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30-2026-01575619-CU-HR-CJC - ROA # 120 - DAVID H. YAMASAKI, Clerk of the Court By M. Johnson, Deputy Clerk.

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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: Hon. Amber Poston **RESPONDENT HOOMAN ABEDI KARAMIAN a/k/a NIK RICHIE'S REPLY IN SUPPORT OF ANTI-SLAPP MOTION** Date: August 26, 2026 Time: 8:30 a.m. Dept: C65

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT Respondent Nik Lamas-Richie ("Richie") files his Reply in support of his Special Motion to Strike Petitioner Evander Kane's Petition for a Civil Harassment Restraining Order under Cal. Code Civ. Proc. § 425.16 (the "Anti-SLAPP Motion").

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MEMORANDUM OF POINTS AND AUTHORITIES

1.0 INTRODUCTION

Evander Kane filed his Requests for Civil Harassment Restraining Order (the "Petition") to silence a critical journalist from broadcasting an interview about Kane. He attempts to deny this by claiming Richie's large social media presence turns this interview and criticism into "stalking" and "harassment." He attempts to misdirect the Court away from the fact that the broad request for relief in his Petition is a prior restraint on protected speech and clear censorship of constitutionally protected journalism. He also made the strange decision to base his Opposition to the Anti-SLAPP Motion on conduct that post-dates both the Petition and the filing of the Anti-SLAPP Motion. The Court may not consider any of that in deciding the motion. The Court must decide the motion based on the conduct alleged in the Petition. All of his arguments and evidence related to this post-Petition conduct are thus irrelevant to this Anti-SLAPP motion, and the Court has already found the only evidence of alleged harm – encounters with unidentified third parties – is not attributable to Richie.

Mr. Kane therefore admits that Richie's conduct alleged in the Petition is in connection with an issue of public interest and he has failed to show that such conduct constitutes a violation of Cal. Code Civ. Proc. § 527.6. The Court must grant Richie's Anti-SLAPP Motion and award him his fees under Cal. Code Civ. Proc. § 425.16(c).

2.0 ARGUMENT

2.1 Prong 1: Richie's Alleged Conduct is in Connection with an Issue of Public Interest, and His Alleged Post-Petition Conduct is Irrelevant

Mr. Kane improperly attempts to amend his Petition in his Opposition, falsely claiming that he "only" seeks an order preventing Richie from soliciting others to locate him or his family, publish their locations, and stop publishing photos of his children. (Opp. at 6.) But that is not what his Petition requests. In the Petition, Mr. Kane asks for an injunction requiring removal of "all existing posts, videos, interviews, and content concerning Petitioner, Kensington Kane, and Petitioner's family from all platforms that is threatening, harassing, defamatory, or otherwise in

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violation of the United States and Canadian protective orders[1] against Deanna Kane a/k/a Anna Kane," as well as a mandate that Richie "not encourage, solicit, or assist Deanna Kane a/k/a Anna Kane in making, publishing, or disseminating statements about Petitioner, Kensington Kane, or Petitioner's family that are threatening, harassing, defamatory, or otherwise in violation of the United States or Canadian protective orders against Ms. Kane." (Petition at 8 & Kane Petition Dec. at ¶ 23.) Kane seems to have forgotten his own petition, arguing that he "does not seek to enjoin such conduct." (Opp. at 12.) He also ignores that this Court already denied his request to expand the scope of the evidentiary hearing on his Petition. (*See* Aug. 6, 2026, minute order.)

Mr. Kane has not attempted to file an amended Petition. Even if he were to try filing an amended Petition today to narrow the scope of allegedly unlawful conduct, he could not do so: "[a] plaintiff . . . may not seek to subvert or avoid a ruling on an anti-SLAPP motion by amending the challenged complaint . . . in response to the motion." (*JKC3H8 v. Colton* (2013) 221 Cal. App. 4th 468, 477–78; *Salma v. Capon* (2008) 161 Cal. App. 4th 1275, 1294 ["Requiring the trial court to analyze the amended claims under section 425.16 simply because the claims were amended before the court ruled on the first motion to strike would . . . undermine the legislative policy of early evaluation and expeditious resolution of claims arising from protected activity"].) He is stuck with the allegations in his Petition, which he largely ignores in his Opposition.

