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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 REPLY IN SUPPORT OF MOTION FOR SANCTIONS AGAINST PLAINTIFF AND HIS COUNSEL UNDER THE COURT'S INHERENT AUTHORITY AND 28 U.S.C. § 1927

[*Filed concurrently with Supplemental Declaration of Ryan F. Coy*]

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

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Defendant Evander Kane ("Mr. Kane") hereby submits his reply brief and the supplemental declaration of Ryan F. Coy ("Supp. Coy Decl.") in support of his Motion for Sanctions ("Motion," ECF No. 40) and in response to the opposition ("Opposition," ECF No. 43) filed by Plaintiff Hooman Abedi Karamian a/k/a Nik Lamas-Richie ("Plaintiff" or "Richie").

I. INTRODUCTION

Plaintiff Nik Richie blatantly told his audience, with his lawyer seated beside him, that he was "papering so hard" and "coming from every single angle" so that Mr. Kane would be "financially drained" and "come to the table." (ECF No. 23-1, Ex. E at 58:07–58:32.) The Opposition does not (and cannot) deny this. Rather, Plaintiff's only answer is that the number he attached to that improper plan—"my goal is 2.5"—is "unexplained," that reading it as dollars is "attorney argument," as opposed to evidence, and that Richie was talking only about the Orange County case. (Opp. at 11.) Yet Richie did not submit a sworn declaration saying any of that. He did not need one: he had already explained exactly what "2.5" meant, in his own words.

In a video he posted to his Instagram account on June 21, 2026—three days after the Orange County restraining order was dissolved, and four days before he filed this action—Richie said "[t]he only way I feel like I can beat these monsters is to burn cash, and they have to burn it," and then: "It's like with Evander Kane. I'm sure Evander's gonna watch this. *I want to burn 2.5 million, so he has to burn it too, because I know he doesn't have it* . . . . And his limit's gonna come soon, and he's gonna fold." (Supp. Coy Decl. ¶¶ 4–9, Exs. 11–12 (emphasis added).) Richie then commented on his own post: "Sell the house Mr. Kane. Hurry @nhlpr." (*Id.* ¶ 7, Ex. 11.) Richie's words plainly admit his improper purpose and intent to harass and financially drain Mr. Kane until he "fold[s]." The statements clearly show: the "2.5" was $2.5 million; the target was Mr. Kane; the mechanism was to force Mr. Kane to spend money Richie believed he did not have; and the plan was announced before this lawsuit existed. Four days later, Richie filed this case as a part of his admitted effort to force Mr. Kane to "burn cash"—even telling Mr. Kane to sell his family's home. Thus, Plaintiff's own words demonstrate clearly that his litigation conduct is the epitome of filing a case in bad faith.

The Opposition rests on characterizations by counsel, not evidence: it is supported by no declaration from Richie, from either of his lawyers, or from the process server whose return Plaintiff

still refuses to withdraw or correct. It concedes that Richie "knew of the July 10, 2024, Santa Clara order" that he told more than 500,000 followers he "knew nothing about," and then asks: "even if Richie were lying through his teeth, what would it matter?" (Opp. at 14.) It matters because it shows that Richie knew, before he filed this action, that Ms. Kane was independently bound by a California restraining order, the Santa Clara order, on which the Orange County Superior Court also relied. Richie nonetheless built a narrative and a lawsuit entirely around the Alberta Judgment and said nothing about the Santa Clara order. A declaration that the Alberta Judgment is unenforceable would therefore leave Ms. Kane's obligations, and the Orange County proceeding, exactly where they are because of the Santa Clara order. It also matters because Richie's and his counsel's statements, admissions, and contradictions evidence the purpose and motive in misusing this Court's jurisdiction for oppressive reasons.

The Opposition likewise concedes that Plaintiff's counsel knew Mr. Kane was "at Disneyland today with his kids" when Richie aimed his followers at the family, and now, because it is under scrutiny, service apparently "doesn't matter anymore." (Opp. at 4, 6, 13.)

The Opposition's legal theme—that the Motion asks the Court to "sanction speech"—collapses on its own concession that speech is admissible to prove motive. (Opp. at 9.) Despite the Opposition's best efforts to distract with its strawman argument, Mr. Kane only asks the Court to sanction litigation *conduct*: filing and maintaining this action as one "angle" of an announced campaign to drain Mr. Kane financially, using this Court's process as cover to direct an online following at a family with minor children, and filing and then standing on returns of service that were not true. Richie's motive was not to vindicate legal rights; it was to "drain" Mr. Kane until he gave up his lawful petition for a civil harassment restraining order. The Motion should be granted.

II. ARGUMENT

A. Richie Defined His Own Purpose Through His Own Words, and the Opposition Offers No Evidence to the Contrary.

1. *Richie's June 21 video answers the Opposition's only response to the "papering" admission.*

The Opposition's treatment of the July 7 podcast rests on three propositions: that "2.5" is "unexplained in the transcript"; that Mr. Kane's reading of it is "attorney argument, not evidence";

and that "[e]ven if Kane's counsel was correct about what '2.5' meant, Richie was talking about the state court case, not this case." (Opp. at 11.) The Opposition supports none of those propositions with evidence, and Richie's own words refute all three and show exactly why he filed this case.

On June 21, 2026, Richie posted to his @nikrichie Instagram account a clip from an episode of his own podcast, captioned with the announcement that "our episode drops tomorrow night." (Supp. Coy Decl. ¶¶ 4, 7, Ex. 11.) He posted the full episode to his YouTube channel the next day. (*Id.* ¶ 5.) In the clip, Richie told his guest that "[t]he only way I feel like I can beat these monsters [such as Mr. Kane] is to burn cash, and they have to burn it." (*Id.* ¶ 8, Ex. 12 at 00:01.) He then described a prior lawsuit in which, he said, Dan Bilzerian told him at a mediation that he was "gonna burn five million, so you [Richie] have to burn it too"—a tactic Richie said "wasn't even about the lawsuit" but about "the challenge, the ego, the narcissism." (*Id.* at 00:58.) Richie then explained what he took from that experience:

> [I]t taught me a lot. I'm like, okay, this is how you beat these guys. And now it's the same thing. *It's like with Evander Kane*. I'm sure Evander's gonna watch this. I want to burn 2.5 million, *so he has to burn it too*, *because I know he doesn't have it*, you know. I don't have it either, but I'll get it. So, and that's not me being like, hey, I'm a narcissist or whatever. That's just me knowing we all have limits. *And his limit's gonna come soon, and he's gonna fold*.

