for me.

00:02:00 Speaker 1
And I know today, honestly, it's an out. I lost. And I have to accept that. But the reality was we never wanted to be here anyways. We wanted to get to a higher court, we wanted to appeal from the get-go and the judge would not let us. She wanted to have her face time. She literally said at the beginning of this entire hearing, "You are not allowed to have any media involved." She wanted to silence and censor true journalism. She looked at me and basically said, "Nik." She laughed. Imagine being a judge when you're supposed to not have any emotions, you're supposed to not be on one side or the other. Her mind was made up before we even got into the courtroom. She looked at me and said, "Your form of journalism, your podcast."

00:02:58 Speaker 1
And the way you approach things is not right. You should be censored, and that's what happened. I'm upset, but I'm not upset at the result. I'm more upset at the system. As I dive

deeper into this, I'm realizing how corrupt Orange County is. How corrupt the system in Orange County is.

00:03:27 Speaker 1
And judge, just so you know, when you go up for re-election, I'm not voting for you. And a lot of other people are not going to vote for you. Because what you did today is you hurt families. You hurt mothers. You basically told mothers that they do not exist. That if you have a child and that child gets taken away from you, you deserve it. That's what you did today. That's what you did today, Judge. And I'll end it this: We're going to the appellate court. Now we're going to go in front of three judges. It's going to get to a higher level. And now it's going to matter, and we are going to make change because we're going to a higher court. Honestly, you're a waste of time. We wasted time today. Thank you, Judge.

00:04:26 Speaker 1
For what you did. Because now, you made every journalist actually understand that the system doesn't give a shit about mothers. Listen, if it gets to the Supreme Court level, that's great. If we want to make change and we want to do this the right way, the Army, if we want to do this the right way, I need everyone to follow. I need everyone to share. I need everyone to understand if we want mothers and fathers to get the rights they deserve, because we're going into a system where whoever has the most money wins, whoever pays the most wins. It's fucking bullshit. And that's where I'm at. That's where I'm at mentally.

00:05:24 Speaker 1
I am not going to stop. If you tried to stop me today, Judge, you fucking failed.

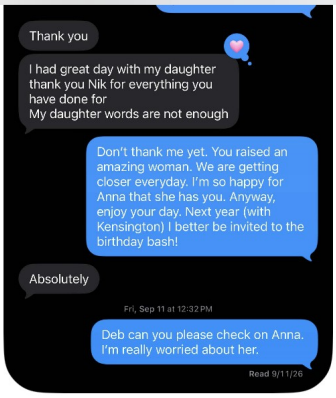
Exhibit 9

11:15

10

Dirty Army
nikrichie · 8.2K members

Welcome to the Dirty Army.



Anna's mother Deb who I warned prior to her breakdown that something was not right with Anna Kane and then she goes full lies like a serial stalker abuser. Making up a Cynthia from Google and saying I've teamed up with Evander.

😂 4 🤣 1



Is Anna Kane Pay-4-Play?
Vote

11:16 10

Dirty Army
nikrichie · 8.2K members

Welcome to the Dirty Army.

FRI 8:55 PM

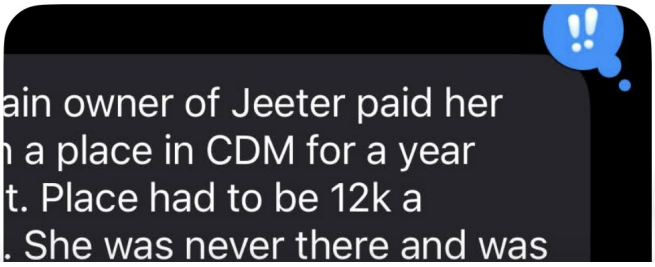


❤️ 3 🤔 2

All the messages coming in. Man I was an idiot to believe Anna.

Anna tell us all how you make your money?