Mr. Kane articulates the conduct at issue as "Respondent's use of an audience of more than 500,000 people as an instrument—taking an adjudicated-false claim that a child is wrongfully being held captive, telling that audience she must be 'freed,' and directing them to locate the family." (Opp. at 11–12.) This does not refute Mr. Richie's prong one argument; the Petition is based on Richie's online speech, namely his interviewing of Anna Kane, publishing the interview on social media, and providing his commentary about it. Mr. Kane can characterize this speech as insidiously as he wants, but his fictional rhetoric (largely AI-generated, from the look of it) cannot change the facts.

[1] This request for relief shows that Mr. Kane is not being honest when he argues in his Opposition that he is not attempting to enforce the California DVRO or Canadian injunction against Richie (Opp. at 17–18); his Petition specifically requests that this Court enter a co-extensive injunction against Richie.

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It also appears Mr. Kane is conflating the two prongs of the analysis, claiming that because he concludes that Richie's speech is allegedly harassing, it is not protected.[2] But that is not the question at this stage. The Court must only consider whether the speech is in connection with an issue of public interest; whether the speech is unlawful is a question reserved for prong two. (*RGC Gaslamp, LLC v. Ehmcke Sheet Metal Co., Inc.* (2020) 56 Cal. App. 5th 413, 426 ["Any claimed illegitimacy of the defendant's acts is an issue that must be raised and supported by the plaintiff in discharging its burden on prong two"].) Whether Richie's statements are false has nothing to do with the prong one analysis, and Mr. Kane makes no effort to address any of the evidence or authority cited in the Anti-SLAPP Motion establishing Mr. Kane's public figure status and the existing controversy about his history of sexual assault, bankruptcy, and alleged abduction of Kensington, all of which Anna Kane discusses in her interview.

There is no question Richie published his speech in a public forum, namely publicly accessible social media websites. Mr. Kane fails to address Richie's showing that the speech and conduct on which his Petition is based are protected under Cal. Code Civ. Proc. § 425.16. To the extent the Court considers Richie's post-Petition conduct at the first prong, his social media posts asking third parties to locate Mr. Kane were also protected.[3] They were published for the purpose of locating Mr. Kane to serve him with the complaint in separate litigation, which is petitioning activity protected[4] under Cal. Code Civ. Proc. § 425.16(e)(1) and (2). (*Kenne v. Stennis* (2014) 230 Cal. App. 4th 953, 966; *Rusheen v. Cohen* (2006) 37 Cal. 4th 1048, 1056 ["[T]he filing . . .

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[2] Mr. Kane additionally claims that his Petition presents a "mixed" cause of action based on both protected and unprotected conduct. (Opp. at 12–13.) This does not help him, however, as he does not identify any conduct that falls outside the scope of Cal. Code Civ. Proc. § 425.16(e). He merely claims Richie's speech constitutes stalking or harassment, which is relevant only to the prong two analysis.

[3] The Court seems to preliminarily believe otherwise, but should that belief find its way into any denial of the Anti-SLAPP, it will be reversed on appeal. Trying to find a defendant in a federal lawsuit, for the purpose of serving him with that lawsuit (especially after he has been afforded multiple opportunities to accept service) is both petitioning activity, and a "legitimate purpose" under Cal. Code Civ. Proc. § 527.6.

[4] While the Court, in deciding an emergency motion with mere hours to consider the parties' briefing, found that Richie's July 10 statements were not constitutionally protected, it did not make any findings on the separate question of whether the statements were protected under the anti-SLAPP statute.

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and prosecution of a civil action" is constitutionally protected conduct].) Richie has carried his burden under the first anti-SLAPP prong.

