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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE, CENTRAL JUSTICE CENTER**

EVANDER KANE,

Petitioner,

vs.

HOOMAN ABEDI KARAMIAN a/k/a NIK
RICHIE,

Respondent.

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

Assigned For All Purposes To: The Hon.
Amber Poston

**RESPONDENT'S OPPOSITION TO
PETITIONER'S EX PARTE
APPLICATION FOR REINSTATING
TRO**

Date: August 6, 2026
Time: 1:45 p.m.
Dept: C65

Respondent Hooman Abedi Karamian a/k/a Nik Richie ("Richie") files his opposition to Petitioner Evander Kane's Ex Parte Application for Reinstating TRO (the "Motion"). The Motion is another bad-faith attempt to mislead this Court. If the Court follows the facts, the timelines, and the law, the Motion will be denied. The Court should deny the Motion in full. If the Court grants any part of it, Richie requests that the grant be stayed pending appeal.

MEMORANDUM OF POINTS AND AUTHORITIES

1.0 INTRODUCTION AND BACKGROUND

Petitioner Evander Kane does not want his ex-wife to speak publicly about him. She declined to be silenced, and appeared on Nik Richie’s show. Mr. Kane then sought and obtained an *ex parte* TRO with no notice against Respondent Nik Richie based on him interviewing Mr. Kane’s ex. After Richie had the opportunity to appear and explain how the TRO was overbroad and unconstitutional, Commissioner Glenn Mondo vacated the TRO.

As part of the proceedings to vacate the TRO, Mr. Kane told the Court that on June 10, 2026, he filed an order to register an Alberta Injunction with the Santa Clara County, California Superior Court. (*See* Order to Register Alberta Injunction, attached as **Exhibit 1**; Declaration of Alex J. Shepard [“Shepard Dec.”], at ¶ 3.) Why did he want to register that injunction? Because he thinks that since the Alberta court says that Ms. Kane has to shut up, that an American court will give it credit and also shut her up. But he went further and also tried to use that injunction to stop Richie from publishing his long-form journalism.

Mr. Kane was taking steps to enforce the Alberta Injunction against Richie directly. Since the Alberta Injunction does not comport with the First Amendment, Richie filed a complaint in the Northern District of California, Case No. 5:26-cv-06348, on June 25, 2026, for a declaratory judgment that the Alberta Injunction cannot be enforced against Richie under the Securing the Protection of our Enduring and Established Constitutional Heritage (“SPEECH”) Act, 28 U.S.C. §§ 4101–05 (the “SPEECH Act Lawsuit”). (*See* Complaint in SPEECH Act Lawsuit, attached as **Exhibit 2**; Shepard Dec. at ¶ 5.) A week before filing the SPEECH Act Lawsuit, Richie’s counsel informed Mr. Kane’s counsel that Richie intended to file the lawsuit and asked whether Mr. Kane’s counsel would accept service of the complaint to avoid stress on Mr. Kane. (*See* June 18, 2026, email exchange, attached as **Exhibit 3**; Shepard Dec. at ¶ 6.) Mr. Kane’s counsel responded the same day, stating they were not authorized to accept service on his behalf. (*Id.*)

On June 26, 2026, Richie sent waiver of service packages to both Kane and his counsel, which were delivered on June 29. (Shepard Dec. at ¶ 7.) Neither Kane nor his counsel acknowledged this. (*Id.*) Richie then retained a process server to serve Mr. Kane at his home in Edmonton, Canada. (*Id.* at ¶ 8.) On July 8, 2026, the process server spoke to a woman at Mr. Kane’s residence who claimed that Mr. Kane would be away, indefinitely. (*Id.* at ¶ 9; July 8, 2026, email from process server, attached as **Exhibit 4.**) A few days later, Richie’s counsel discovered a social media post by Kane showing him playing golf. (Shepard Dec. at ¶ 10; screenshot of July 10, 2026, Instagram post, attached as **Exhibit 5.**) Mr. Kane was deliberately evading service. Therefore, Richie’s counsel sent Mr. Kane’s counsel an email on July 9, 2026, in which Richie’s counsel stated that, if Mr. Kane’s counsel did not respond by the following day, Richie and his counsel would seek to employ the assistance of Richie’s social media followers to locate Mr. Kane so that he could be served with the SPEECH Act Lawsuit. (Shepard Dec. at ¶ 11; July 9–21, 2026 email thread, attached as **Exhibit 6.**) In that email, counsel specifically gave him the opportunity to avoid any stress.

My client could ask his audience to find Kane. I believe that if he did so, we would be able to locate him within a matter of hours. This is a reasonable option. There is no legal nor moral reason to refrain from doing so. However, I also presume that if we did that, you would have a histrionic response, and lie to the court that this was “harassment.” Accordingly, we would like to avoid doing that and just have you accept service.

(*Id.*) Kane had a chance to avoid this, but he chose instead to summon crocodile tears and have a tantrum before this Court. As predicted, Mr. Kane’s counsel came to this court, lying, that it is “harassment” to try and find a defendant who was evading service, for the sole purpose of serving him with process.

Mr. Kane’s counsel ignored that email. (Shepard Dec. at ¶ 12.) Richie’s counsel sent a follow-up email on July 10. Mr. Kane had been located at Disneyland. But in an effort to avoid serving him in that environment, counsel again tried to get Mr. Kane’s lawyers to come to their senses. “*Guys: come on accept Service, don’t make us serve him while he’s at Disneyland today*

with his kids. Be grown-ups about it.” (*Id.* at ¶ 13; Exhibit 6.) Mr. Kane’s counsel ignored this grace afforded to Mr. Kane. (Shepard Dec. at ¶ 14.) In fact, that grace cost Richie the ability to serve Kane that day.

While a motion for alternate service was pending (Exhibit 7), Richie continued his efforts at conventional service. On July 21, 2026, a report came in that Kane was at the Bel Air Country Club in Los Angeles and Richie had him served with process, finally. (Shepard Dec. at ¶ 16; declarations of service, attached as Exhibit 8.) The same day, Richie’s counsel sent an email to Mr. Kane’s counsel informing them. (Shepard Dec. at ¶ 16; Exhibit 6.)

On July 30, 2026, after more than a month of silence, Mr. Kane’s counsel sent a letter to Richie’s counsel claiming that the declarations of service were false and fraudulent, and complaining of a social media post by Richie featuring a photo taken by the process server to prove the service was effective. (Shepard Dec. at ¶ 17; July 30, 2026, letter, attached as Exhibit 9.) This accusation was brought to the attention of the judge in the Northern District of California, and apparently that embarrassed Kane and his counsel. So here he is, trying to retaliate.

Kane now seeks to reinstate the TRO. His basis for doing so? Richie requested that followers on social media assist him in his attempts to find Mr. Kane, so that he could serve him with the complaint and summons in the SPEECH Act Lawsuit.