2 ❤️ 6 😬 3 😂 2 +3





Is Anna Kane Pay-4-Play?
Vote

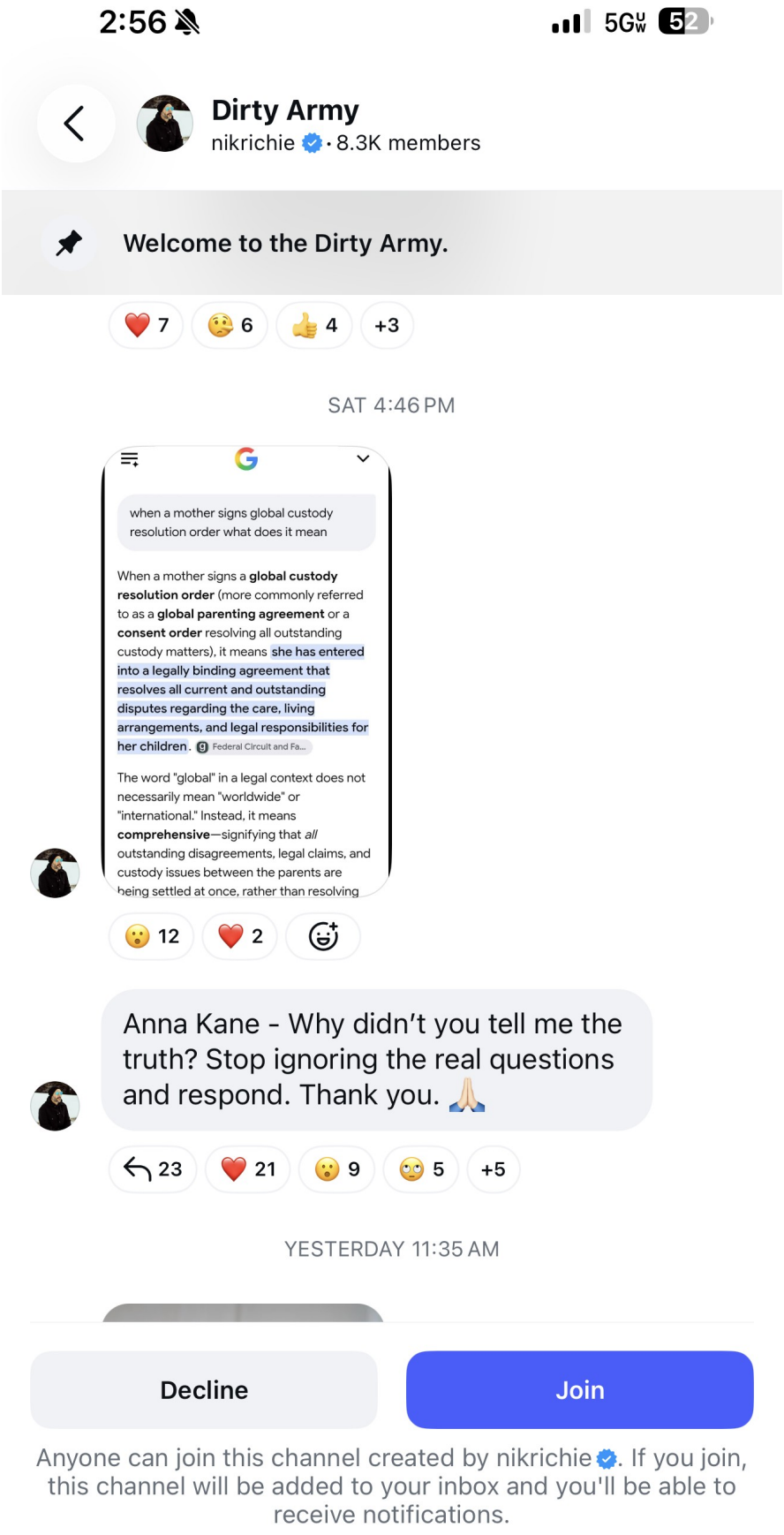

2:56
5G
52
Dirty Army
nikrichie · 8.3K members
Welcome to the Dirty Army.
7
6
4
+3
SAT 4:46 PM
when a mother signs global custody resolution order what does it mean
When a mother signs a global custody resolution order (more commonly referred to as a global parenting agreement or a consent order resolving all outstanding custody matters), it means she has entered into a legally binding agreement that resolves all current and outstanding disputes regarding the care, living arrangements, and legal responsibilities for her children.
Federal Circuit and Fa...
The word "global" in a legal context does not necessarily mean "worldwide" or "international." Instead, it means comprehensive—signifying that all outstanding disagreements, legal claims, and custody issues between the parents are being settled at once, rather than resolving
12
2
Anna Kane - Why didn't you tell me the truth? Stop ignoring the real questions and respond. Thank you. 🙏
23
21
9
5
+5
YESTERDAY 11:35 AM
Decline
Join
Anyone can join this channel created by nikrichie. If you join, this channel will be added to your inbox and you'll be able to receive notifications.

Exhibit 10

nikrichie
MOONLGHT · Free Bird E

1/2

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Alex J. Shepard, SBN 295058
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Telephone: 702-420-2001
ecf@randazza.com

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

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

HOOMAN ABEDI KARAMIAN a/k/a NIK LAMAS-RICHIE,

Plaintiff,

vs.

EVANDER KANE,

Defendant

Case No.: 5:26-cv-06348-NW
Judge: Noel Wise

NOTICE OF VOLUNTARY DISMISSAL

RANDAZZA | LEGAL GROUP

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), Plaintiff Hooman Abedi Karamian a/k/a Nik Lamas-Richie ("Richie") voluntarily dismisses without prejudice all claims asserted in his Complaint (ECF No. 1). Defendant Evander Kane ("Kane") has not filed an answer or motion for summary judgment, and so Richie may voluntarily dismiss this action without a court order.