2.2 Prong 2: Richie's Alleged Conduct is Constitutionally Protected

Anti-SLAPP motions are similar to summary judgment motions, and as with such, the evidence considered must be admissible. (*Sweetwater Union High School Dist. v. Gilbane Building Co.* (2019) 6 Cal. 5th 931, 945-46.) The Court in *Gilbane* noted that '"Courts have thus excluded evidence which would be barred at trial by the hearsay rule, or because it is speculative, not based on personal knowledge or consists of impermissible opinion testimony. This type of evidence cannot be used by the plaintiff to establish a probability of success on the merits because it could *never* be introduced at trial."' (*Id*. at 947 [quoting *Fashion 21 v. Coalition for Humane Immigrant Rights of Los Angeles* (2004) 117 Cal. App. 4th 1138, 1147-48]; *Dwight R. v. Christy B.* (2013) 212 Cal. App. 4th 697, 714 ["[W]e disregard declarations lacking in foundation or personal knowledge, or that are argumentative, speculative, impermissible opinion, hearsay, or conclusory"].) For the reasons stated in the separate objections to the declarations in support of his Opposition, the vast majority of Mr. Kane's evidence is irrelevant and/or inadmissible. Without supporting evidence, Mr. Kane's claim fails as a matter of law.

The Anti-SLAPP Motion discusses how Cal. Code Civ. Proc. § 527.6 excludes constitutionally protected actions from its definition of a harassing "course of conduct" and that all speech receives full constitutional protection unless it falls within a set of narrow exceptions, none of which apply here. (Motion at 9–11.) Mr. Kane responds by conceding that the alleged conduct does not constitute incitement under *Brandenburg v. Ohio* (1969) 395 U.S. 444, 447–48. (Opp. at 16.) He then claims that a statement can be a "true threat" if the speaker "consciously disregarded a substantial risk that his communications would be viewed as threatening." (*Id*. at 16–17 [quoting *Counterman v. Colorado* (2023) 600 U.S. 66, 69].) But *Counterman* dealt with sending "hundreds of Facebook messages" directly to the victim, "a number [of which] expressed anger at [the victim] and envisaged harm befalling her." (*Id*. at 70.) The Court found that prosecuting an individual for true threats required a showing of *mens rea*, which could be satisfied by proving the speaker subjectively had a reckless disregard for whether the speech could be

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viewed as a *threat*. (*Id*. at 82.) Here, there is nothing in the record showing that Richie had any awareness of Mr. Kane or anyone else potentially interpreting his statements as threats. The only record evidence shows that Richie published his statements for journalistic purposes, he had no reason to think anyone would harm Mr. Kane or Kensington in response to his statements, that he had no intent to harm them, that he had no reason to believe his statements would cause actual harm, and that his reporting has never resulted in violence against the subjects of his reporting. (Richie Anti-SLAPP Dec. at ¶¶ 9–14.)[5]

Without a true threat or incitement, the only possible theory of unprotected conduct set forth in the Petition is defamation. Mr. Kane loses on this by admitting he does not state a claim for defamation. (Opp. at 13.) Despite this concession, he argues that the references to Mr. Kane having "kidnapped" Kensington are false. (Opp. at 17.) As explained in the Anti-SLAPP Motion, this is an expression of opinion or rhetorical hyperbole based on the disclosed facts Anna Kane provided in her interview. She described a situation in which Mr. Kane inveigled a California family court into awarding him full custody of Kensington, which Ms. Kane has constantly contested. (Anti-SLAPP Motion at 4–5.) Richie found Ms. Kane to be credible and that, based on these disclosed facts, it was reasonable to characterize this deceptive method of obtaining custody of a child to be consistent with stealing or kidnapping. (Richie Anti-SLAPP Dec. at ¶¶ 15–16.)

Mr. Kane insists that this is a factual assertion, but ignores that Richie was merely providing a characterization of disclosed facts, which cannot be defamatory. (*Integrated Healthcare Holdings, Inc. v. Fitzgibbons* (2006) 140 Cal. App. 4th 515, 528; *see also Fortson v. Colangelo* (S.D. Fla. June 5, 2006) 434 F. Supp. 2d 1369, 1384–85 [finding that, in context, claiming an athlete engaged in "attempted murder" of another player was non-actionable hyperbole]; *Greenbelt Cooperative Pub. Ass'n v. Bresler* (1970) 398 U.S. 6, 13 [finding that characterizing public official's negotiations with city as "blackmail" was not defamatory].) Mr.