None of the complained-of conduct constitutes harassment or stalking under Cal. Code Civ. Proc. § 527.6, as it had one purpose – to effect service of process in pending litigation. (Declaration of Nik Richie [“Richie Dec.”] at ¶¶ 5–6.) Even if there were something potentially problematic about this conduct, Mr. Kane had notice of this conduct almost a month before seeking emergency relief, with no explanation for the delay.

Finally, Mr. Kane has already been served in the SPEECH Act Lawsuit; there is no likelihood this alleged conduct will continue. Richie no longer cares where Kane is. Kane identifies only a single time Richie asked his readers to put out an APB on Kane, on July 10. Once Kane was served, that was that.

2.0 LEGAL STANDARD

Cal. Code Civ. Proc. § 527.6 does not permit a court to enjoin constitutionally protected conduct. It can restrain only “harassment,” which means “a credible threat of violence, or 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*. The course of conduct must be that which would cause a reasonable person to suffer substantial emotional distress, and must actually cause substantial emotional distress to the petitioner.” (*Id.* at § 527.6(b)(3) [emphasis added].) “Constitutionally protected activity is not included within the meaning of ‘course of conduct.’” (*Id.* at § 527.6(b)(1).) Not only is speech implicated here – but the right to petition as well.

3.0 ARGUMENT

3.1 Richie’s New Alleged Conduct Does Not Violate § 527.6

Mr. Kane’s Motion is based on speech and petitioning activity, namely Richie’s social media posts asking his followers to locate Mr. Kane so that Mr. Kane could be served in the SPEECH Act Lawsuit. Service of process is petitioning activity. (*Kenne v. Stennis* (2014) 230 Cal. App. 4th 953, 966.) That is always protected. Speech is protected unless it falls into a small number of clearly defined exceptions: defamation, obscenity, incitement to **imminent** lawless action, “fighting words,” and child pornography. (*Larson v. City and County of San Francisco* (2011) 192 Cal. App. 4th 1263, 1284.) “There is no categorical ‘harassment exception’ to the First Amendment’s free speech clause.” (*Rodriguez v. Maricopa County Community College Dist.* (9th Cir. 2010) 605 F.3d 703, 708.) The California Legislature recognizes this, as Cal. Code Civ. Proc. § 527.6 specifically excludes constitutionally protected speech from its definition of “harassment.”

Mr. Kane outlines a number of “new” facts (nearly all of which are not new at all) in support of his Motion. He cites Mara Teigen’s declaration. She claims she has had encounters with individuals in public who said that she kidnapped her daughter. (Teigen Dec. at ¶¶ 10–13.) There is no evidence that any of these people follow Richie on social media or have seen any of his posts. The fact that one of these people said “FREE KENSINGTON” does not establish, or even suggest, that they did anything in response to Richie’s statements. Furthermore, these

complained-of encounters either happened in May, before this action was even filed (*id.* at ¶ 11), in “early June,” before even the June 17 hearing on the application to vacate the TRO (*id.* at ¶ 13), or within a few days of that hearing (*id.* at ¶¶ 10, 12). This is not “new” information.

Mr. Kane mentions a June 26 incident where someone was recording him and three of his children at a shopping mall. (Kane Dec. at ¶ 8.) What does that have to do with Richie? Kane admits he has no evidence this person had so much as *heard of* Richie. (*Id.*) Is Richie responsible for every paparazzo? Is a famous NHL player only being photographed in public because of Nik Richie? Kane is probably one of the best-known active NHL players. What is more likely? That someone recognized a celebrity and took his picture, or that Nik Richie engaged in mind control over this person and did this to harass Kane?

These incidents all took place well over a month ago, and there is no offered explanation for why Mr. Kane did not bring these alleged facts to the Court’s attention before now.²

And for all of Mr. Kane’s bluster about how Richie has doubled down on his non-existent “harassment” campaign, the only conduct by Richie that Mr. Kane identifies after the June 17 hearing is Richie’s July 10 social media posts asking for assistance in locating Mr. Kane so that he could be served, conduct that post-dates all of these alleged encounters. **Every one of the “new” incidents he complains of took place before Richie asked his readers to find Kane so that he could be served.** Does Kane think that his words in July traveled back in time to June?

Mr. Kane complains of the July 10 social media post in which Richie asked his followers if they could locate Mr. Kane. One of these followers did so, as Mr. Kane was at Disneyland, a

² Apparently recognizing that these are facts that could have been brought to the Court’s attention by the time of the motion to vacate hearing, Mr. Kane claims these are new facts that warrant reconsideration under Cal. Code Civ. Proc. § 1008(b). (Motion at 20.) This does not help Mr. Kane. As he admits, multiple of the alleged incidents took place before the hearing, and there is no explanation for why they were not before the Court. All alleged incidents prior to July 10 could only have been the result of Richie’s statements he had already made at the time of the June 17 hearing – statements that consisted entirely of Richie’s criticism of Mr. Kane rather than conduct about locating him to serve him with process – and thus would not fall within the scope of the narrowed TRO Mr. Kane now seeks. The only relevant new fact is Richie’s July 10 request for information about Mr. Kane’s whereabouts for the specific purpose of serving him in the SPEECH Act Lawsuit.

theme park with no expectation of privacy in public areas. This occurred the day after Richie’s counsel told Mr. Kane’s counsel that Richie would be crowdsourcing efforts to locate Mr. Kane for the specific purpose of serving him in the SPEECH Act Lawsuit. (See Exhibit 6.) Also on July 10, Richie’s counsel informed Mr. Kane’s counsel that they were aware Mr. Kane was at Disneyland. (*Id.*) And as an act of grace, Richie’s counsel tried to get Kane’s attorneys to accept service so it would not have to be done at Disneyland. As noted above, that grace created a delay that cost him the ability to effect service that day.

Mr. Kane attempts to paint this effort at locating him as a nefarious intimidation tactic. But he lies to the Court about the explicit and previously disclosed purpose for it – to aid in pending federal litigation. Mr. Kane elides over this, falsely claiming that Mr. Richie’s claimed legitimate purpose for this conduct is “the public’s interest in allegations against a professional athlete.” (Motion at 16.) The bad faith is astounding.³ When Mr. Kane ducks service and only appears in public alongside his family, he has only himself to blame when his family is present at the time people are trying to locate him.⁴ Richie’s counsel advised Mr. Kane’s counsel that this would be the result of ducking service. Mr. Kane chose this outcome.

Mr. Kane once again beats the drum of injunctions against Ms. Kane, claiming dramatically that Richie “has made himself the instrument by which they are defeated—and the surveillance network he built now features and feeds her.” (Motion at 11.) But earlier in the Motion, Mr. Kane specifically disclaims any argument that the Court should enter a restraining order based on these injunctions. (Motion at 8 [“Petitioner does not rest this Application on the 2024 domestic violence

³ Mr. Kane cites this email correspondence and quotes Mr. Randazza, but fails to notify the Court as to *why* Richie was attempting to locate Mr. Kane. (Motion at 10.)