Richie filed this action due to Kane's attorneys coming up with one of the most bizarre legal theories one could imagine. Evander Kane secured an injunction against his ex-wife, Anna Kane, in a court in Alberta. That injunction prohibited Anna Kane from speaking about Evander. Nik Richie, an American Journalist, interviewed Anna Kane. Evander Kane wanted the interview off the air, so he got his lawyers to both threaten (ECF No. 1-2, Kane demand letter) and follow through on the threat to try and get an American court to enforce the injunction against the American Journalist.

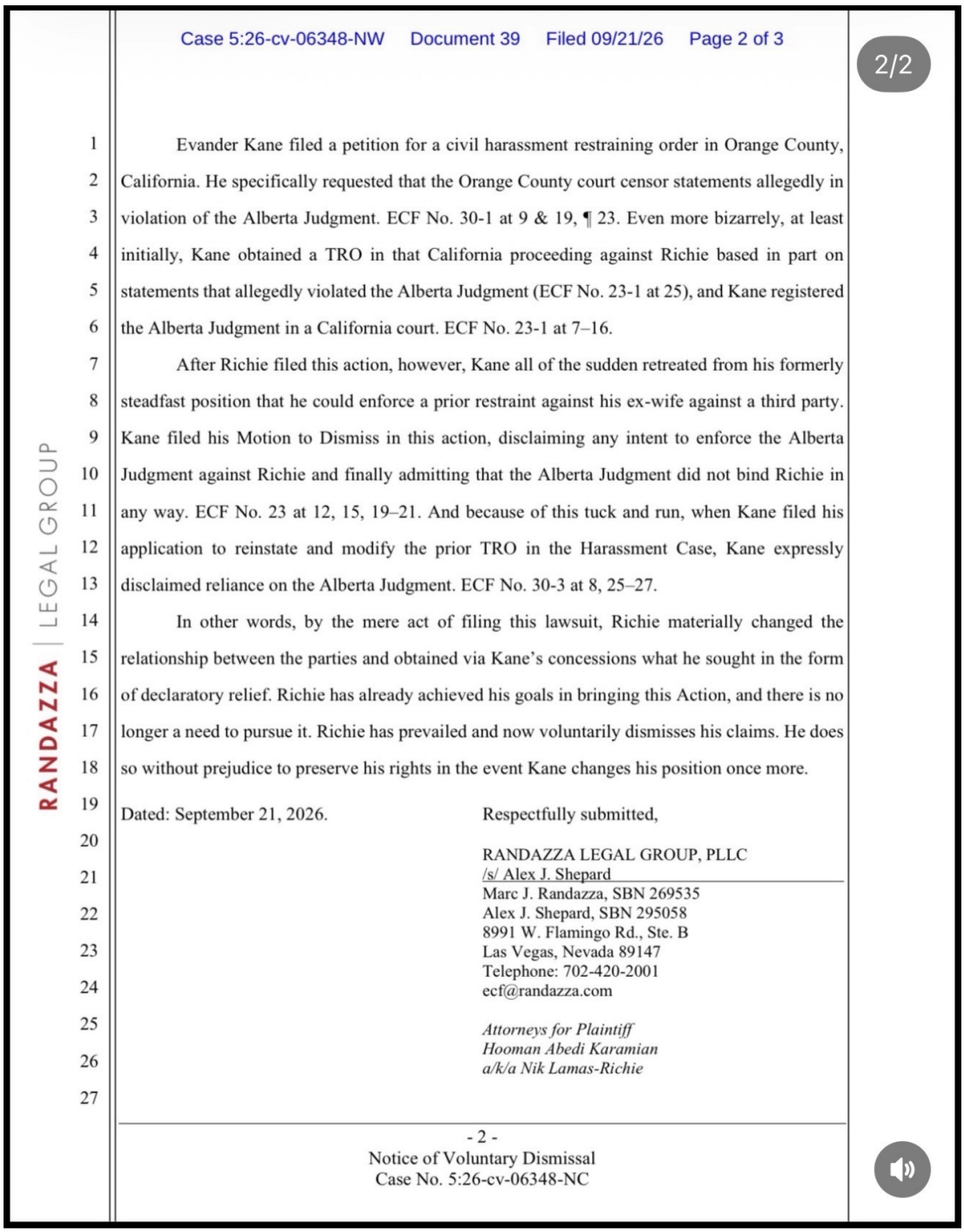
126 1

Liked by **amber_baw** and **others**

nikrichie Now that I have obtained victory as a journalist. I want to take a moment to personally apologize to Mara Teigen. I will be removing previous channel postings and I want to... more

2 hours ago

nikrichie
Newport Beach, California



2/2

Evander Kane filed a petition for a civil harassment restraining order in Orange County, California. He specifically requested that the Orange County court censor statements allegedly in violation of the Alberta Judgment. ECF No. 30-1 at 9 & 19, ¶ 23. Even more bizarrely, at least initially, Kane obtained a TRO in that California proceeding against Richie based in part on statements that allegedly violated the Alberta Judgment (ECF No. 23-1 at 25), and Kane registered the Alberta Judgment in a California court. ECF No. 23-1 at 7–16.