[5] If the Court is inclined to consider Mr. Richie's post-Petition conduct, the only evidence regarding his July 10 social media posts shows that he published such statements solely for the purpose of locating Mr. Kane so that Mr. Kane could be served in a separate lawsuit, and not to threaten or harass Mr. Kane or anyone else. (Richie Dec. ISO Opp. to App. to Reinstate TRO at ¶¶ 5–7.)

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Kane asserts this characterization of how he obtained custody of Kensington is false, but he provides no evidence that any of Anna Kane's statements about him are false; he only testifies that the conclusion, muttered under Richie's breath, of kidnapping is false.[6] (Kane Opp. Dec. at ¶ 3.)

Even if this statement were unquestionably factual and false, it would not matter because there is no evidence Richie published with *actual malice*, a constitutional standard that no lower court can overrule on its own. Mr. Kane is a public figure who must satisfy the actual malice standard. (Anti-SLAPP Motion at 12–13.) Mr. Kane does not dispute that he is a public figure, and his only attempt at showing actual malice is noting that Richie did not consider the California DVRO or Canadian injunction as establishing the falsity of her statements because they were entered without her present. (Opp. at 17; Richie Anti-SLAPP Dec. at ¶¶ 15–17.) It thus appears Mr. Kane is alleging Richie did not sufficiently investigate the truth of Ms. Kane's statements before publishing his own, but "the failure to conduct a thorough and objective investigation, standing alone, does not prove actual malice, nor even necessarily raise a triable issue of fact on that controversy." (*Reader's Digest Assn. v. Superior Court* (1984) 37 Cal. 3d 244, 258.) With no evidence of actual malice, Mr. Kane has not shown Richie's speech is defamatory.

Given that each and every possible exception to the First Amendment has been disproven, the Interview thus receives full constitutional protections and cannot be considered a "course of conduct" under Cal. Code Civ. Proc. § 527.6.[7] Even if there were some question as to this, Richie had a legitimate purpose in publishing his statements: providing journalistic reporting on an issue of public interest (sexual assault and manipulation of custody proceedings by a celebrity athlete) about a public figure (which status Mr. Kane does not dispute).[8]

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[6] While Kane relies heavily on Commissioner Mondo's findings, Kane does not engage with the fact that Commissioner Mondo declined to actually watch the relevant portion of the interview. This Court should not make the same error. (*See* Anti-SLAPP Motion **Exhibit 30** at 0:15:35–0:16:05.)

[7] If the Court decides to consider Richie's post-Petition conduct, it has already found that Richie's July 10 posts about locating Mr. Kane were an isolated incident that cannot form a course of conduct under the statute. (Aug. 6 minute order at 2–3.)

[8] Mr. Kane briefly argues there is no legitimate purpose in statements and conduct regarding Ms. Teigen or Mr. Kane's children. (Opp. at 15.) This argument is misguided. The only protected persons in the Petition are Mr. Kane and Kensington, meaning any statements regarding Ms.

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2.3 Prong 2: The Alleged Conduct Does Not Constitute Stalking or Harassment

The Anti-SLAPP Motion explains how, as a matter of law, the statements alleged in the Petition[9] are not likely to cause any harm to Mr. Kane or Kensington, and that there is no reasonable expectation they will do so. (Anti-SLAPP Motion at 10–11.) Mr. Kane attempts to patch this hole in his case by providing declarations attesting to encounters with anonymous third parties. Mara Teigen, who is not a party to this action and not a person the Petition seeks to protect, claims she 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. Mr. Kane mentions a June 26 incident where he claims that someone was recording him and three of his children at a shopping mall. (Kane Opp. Dec. at ¶ 8.) However, he admits he has no evidence this person (if they existed at all) had so much as *heard of* Richie. (*Id*.) As this Court has already found, there is a lack of evidence that Richie's speech alleged in the Petition had anything to do with these encounters. (Aug. 6 minute order at 2 ["those incidents are remote in time and the present record does not establish that they were specifically attributable to Respondent's challenged conduct"].)[10]

But let's assume, *arguendo*, that this was not the case. Mr. Kane is still attempting to premise liability on the conduct of third parties in response to Richie's statements. The First

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Teigen and other children are irrelevant. And while Kensington may not be a public figure, Mr. Kane is, and it is impossible to report on Mr. Kane's alleged abduction of Kensington without mentioning Kensington. Mr. Kane does not get to escape journalistic scrutiny because he happens to go outside with his family and fiancée.