(*Id.* at 00:58–01:59. (emphasis added)) Those statements are Richie's own words, admissible against him, not counsel argument. Fed. R. Evid. 801(d)(2)(A). They resolve precisely what "2.5" meant: $2.5 million in litigation spending to "burn cash" so that his opponent—by name, "Evander Kane"—has to spend it too. And they resolve Plaintiff's purpose: to make Mr. Kane "burn it too," in an amount Richie believed Mr. Kane could not afford, until Mr. Kane reached his "limit" and would "fold"—or, as Richie put it on July 7, until he would "come to the table and . . . be like, I'm over it." (Supp. Coy Decl. ¶ 8, Ex. 12 at 00:58-01:59; ECF No. 23-1, Ex. E at 58:14–58:24.) Richie even explicitly said "[s]ell the house Mr. Kane"—further cementing Richie's true intent to push Mr. Kane to the financial brink. (Supp. Coy Decl. ¶¶ 7, 8, Exs. 11, 12 at 00:58.)

The video also disposes of the claim that Richie "was talking about the state court case, not this case." (Opp. at 11.) When Richie posted it, the Orange County temporary restraining order had been dissolved three days before on Richie's own application. (RJN, Ex. 5.) Richie said as much:

he opened the June 21 clip by describing how he "won against Evander Kane this first round." (Supp. Coy Decl., Ex. 12 at 00:00:01.) Nothing restrained him. His speech rights, in his counsel's words, had been "restored." (ECF No. 23-1, Ex. E at 57:59–58:07.) The spending Richie announced on June 21 therefore could not have referred to the cost of defending against an injunction; rather, it must have been in reference to a plan to impose costs in the rounds to come. Four days later he opened a second front in this Court. And when he described the plan again on July 7—twelve days after filing this action—he described "papering so hard" from "every single angle" and declared that "[t]his thing's going to cost him." (*Id.* at 58:07–58:14.) The timeline is clear.

The Opposition's fallback argument—that "a respondent's hope that the petitioner who sued him will tire of the fight is what every defendant hopes" (Opp. at 11)—describes a *hope* that an adversary will wish to avoid the *necessary* costs of litigation. But Richie described a *plan* to impose a certain amount of costs as its own goal: spend a specified sum, by design, to force an opponent to spend the same, because Richie believed the opponent could not afford it, with the stated goal of forcing his opponent to give up. (*See* Supp. Coy Decl. ¶ 8, Ex. 12 at 00:58-01:59; ECF No. 23-1, Ex. E at 58:14–58:24.) That is a description in Richie's own words of litigation conducted "vexatiously, wantonly, or for oppressive reasons." *Chambers v. NASCO, Inc.*, 501 U.S. 32, 45-46 (1991) (citations omitted). And because a claim pursued "for the purpose of harassing an opponent" is sanctionable even if it is colorable, *Primus Auto. Fin. Servs., Inc. v. Batarse*, 115 F.3d 644, 649 (9th Cir. 1997), the Opposition's insistence that the Complaint was not frivolous (Opp. at 9-10) is beside the point. Its own authority says so: a non-frivolous filing is sanctionable where it is "intended to harass." *In re Keegan Mgmt. Co., Sec. Litig.*, 78 F.3d 431, 436 (9th Cir. 1996) (cited at Opp. at 8).

The June 21 video is proper reply evidence. A reply "may include affidavits or declarations." Civ. L.R. 7-3(c). Evidence that responds directly to an argument raised in the opposition is not "new." *See Edwards v. Toys "R" Us*, 527 F. Supp. 2d 1197, 1205 n.31 (C.D. Cal. 2007). The Opposition attacked the evidentiary foundation for the meaning of "2.5," Richie's own words posted on June 21 and July 7 answer that attack. Nor can Plaintiff claim surprise: Richie is the speaker, he published the clip on his own account to promote his own podcast, and the full episode has been

publicly available on his YouTube channel since June 22, 2026 (and as of the date of this filing is still available). (Supp. Coy Decl. ¶¶ 4-5, 9.) Exhibit 12 transcribes the entire clip, so nothing has been taken out of context. *See* Fed. R. Evid. 106. Dr. Dobson's statements are offered only as context, not for their truth. Plaintiff may respond under Civil Local Rule 7-3(d)(1), which supplies the opportunity to respond that *Provenz v. Miller*, 102 F.3d 1478, 1483 (9th Cir. 1996) requires, so there is no prejudice to Plaintiff by the Court admitting Exhibits 11 and 12 into the record.

2. *Counsel's response to the "papering" admission confirmed Plaintiff's improper strategy rather than correcting it.*

The Opposition says Mr. Randazza's response to Richie's statement shows him "correcting his client." (Opp. at 11.) It does no such thing. He told Richie that "it's not a good idea to talk about *your settlement strategy* on camera." (ECF No. 23-1, Ex. E at 58:24–58:32.) He did not say the strategy was wrong or improper, that it was not in fact their strategy, or that the litigation would not be conducted that way. A lawyer who tells his client not to discuss an improper strategy the client has announced on camera is not correcting his client or advising him as to the strategy's impropriety; he is attempting *to protect* that strategy. The words that followed—"but it's not about that"—came after the advice to keep it off camera, and are followed by a prediction of appeals "anyway," regardless of "which one of us wins." (*Id.* at 58:32–59:08.) On the same episode Mr. Randazza volunteered that he was "doing this case so much" because he did not like Mr. Kane's counsel. (*Id.* at 57:04–57:15.) The Opposition does not address that statement, which speaks directly to Mr. Randazza's bad faith motive.

Nor does the Opposition's own reading of the quotes help it. It says the "papering" referred to the "emergency motions" Richie filed "to get our free speech rights restored." (Opp. at 10-11.) But Richie describes the plan as current or future "paper*ing*," not what had already been "paper*ed*." By July 7 the rights to which counsel refers had been "restored" for nearly three weeks. Indeed, immediately before Richie spoke, Mr. Randazza stated, "[s]o now we *got him back*." Richie's statement looked forward, not back: "This thing's *going to* cost him." (ECF No. 23-1, Ex. E at 57:59–58:14 (emphasis added).) Richie's statements demonstrate a prospective intent to burn cash.