After Richie filed this action, however, Kane all of the sudden retreated from his formerly steadfast position that he could enforce a prior restraint against his ex-wife against a third party. Kane filed his Motion to Dismiss in this action, disclaiming any intent to enforce the Alberta Judgment against Richie and finally admitting that the Alberta Judgment did not bind Richie in any way. ECF No. 23 at 12, 15, 19–21. And because of this tuck and run, when Kane filed his application to reinstate and modify the prior TRO in the Harassment Case, Kane expressly disclaimed reliance on the Alberta Judgment. ECF No. 30-3 at 8, 25–27.

In other words, by the mere act of filing this lawsuit, Richie materially changed the relationship between the parties and obtained via Kane's concessions what he sought in the form of declaratory relief. Richie has already achieved his goals in bringing this Action, and there is no longer a need to pursue it. Richie has prevailed and now voluntarily dismisses his claims. He does so without prejudice to preserve his rights in the event Kane changes his position once more.

Dated: September 21, 2026.

Respectfully submitted,

RANDAZZA LEGAL GROUP, PLLC
/s/ Alex J. Shepard
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a/k/a Nik Lamas-Richie

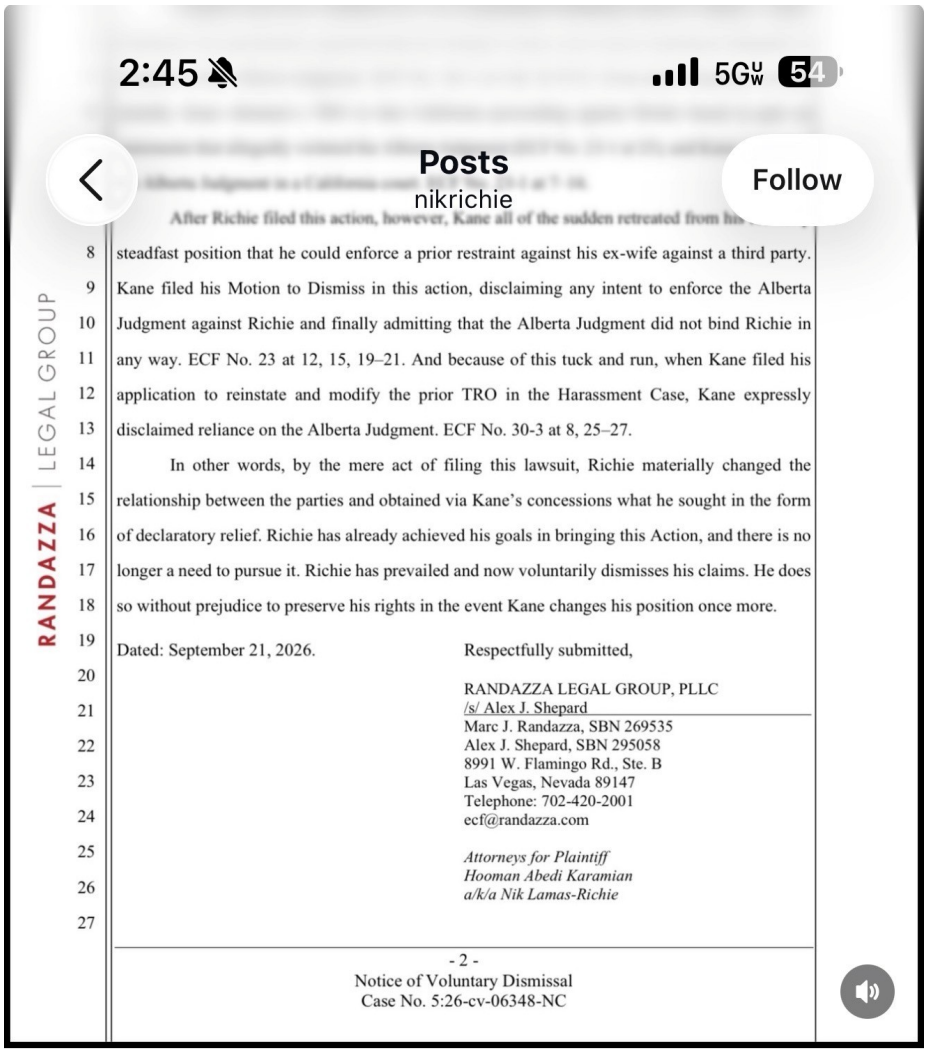
RANDAZZA | LEGAL GROUP

126 1

Liked by **amber_baw** and **others**

nikrichie Now that I have obtained victory as a journalist. I want to take a moment to personally apologize to Mara Teigen. I will be removing previous channel postings and I want to... more