[9] Mr. Kane claims in his declaration that Richie has published dozens of additional posts about him and his family (Kane Opp. Dec. at ¶ 4), but he provides no evidence of such statements and his testimony is inadmissible.

[10] It is worth noting that all of this "evidence" (such as it is) of harm is in the form of Kane or his girlfriend attesting to encounters. It is telling that there is not a single piece of documentary evidence. Not a police report. Not a text message. Not an email. Not a social media comment. No voicemails. No mail. Nothing. Kane claims that there is some groundswell of negative attention online, that produced absolutely no documents or messages – the only evidence is personal encounters that have no proven connection to the interview.

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Amendment does not permit this unless Richie authorized, directed, or ratified the unlawful conduct of third parties. (*NAACP v. Claiborne Hardware Co.* (1982) 458 U.S. 886, 927–29 [finding that emotionally charged speech referring to "the possibility that necks would be broken" could not make speaker liable for unlawful conduct of listeners weeks or months later].) There is no evidence he did so, and Richie denies doing so. (Richie Anti-SLAPP Dec. at ¶¶ 9–13.)

The Anti-SLAPP Motion discusses *Thomas v. Quintero* (2005) 126 Cal. App. 4th 635, 642–43, 654, where the respondent physically protested outside the home and church of the petitioner, and sent a letter to his church, with the goal "of causing extreme embarrassment" and "disrupting church activities and invading [his] free exercise of religion and right to privacy." The court found Cal. Code Civ. Proc. § 527.6 "requires significantly more" than speech directed to third parties, which cannot make up a "course of conduct," and that speech directed to others was not "qualitatively" the type of conduct "contemplated by the statute." (*Id*. at 662–63.) Mr. Kane attempts to distinguish *Quintero* by claiming that Richie "tells hundreds of thousands of people that a child must be freed from him, and he directly solicits those people, pointing them toward the family . . . ." (Opp. at 12.) But Mr. Kane provides no evidence that Richie encouraged anyone to do *anything* to "free" Kensington, and the only "solicitation" Mr. Kane identifies was a single attempt to locate Mr. Kane (because he was ducking service of a separate lawsuit) which the Court may not consider anyway because it is mentioned nowhere in the Petition. *Quintero* establishes that Mr. Kane cannot meet his evidentiary burden at prong two.[11]

Mr. Kane claims *E.G. v. M.L.* (2024) 105 Cal. App. 5th 688, is directly on-point, but he is wrong. That case dealt with third-party statements *directly attributable* to the respondent's social media posts which *specifically threatened the petitioner with violence*, such as "they hoped her life 'is destroyed like the lives of the children you have destroyed,' and warned her 'They're coming for you, [E.G.], better bat [sic] down the hatches. A storm is heading your way," along

[11] Richie also cites *People v. Peterson,* (2023) 95 Cal. App. 5th 1061, 1068, 1071, where the court overturned a stalking conviction based on constitutionally protected speech. Mr. Kane does not attempt to distinguish it, instead claiming it was limited to its facts. (Opp. at 15.) But that hardly helps him, as *Peterson* also dealt with an individual referring to a public figure's family members and their locations in an "upsetting and even alarming" manner in the context of a discussion on a matter of public interest. (*Peterson*, 95 Cal. App. 5th at 1069.)