⁴ Let us entertain the lie here, that Richie was only trying to find him to have pictures taken of him in public. That is completely legitimate activity. Paparazzi seek out celebrities all the time. Publications pay good money for candid shots of celebrities. Although that is not Richie’s publication focus, it is within his rights. If he simply wanted to have his readers snap photos of celebrities for the sheer distasteful purpose of getting voyeuristic shots, that is still a matter of public interest and no harassment order could issue against that, either. (*Aisenson v. Am. Broad. Co.* (1990) 220 Cal. App. 3d 146, 162–63.)

restraining order or the Canadian judgment against Ms. Deanna ‘Anna’ Kane”].) The Court should honor Mr. Kane’s request and disregard this argument.

Moving even further afield of § 527.6, Mr. Kane cites a podcast episode in which Mr. Richie made some statements referring to possible settlement strategy and Mr. Randazza referred to the uncontroversial fact that, win or lose, this Court’s ruling will be appealed. (Motion at 12.) Randazza stated that exact thing, on the record, at the scheduling conference on June 24, 2026. Mr. Kane attempts to use this as evidence for the assertion that the complained-of conduct (Richie’s social media posts about locating Mr. Kane) are a vexatious litigation tactic, but this is nonsense; Richie urged, even *begged*, Mr. Kane’s counsel to accept service in the SPEECH Act Lawsuit to avoid this outcome. Mr. Kane refused, so here we are.⁵

Mr. Kane alleges no other conduct and specifically disclaims any argument that the Court should enjoin Richie’s speech. (*See* Motion at 8 [Mr. Kane “does not ask this Court to restrict what Respondent may say about him, to order any content removed, or to prohibit any commentary”].) There is nothing a rational person could construe as a threat in Richie’s social media posts. Richie has never stated an intent to inflict violence on anyone, nor does he suggest that his followers harm anyone. Stripped of all context, one could potentially see how encouraging third parties to locate an individual might be surprising. But we are not stripped of context. Richie made his July 10 request to locate Mr. Kane for the specific and stated purpose of serving him in the SPEECH Act Lawsuit. (Richie Dec. at ¶¶ 5–7.) This is an obvious “legitimate purpose” under § 527.6(b)(3). (*See Stennis*, 230 Cal. App. 4th at 966; *Luo v. Volokh* (2024) 102 Cal. App. 5th 1312, 1323 [affirming anti-SLAPP dismissal of § 527.6 petition against blogger who posted about how litigant’s use of a pseudonym affects open access to court proceedings]; *Rusheen v. Cohen* (2006) 37 Cal. 4th 1048, 1056 [“[T]he filing . . . and prosecution of a civil action” is constitutionally protected conduct].) Serving a defendant with a complaint, a prerequisite to prosecuting a lawsuit, is thus quintessential

⁵ How is it Richie’s fault that he had to ask around if anyone had seen Kane, when that was the only way to serve him? Recall Richie tried to serve Mr. Kane at his home, but whoever answered the door said he would not be back. And Alberta does not permit substitute service.

constitutionally protected conduct that cannot be harassing and *per se* serves a legitimate purpose under § 527.6.

To avoid a lengthy and costly game of hide-and-seek, Mr. Richie took the more efficient route and crowd-sourced his efforts at locating Mr. Kane. (Richie Dec. at ¶ 5.) And when he obtained tips regarding Mr. Kane’s location, he sent those along to his counsel for the purpose of retaining process servers to serve Mr. Kane. (Declaration of Joanna Turner [“Turner Dec.”], at ¶¶ 8–9.) This does not even conceivably amount to stalking, threats, or harassment under Cal. Code Civ. Proc. § 527.6, and Mr. Kane’s counsel must have known this when they filed the Motion.

3.2 Mr. Kane Excessively Delayed in Seeking Emergency Relief

The Court may only enter a TRO if the petitioner shows that “great or irreparable harm would result to the petitioner” in the absence of the requested TRO. Cal. Code Civ. Proc. § 527.6(d). Delays in seeking injunctive relief significantly reduce any likelihood of irreparable harm. (*See, e.g., O’Connell v. Superior Court* (2006) 141 Cal. App. 4th 1452, 1481–82 [where “the urgency with which the trial court was forced to decide plaintiff’s motion may have been, to some extent, of plaintiffs’ own making,” finding that the trial court should have taken movant’s delay “into account in determining what weight to give plaintiffs’ claim of imminent irreparable injury”]; *Lusk v. Krejci* (1960) 187 Cal. App. 2d 553, 556 [“Long delays in assertion of rights can be the basis of denial of mandatory injunctive relief”].)

Despite having notice on July 9, 2026, that Richie intended to crowdsource his efforts to locate and serve him, and having actual notice on July 10 that Mr. Kane was spotted at Disneyland, Mr. Kane waited almost a month to seek relief from this Court based on such efforts. This is to say nothing of the even longer gaps between encounters with unidentified strangers with no apparent connection to Richie that Ms. Teigen and Mr. Kane mention. Mr. Kane had ample opportunity to bring these facts to the Court’s attention earlier, and his delay is the sole cause of the emergency he now asserts. The Court should not credit his or Ms. Teigen’s claims of irreparable harm.

One must question this timing – with the motion filed right after Kane was embarrassed by actually being served, and on the eve of his Anti-SLAPP opposition being due. That seems more

the motivation here than old information (to the extent it is credited) all of a sudden creating an exigent circumstance.

3.3 Mr. Kane's Requested Relief is Moot

Richie was looking for Kane's whereabouts so that he could be served in the SPEECH Act Lawsuit. Mr. Kane has been served. There is thus no likelihood that Richie will ask about his whereabouts. Accordingly there is no conduct to enjoin. Kane's desire to retaliate for service being effected on him is no basis for a TRO.

3.4 There is No Basis for Advancing the Evidentiary Hearing

Mr. Kane argues that the evidentiary hearing should be advanced to August 26, the date of the anti-SLAPP hearing, because it would be unjust to conduct the hearing in September. (Motion at 18–19.) In support, he cites provisions of Cal. Code Civ. Proc. § 527.6(g), which requires that an evidentiary hearing be set within 21 or 25 days after a TRO is granted or denied. That's well and good, but Mr. Kane's counsel was at the June 24 scheduling conference where the parties and the Court all agreed to hear the Anti-SLAPP Motion on August 26 and conduct the evidentiary hearing later, as well as the July 7 hearing during which the Court set the evidentiary hearing in September. It is too late to complain about compliance with the statute's 21-day evidentiary hearing period: Mr. Kane waited to raise this issue until weeks after these statutory periods expired (34 days after the TRO was vacated and 42 days after the TRO was granted). This is waived.