3. *The Opposition concedes that Richie's statements are admissible to prove his purpose.*

The Opposition concedes that "speech may be offered as evidence of motive." (Opp. at 9.) That concession ends the "sanctioning speech" argument to which the Opposition so desperately clings. *See Wisconsin v. Mitchell*, 508 U.S. 476, 489 (1993) ("The First Amendment, moreover, ***does not prohibit the evidentiary use of speech*** to establish the elements of a crime or to prove motive or intent.") (emphasis added). What remains of the Opposition's arguments is the contention that the statements were made outside this Court. But the inherent power reaches "abuses of process occurring beyond the courtroom," *Chambers*, 501 U.S. at 57, and "'bad faith' may be found, not only in the actions that led to the lawsuit, but also in the conduct of the litigation," *Hall v. Cole*, 412 U.S. 1, 15 (1973). Mr. Kane does not ask the Court to sanction Richie for criticizing a judge or commenting on a public dispute, which is why the Opposition's citation to *Gentile v. State Bar of Nevada*, 501 U.S. 1030 (1991), is beside the point. Rather, Mr. Kane offers Richie's statements for what they are: Richie's own account of why he sued, his motive, how he went about "serving" Mr. Kane, what he knew, and the purpose of his conduct during the litigation. Statements made after the dismissal are admissible for the same reason; they are admissions about what Richie knew and intended while the case was pending and his motive for having filed and maintained the claims.

B. The "Kane Changed Positions" Narrative Does Not Survive the Record.

The factual premise of the Opposition—that Mr. Kane sought to enforce the Alberta Judgment against Richie, registered it in this District, and disclaimed it only after being sued (Opp. at 1, 10, 20)—is belied by the facts and the timeline.

First, the registration. The June 10, 2026, order was entered on Judicial Council form DV-630, an "Order to Register Canadian Domestic Violence Protective/Restraining Order," in Mr. Kane's pre-existing family law case against Ms. Kane, and it identifies Ms. Kane as the restrained person. (ECF No. 23-1 ¶ 6, Ex. A.) Registration under California's Uniform Recognition and Enforcement of Canadian Domestic Violence Protection Orders Act allows a Canadian family-violence protection order to be entered into the law-enforcement database and enforced in California against the person it restrains. *See* Cal. Fam. Code §§ 6450–6460, 6454. That is what "registered and enforceable in California" means. Plaintiff has conceded that Richie "was not identified in the form [Kane] submitted to register the Judgment." (ECF No. 30 at 10.) A filing that names Ms. Kane

as the only restrained person, in a case to which Richie is a stranger, *on its face* does not seek to enforce anything against Richie—and no reasonable person could conclude otherwise. Richie and his counsel have simply ignored that fact at every turn.

Second, the statute. The SPEECH Act's declaratory remedy belongs to a United States person "*against whom a foreign judgment is entered* on the basis of the content of any writing, utterance, or other speech *by that person*." 28 U.S.C. § 4104(a)(1) (emphasis added). Richie and his counsel rely entirely on the SPEECH Act for the basis of Richie's claims, notwithstanding that no foreign judgment was entered against them. The contention that "Richie was required to make a novel argument [under the SPEECH Act] in response to Kane's novel attempts at censorship" is nonsense; Richie's argument was directly contrary to the statute he relied upon all along. (Opp. at 9.) An argument that contradicts binding authority is not "novel," it is simply unsupported by law. There is no reasonable basis to contend that the Alberta Judgment was being enforced against Richie; at most, Mr. Kane offered it as evidence of Richie's motive, intent, and course of conduct in the civil harassment proceeding, and that is not censorship against speech. *Wisconsin*, 508 U.S. at 489. Richie's Complaint pleaded *four times* that the Alberta Judgment was entered against someone else. (Compl. ¶¶ 2, 17, 27, 43.) His counsel had conceded in writing twenty days before suit that it "does not extend to anyone other than Mrs. Kane." (Coy Decl., Ex. 4 at 2.) What Richie insists is a "question of first impression" (Opp. at 9) is in fact answered by the statutory text itself. In any event, the Motion does not depend on frivolousness; it depends on improper purpose, which has clearly been established here. *See* Section II.A.1, *supra*.

Third, the Orange County proceeding. Mr. Kane has never disputed that the June 8 temporary restraining order referred to the Alberta Judgment (Mot. at 14), or that his petition referred to the protective orders against Ms. Kane. The petition referred to those orders because Richie was engaging in his own course of conduct that constituted civil harassment under California law by, among other things, publishing statements that Ms. Kane was legally barred from making in both the United States and Canada. The TRO rested first on the Santa Clara Order and Richie's own course of conduct, and its Alberta paragraph restrained Richie only from posting content "as described or relayed to respondent by Deanna Kane"—which was relief under Code of Civil

Procedure section 527.6 directed at Richie's own conduct, not enforcement of a foreign judgment against him. (RJN, Ex. 3, Att. 5a(4).) Richie obtained dissolution of that TRO on June 18, a week before he filed this action. (RJN, Ex. 5; ECF No. 1.) Every First Amendment argument he had about the pending petition was before the state court in the anti-SLAPP motion he filed on June 16. A second lawsuit in a second forum added nothing but expense—which is precisely what Richie said he wanted, *i.e.,* to force Mr. Kane "to burn cash."

Fourth, the timing, which disposes of the unsupported narrative. The "concessions" that the Opposition says gave Richie "what he sought" came on August 5, in Mr. Kane's state-court application, and August 10, in his motion to dismiss. (Opp. at 1, 6.) If those statements were actually the relief Richie wanted, he had it by August 10. But he did not dismiss then. Instead, on August 24, he *opposed* the motion to dismiss. On September 14, his counsel refused a routine continuance, accused Mr. Kane of delay, and insisted on discovery into service. (*Id.* ¶ 14, Ex. 6.) Richie dismissed only on September 21—after a week of public posts blaming his own source (*id.* ¶ 18, Ex. 9), and five days after the Court continued the case management conference (ECF No. 37), with the December 9 hearing on the motion to dismiss approaching. Nothing about Mr. Kane's position changed between June 25 and September 21, and certainly not between August 10 and September 21. What did change, however, was that Richie's source had become a liability, and the case was headed to a hearing where Richie's "papering so hard" statements were going to be front and center. The "victory" Richie describes was a story for his audience, and he published it within hours of filing the dismissal. (Coy Decl. ¶ 19, Ex. 10.)

C. The Service Record Shows Reckless Disregard Combined With an Improper Purpose.

1. *Plaintiff bore the burden of proving service, and SEC v. Internet Solutions does not shift it.*

Once service is challenged, the plaintiff bears the burden of establishing that it was valid. *Brockmeyer v. May*, 383 F.3d 798, 801 (9th Cir. 2004). The Opposition relies on *SEC v. Internet Solutions for Business Inc.*, 509 F.3d 1161 (9th Cir. 2007), (Opp. at 15), but that case applies a different rule to a different situation: a defendant who "had actual notice of the original proceeding but delayed in bringing the motion until after entry of default judgment, bears the burden of proving

that service did not occur." *Id.* at 1163. It has no application here: there was no default, and no delay. Mr. Kane's counsel challenged the returns in writing within eight days of their filing, and Mr. Kane denied service under penalty of perjury within three weeks. (ECF No. 23-1 ¶ 10, Ex. C; ECF No. 23-2 ¶¶ 9–13.) Nor does a return's *prima facie* weight relieve counsel of the duty to stop vouching for it once confronted with facts showing it cannot be true.

