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11
12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **COUNTY OF ORANGE – CENTRAL JUSTICE CENTER**

14 EVANDER FRANK KANE,

15
16 Petitioner,

17 v.

18 HOOMAN ABEDI KARAMIAN A/K/A NIK
19 RICHIE,

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

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

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

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

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

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

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

- 6 1) Reinstating the temporary restraining order previously issued against Respondent
7 Hooman Abedi Karamian *aka* Nik Richie (“Respondent”) in this proceeding as to
8 Petitioner and his six-year-old daughter, Kensington Kane, and continuing that order
9 in effect through the conclusion of the continued evidentiary hearing pursuant to Code
10 of Civil Procedure section 527.6, subdivisions (c), (d), (f), and (p)(2);
- 11 2) Expanding the protected persons under the temporary restraining order, on a showing
12 of good cause pursuant to Code of Civil Procedure section 527.6, subdivision (c), to
13 include Petitioner’s fiancée and household member Mara Teigen and their three
14 additional minor children, Iverson Kane (age 4), Hendrix Kane (age 3), and Penelope
15 Kane (age 1); and
- 16 3) Advancing the evidentiary hearing on the petition, presently set for September 8-10,
17 2026, to the earliest available date, and in no event later than the week of August 26,
18 2026, so that hearing occurs within the period contemplated by Code of Civil
19 Procedure section 527.6, subdivisions (f) and (g), and so that Petitioner’s statutory
20 right to a prompt hearing is not further deferred by Respondent’s motion practice and
21 to prevent further stalking and harassment by Respondent; and
- 22 4) In the alternative, if the Court declines to expand the temporary restraining order at
23 the ex parte stage, ordering that the scope of the evidentiary hearing presently set for
24 September 8-10, 2026 be expanded to include Ms. Teigen and the three additional
25 minor children as additional protected persons.

26 This Application is made on the grounds that, since the temporary restraining order was
27 dissolved on June 18, 2026, Respondent has escalated his conduct in a manner that places
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1 Petitioner's entire household—including four children under the age of seven—in immediate danger
2 of irreparable harm. Respondent has now expressly directed his audience of more than 500,000
3 followers to locate Petitioner's family in real time, set a thirty-minute deadline for them to do so,
4 and then publicly celebrated the surveillance photograph his followers delivered. Petitioner seeks
5 only conduct-based relief. He does not seek any order restricting Respondent's general commentary
6 about Petitioner or this litigation.

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

12 Notice of this Application was given to Respondent's counsel of record, Marc J. Randazza
13 and Alex J. Shepard of Randazza Legal Group, PLLC, on August 5, 2026 at 9:46 a.m. by telephone
14 and on August 5, 2026 at 9:57 a.m. by email, in accordance with California Rules of Court, rules
15 3.1203 and 3.1204, and Code of Civil Procedure §§ 527, 527.6. (Coy Decl. ¶ 17, Ex. 18.)

16 DATED: August 5, 2026

BLANK ROME LLP

18 By: 
19 _____

Joseph J. Mellema

Ryan F. Coy

Attorneys for Petitioner

EVANDER FRANK KANE

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I. INTRODUCTION

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

“Looking for Monster Kane & Co. . . . Let’s test the Dirty Army. Can anyone grab a pic in next 30 minutes[.]”

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

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

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

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

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

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

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

22 **II. FACTUAL BACKGROUND**

23 **A. The Court Dissolved the Temporary Restraining Order on June 18, 2026,** 24 **Without Vindicating Respondent’s Free Speech Defense.**

25 Petitioner filed his petition for a civil harassment restraining order on June 5, 2026. On June
26 8, 2026, the Court issued a *Temporary Restraining Order* (“TRO”) protecting Petitioner and
27 Petitioner’s daughter from further conduct by Respondent, including but not limited to, conduct that
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1 harasses, intimidates, stalks, and disturbs the peace of Petitioner and his daughter. (TRO at p. 2, ¶
2 5.) The TRO further ordered Respondent “to cease any posting to social media alleging petitioner
3 had kidnapped his daughter,” and it “prohibited [Respondent] from posting anything to social media
4 . . . regarding petitioner or his daughter Kensington as described or relayed to respondent by Deanna
5 Kane.” (TRO at p. 8, Attachment 5a(4).)