Fairness is also not a basis for advancing the hearing. Richie made it clear early on that an appeal of the Court's order on the Anti-SLAPP motion, win or lose, is extremely likely. (*See* Reply in support of motion for undertaking under Cal. Code Civ. Proc. § 1030 at 5 [“The requested bond is only more necessary given that, win or lose, there is almost certainly going to be an appeal of the order regarding the anti-SLAPP motion, which will considerably increase litigation costs”].) Mr. Randazza informed all involved, in open court, that if the Anti-SLAPP motion was not granted, there would be an appeal. A statement affirming this reality is not a new development. And while Mr. Kane claims that the automatic stay afforded by the anti-SLAPP statute extends only to discovery (Motion at 20), he is incompetently advised. An appeal of an order on an anti-SLAPP

motion stays the entire case. (*Varian Medical Systems, Inc. v. Delfino* (2005) 35 Cal. 4th 180, 191, 195-96 [finding all trial court proceedings were stayed and that trial court's judgment entered during pendency of Anti-SLAPP appeal was void].)

3.5 There is No Basis for Extending the TRO or the Evidentiary Hearing

For the same reasons a TRO should not issue at all, it should not issue as to additional parties. Mr. Kane also requests that the evidentiary hearing have its scope expanded to include the new information contained within the Motion. Richie objects to this, as Mr. Kane has not filed a request for a civil harassment restraining order that complies with the requirements of Cal. Code Civ. Proc. § 527.6 as to these additional persons. And let us not forget how strictly Kane's attorneys believe the statutes should be interpreted. It was, to them, a grave transgression to file an affidavit late. Are they now asking that the rules be relaxed now that Kane wants it to be so? Furthermore, if Mr. Kane were to file such a request, Richie would be entitled to file an anti-SLAPP motion directed at it, which motion should be heard before the evidentiary hearing. Mr. Kane is correct that the anti-SLAPP statute does not apply to requests for a TRO under § 527.6, but he cites no authority for the proposition that a request for a civil harassment restraining order can avoid the anti-SLAPP law by hiding an amendment within a motion for a TRO.

4.0 CONCLUSION

For the foregoing reasons, the Court should deny Petitioner Evander Kane's Motion in its entirety and keep all existing briefing and hearing schedules in place.

Dated: August 5, 2026.

Respectfully Submitted,

RANDAZZA LEGAL GROUP, PLLC

/s/ Marc J. Randazza

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PROOF OF SERVICE

Kane v. Karamian | Orange County Superior Court

At the time of service, I was over the age of 18 and not a party to this action. I am employed in the County of Clark, State of Nevada. My business address is Randazza Legal Group, PLLC, 8991 W. Flamingo Rd., Ste. B, Las Vegas, NV 89147.

On August 5, 2026, I served true and correct copies of the foregoing document on all interested parties in this action as stated on the attached service list.

BY ELECTRONIC MAIL. I electronically served the documents listed above to the persons at the electronic mail addresses listed in the attached service list, from my electronic service address, <ajs>@randazza.com.

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

Executed on August 5, 2026, at Las Vegas, Nevada.

/s/ Alex J. Shepard

Alex J. Shepard

SERVICE LIST

***Kane v. Karamian* | Orange County Superior Court
Case No. 30-2026-01575619-CU-HR-CJC**

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE, CENTRAL JUSTICE CENTER**

EVANDER KANE,

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HOOMAN ABEDI KARAMIAN a/k/a NIK
RICHIE,

Respondent.

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

Assigned For All Purposes To: Hon. Amber
Poston

**DECLARATION OF ALEX J. SHEPARD
IN SUPPORT OF RESPONDENT'S
OPPOSITION TO PETITIONER'S EX
PARTE APPLICATION FOR
REINSTATING TRO**

Date: August 6, 2026

Time: 1:45 p.m.

Dept: C65

I, Alex J. Shepard, declare:

1. I am over 18 years of age. I have knowledge of the facts set forth herein, and if called as a witness, could and would testify competently thereto.

2. I am an attorney with Randazza Legal Group, PLLC ("RLG"), counsel for Respondent Hooman Abedi Karamian a/k/a Nik Lamas-Richie ("Richie") in the above-captioned matter. I submit this declaration in support of Richie's Opposition to Petitioner's Ex Parte Application for Reinstating TRO (the "Opposition").

3. As part of the proceedings to vacate this Court's prior temporary restraining order in this matter, Mr. Kane revealed that on June 10, 2026, he filed an order to register the Alberta

1 Injunction with the Santa Clara County, California Superior Court. His counsel sent me the order
2 via email on June 18, 2026. A true and correct copy of the first page of the order Kane’s counsel
3 sent is attached to the Opposition as **Exhibit 1**. Only the first page is included so as not to overload
4 the docket, since the specific contents with this document are only tangentially related to the
5 Opposition.

6 4. On June 25, 2026, Richie commenced an action against Petitioner Evander Kane
7 (“Kane”) in the United States District Court for the Northern District of California, San Jose
8 Division, captioned *Richie v. Kane*, Case No. 5:26-cv-06348-NC, seeking a declaratory judgment
9 under the Securing the Protection of our Enduring and Established Constitutional Heritage
10 (“SPEECH”) Act, 28 U.S.C. §§ 4101–05 (the “SPEECH Act Lawsuit”). A true and correct copy
11 of the first page of the Complaint filed in this suit is attached to the Opposition as **Exhibit 2**. Only
12 the first page is included so as not to overload the docket, since the allegations within the
13 Complaint are not material to the Opposition.

14 5. On June 18, 2026, my colleague, Marc J. Randazza, sent an email to Kane’s
15 counsel at Blank Rome, on which correspondence I was copied, and asked whether they were
16 authorized to accept service of Richie’s Complaint in the SPEECH Act Lawsuit. That same day,
17 Joseph J. Mellema of Blank Rome responded, “We are not authorized to accept service on behalf
18 of Mr. Kane.” A true and correct copy of that email correspondence is attached to the Opposition
19 as **Exhibit 3**.

20 6. On June 26, 2026, RLG sent waiver of service packages to both Kane and his
21 counsel, which were delivered on June 29. Neither Kane nor his counsel acknowledged this.

22 7. Due to the lack of any communication from Kane or his counsel regarding service,
23 RLG then retained a process server to serve Mr. Kane at his home in Edmonton, Canada.

24 8. The process server attempted to serve Kane at his residence a second time on July
25 8, 2026, at approximately 9:30 a.m. *Id.* An adult woman answered the door, declined to identify
26 herself, advised the server that she was able to accept any deliveries but not service of process, and
27 stated that Kane was “out of the city for an indefinite period.” *See id.* A true and correct copy of a

1 July 8, 2026, email from the process server recounting these facts is attached to the Opposition as
2 **Exhibit 4**.

3 9. On July 10, 2026, RLG law clerk Richard L. McLaren viewed an active Instagram
4 Story posted by Kane's verified account @evanderkane. McLaren made a screen recording of the
5 video at approximately 11:29 a.m. on July 10, 2026. A true and accurate screenshot of the screen
6 recording is attached to the Opposition as **Exhibit 5**. I personally reviewed the screen recording
7 on July 10, 2026. It depicts an individual resembling Kane golfing on a golf course, with a
8 timestamp "3h" indicating it was posted approximately three hours before McLaren viewed and
9 recorded it.