2 hours ago



126 1

Liked by **amber_baw** and **others**

nikrichie Now that I have obtained victory as a journalist. I want to take a moment to personally apologize to Mara Teigen. I will be removing previous channel postings and I want to reference what someone wrote on @reddit, which I am now 100% in agreement with:

"I think you owe Mara Teigen an apology. The way you came at her simply for being there for a child whose biological mom basically abandoned her was honestly appalling. If you still hate Evander, fair enough, he certainly has a questionable past. But taking that out on Mara for stepping up and being there for a child who needed her was completely unnecessary."

Now that I have seen the Global Settlement agreement which was not disclosed to me, I can admit that I was misled by Anna Kane and the Judge was giving weight to a confidential Santa Clara order that I knew nothing about. Mara, thank you for stepping up for Kensington.

2 hours ago

September 21
2:56 PM

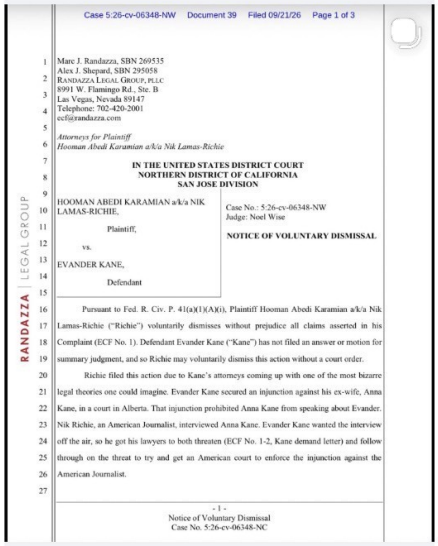
2:56

Dirty Army
nikrichie · 8.3K members

Welcome to the Dirty Army.

12:21 PM

nikrichie



Case 5:26-cv-06348-NW Document 39 Filed 09/21/26 Page 1 of 3

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IN THE UNITED STATES DISTRICT COURT
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SAN JOSE DIVISION

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- 1 -
Notice of Voluntary Dismissal
Case No. 5:26-cv-06348-NC

RANDAZZA | LEGAL GROUP

nikrichie Now that I have obtained victory as a journalist....