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

15 On June 16, 2026, Respondent filed a special motion to strike under the anti-SLAPP statute
16 (the “Anti-SLAPP Motion”). The Anti-SLAPP Motion is currently set for hearing on August 26,
17 2026, and the evidentiary hearing on the petition is currently set for September 8–10, 2026.

18 **B. Respondent’s Motion for an Undertaking Under Section 1030 was Denied.**

19 One day after the Anti-SLAPP Motion was filed, on June 17, 2026, Respondent filed a *Motion for*
20 *Order Requiring Plaintiff to Furnish an Undertaking Pursuant to [CCP] § 1030* (“Undertaking
21 Motion”) to compel Mr. Kane—the petitioner in a civil harassment proceeding—to post a \$100,000
22 undertaking based on the alleged violation of Respondent’s rights. Respondent filed the Undertaking
23 Motion without the affidavit section 1030(b) makes a mandatory predicate. When Petitioner’s
24 opposition identified that defect, Respondent moved on June 30, 2026 to supplement the record with
25 a declaration executed that same day. On July 7, 2026, the Court ruled in Petitioner’s favor, denying
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1 the Undertaking Motion, and finding that even considering Respondent’s supplemental evidence,
2 Respondent failed to demonstrate a reasonable possibility of success on his Anti-SLAPP Motion.²

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

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

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

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

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

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

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

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

10 Respondent does not operate alone. Deanna “Anna” Kane—Kensington’s biological mother,
11 who has no custodial rights, who is subject to permanent orders in the United States and Canada
12 prohibiting precisely these publications, and who is the subject of a July 2024 Alberta warrant
13 arising from her online harassment—appears throughout Respondent’s content as his
14 “collaborator,” as their shared Instagram posts frequently demonstrate, including as recently as July
15 23, 2026. (Coy Decl. ¶¶ 8-12, Exs. 7-15.) She publicly thanks him for continuing to publish about
16 the family. She republishes his material to her own accounts. On or about July 15, 2026, she
17 published multiple photographs of Mr. Kane taken covertly by strangers, broadcasting where he had
18 been “spotted.” (Kane Decl. ¶¶ 3, 12; Teigen Decl. ¶¶ 8, 12; Coy Decl., Exs. 7-8.) And on July 29,
19 2026, she published a message reporting the reach of their collaboration to her, with the note that
20 “the clip is still going.” (Coy Decl. ¶ 12, Ex. 15.) The orders entered against Ms. Kane were
21 supposed to end this. Respondent has made himself the instrument by which they are defeated—
22 and the surveillance network he built now features and feeds her.

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

1 **D. Respondent Explained Why His Conduct Escalated.**

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

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

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

25 **E. The Unprotected Family Members Being Confronted.**

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

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

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

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

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

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

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

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

4 The children have been withdrawn from summer camps and from soccer. The family
5 surrendered its club membership. Kensington is permitted at exactly one friend's home. (Kane Decl.
6 ¶ 17; Teigen Decl. ¶¶ 23, 24–27.) Mr. Kane's professional schedule is public, which means that
7 Respondent's audience knows not only where the family lives but when Mr. Kane is away and Ms.
8 Teigen is alone with the children. (Kane Decl. ¶ 15; Teigen Decl. ¶ 21.)