2. *Counsel stood on the returns in the face of every warning sign.*

By August 10, Plaintiff's counsel knew that there was reason to question the validity of the returns of service (ECF Nos. 11, 12); that his own client had publicized the "service" with an image bearing Instagram's "AI info" label, co-published with his source and captioned "we have more lawsuits coming" (ECF No. 23-1 at 30); that Mr. Kane's counsel had given written notice that Mr. Kane was not in the country (*id.*, Ex. C); and that Mr. Kane had sworn to it (ECF No. 23-2 ¶¶ 9–13). Mr. Shepard had meanwhile sworn in the state court to a service on yet another date. (ECF No. 23-1 at 35 ¶ 15.) Yet Plaintiff did not investigate. No filing then or now reflects that counsel asked the process server to account for the discrepancy, produced her original photograph or its metadata, or obtained a declaration from her responding to Mr. Kane's sworn denial. Instead, counsel told this Court that "Service Has Been Effected" (ECF No. 30 at 12), and demanded that Mr. Kane *disprove* it, even though it was Richie's burden to prove proper service. Standing on a sworn filing after receiving notice that it is false, without any inquiry, is reckless disregard of the truth; combined with the improper purpose announced by Richie himself, it is bad faith. *Fink v. Gomez*, 239 F.3d 989, 993–94 (9th Cir. 2001).

3. *The "withheld evidence" argument inverts the burden and is refuted by Plaintiff's own conduct.*

Mr. Kane's sworn declaration is evidence. No rule required him to produce documents to Plaintiff's satisfaction before discovery, and Plaintiff's counsel said they wanted discovery into service. (Coy Decl., Ex. 6.) The Court declined to defer discovery. (ECF No. 37.) Plaintiff served none. The date on which Mr. Kane forwarded an airline confirmation to his counsel (Opp. at 6) is immaterial; the confirmation itself is dated July 6, 2026, and confirms a round trip from July 9 to July 13. (Kane Decl. ¶ 6, Ex. A.) The irrefutable evidence is Mr. Kane's sworn testimony.

The Opposition's premise that documents would have changed counsel's course is refuted by what happened when the documents arrived. In August, Plaintiff told this Court that if the evidence were provided, "and was indeed 'irrefutable,' Richie would act accordingly." (ECF No. 30 at 16.) On September 30, Mr. Kane filed his flight itinerary and hotel folio showing that he left California on July 13, a photograph taken in his Edmonton home on the morning of July 19, and a renewed sworn declaration that he was in Edmonton on July 19 and did not return to Southern California that month. (Kane Decl. ¶¶ 4–9, Exs. A–C.) Plaintiff did not act accordingly. Instead, he now claims the photograph "proves nothing," asserts that "[e]very indication is that the process server was truthful," and declines to "ask the Court to resolve whether service occurred" because "[i]t doesn't matter anymore." (Opp. at 6, 17.) There is still no declaration from the process server, and still no withdrawal. That is not a litigant waiting for evidence; it is a litigant who never intended to be held to his filings and ran once his filings were proven false.

4. *By Richie's own account, the July 10 posts were this case's "service" efforts—and counsel already knew where Mr. Kane was.*

The Opposition says the July 10 posts are "not litigation conduct in this Court." (Opp. at 12.) Richie, however, disagrees, as he told his followers that the "only reason" he incited the Dirty Army to find Mr. Kane was "because [he is] trying to serve him for the SPEECH Act." (Coy Decl. ¶ 17, Ex. 8.) The Opposition then proves the service rationale was a pretext. It recounts that on July 10, Plaintiff's counsel urged Mr. Kane's counsel to accept service rather than "make us serve him while he's at Disneyland today with his kids." (Opp. at 4, 13 (quoting ECF No. 14-5 at 3).) Plaintiff thus knew where Mr. Kane was, and if he was actually trying to serve process, he would have sent a process server. The Opposition identifies no attempt to serve Mr. Kane at Disneyland, or anywhere in California, between July 9 and July 13. Instead, Richie posted the family's location and asked his followers whether "anyone [can] grab a pic in next 30 minutes." (Coy Decl. ¶ 11, Ex. 5.) The Opposition never explains how photographs of a defendant's minor children, taken by strangers within thirty minutes, would accomplish service of a summons. Mr. Kane does not ask the Court to give the state court's findings preclusive effect, *see Lee v. City of Los Angeles*, 250 F.3d 668, 689-90 (9th Cir. 2001); rather, the facts come from Richie's post, Richie's video, and Plaintiff's

counsel's own email.

The July 9 email was not, as the Opposition says, a "compromise." (Opp. at 13.) It told Mr. Kane's counsel that unless they accepted service, Plaintiff would "crowdsource his location." (*Id.* at 4.) Mr. Kane's counsel had already advised that they were not authorized to accept service. (ECF No. 23-1 at 33 ¶ 5.) Mr. Kane had no obligation to change that answer; the only consequence Rule 4 attaches to declining a waiver applies to a defendant "located within the United States." Fed. R. Civ. P. 4(d)(2). Richie's counsel's announcement in advance that Mr. Kane's location will be crowdsourced did not mean it was not harassment and it did not make engaging in such harassment a legitimate litigation tactic.

D. The Opposition's Remaining Defenses Fail.

Mr. Kane does not dispute Richie's right to dismiss; he disputes the claim that dismissal ends the inquiry. The Opposition does not contest the Court's authority to decide this motion. *Cooter & Gell v. Hartmarx Corp.*, 496 U.S. 384, 395–96 (1990). The dismissal is relevant for what its timing reveals (Section II.B, *supra*) and for what it said. Rule 41(a)(1)(A)(i) required only a notice. Plaintiff instead filed two pages of argument declaring that Richie "has prevailed," which is false, *Buckhannon Bd. & Care Home, Inc. v. W. Va. Dep't of Health & Human Res.*, 532 U.S. 598, 605 (2001), and Richie published it as "victory" within hours. (ECF No. 39 at 1–2; Coy Decl. ¶ 19, Ex. 10.) That Richie did not seek fees as a prevailing party (Opp. at 13) does not make a false statement in a filing in this Court any less false; it confirms the filing was drafted for his audience.