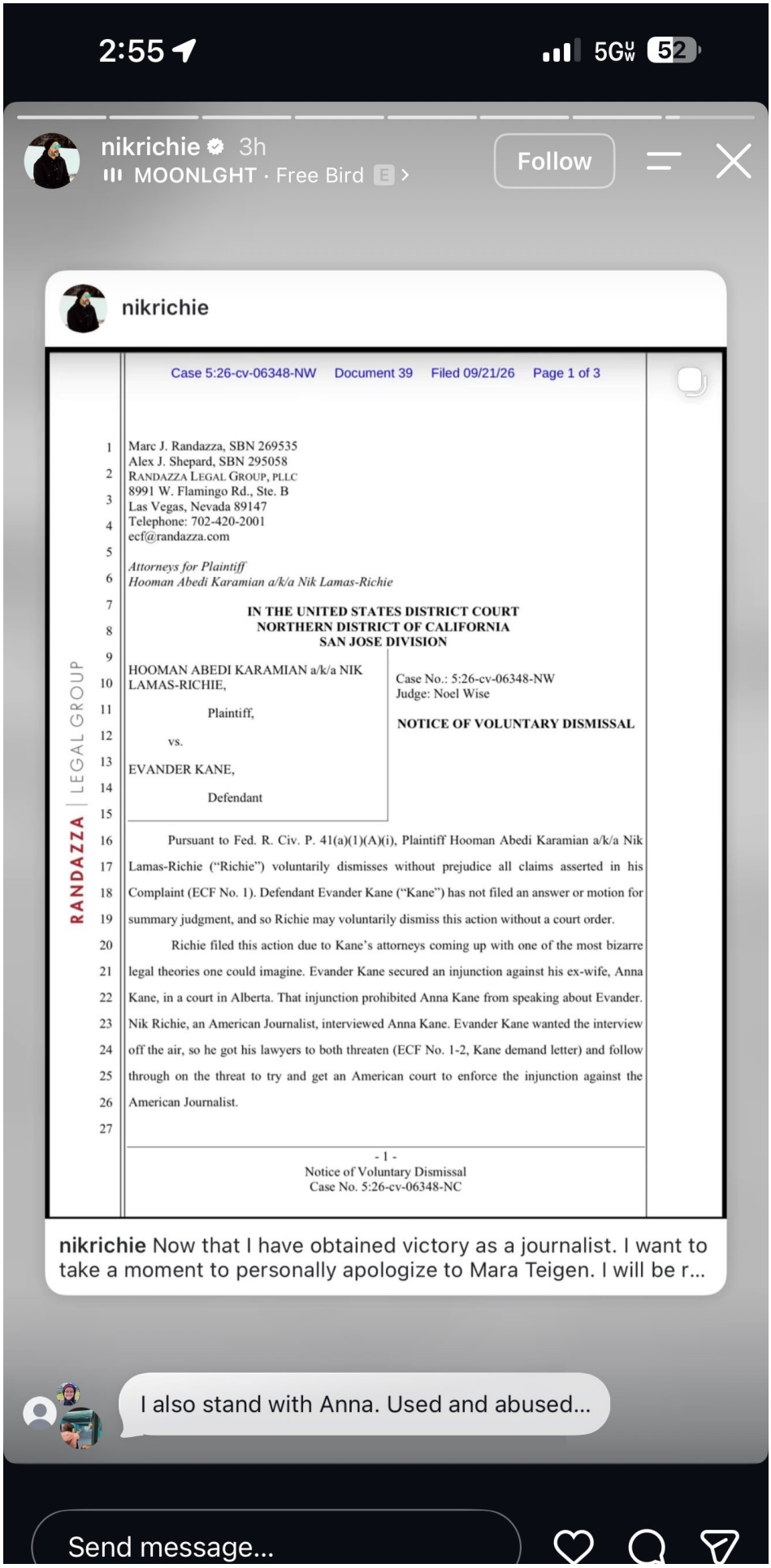
❤️ 12

FREE BIRD... literally.

3 ❤️ 16

Decline Join

Anyone can join this channel created by nikrichie. If you join, this channel will be added to your inbox and you'll be able to receive notifications.


2:55
5G
52
nikrichie 3h
MOONLGHT · Free Bird
Follow
nikrichie
Case 5:26-cv-06348-NW Document 39 Filed 09/21/26 Page 1 of 3
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- 1 -
Notice of Voluntary Dismissal
Case No. 5:26-cv-06348-NC
nikrichie Now that I have obtained victory as a journalist. I want to take a moment to personally apologize to Mara Teigen. I will be r...
I also stand with Anna. Used and abused...
Send message...

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Attorneys for Defendant
E ANDE F ANK KANE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN OSE DIVISION

HOOMAN ABEDI KA AMIAN a k a NIK LAMAS- ICHIE,

Plaintiff,

v.

E ANDE KANE,

Defendant.

Case No. :2 -cv- -NW

DECLARATION OF EVANDER FRANK KANE IN SUPPORT OF MOTION FOR SANCTIONS AGAINST PLAINTIFF AND HIS COUNSEL

[Filed concurrently with Notice of Motion and Motion for Sanctions; Declaration of Ryan F. Coy; Request for Judicial Notice; and [Proposed] Order]

Hearing:
Date: February 3, 2027
Time: : a.m.
Place: Courtroom , th Floor
San Jose Federal Courthouse

Complaint Filed: June 2 , 2 2
Dismissed: Sept. 21, 2 2 ECF No.

DECLARATION OF EVANDER FRANK KANE

I, Evander Frank Kane, declare as follows:

1. I am the defendant in this action. I make this declaration based on my own personal knowledge, and if called as a witness I could and would testify competently to the matters set forth below.

2. I submit this declaration solely in support of my motion for sanctions. By submitting it, I do not consent to the jurisdiction of this Court, do not waive service of process, and do not make a general appearance.

3. On August 6, 2026, I signed a declaration in support of my motion to dismiss, which was filed as ECF No. 23-2. The statements in that declaration remain true and correct, and I reaffirm them here.

4. On July 19, 2026, I was in Edmonton, Alberta, Canada. I was not in the State of California, and I was not anywhere in the United States.

5. Between July 9, 2026 and July 13, 2026, I was in Southern California with my family, visiting Disneyland. On July 13, 2026, I flew with my family back home to Edmonton, and I did not go back to Southern California the rest of July 2026.

6. Attached as **Exhibit A** is a true and correct copy of my dated flight receipt and itinerary, which was sent to my email by WestJet and I forwarded that email to my counsel. It reflects that I flew from Edmonton to Los Angeles airport on July 9, 2026, and on July 13, 2026, I flew from Los Angeles airport back to Edmonton.