9 **III. LEGAL STANDARD**

10 A temporary restraining order under section 527.6 “may be issued with or without notice,
11 based on a declaration that, to the satisfaction of the court, shows reasonable proof of harassment
12 of the petitioner by the respondent, and that great or irreparable harm would result to the petitioner.”
13 (Code Civ. Proc., § 527.6, subd. (d).) That standard is materially lower than the clear-and-
14 convincing standard governing the injunction after hearing. (*Id.*, subd. (i); *see Adler v. Vaicius*
15 (1993) 21 Cal.App.4th 1770, 1775.) “In the discretion of the court, on a showing of good cause, a
16 temporary restraining order or order after hearing issued under this section may include other named
17 family or household members.” (Code Civ. Proc., § 527.6, subd. (c).) An application for a temporary
18 restraining order “shall be granted or denied on the same day that the petition is submitted to the
19 court,” unless it is filed too late in the day to permit effective review, in which case it shall be granted
20 or denied on the next court day. (*Id.*, subd. (e).)

21 An ex parte application must be supported by an affirmative factual showing of irreparable
22 harm, immediate danger, or another statutory basis for granting relief ex parte. (Cal. Rules of Court,
23 rule 3.1202(c).) Notice must be given by 10:00 a.m. the court day before the ex parte appearance
24 absent a showing of exceptional circumstances. (*Id.*, rules 3.1203, 3.1204.) Though this Application
25 is titled and filed as an “ex parte” application, the ex parte request for a TRO under the civil
26 harassment restraining order statute/procedure has different standards and rules, and notably, the
27 Court may issue a TRO under the civil harassment restraining order statute without notice and
28

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

IV. ARGUMENT

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

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

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

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

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

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

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

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

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

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

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

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

1 **4. Great or irreparable harm.**

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

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

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

25 Each element is satisfied here. Ms. Teigen is Mr. Kane’s fiancée and resides with him;
26 Iverson, Hendrix, and Penelope are their children and reside with them. (Kane Decl. ¶ 2; Teigen
27 Decl. ¶ 3.) They are not incidental to Respondent’s campaign; they are its objects. Respondent’s
28

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

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

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

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

17 If the Court declines to enter a TRO preventing the continued stalking and harassment by
18 Respondent, then the Court should advance the hearing date to a date as soon as possible. Under the
19 civil harassment restraining order statute, Petitioner is entitled to have had an evidentiary hearing
20 on his petition within 21 days, or 25 days on a showing of good cause, after the TRO was granted
21 or denied. (Code of Civ. Proc., § 527.6, subd. (g).) Petitioner filed his petition for a civil harassment
22 restraining order on June 5, 2026, and instead of having a hearing by June 30, 2026—as required
23 by the statute and originally scheduled by the Court—Respondent convinced the Court to usurp
24 Petitioner’s statutory right and delay the evidentiary hearing until after Respondent’s baseless Anti-
25 SLAPP Motion is decided. This manufactured reason for delay is without legal basis and does not
26 align with common sense—after all, it cannot be that a stalker/harasser can avoid or delay an
27 evidentiary hearing by filing an anti-SLAPP motion, especially when the harasser is literally
28

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

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

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

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

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

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

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

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

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

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

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

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

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

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

18 Second, and independently, this Application satisfies Code of Civil Procedure, section
19 1008(b), which permits a party whose application was previously ruled on to renew it “upon new or
20 different facts, circumstances, or law,” supported by a declaration stating what application was made
21 before, what order or refusal was made, and what new or different facts are claimed to be shown.
22 The concurrently filed Coy Declaration makes that showing. (Coy Decl. ¶ 18.) The operative facts—
23 Respondent’s July 9 threat through counsel, the July 10 directive and its execution, the July 15
24 republications, and the escalating public confrontations of Mr. Kane and Ms. Teigen—all postdate
25 June 18, 2026, when the TRO was previously dissolved. Two of the confrontations described
26 above—the May 18 airport incident and the early-June parking-lot incident—predate the
27 dissolution, but neither was before the Court on June 18, 2026.