10 10. As it had become apparent by this point that Mr. Kane was deliberately evading
11 service, Mr. Randazza sent Kane's counsel an email on July 9, 2026, in which Mr. Randazza stated
12 that, if Mr. Kane's counsel did not respond by the following day, Richie and his counsel would
13 seek to employ the assistance of Richie's social media followers to locate Kane so that he could
14 be served with the SPEECH Act Lawsuit. A true and correct copy of an email thread containing
15 this email is attached to the Opposition as **Exhibit 6**.

16 11. Kane's counsel did not respond to this email.

17 12. Mr. Randazza sent a follow-up email on July 10, again urging Kane's counsel to
18 accept service so that Kane would not have to suffer the embarrassment of being served while his
19 family might be present. A true and correct copy of this email is included in **Exhibit 6**.

20 13. Mr. Kane's counsel did not respond to this email.

21 14. In light of this silence, Richie filed a motion for alternative service upon Kane in
22 the SPEECH Act Lawsuit on July 13, 2026, seeking leave to serve him by email personally and
23 through his counsel, and by social media. A true and correct copy of the first page of the motion
24 is attached to the Opposition as **Exhibit 7**. Only the first page is included so as not to overload the
25 docket, since the arguments within that motion are only tangentially related to the Opposition.
26 RLG emailed this motion to Kane's counsel the following day, and I was copied on this
27 transmission.

1 15. While the motion for alternative service was pending, Richie continued his efforts
2 at conventional service and on July 21, 2026, a process server successfully served Kane at the Bel
3 Air Country Club in Los Angeles. True and correct copies of declarations of service from the
4 process server who completed this service are attached to the Opposition as **Exhibit 8**. The same
5 day, Mr. Randazza sent an email to Kane’s counsel informing them of this service, and I was
6 copied on this transmission. A true and correct copy of this email is included in **Exhibit 6**.

7 16. On July 30, 2026, after more than a month with no response, Kane’s counsel
8 emailed a letter to RLG, claiming that the declarations of service were false and fraudulent, and
9 complaining of a social media post by Richie featuring a photo taken by the process server. A true
10 and correct copy of this letter, which I personally received via email on July 30, is attached to the
11 Opposition as **Exhibit 9**.

12 17. Despite the letter claiming there was “irrefutable evidence” that the declarations of
13 service were false, Mr. Kane’s counsel provided no such evidence. Neither I, nor anyone else at
14 RLG, has any reason to believe there was anything inaccurate about the declarations of service.

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

17
18 Executed on August 5, 2026.

19 /s/ Alex J. Shepard

20 _____
21 Alex J. Shepard
22
23
24
25
26
27

Exhibit 1

Domestication of Alberta Injunction

DV-630**Order to Register Canadian Domestic Violence Protective/Restraining Order**

Instructions: Use this form to register a civil Canadian domestic violence or family violence protective/restraining order in California. Registration means that the order will be entered into a database that all law enforcement in California can view. Although registration is not required for the order to be enforced, it is helpful to have the order in the database. There is no fee to file this form. A certified copy of the order must be submitted with this form. The order must have been issued in English.

Clerk stamps date here when form is filed.

Filed
June 10, 2026
Clerk of the Court
Superior Court of CA
County of Santa Clara
21FL002586
By: pnwton

Fill in court name and street address:

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

Fills in case number:

Case Number:
21FL002586

1 Information About the Person Registering the Protective/Restraining Order:

- a. My Name: Evander Kane
- b. ☐ I do not have a lawyer for this case (fill in items c-f below).
☒ I have a lawyer for this case fill in your lawyer's information below and for items c-e):
Name: Kristina Royce State Bar No.: 197752
Firm Name: Blank Rome LLP
- c. Address (If you want to keep your home address private, give a different mailing address instead.):
2029 Century Park East | 6th Floor
City: Los Angeles State: CA Zip: 90067
- d. Telephone (optional): 424-239-3400
- e. E-mail Address (optional): kristina.royce@blankrome.com
- f. I am (check one):
☒ protected by the attached order.
☐ restrained by the attached order.
☒ a legal guardian of a minor protected by the attached order.
☐ other (specify): _____

2 Restrained Person

Full Name: Deanna Sara Jeanne Kane
Sex: ☐ M ☒ F Height: 5'4 Weight: 125 Hair Color: Brown Eye Color: Brown
Race: White Age: 40 Date of Birth: 1/12/1986
Address (if known): 15411 Collinson Ave.
City: Eastpointe State: MI Zip: 48021
Relationship to protected person: ex-wife

3 To the best of my knowledge, the attached order:

- Is a certified copy of a Canadian protective/restraining order.
- Was issued in English by a civil (noncriminal) court in Canada.
- Was made because of domestic violence or family violence.
- Is currently valid and in effect.
- Has not been changed, canceled, or replaced by another court order.
- Expires on (date): permanent order/does not expire

month/day/year

This is a Court Order.

Exhibit 2

Complaint for Declaratory Judgment

(Filed 06/25/2026)

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

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

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

Plaintiff,

vs.

EVANDER KANE,

Defendant.

Case No.:
 JUDGE:

**COMPLAINT FOR
 DECLARATORY JUDGMENT
 JURY TRIAL DEMANDED**

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

INTRODUCTION

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

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

Exhibit 3

Email Correspondence Regarding
Acceptance of Service
(Sent 06/18/2026)



Danielle Darkenwald <dbd@randazza.com>

Kane v. Karamian (Case No. 30-2026-01575619-CU-HR-CJC) | Alleged Violation of TRO

'Mellema, Joseph' via Staff <staff@randazza.com>

Thu, Jun 18, 2026 at 7:12 PM

Reply-To: "Mellema, Joseph" <joseph.mellema@blankrome.com>

To: "mjr@randazza.com" <mjr@randazza.com>

Cc: "ajs@randazza.com" <ajs@randazza.com>, "staff@randazza.com" <staff@randazza.com>, "Weiner, Craig" <craig.weiner@blankrome.com>, "Coy, Ryan" <ryan.coy@blankrome.com>

Marc,

Please see the attached order that was provided to the Court at yesterday's hearing.

We are not authorized to accept service on behalf of Mr. Kane.

When are you available on Monday to meet and confer regarding a briefing and hearing schedule?

In the future, please make sure to include me on correspondence.