The Opposition concedes that "Richie knew of the July 10, 2024, Santa Clara order; his counsel addressed it in the state court in June." (Opp. at 14.) Yet on September 21, Richie told his followers that the state judge "was giving weight to a confidential Santa Clara order that [he] knew nothing about." (Coy Decl. ¶ 19, Ex. 10.) The Opposition suggests the post "is thus fairly read as referring to a custody settlement" (Opp. at 14), but the post refers separately to "the Global Settlement agreement which was not disclosed to me" and to the "Santa Clara order" to which the judge gave weight. The only Santa Clara order the state court gave weight to was the July 10, 2024 order (RJN, Ex. 1)—the order Richie himself filed in this Court (ECF No. 1-2). On September 10, he had posted the transcript page reflecting that weight with the caption "I have zero to do with

Santa Clara." (Coy Decl. ¶ 16, Ex. 7.) Richie's willingness to misstate publicly what he knew about the central court order bears directly on the credibility of the unsworn explanations his counsel now offers for his purpose. Richie has offered no sworn explanation at all.

E. Each Attorney Is Individually Sanctionable.

The Opposition argues that § 1927 requires findings as to each attorney. (Opp. at 15.) The record supports such findings.

Mr. Randazza sat beside his client as he described the "papering" strategy, responded only that it should not be discussed on camera, and volunteered that he was "doing this case so much" out of dislike for opposing counsel. (ECF No. 23-1, Ex. E at 57:04–58:46.) He wrote the July 9 email announcing that Mr. Kane's location would be crowdsourced and the July 10 email confirming that Plaintiff knew where Mr. Kane was. (ECF No. 23-1 at 34 ¶¶ 10, 12; Opp. at 4.) He received the July 30 notice. (ECF No. 23-1, Ex. C.) He then signed the opposition to the motion to dismiss, which represented that "Service Has Been Effected" on the strength of the returns alone, and promised that Richie would "act accordingly" if shown evidence. (ECF No. 30 at 12, 16.) And he signed the Opposition, which, after that evidence was filed, neither defends the returns nor withdraws them. (Opp. at 6, 17, 21.)

Mr. Shepard swore on August 5, after written notice, that a process server "successfully served Kane" on "July 21, 2026," 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.) That declaration is evidence of what counsel knew and chose to disregard in this Court. On September 14, he refused a routine continuance on the stated ground that Plaintiff needed discovery into service—discovery Plaintiff never served—which required Mr. Kane's administrative motion. (Coy Decl. ¶¶ 14–15, Ex. 6; ECF Nos. 34, 37.) He signed the dismissal notice declaring that Richie "prevailed." (ECF No. 39.) And at the September 24 meet-and-confer, he refused to withdraw the returns without further proof of their falsity and stated that Richie would respond to this Motion with his own § 1927 motion against Mr. Kane for, among other things, declining to accept service through counsel, challenging service, and filing this Motion. (Coy Decl. ¶ 21.)

Each of these steps after notice multiplied the proceedings: Mr. Kane's response to the renewed motion for alternative service (ECF No. 28), the service briefing in the motion to dismiss and reply (ECF Nos. 23, 31), the administrative motion (ECF No. 34), and this motion. The characterization of the renewed alternative-service motion as an "ordinary alternative pleading" (Opp. at 18) misses the point. Asking for alternative service was not the problem; continuing to vouch for returns counsel would not defend, after notice that they were false, was the problem. The Court need not consider Mr. Randazza's disciplinary history to grant this motion; the record of this case is sufficient.

F. The Fees Mr. Kane Seeks Were Caused by the Sanctionable Conduct.

Service. The Opposition says Mr. Kane caused his own service-related fees by declining to accept service and to produce documents. (Opp. at 19–20.) But a defendant abroad has no duty to accept service through counsel, *see* Fed. R. Civ. P. 4(d)(2), and no rule required Mr. Kane to disprove Plaintiff's returns before discovery. The July 30 letter, the service portions of the motion to dismiss and reply, the response to the renewed alternative-service motion, and the supplemental Kane declaration would not have been necessary had Plaintiff not filed, and then refused to withdraw, false returns reciting a service that never occurred. *Goodyear Tire & Rubber Co. v. Haeger*, 581 U.S. 101, 108–09 (2017). Plaintiff is essentially arguing that a plaintiff can lie about service of process and there should be no remedy for a defendant that is forced to protect his rights against his will.

Motion to dismiss and reply. The Opposition says the returns affected only "when" Mr. Kane filed, and that if he was never served, "there was no deadline for him to respond." (Opp. at 20.) That ridiculous argument asks a defendant to stake a default on the outcome of a factual dispute that the plaintiff falsely manufactured. A return reciting personal service starts the response clock on its face, Fed. R. Civ. P. 12(a)(1)(A)(i), and a defendant who ignores it risks default, Fed. R. Civ. P. 55(a). Richie's admitted bad faith tactics and improper purpose demonstrate that the conduct regarding service was almost certainly a part of the intended effort to force Mr. Kane to "burn cash."

Case management and this Motion. Mr. Kane should not have been forced to participate in the Rule 26(f) conference because he was never served with service of process in this action. Further,

the administrative motion should not have been necessary and became necessary only because Plaintiff refused to agree to a continuance to pursue discovery, then never took it. (ECF Nos. 34, 37.) Mr. Kane will establish the amounts by supplemental declaration. And the fees for this Motion were caused by the conduct that made it necessary.

All fees. The Opposition says shifting all fees is reserved for a case initiated "in complete bad faith." (Opp. at 20 (quoting *Haeger*, 581 U.S. at 110).) This is that case. Richie publicly announced on June 21 that he intended to "burn 2.5 million so [Mr. Kane] has to burn it too," until Mr. Kane's "limit" came and he would "fold." (Supp. Coy Decl. ¶ 8, Ex. 12 at 00:58-01:59.) He filed this action four days later, maintained it through false returns and a discovery demand he never acted on, and abandoned it once it stopped serving that purpose. Every dollar Mr. Kane spent defending this action is a dollar Richie intentionally set out to make him "burn." The Court should award all fees. *Haeger*, 581 U.S. at 110.

III. EVIDENTIARY OBJECTIONS

Pursuant to Civil Local Rule 7-3(c), Mr. Kane objects to the following material in the Opposition. The Opposition is supported by no declaration. Factual contentions in opposition to a motion "must be supported by an affidavit or declaration," and evidentiary matter "must be appropriately authenticated by an affidavit or declaration." Civ. L.R. 7-5(a). Authentication is a condition precedent to admissibility, and unauthenticated material cannot be considered. *Orr v. Bank of Am., NT & SA*, 285 F.3d 764, 773 (9th Cir. 2002). Arguments and statements of counsel are not evidence. *Smith v. Mack Trucks, Inc.*, 505 F.2d 1248, 1249 (9th Cir. 1974).