7. Attached as **Exhibit B** is a true and correct copy of my hotel receipt for mine and my family's stay at the JW Marriot in Anaheim from July 9, 2026 to July 13, 2026.

8. Attached as **Exhibit C** is a true and correct copy of a photo that I took on my phone on July 19, 2026. I took this photo at my home of my living room, where my kids where watching Toy Story. The date stamp for this photo shows that I took it on July 19, 2026 at 8:05 a.m. MDT.

9. No person has ever handed me, delivered to me, or left with me a summons or a copy of the Complaint in this action, in California or anywhere else.

10. I have again reviewed the Instagram post dated July 19, 2026 that is attached to the July 30, 2026 letter from my counsel (ECF No. 23-1 at 30). The individual depicted in that image is not me.

11. I do not know a person named Andrea Leilani-Taylor, and I have never met or spoken with anyone by that name.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on 9/30/2026, at Edmonton, Alberta, Canada.

DocuSigned by:
Evander kane
DDB9D16BBA9043E...

Evander Frank Kane

Exhibit A

Coy, Ryan

From: Evander Kane <[redacted]
Sent: Thursday, September 24, 2026 6:23 PM
To: Coy, Ryan
Subject: Re: Your itinerary and receipt - July 09 LOS ANGELES, CA for MR EVANDER KANE
Attachments: Electronic ticket receipt, July 09 for MR EVANDER KANE.pdf; Electronic ticket receipt, July 09 for [redacted].pdf; Electronic ticket receipt, July 09 for [redacted].pdf; Electronic ticket receipt, July 09 for [redacted].pdf; Electronic ticket receipt, July 09 for [redacted].pdf; Electronic ticket receipt, July 09 for [redacted].pdf

Here is a copy of my itinerary for the flights
Sent from my iPhone

On Jul 6, 2026, at 10:40 AM, WestJet <noreply@itinerary.westjet.com> wrote:

Be sure to review your booking details and important travel info.
To ensure you receive emails from WestJet, please add us to your address book.

WESTJET

Your itinerary and receipt

IMPORTANT INFORMATION

Review baggage allowance and fare details

Your baggage allowance may be different than what is shown in the attached receipt. Be sure to familiarize yourself with your fare. To review your baggage allowance and fare details, visit Manage Trips and select your trip.

WestJet reservation code	[redacted]

Flight Number M
CONFIRMED

M YEG EDMONTON INTL AB, CANADA
13:25

M LAX LOS ANGELES, CA
16:00
TERMINAL 2

Please verify flight times prior to departure

Cabin: Premium Economy
Duration: 3hour(s) and 35minute(s)
Distance (in Miles): 1358

M M
Seat(s): 01A
Frequent Flyer: [redacted] WESTJET
Special Request: INFANT SSR CODE / INFANT'S INFORMATION - Confirmed

[redacted]
Seat(s): 02A

[redacted]
Seat(s): 03C

[redacted]
Seat(s): 01C
Frequent Flyer: [redacted] WESTJET

[redacted]
Seat(s): 02C
Frequent Flyer: [redacted] WESTJET

[redacted]
Seat(s): 03D
Frequent Flyer: [redacted] WESTJET

[redacted]

Add to Calendar

Flight Number M
CONFIRMED

M LAX LOS ANGELES, CA
16:55
TERMINAL 2

M YEG EDMONTON INTL AB, CANADA
21:15

Please verify flight times prior to departure

Cabin: Economy
Duration: 3hour(s) and 20minute(s)
Distance (in Miles): 1358

M M
Seat(s): 16A
Frequent Flyer: [redacted] WESTJET
Special Request: INFANT SSR CODE / INFANT'S INFORMATION - Confirmed

[redacted]
Seat(s): 16B
Frequent Flyer: [redacted] WESTJET

[redacted]
Seat(s): 16C

[redacted]
Seat(s): 16D
Frequent Flyer: [redacted] WESTJET

[redacted]
Seat(s): 16E

[redacted]
Seat(s): 16F
Frequent Flyer: [redacted] WESTJET

[redacted]

Add to Calendar

Print Itinerary

Manage trip

Change or cancel your flight	Add bags or seats	Add your WestJet Rewards ID	Edit guest details	Learn about your inflight experience	Check in 24 hours before departure

WestJet and the Canadian Transportation Agency want to make you aware of your rights as a traveller. Visit Flight and service disruptions for an in-depth explanation.

If you are denied boarding, your flight is cancelled or delayed for at least two hours, or your baggage is lost or damaged, you may be entitled to certain standards of treatment and compensation under the Air Passenger Protection Regulations. For more information about your passenger rights please contact your air carrier or visit the Canadian Transportation Agency's website.