Best,

Joe

Joseph J. Mellema | BLANKROME

4 Park Plaza | Suite 450 | Irvine, CA 92614

+1.949.812.6038 | joseph.mellema@blankrome.com | [bio](#)

From: Marc Randazza <mjr@randazza.com>**Sent:** Thursday, June 18, 2026 4:20 PM**To:** Coy, Ryan <ryan.coy@blankrome.com>**Cc:** Weiner, Craig <craig.weiner@blankrome.com>; Marc J. Randazza <staff@randazza.com>; Alex Shepard <ajs@randazza.com>**Subject:** Re: Kane v. Karamian (Case No. 30-2026-01575619-CU-HR-CJC) | Alleged Violation of TRO

We still would like to see this document that you seem to have procured in Santa Clara. Because it is relevant to a federal claim we're bringing under the SPEECH Act.

We would also like to know if you are authorized to accept service of our federal complaint under the SPEECH Act. Given how terrified Evander Kane says he is, we do not want to increase his stress by sending a process server to his home.



[Quoted text hidden]

This message and any attachments may contain confidential or privileged information and are only for the use of the intended recipient of this message. If you are not the intended recipient, please notify the Blank Rome LLP or Blank Rome Government Relations LLC sender by return email, and delete or destroy this and all copies of this message and all attachments. Any unauthorized disclosure, use, distribution, or reproduction of this message or any attachments is prohibited and may be unlawful.



21FL002586 DV630.pdf
1502K

Exhibit 4

TrueServe Edmonton Email Correspondence Regarding
Failed Service Attempt
(Sent 07/08/2026)



Danielle Darkenwald <dbd@randazza.com>

Richie v. Kane (Case No. 26-cv-06348-NC) | Service Request | Randazza Legal Group, PLLC

TrueServe Edmonton <info@trueserveedmonton.ca>

Wed, Jul 8, 2026 at 1:28 PM

To: Danielle Darkenwald <dbd@randazza.com>

Cc: Marc Randazza <mjr@randazza.com>, Alex Shepard <ajs@randazza.com>, Staff <staff@randazza.com>

Hello Danielle,

We wish to provide you with an update regarding service on Mr. Evander Kane.

On July 7, 2026, at approximately 7:00 p.m., we attended the service address and made our first attempt; however, there was no answer at the door.

We attended the address again on July 8, 2026, at approximately 9:30 a.m. On this occasion, the door was answered by an adult female who did not identify herself. She advised that she was able to accept any deliveries; however, she stated that Mr. Kane is currently out of the city for an indefinite period.

Please let us know how you wish to proceed or if you have any further instructions.

Kind regards,

Ankit R

True Serve Edmonton (780) 604-7907 10004 – 104 Ave NW, #1120

Edmonton, AB T5J 0K1

 www.trueserveedmonton.ca

From: Danielle Darkenwald <dbd@randazza.com>**Sent:** Monday, July 6, 2026 17:04**To:** TrueServe Edmonton <info@trueserveedmonton.ca>**Cc:** Marc Randazza <mjr@randazza.com>; Alex Shepard <ajs@randazza.com>; Staff <staff@randazza.com>**Subject:** Richie v. Kane (Case No. 26-cv-06348-NC) | Service Request | Randazza Legal Group, PLLC

[Quoted text hidden]

Exhibit 5

Screenshot of Instagram Story of Evander Kane Golfing

11:16

LTE 100



evanderkane 3h

Travis Scott · MEL... E >

Follow



Send message...



Exhibit 6

Email Correspondence Regarding Service on
Evander Kane
(Sent 07/09/2026)

Service on Evander Kane

4 messages

Marc Randazza <mjr@randazza.com>

Thu, Jul 9, 2026 at 8:51 AM

To: "Coy, Ryan" <ryan.coy@blankrome.com>, Joseph Mellema <joseph.mellema@blankrome.com>

Cc: Alex Shepard <ajs@randazza.com>

Ryan and Joe,

As you are aware, we have filed a SPEECH Act claim against Evander Kane in the Northern District of California. You previously told us you were not authorized to accept service of the complaint.

We sent a process server to his house, and a woman there who did not identify herself said that he was away for an "indefinite period."

So here are our options:

My client could ask his audience to find Kane. I believe that if he did so, we would be able to locate him within a matter of hours. This is a reasonable option. There is no legal nor moral reason to refrain from doing so.

However, I also presume that if we did that, you would have a histrionic response, and lie to the court that this was "harassment."

Accordingly, we would like to avoid doing that and just have you accept service.

Our other option is to file a motion for alternate service, under the Rio Properties standard. And I presume that *this* will be granted. However, before we do ask the court for that kind of relief, which I am certain it will grant, I also want to be able to tell the court that we asked a second time if you would just accept service.

The most efficient way to do this would be to crowdsource our service. Mr. Kane is publishing information on his social media accounts that makes it likely that we could track him down that way within a matter of hours.

If we do not hear back from you that you will accept service by 10:00 AM Pacific, we will seek to crowdsource his location so we can send a server to put the papers in his hands. Should that not work as well as we expect it to, we will file a motion for alternate service, noting that we attempted to serve him the old fashioned way, and attempted to get his counsel to accept service, but they had a negative response.

Marc John Randazza, JD, MAMC, LLM* | Randazza Legal Group

8991 W. Flamingo Road, Unit B, Las Vegas, NV 89147

30 Western Avenue, Gloucester, MA 01930

2 S Biscayne Boulevard, Suite 2680, Miami, FL 33131

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

Firm Offices - Las Vegas | Miami | New England

* Licensed to practice law in Arizona, California, Florida, Massachusetts, and Nevada.

Marc John Randazza <mjr@randazza.com>

Fri, Jul 10, 2026 at 1:43 PM

To: Ryan Coy <ryan.coy@blankrome.com>, Joseph Mellema <joseph.mellema@blankrome.com>

Cc: Alex Shepard <ajs@randazza.com>

Guys: come on accept Service, don't make us serve him while he's at Disneyland today with his kids. Be grown-ups about it.

Marc John Randazza, JD, MAMC, LLM

Randazza Legal Group

Las Vegas - Gloucester - Miami

Sent from iPhone (maybe even using Siri). If the message is at all intelligible, it is a minor miracle.

Il giorno 9 lug 2026, alle ore 08:51, Marc Randazza <mjr@randazza.com> ha scritto:

[Quoted text hidden]

Marc Randazza <mjr@randazza.com>

Tue, Jul 21, 2026 at 3:39 PM

To: "Coy, Ryan" <ryan.coy@blankrome.com>, Joseph Mellema <joseph.mellema@blankrome.com>

Cc: Alex Shepard <ajs@randazza.com>

Gentlemen, happy to inform you that we served him on the golf course on Sunday.