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with a voicemail threatening to find '"somebody to tie you to a hotel bed, you fucking bitch, raping children . . . ."' (*Id.* at 696.) Aside from a lack of evidence that Richie's conduct alleged in the Petition caused anyone to do anything, the anonymous third parties mentioned in Mr. Kane and Ms. Teigen's declarations did not engage in conduct anywhere near as severe as the threats in *E.G.* And the finding of a lack of legitimate purpose in that case was based on a factual determination by the trial court that the respondent's stated justification was not credible due to no more than conjecture on the respondent's part that the petitioner was a danger to her, and were thus false and defamatory. (*Id.* at 702–04.) *E.G.* is thus inapposite because, as explained above, Richie's statements were not defamatory, particularly given Mr. Kane's undisputed public figure status. [12]

Mr. Kane rests much of his prong two argument on the Court's prior rulings vacating the *ex parte* TRO Mr. Kane requested and denying his request to reinstate the TRO. Mr. Kane lost both of these motions, making them odd choices as a foundation for his argument. Commissioner Glenn Mondo issued his decision on an extremely condensed timeline with little evidence, and the statements Mr. Kane cites from the Court's August 6 minute order pertain only to Mr. Richie's July 10 posts requesting third parties to locate Mr. Kane, which is not conduct on which the Petition is based. These preliminary findings have no bearing on Mr. Kane's prong two showing.

Mr. Kane also refers at multiple points to alleged attempts at commercialization, namely Richie selling merchandise related to this dispute. First, there is no evidence of this in the record as to conduct alleged in the Petition. Mr. Kane's declarations make reference to Richie selling "Free Kensington" merchandise, but he has never provided admissible evidence of this, such as screenshots of merchandise offered for sale. The only documentary evidence of these "commercialization" efforts is a social media post soliciting donations for Richie's legal defense fund. (Coy Dec. at Exh. 17.) In any event, Mr. Kane makes no effort to explain how any of this constitutes a violation of § 527.6. If Mr. Kane wants to bring a Lanham Act claim, he is welcome

[12] Mr. Kane also attempts to analogize this case to *People v. Planchard,* (2025) 109 Cal. App. 5th 157, which, as the Anti-SLAPP Motion explains, is as factually distinct as a case can be. (Motion at 9–10.) Mr. Kane's attempted comparison, however, is premised on post-Petition speech, and in any event there is no evidence Richie assisted or enlisted anyone in threatening Mr. Kane or anyone else.

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to do so, but this argument, unburdened by evidence, has no place in a § 527.6 proceeding. Selling merchandise is a "legitimate purpose" under § 527.6, and does not constitute the kind of conduct that this particular statute reaches. Mr. Kane brought a § 527.6 proceeding because the amount of due process in these proceedings is at least functionally diminished. He cannot try and shoehorn other claims into this one statute because he feared bringing his claims under other theories, where there would have been no *ex parte* sneak attack available to him.

2.4 There is No Basis for Awarding Kane Sanctions

Mr. Kane argues the Anti-SLAPP Motion was filed solely to cause unnecessary delay, and thus sanctions are proper under Cal. Code Civ. Proc. § 425.16(c)(1).[13] This request is premised on a podcast episode in which Mr. Richie referred to the case and Mr. Randazza spoke to the fact that, win or lose, this Court's ruling will be appealed. (Opp. at 10–11.) This is hardly a surprise, as Mr. Randazza stated that exact thing, on the record, at the scheduling conference on June 24, 2026. And Mr. Randazza's statement cannot conceivably be construed as an intent to "delay" proceedings; he was stating that a case does not create binding authority until an appellate court gets involved. (Coy Dec. at Exh. 16, 52:34–53:05.) Richie's reference to Mr. Kane being "financially drained" does not imply anything about the Anti-SLAPP Motion since the merits of the motion are self-evident. If his own lawyers have chosen to financially drain him by bringing an unsupportable claim and multiplying the proceedings, then he should take that up with them. Mr. Richie is attempting to end this case as expeditiously as possible.

3.0 CONCLUSION

The Court should grant Richie's Anti-SLAPP Motion, dismiss Mr. Kane's Petition, and award Richie his costs and attorneys' fees, to be substantiated in a separate motion.

[13] The statute also allows for sanctions if an anti-SLAPP motion is frivolous. Mr. Kane does not argue Richie's Motion is frivolous, but even if he did, the Motion is based on good-faith factual and legal arguments.

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Dated: August 14, 2026.

Respectfully Submitted,

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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 14, 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 above, from my electronic service address, dbd@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 14, 2026, at Las Vegas, Nevada.

/s/ Danielle Darkenwald
Danielle Darkenwald

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SERVICE LIST

***Kane v. Karamian* | Orange County Superior Court**
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