Objection No. 1: The image captioned "Photo of Kane from Ms. Taylor" (Opp. at 16). Fed. R. Evid. 602, 802, 901(a); Civ. L.R. 7-5(a). No person with personal knowledge authenticates the image. Ms. Leilani-Taylor has never declared that she took the photo, when or where it was taken, or whom it depicts. The only foundation Plaintiff cites (ECF Nos. 20-1, 20-2 ¶¶ 3–4) is, by Plaintiff's own unsupported description, an account that Ms. Leilani-Taylor "sent a photograph that she said she took when she served Kane" (Opp. at 4)—an out-of-court statement offered for its truth, not authentication by a witness with knowledge. The caption identifying the subject as "Kane" is counsel's mischaracterization. Mr. Kane has sworn that he was not at the Bel-Air Country Club in

July 2026 and that the person depicted in Richie's July 19 image—which Plaintiff says incorporated the photograph (Opp. at 16 n.4)—is not him. (ECF No. 23-2 ¶¶ 10, 13; Kane Decl. ¶¶ 4, 10.)

Objection No. 2: The image captioned "Photo of Kane from 2022 Mercury News article" (Opp. at 16). Fed. R. Evid. 401-403, 802, 901(a); Civ. L.R. 7-5(a). The image is unauthenticated; Plaintiff provides no source, link, or declaration, and its caption is hearsay. It is not a proper subject of judicial notice for the identity of any person. Fed. R. Evid. 201(b). A 2022 photograph of Mr. Kane is also irrelevant to whether he was served in July 2026.

Objection No. 3: Counsel's side-by-side comparison and identification, including "If the man the process server found was not Kane, it is his doppelganger" (Opp. at 16). Fed. R. Evid. 602, 701; Civ. L.R. 7-5(a). Counsel has no personal knowledge of the event and offers an identification opinion in a brief. It is unsupported argument, not evidence. *Smith*, 505 F.2d at 1249.

Objection No. 4: Unsworn factual assertions, including that "Kane's suggestion" that the image in Richie's July 19 post was AI-generated "is false" (Opp. at 16 n.4), that "[e]very indication is that the process server was truthful" (*id.* at 17), and the characterizations of what Richie meant on the July 7 podcast (*id.* at 10–11). Fed. R. Evid. 602; Civ. L.R. 7-5(a). None is supported by any declaration. If the process server's account is truthful and worthy of defending, then Richie should have proffered her declaration. Richie's July 19 post itself bears Instagram's "AI info" label. (ECF No. 23-1 at 30.)

IV. CONCLUSION

Richie explicitly announced the reason for filing this case before he filed it: to "burn 2.5 million so [Mr. Kane] has to burn it too." He then filed the case, used its service as cover to aim his followers at a family with minor children, stood on false returns of service his counsel would neither defend nor withdraw, and walked away declaring victory when the case threatened accountability. The Court should find that Richie brought and maintained this action in bad faith and for an improper purpose, that Mr. Randazza and Mr. Shepard unreasonably and vexatiously multiplied these proceedings and acted in bad faith, and that Mr. Kane is entitled to the fees and costs caused by that conduct in an amount to be established by supplemental declaration.

DATED: October 21, 2026

Respectfully Submitted,
BLANK ROME LLP

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

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

[*Filed concurrently with Reply in Support of Motion for Sanctions*]

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)

SUPPLEMENTAL 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 ("Mr. 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 supplemental declaration in support of Mr. Kane's reply in support of his Motion for Sanctions Against Plaintiff and His Counsel ("Motion"). This declaration responds to the argument in Plaintiff's Opposition (ECF No. 43 at 10–11) that the meaning of Plaintiff's statement "my goal is 2.5" during the July 7, 2026 podcast episode (ECF No. 23-1 ¶ 13, Ex. E) is unexplained and unsupported by evidence, and that Plaintiff was referring only to the Orange County proceeding. Neither this declaration nor the reply 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.

3. As described in my prior declaration, Plaintiff Hooman Abedi Karamian a/k/a Nik Lamas-Richie ("Richie") publishes on Instagram through the verified account "@nikrichie." (ECF No. 40-1 ¶¶ 3–4, Ex. 1.) After Kane filed his Motion on September 30, 2026, I continued to periodically review publicly available posts on the @nikrichie account.

4. On October 4, 2026, I viewed Mr. Richie's @nikrichie Instagram account, and despite having reviewed Mr. Richie's Instagram account many times before October 4, that day I discovered a video post that displays a posting date of June 21, 2026. If I The posting date, "June 21," is displayed beneath the caption. The video is 2 minutes and 45 seconds long. It is an excerpt of an episode of Richie's podcast, in which Richie speaks with a guest identified in the caption as "@drlesliedobson" (Dr. Leslie Dobson) about, among other things, his litigation with Kane. The caption of the post reads: "Inside the minds of the monsters with @drlesliedobson - our episode drops tomorrow night. Let's all work together to defeat the MONSTERS and bring the children

home to their real mothers," followed by a heart emoji. The post is publicly accessible at https://www.instagram.com/reel/DZ3-12ay05W/?rpxt=NTc4MTIwNjQ2YQ==.

5. On October 17, 2026, I viewed the YouTube channel "@nikrichiepodcast" and located the full-length episode of Richie's podcast from which the Instagram video was taken. The YouTube episode displays a posting date of June 22, 2026, and is publicly accessible at https://youtu.be/6fNPr42VTK4?is=V6K8KwwHW3gjkrap. The Instagram video described in paragraph 4 corresponds to the portion of the YouTube episode from 40:08 to 42:53. I have compared the two, and the statements made in the Instagram video are the same as the statements made in that portion of the YouTube episode.

6. I recognize the person speaking in the Instagram video and the YouTube episode as Richie, both by his appearance and by his voice. I have seen and heard Richie speak in person, including at the August 26, 2026 hearing in the Orange County proceeding, *Kane v. Karamian*, Orange County Superior Court Case No. 30-2026-01575619-CU-HR-CJC, at which Richie was present (ECF No. 41, Ex. 1), and I have watched numerous videos of Richie speaking that were posted on the @nikrichie account, including the video described in my prior declaration (ECF No. 40-1 ¶ 17, Ex. 8) and the July 7, 2026 podcast episode (ECF No. 23-1 ¶ 13, Ex. E).