[Quoted text hidden]

--

[Quoted text hidden]

Marc Randazza <mjr@randazza.com>

Tue, Jul 21, 2026 at 4:07 PM

To: "Coy, Ryan" <ryan.coy@blankrome.com>, Joseph Mellema <joseph.mellema@blankrome.com>

Cc: Alex Shepard <ajs@randazza.com>

We also have a pending motion for alternate service. Naturally, I believe that this motion can be withdrawn as no longer necessary. However, we also would be foolish (I think) if we did not anticipate some argument from you about service. Accordingly, should we report to the judge that the motion can come off their calendar, or should we inform the judge that you question the validity of the personal service and we still need to have the hearing?

Or should we inform the judge that you don't want to respond? We can do that too.

[Quoted text hidden]

Exhibit 7

Plaintiff Nik Richie's Motion for an Order Permitting
Alternative Service Upon Defendant Evander Kane

(Filed 07/13/2026)

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

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

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

Plaintiff,

vs.

EVANDER KANE,

Defendant.

Case No.: 5:26-cv-06348-NC
Judge: Nathanael M. Cousins

**PLAINTIFF NIK RICHIE'S MOTION
FOR AN ORDER PERMITTING
ALTERNATIVE SERVICE UPON
DEFENDANT EVANDER KANE**

Hearing Date: August 19, 2026
Hearing Time: 11:00 a.m.
Courtroom: 5 – 4th Floor

TO: THE COURT, THE PARTIES, AND THEIR RESPECTIVE COUNSEL:

PLEASE TAKE NOTICE that Plaintiff Hooman Abedi Karamian a/k/a Nik Richie (“Richie”) will and hereby does move this Court, pursuant to Federal Rule of Civil Procedure 4(f)(3), for an order authorizing alternative service of the Summons and Complaint upon Defendant Evander Kane (“Kane”).

Specifically, Richie requests an order authorizing service upon Kane by any one or more of the following means: (1) electronic mail to Kane and his counsel; (2) messages to Kane’s active, verified social media accounts, including his verified Instagram account @evanderkane, and X (formerly Twitter) account @evanderkane; (3) delivery and electronic mail to Kane’s counsel in the related California proceedings, Blank Rome LLP (Craig Weiner, Esq. and Ryan F. Coy, Esq.);

Exhibit 8

Declaration of Andrea Leilani-Taylor

(Filed 07/23/2026)

Los Angeles

SUPERIOR COURT OF THE STATE OF CALIFORNIA

County of _____

Case No.: _____

DECLARATION OF PERSONAL SERVICE

I, **Andrea Leilani Taylor**, declare:

1. I am over the age of eighteen (18) years.

2. On **July 19, 2026**, at approximately **1:30 p.m. Pacific Time**, I personally served **Mr. Evander Kane** by personally delivering the legal documents to him at:

Bel Air Country Club
10768 Bellagio Road
Los Angeles, CA 90077.

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

Executed on **July 21, 2026**, at _____, California.

Signature: _____

Andrea L. Taylor

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

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

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

Plaintiff,

vs.

EVANDER KANE,

Defendant.

Case No.: 5:26-cv-06348-NC
Judge: Nathanael M. Cousins

**DECLARATION OF
ANDREA LEILANI-TAYLOR**

I, Andrea Leilani-Taylor, declare as follows:

1. I am over the age of 18 years, not a party to the above captioned action, and competent to make this declaration.

2. On July 19, 2025, at approximately 1:30 PM PST, I personally served Defendant Evander Kane with copies of the following documents in this action:

- a. Summons in a Civil Action;
- b. Complaint for Declaratory Judgment;
- c. Certificate of Interested Parties;
- d. Order Setting Initial Case Management Conference and ADR Deadlines.

3. Service was effectuated at the Bel-Air Country Club, located at 10768 Bellagio Rd, Los Angeles, CA 90077.

1 4. I directly approached Defendant Evander Kane, identified myself as the process
2 server, and physically handed the aforementioned documents to him.

3 5. Immediately upon handing the documents to Defendant Evander Kane, he
4 instructed his bodyguards to throw the served documents back at me.

5 6. Following his instructions, his bodyguards took the legal documents and threw
6 them back in my direction.

7 7. Service was complete upon my personal delivery of the documents into Defendant
8 Evander Kane's possession.

9 8. I declare under penalty of perjury that the foregoing is true and correct.

10 Dated: July 21, 2026.

11 Respectfully submitted,

12 

13 **Andrea Leilani-Taylor**

14 Affiant/ Registered Process Server
15
16
17
18
19
20
21
22
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24
25
26
27

Exhibit 9

Letter from Opposing Counsel Regarding False
Affidavit of Service
(Sent 07/30/2026)

Phone: (424) 239-3400

Fax: (424) 239-3434

Email: ryan.coy@blankrome.com

July 30, 2026

BY EMAIL

Marc J. Randazza
Randazza Legal Group
8991 W. Flamingo Road, Suite B
Las Vegas, NV 89147
mjr@randazza.com

**Re: *Karamian v. Kane*, No. 5:26-cv-06348-NC
False Affidavit of Service**

Mr. Randazza:

We are legal counsel for Evander Kane. We write regarding the pending lawsuit *Karamian v. Kane*, No. 5:26-cv-06348-NC. At the outset, be advised: we are not authorized to accept service on behalf of Mr. Kane, we have not entered an appearance in this lawsuit, and we are not counsel of record. Nothing in this letter shall be construed as a waiver of any defense, including insufficient service of process or lack of personal jurisdiction. That said, the circumstances compel us to write immediately because what your client and your firm have represented to the Court is demonstrably and verifiably false.

On July 22 and 23, 2026, you filed a “Declaration of Personal Service” along with the Declaration of Andrea Leilani-Taylor (collectively, “Affidavit of Service”) (Dkt. Nos. 11, 12), purporting to establish that Mr. Kane was personally served at the Bel-Air Country Club on July 19, 2026.¹ These filings are a fraud upon the Court, and we intend to treat them as such.

The Affidavit of Service is patently and provably false. Mr. Kane was not in the United States on July 19, 2026—a fact that is readily verifiable through travel records, passport stamps, and other corroborating evidence. He was not at the Bel-Air Country Club. He was not in the State of California. Put simply, personal service on Mr. Kane on that date, at that location, did not and could not have occurred.

¹ Although the Declaration of Personal Service claims that service was made on July 19, 2026, the Declaration of Andrea Leilani-Taylor claims that service was made on July 19, 2025.

July 30, 2026

Page 2

The purported photographic “evidence” is equally fraudulent. The photograph your client posted on Instagram, ostensibly depicting the moment of service, is not a photograph of Mr. Kane. A true and correct screenshot of your client’s Instagram post is attached hereto as **Exhibit A.**² The individual depicted does not bear resemblance to Mr. Kane. Indeed, it appears to have been created and/or edited by artificial intelligence (“AI”)—it includes an “AI info” label which “indicates that content is entirely AI-generated.” That your client would publicly circulate a fabricated photograph to bolster a fabricated claim of service reflects a disturbing willingness to deceive—not only the public, but the Court itself.