Si l'embarquement vous est refusé, si votre vol est annulé ou retardé d'au moins deux heures ou si vos bagages sont perdus ou endommagés, vous pourriez avoir droit au titre du Règlement sur la protection des passagers aériens, à certains avantages au titre des normes de traitement applicables et à une indemnité. Pour de plus amples renseignements sur vos droits, veuillez communiquer avec votre transporteur aérien ou visiter le site Web de l'Office des transports du Canada.

Payment details

Your eTicket receipt can be found here:
Miss [redacted]: 8382110047568
Mr [redacted]: 8382110047566
Miss [redacted]: 8382110047569
Mrs [redacted]: 8382110047564
Mrs [redacted]: 8382110047565
Mr [redacted]: 8382110047567
Mr Evander Kane: 8382110047563

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Fare options
Baggage fees
Baggage allowances
Children, infants and expectant mothers
Guests with special needs
ID requirements
Inflight services
Seat selection

Important details about your fare

All guests have to cancel without penalty.

If you have purchased an **M M M** please remember that as our lowest-price fare, UltraBasic comes with restrictions. Review what is included with UltraBasic.

M M

- No carry-on bag for flights in North America and Central America. One carry-on bag permitted for all other routes.
- You cannot change or cancel a flight outside the 24-hour window of the original booking, without a total loss of funds.
- If you do not select a seat before check-in, you will be randomly assigned a seat at the back of the aircraft and may not be seated with your party. There is a fee to change your assigned seat.
- You will not earn WestJet points, tier qualifying spend or milestone qualifying spend with this fare.
- You are not eligible for paid or complimentary cabin upgrades.
- You will be last to board the aircraft.

To take advantage of your WestJet Rewards earn and tier benefits with more choice and flexibility, book Econo or EconoFlex. Please refer to the complete fare rules to compare features of our fare types.

WESTJET

If you have questions regarding your reservation, please contact us at 1-888-937-8538 (1-888-WESTJET). We're available 24 hours a day, 7 days a week. Calling outside Canada and the U.S.?

You received this notification because you booked a flight with WestJet. Replies to this email will not be received.

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Exhibit B

JW MARRIOTT

JW MARRIOTT ANAHEIM

GUEST FOLIO

706	KANE/E	291.00	07/13/26	11:00	40104
ROOM	NAME	RATE	DEPART	TIME	ACCT#
TK			07/09/26	16:04	
TYPE			ARRIVE	TIME	
147					
ROOM CLERK	ADDRESS	PAYMENT			RWD#:

DATE	REFERENCES		CHARGES	CREDITS	BALANCES DUE
07/09	HSIA	BASEHSIA	9.95		
07/09	IRD	2214 706	20.26		
07/09	TR ROOM	706, 1	307.00		
07/09	ROOM TAX	706, 1	46.05		
07/09	ATID	706, 1	6.14		
07/09	CATOURFE	706, 1	.75		
07/09	CATOUR T	706, 1	.11		
07/10	HSIA	BASEHSIA	9.95		
07/10	IRD	2265 706	96.54		
07/10	TR ROOM	706, 1	349.00		
07/10	ROOM TAX	706, 1	52.35		
07/10	ATID	706, 1	6.98		
07/10	CATOURFE	706, 1	.75		
07/10	CATOUR T	706, 1	.11		
07/11	MARKET	8333 706	20.26		
07/11	IRD	2342 706	45.69		
07/11	HSIA	BASEHSIA	9.95		
07/11	TR ROOM	706, 1	340.00		
07/11	ROOM TAX	706, 1	51.00		
07/11	ATID	706, 1	6.80		
07/11	CATOURFE	706, 1	.75		
07/11	CATOUR T	706, 1	.11		
07/12	MARKET	8456 706	32.11		
07/12	HSIA	BASEHSIA	9.95		
07/12	IRD	2433 706	77.47		
07/12	TR ROOM	706, 1	291.00		
07/12	ROOM TAX	706, 1	43.65		
07/12	ATID	706, 1	5.82		
07/12	CATOURFE	706, 1	.75		
07/12	CATOUR T	706, 1	.11		
07/13	AX CARD			$1841.36	

TO BE SETTLED TO: AMERICAN EXPRESS CURRENT BALANCE .00

THANK YOU FOR CHOOSING THE JW MARRIOTT ANAHEIM!
USE THE TV REMOTE CONTROL FOR SIMPLE "IN-ROOM" CHECK-OUT.
WE LOOK FORWARD TO YOUR RETURN TO THE ANAHEIM AREA.3

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PLEASE CALL 714-294-7800 WITH ACCOUNTING QUESTIONS

JW MARRIOTT

JW MARRIOTT ANAHEIM
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Signature X

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Exhibit C


7:26
July 19
8:05 AM
LIVE