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

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

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

13 **V. CONCLUSION**

14 Respondent told this Court under oath that the suggestion anyone might act on his posts was
15 "ludicrous." While the Court already "deeply disagree[d]" with Respondent's characterization (*see*
16 June 18 Minute Order at p. 2), three weeks later Respondent asked his audience to find this family
17 within thirty minutes, and they did. Since then he has told that audience that "we are going to make
18 change," and that he will "see everyone in August." The Court need not decide today whether
19 Respondent's campaign is protected commentary or unlawful harassment; that is what the
20 evidentiary hearing is for. It need only decide whether Ms. Teigen and four children under the age
21 of seven should remain wholly unprotected while Respondent publishes their photographs and
22 broadcasts their location to millions of people. Petitioner respectfully requests that the Court
23 reinstate the temporary restraining order as to Mr. Kane and Kensington, add Ms. Teigen, Iverson,
24 Hendrix, and Penelope as protected persons, advance the evidentiary hearing consistent with section
25 527.6, subdivisions (f) and (g), and, in the alternative, order that the household members'
26 entitlement to protection be determined at that hearing.

1 DATED: August 5, 2026

BLANK ROME LLP

2 By: 

3 Joseph J. Mellema

4 Ryan F. Coy

Attorneys for Petitioner

5 EVANDER FRANK KANE

EXHIBIT A

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10 EVANDER FRANK KANE

11
12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **COUNTY OF ORANGE**

14 EVANDER FRANK KANE,

15
16 Petitioner,

17 v.

18 HOOMAN ABEDI KARAMIAN A/K/A NIK
19 RICHIE,

20 Respondent.
21
22
23
24
25
26
27
28

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

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

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

Hearing:

Date: August __, 2026

Time: _____ p.m.

Dept: TBD

1 The Court having reviewed and considered the *Ex Parte Application for Orders: (1)*
2 *Reinstating and Continuing Temporary Restraining Order; (2) Expanding Protected Persons*
3 *Pursuant to Code of Civil Procedure § 527.6(c); and, in the alternative, (3) Expanding the Scope*
4 *of the Evidentiary Hearing* (“Application”) filed on August 5, 2026 by Petitioner Evander Frank
5 Kane, all related pleadings to the Application, and the record in this case, and good cause appearing
6 therefor,

7 IT IS HEREBY ORDERED that:

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

- 1 d. Respondent shall not solicit, request, direct, encourage, or offer any
2 inducement to any third party to locate, follow, surveil, photograph, film, or
3 approach the protected persons; and
4 e. Respondent shall not publish or republish any photograph or recording of the
5 minor children, or any photograph or recording obtained by a third party
6 depicting the protected persons' location.

7 IT IS SO ORDERED.

8
9
10 DATED: _____

The Honorable _____
Judge, Orange County Superior Court

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

① Protected Person

a. Your Full Name: Evander Frank Kane

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

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

Firm Name: Blank Rome LLP

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

Address: 2029 Century Park East, 6th Floor

City: Los Angeles State: CA Zip: 90067

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

Email Address: ryan.coy@blankrome.com

Fill in court name and street address:

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

Court fills in case number when form is filed.

Case Number:

30-2026-01575619-CU-HR-CJC

② Restrained Person

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

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

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

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

City: Trabuco Canyon State: CA Zip: 92679

Relationship to Protected Person: No relation.

③ ☒ Additional Protected Persons

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

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

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

The court will complete the rest of this form.

④ Expiration Date

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

Date: _____ Time: _____ ☐ a.m. ☐ p.m.

This is a Court Order.