7. Attached as **Exhibit 11** are true and correct copies of screenshots that I captured on my mobile phone on October 17, 2026 of the June 21, 2026 post, showing the @nikrichie account name, the posting date, the caption, a still image from the video, and a screenshot of the comment section on the post, in which Richie comments on his own post, stating: "Sell the house Mr. Kane. Hurry @nhlpr". Each screenshot is a true and correct copy of what appeared on my screen.

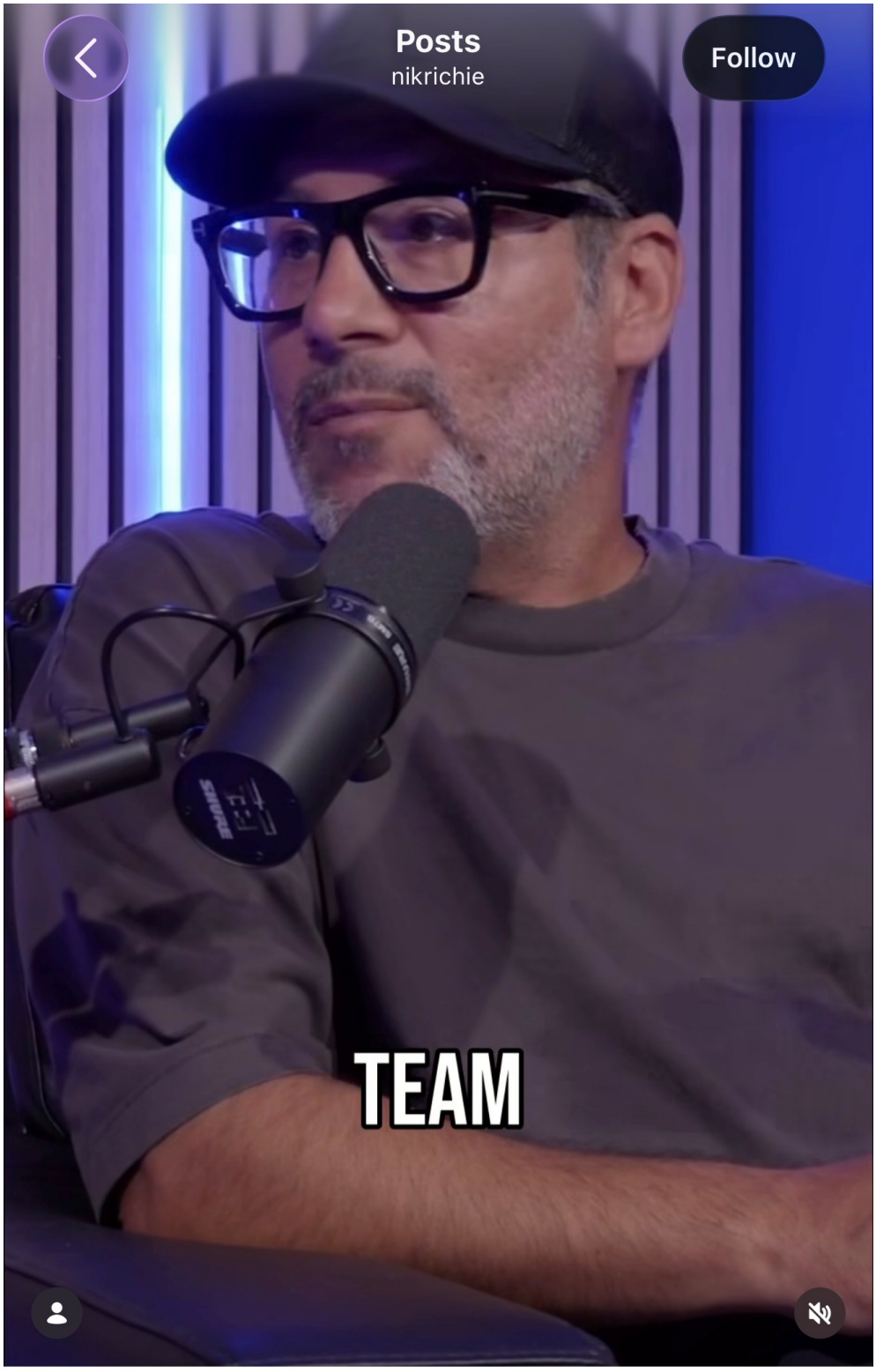
8. Attached as **Exhibit 12** is a true and correct copy of a transcription of the Instagram video described in paragraph 4, in its entirety, from 0:00 to 2:45. I have listened to the entire video, compared it word for word against the transcription, and corrected the transcription where needed. The transcription accurately reflects the words spoken in the video. Exhibit 12 identifies the speaker of each statement and the elapsed time in the video at which statements begin. Adding 40:08 to an Exhibit 12 timestamp gives the approximate corresponding point in the YouTube episode.

9. When I last viewed the @nikrichie Instagram account and the @nikrichiepodcast YouTube channel on October 21, 2026, the June 21, 2026 post and the June 22, 2026 episode remained publicly available.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 21, 2026, at Los Angeles, California.

/s/ Ryan F. Coy
Ryan F. Coy

EXHIBIT 11



62 28

Liked by **mili___1922** and **others**

nikrichie Inside the minds of the monsters with @drlesliedobson - our episode drops tomorrow night. Let's all work together to defeat the MONSTERS and bring the children home to their real mothers. ❤️