Your client’s conduct—and your firm’s willingness to file these declarations without any apparent independent verification—raises serious questions about whether this entire course of conduct was orchestrated to manufacture the appearance of service where none occurred. We trust you appreciate that an attorney’s obligation under Rule 11 extends to conducting a reasonable inquiry into the factual basis for any filing. The filing of the Affidavit of Service that is contradicted by irrefutable evidence of Mr. Kane’s absence from the country suggests that no such inquiry was made.

Accordingly, we hereby demand the following, without delay: (1) the immediate withdrawal of the Affidavit of Service, Dkt. Nos. 11 and 12; (2) a written acknowledgment that service was not effectuated on Mr. Kane on July 19, 2026 or on any other date; and (3) the immediate removal of your client’s fraudulent Instagram post depicting an individual falsely identified as Mr. Kane.

If these demands are not satisfied by **August 3, 2026**, Mr. Kane will pursue all available remedies at his disposal with the full force of the law.

We strongly urge you to consult with your client about the veracity of the representations made in the Affidavit of Service. If your client has misled you, we suggest you consider your own professional obligations carefully. If your client has not misled you, the implications are even more troubling.

The foregoing is not intended to be, nor shall be deemed to be, an exhaustive statement of our client’s rights and remedies, all of which are expressly reserved. Moreover, it is not intended to be, nor shall be deemed to be, a general appearance, an acceptance of service of process, or a submission to jurisdiction on behalf of our client.

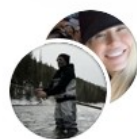
Sincerely,



Ryan F. Coy

² See also https://www.instagram.com/p/Da_ufFqBKIV/.

Exhibit A



nikrichie  and annaavakane 

 AI info



 169  25  6 



nikrichie Another step forward for the Dirty Army today as we served Monster Evander Kane in the middle of his backswing. FREE KENSINGTON !!!

This service has nothing to do with our current trial litigation as we have more lawsuits coming. As my lawyer [@marcorandazza](#) would say, "let's dance." [#FreeBird](#)

1 hour ago

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

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

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE, CENTRAL JUSTICE CENTER**

EVANDER KANE,

Petitioner,

vs.

HOOMAN ABEDI KARAMIAN a/k/a NIK
RICHIE,

Respondent.

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

Assigned For All Purposes To: Hon. Amber
Poston

**DECLARATION OF NIK LAMAS-
RICHIE IN SUPPORT OF OPPOSITION
TO PETITIONER'S EX PARTE
APPLICATION FOR REINSTATING
TRO**

Date: August 6, 2026

Time: 1:45 p.m.

Dept: C65

I, Nik Lamas-Richie, declare:

1. I am over 18 years of age and have never been convicted of a crime involving fraud or dishonesty. I have first-hand knowledge of the facts set forth herein, and if called as a witness, could and would testify competently thereto.

2. I am the Respondent in this matter. I submit this Declaration in support of my Opposition to Petitioner's Ex Parte Application for Reinstating TRO.

3. After the hearing on my prior application to vacate the TRO previously entered in this matter, I learned that Petitioner Evander Kane had registered the injunction entered by an Alberta, Canada court against Anna Kane with the Superior Court for Santa Clara County. Given

1 that Ms. Kane lives in Michigan, the fact that Mr. Kane registered this injunction in a California
2 court made me believe that Mr. Kane intended to attempt to enforce the Alberta Injunction against
3 me, personally. Accordingly, I filed a complaint for a declaratory judgment under the Securing the
4 Protection of our Enduring and Established Constitutional Heritage (“SPEECH”) Act, 28 U.S.C.
5 §§ 4101–05 (the “SPEECH Act Lawsuit”).

6 4. After the SPEECH Act Lawsuit was filed, I learned that there were some difficulties
7 in serving Mr. Kane due to him apparently evading service and his attorneys either refusing to
8 accept service or responding to requests for acceptance of service with silence.

9 5. I am aware that Mr. Kane is a wealthy celebrity athlete who lives in Canada and
10 most likely would be difficult to locate and serve. Rather than pay numerous process servers in
11 Canada and the U.S. to investigate his whereabouts for an extended period, which would be very
12 expensive and likely time-consuming, I chose to crowdsource my investigation into Mr. Kane’s
13 whereabouts. As such, I made social media posts on or about July 10, 2026, requesting my social
14 media followers to provide information regarding Mr. Kane’s whereabouts.

15 6. I only published these posts for the purpose of locating Mr. Kane so that he could
16 be served in the SPEECH Act Lawsuit, and for no other reason.

17 7. At no point did I make any threatening or harassing statements regarding Mr. Kane,
18 his family, or anyone associated with them, nor did I encourage anyone to make threatening or
19 harassing statements or engage in violence, stalking, or harassment regarding them. I was
20 attempting to move a lawsuit forward in the face of Mr. Kane evading service.

21 I declare under penalty of perjury that the foregoing is true and correct.
22 Executed on August 5, 2026.

23 

24 _____
Nik Lamas-Richie

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

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

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE, CENTRAL JUSTICE CENTER**

EVANDER KANE,

Petitioner,

vs.

HOOMAN ABEDI KARAMIAN a/k/a NIK
RICHIE,

Respondent.

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

Assigned For All Purposes To: Hon. Amber
Poston

DECLARATION OF JOANNA TURNER

Date: _____

Time: _____

Dept: C65

I, Joanna Turner, declare:

1. I am over 18 years of age. I have knowledge of the facts set forth herein, and if called as a witness, could and would testify competently to them.

2. On July 14, 2026, Randazza Legal Group, PLLC ("RLG") retained me to effect personal service of process on Petitioner Evander Kane ("Kane").

3. It is my understanding that Mr. Richie received a report that Mr. Kane had been spotted at LifeTime Fitness in Irvine, California.

4. On July 14, 2026, I traveled to LifeTime Fitness in Irvine, California, to serve Kane with the Summons and Complaint in the action captioned *Richie v. Kane*, Case No. 5:26-cv-06348-

1 NC, currently pending in the United States District Court for the Northern District of California,
2 San Jose Division.

3 5. Upon arrival, I searched the premises but was unable to locate him.

4 6. That same day, I am aware that Mr. Richie got a report that Mr. Kane was staying
5 at Marriott's Newport Coast Villas in Newport Coast, California.

6 7. I traveled to the location and searched for Kane but was unable to locate him.

7 8. The information I was given about Kane's believed whereabouts was given to me
8 for the purpose of serving him with process.

9 9. Although I was unable to verify the accuracy of these leads because Kane was not
10 present at either location during my attempts, I conducted both searches exclusively to effect
11 service of legal process, and for no other reason.

12 I declare under penalty of perjury that the foregoing is true and correct.

13
14 Executed on August 5, 2026.

15 *Joanna Turner*

16 _____
Joanna Turner