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

5) Personal Conduct Orders

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

- a. You must **not** do the following things to the person named in **(1)**
- ☐ and to the other protected persons listed in **(3)** :
- (1) ☐ Harass, intimidate, molest, attack, strike, stalk, threaten, assault (sexually or otherwise), hit, abuse, destroy personal property of, or disturb the peace of the person.
- (2) ☐ Contact the person, either directly or indirectly, in **any** way, including, but not limited to, in person, by telephone, in writing, by public or private mail, by interoffice mail, by email, by text message, by fax, or by other electronic means.
- (3) ☐ Take any action to obtain the person's address or location. If this item (3) is not checked, the court has found good cause not to make this order.
- (4) ☐ Other (*specify*):
- ☐ Other personal conduct orders are attached at the end of this order on Attachment 5a(4).
-
-
- b. Peaceful written contact through a lawyer or a process server or other person for service of legal papers related to a court case is allowed and does not violate this order. However, you may have your papers served by mail on the person in **(1)**.

6 Stay-Away Order

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

- a. You must stay at least _____ yards away from *(check all that apply)*:
- | | |
|--|---|
| (1) ☐ The person in ① | (7) ☐ The place of child care of the children of the person in ① |
| (2) ☐ Each person in ③ | |
| (3) ☐ The home of the person in ① | (8) ☐ The vehicle of the person in ① |
| (4) ☐ The job or workplace of the person in ① | (9) ☐ Other <i>(specify)</i> : |
| (5) ☐ The school of the person in ① | _____ |
| (6) ☐ The school of the children of the person in ① | _____ |
| | _____ |
| | _____ |

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

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

- a. You cannot own, possess, have, buy or try to buy, receive or try to receive, or in any other way get any prohibited items listed in ⑦ b on the next page.

This is a Court Order.



- 7 b. **Prohibited items are:**
- (1) Firearms (guns);
 - (2) Firearm parts, meaning receivers, frames, or any item that may be used as or easily turned into a receiver or frame (see Penal Code section 16531); and
 - (3) Ammunition.
- c. You must:
- (1) Sell to or store with a licensed gun dealer, or turn in to a law enforcement agency, any firearms (guns), firearm parts, and ammunition in your immediate possession or control. This must be done within 24 hours of being served with this order.
 - (2) File a receipt with the court within 48 hours of receiving this order that proves that your firearms (guns), firearm parts, and ammunition have been turned in, sold, or stored. (You may use *Receipt for Firearms, Firearm Parts, and Ammunition* (form CH-800) for the receipt.)
- d. ☐ The court has received information that you own or possess a firearm (gun), firearm parts, or ammunition.

8 ☐ **Restrained Person Has Prohibited Items**

The court finds that you have the following prohibited items:

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

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

b. **Ammunition**

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

- ☐ Check here to list additional items. List them on a separate piece of paper, write "CH-110, Restrained Person Has Prohibited Items" at the top, and attach it to this form.

9 **No Body Armor**

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

This is a Court Order.



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

In addition to the hearing listed on form CH-109, you must attend the court hearing listed below to prove that you have properly turned in, sold, or stored all prohibited items (described in ⑦b) you still have or own, including any items listed in ⑧. If you do not attend the court hearing listed below, a judge may find that you have violated the restraining order and notify law enforcement and a prosecuting attorney of the violation.



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

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

11 **Possession and Protection of Animals**

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

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

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

12 **Other Orders**

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

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

To the Person in ①:

13 **Mandatory Entry of Order Into CARPOS Through CLETS**

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

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

This is a Court Order.



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

Name of Law Enforcement Agency

Address (City, State, Zip)

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

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

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

- a. ☐ The order is based on unlawful violence, a credible threat of violence, or stalking.
b. ☐ The person in ① is entitled to a fee waiver.

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

Date: _____

Judicial Officer

Warnings and Notices to the Restrained Person in ②

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

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

Notice Regarding Nonappearance at Hearing and Service of Order

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

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

After You Have Been Served With a Restraining Order

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

This is a Court Order.



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

Instructions for Law Enforcement

Enforcing the Restraining Order

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

Start Date and End Date of Orders

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

Arrest Required if Order Is Violated

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

Notice/Proof of Service

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

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

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

If the Protected Person Contacts the Restrained Person

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

This is a Court Order.