June 21

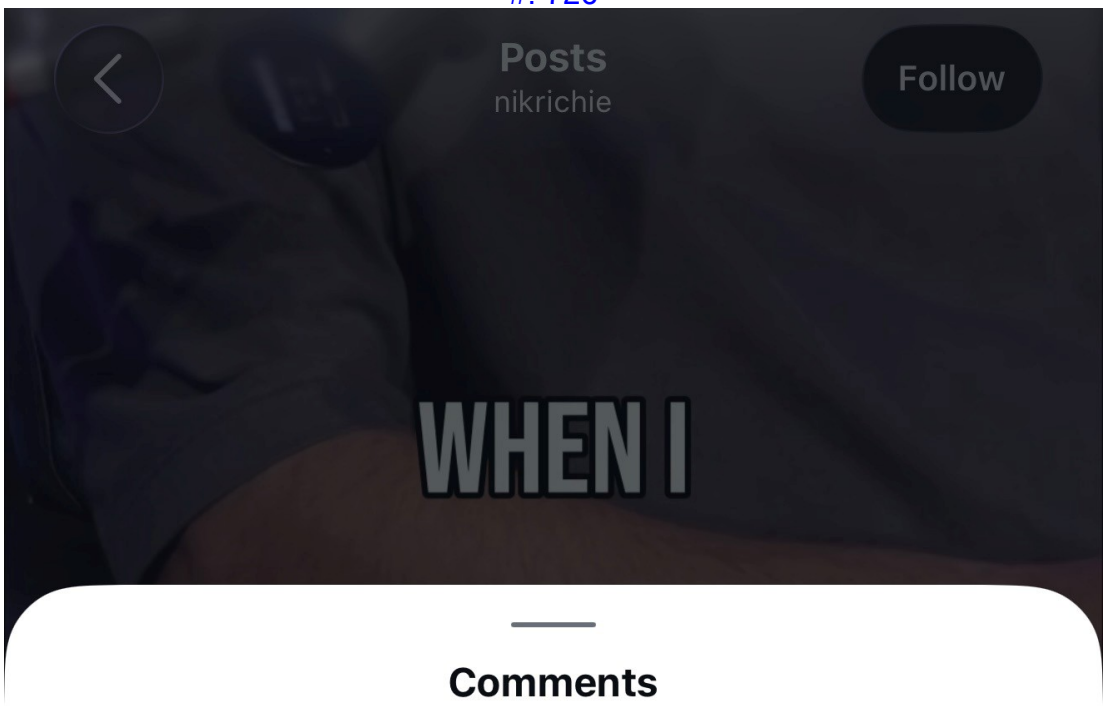
Posts
nikrichie

Follow



62 28

Liked by **mili___1922** and **others**
nikrichie Inside the minds of the monsters with @drlesliedobson



Comments

drlesliedobson 16w · by author
It's a money game. I invite any of these guys to sit down with me, and my 20+ years evaluating men in persons. 😉 no? Then you're the monster.
49
Reply

View 5 more replies

terezakacerova 16w · by author
Yup, exactly. It's just about WINNING. And once they win... it only gives them a taste of court victory and a sense of empowerment - and then they just attack harder. The finish line is always moving cuz there is always more pain available to inflict - especially with the judges being onboard - for the TAXPAYERS' $$$.
31
Reply

View 1 more reply

nikrichie 16w · Author
Sell the house Mr. Kane. Hurry @nhlpr
24
Reply

View 1 more reply

vanessa_kuestner 16w
So true

EXHIBIT 12

TRANSCRIPT OF VIDEO POSTED BY PLAINTIFF HOOMAN ABEDI KARAMIAN a/k/a NIK LAMAS-RICHIE TO INSTAGRAM (@nikrichie) ON JUNE 21, 2026

Karamian v. Kane, Case No. 5:26-cv-06348-NW (N.D. Cal.)

Platform / Account	Instagram, @nikrichie
Posting Date Displayed	June 21, 2026
URL	https://www.instagram.com/reel/DZ3-12ay05W/?rpxt=NTc4MTIwNjQ2YQ==
Caption	"Inside the minds of the monsters with @drlesliedobson - our episode drops tomorrow night. Let's all work together to defeat the MONSTERS and bring the children home to their real mothers. [heart emoji]"
Length	2 minutes, 45 seconds (00:00:00 – 00:02:45); transcribed in its entirety
Corresponding Full Episode	YouTube, @nikrichiepodcast, posted June 22, 2026, https://youtu.be/6fNPr42VTK4?is=V6K8KwwHW3gjkrap, at 40:08 – 42:53
Speakers	RICHIE: Plaintiff Hooman Abedi Karamian a/k/a Nik Lamas-Richie ("Nik Richie") | DR. DOBSON: podcast guest identified in the caption as @drlesliedobson (Dr. Leslie Dobson)

Transcription notes: Timestamps show approximately the elapsed time in the Instagram video at which the statement begins; adding 40:08 to a timestamp gives the approximate corresponding point in the YouTube episode. Brief statements without a timestamp occur between the timestamps that precede and follow them. An ellipsis (…) indicates that the speaker trailed off or was interrupted; no words have been omitted. A dash (—) indicates a repeated word or self-interruption.

[00:00:01] **RICHIE:** For me, it's like I don't have the heart to say it, but you're never gonna win.

DR. DOBSON: I mean …

RICHIE: Unless they have the right counsel, the right team, the right backing. When I say, hey, diagnose me. When I won against Evander Kane this first round, I was kind of not happy. I was just kind of like, okay, this is man versus man, and the judge is looking at me completely different than it would be if it was Anna Kane versus Evander. Because if it was Anna Kane that did this, and it was about her, she would have lost, ya know. And that bothers me. The only way I feel like I can beat these monsters is to burn cash, and they have to burn it. Like, I was in a lawsuit with Dan Bilzerian, and he sued me for 50 million. I remember we—we sat in mediation.

[00:00:58] **RICHIE:** And he sat across from me, and he said, "Hey, I'm gonna burn. I'm gonna burn …" I don't know what the amount was. I think it was like five million. He's like, "I'm gonna burn five million, so you have to burn it too." It wasn't even about the lawsuit for him. It was about the challenge, the ego, the narcissism. Like, he

looked through me, not against me. It was the weirdest, most uncomfortable situation. But it taught me a lot. I'm like, okay, this is how you beat these guys. And now it's the same thing. It's like with Evander Kane. I'm sure Evander's gonna watch this. I want to burn 2.5 million, so he has to burn it too, because I know he doesn't have it, you know. I don't have it either, but I'll get it. So, and that's not me being like, hey, I'm a narcissist or whatever. That's just me knowing we all have limits.

[00:01:56] **RICHIE:** And his limit's gonna come soon, and he's gonna fold.

[00:01:59] **DR. DOBSON:** If he wants to sit down with me and have a conversation.

[00:02:02] **RICHIE:** I wish they would all sit down with you and have a conversation.

[00:02:04] **DR. DOBSON:** Philip, Evander …

RICHIE: All of them.

DR. DOBSON: Whatever the T guy is.

[00:02:09] **RICHIE:** I think it's Trent.

[00:02:10] **DR. DOBSON:** Trent? I don't know. But that's the thing is they don't—they shy away, and even when their defense hires me, and I get hired by these asses' defenses because I'm gonna come in neutral regardless.

RICHIE: Yeah.

DR. DOBSON: They keep them away from me. They just give me the record.

RICHIE: Yeah.

[00:02:24] **DR. DOBSON:** The lawyers strategically give me things.

[00:02:26] **RICHIE:** Because they know the lawyers know the truth.

[00:02:28] **DR. DOBSON:** The lawyers know the truth.

[00:02:30] **RICHIE:** They don't care. The retainer has to be filled. They gotta hit their numbers. It's a money game.

DR. DOBSON: Yeah.

RICHIE: And females are the ones, mothers are the ones that are getting screwed, and that's kind of my wake up. I feel so bad for these people.

[00:02:45] **END OF VIDEO**