Conflicting Orders—Priorities for Enforcement

If more than one restraining order has been issued protecting the protected person from the restrained person, the orders must be enforced in the following priority (see Pen. Code, § 136.2; Fam. Code, §§ 6383(h)(2), 6405(b)); Code Civ. Proc., § 527.12(d)(2)):

1. *Emergency Protective Order (EPO)*: If one of the orders is an *Emergency Protective Order* (form EPO-001), provisions (e.g., stay-away order) that are more restrictive than in the other restraining/protective orders must be enforced. Provisions of another order that do not conflict with the EPO must also be enforced.
2. *No-Contact Order*: If a restraining/protective order includes a no-contact order, the no-contact order must be enforced. (5) a(2) is an example of a no-contact order.
3. *Criminal Protective Order (CPO)*: If none of the orders includes an EPO or a no-contact order, the most recent CPO must be enforced. (Fam. Code, §§ 6383(h)(2), 6405(b); Code Civ. Proc., § 527.12(d)(2).) Additionally, a CPO issued in a criminal case involving charges of domestic violence, Penal Code sections 261, 261.5, or former 262, or charges requiring sex offender registration must be enforced over any civil court order. (Pen. Code, § 136.2(e)(2).) All provisions in the civil court order that do not conflict with the CPO must also be enforced.
4. *Civil Restraining Orders*: If there is more than one civil restraining order (e.g., domestic violence, juvenile, elder abuse, civil harassment), then the order that was issued last must be enforced. Provisions that do not conflict with the most recent civil restraining order must also be enforced.

(Clerk will fill out this part.)

Clerk's Certificate
[seal]

—Clerk's Certificate—

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

Date: _____ Clerk, by _____, Deputy

This is a Court Order.

SHORT TITLE:

Kane v. Karamian

CASE NUMBER:

30-2026-01575619-CU-HR-CJC

ATTACHMENT (Number): 3*(This Attachment may be used with any Judicial Council form.)*

Attachment 3 - Additional Protected Persons

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

*(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)*Page 8 of 8*(Add pages as required)*

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am employed in the county of Los Angeles, State of California. I am over the age of 18 and
4 not a party to the within action; my business address is **BLANK ROME LLP**, 2029 Century Park East,
5 6th Floor, Los Angeles, California 90067.

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

- 13 ☐ **BY ENVELOPE:** by placing ☐ the original ☐ a true copy thereof enclosed in sealed
14 envelope(s) addressed as indicated and delivering such envelope(s):
- 15 ☐ **BY MAIL:** I caused such envelope(s) to be deposited in the mail at Los Angeles,
16 California with postage thereon fully prepaid to the office or home of the addressee(s)
17 as indicated. I am "readily familiar" with this firm's practice of collection and
18 processing documents for mailing. It is deposited with the U.S. Postal Service on that
19 same day, with postage fully prepaid, in the ordinary course of business. I am aware
20 that on motion of party served, service is presumed invalid if postal cancellation date or
21 postage meter date is more than one day after the date of deposit for mailing in affidavit.
- 22 ☐ **BY PERSONAL SERVICE:** I caused such envelope to be hand-delivered to the office
23 or home of the addressee(s) as indicated. A proof of service will be executed by process
24 server upon completion.
- 25 ☒ **BY E-MAIL OR ELECTRONIC TRANSMISSION (EMAIL):** Based on a court
26 order or an agreement of the parties to accept service by e-mail or electronic
27 transmission, I caused the document(s) listed above to be transmitted to the person(s) at
28 the e-mail address(es) as indicated. I did not receive, within a reasonable time after the
transmission, any electronic message or other indication that the transmission was
incomplete or unsuccessful.
- ☒ **STATE:** I declare under penalty of perjury under the laws of the State of California that
the above is true and correct.

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

Charman S. Bee

Charman S. Bee

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SERVICE LIST

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

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