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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.

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

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

**PETITIONER'S OPPOSITION TO
RESPONDENT'S ANTI-SLAPP
SPECIAL MOTION TO STRIKE**

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

Hearing:

Date: August 26, 2026

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Dept: C65

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Petitioner Evander Frank Kane hereby opposes (“Opposition”) the Anti-SLAPP Motion (“Motion”) filed on June 16, 2026 by Respondent Hooman Abedi Karamian aka Nik Richie. This Opposition is based on the arguments set forth herein; the concurrently filed Declarations of Evander Kane, Mara Teigen, and Ryan Coy and the exhibits thereto; and all pleadings, papers, and records filed in this action. The Court should deny the Motion and award attorneys’ fees and costs.

I. INTRODUCTION

The Motion is a classic strawman, and it was filed in bad faith. Throughout the Motion, Respondent defends his right to interview Deanna Kane, to publish that interview, and to comment on past allegations about Petitioner. But the petition does not challenge those events in isolation. Petitioner did not petition this Court to stop an interview, to silence permissible commentary, or to litigate the truth of decade-old unproven allegations. Petitioner seeks a civil harassment restraining order because Respondent has done something that the Motion never addresses: he has taken a claim that has been adjudicated false—that Petitioner “kidnapped” his own lawfully-in-custody daughter—and broadcast it to an audience of more than 500,000 people he calls the “Dirty Army” (as well as the general public), told that audience the child must be “freed” in order to save her, and directed them to find Petitioner and his family. That is the type of stalking conduct the petition challenges and seeks to stop. The Motion does not engage with the *actual* stalking and harassing behavior because that conduct is *not protected*, and Respondent has no answer for it. After all, the Court has already found that Respondent’s conduct “served no legitimate purpose” and “was not constitutionally protected activity,” which is fatal to the Motion.

Respondent admitted his true purpose behind the Motion and papers filed in this action—it is all to “financially drain[]” Petitioner in hopes of extracting a seven-figure settlement from him and forcing him to abandon his efforts to protect his family. (Coy Decl. ¶ 13, Ex. 16.) Despite the Court identifying Respondent’s “crass commercialization” of Petitioner’s daughter’s name (*see* June 18 Minute Order at p. 3), Respondent continues to sell and profit off of his “FREE KENSINGTON” merchandise—something far different from constitutionally protected news-reporting. (Kane Decl. ¶ 5; Teigen Decl. ¶ 6.) The anti-SLAPP statute exists to shield legitimate protected speech from meritless litigation—it is not to be wielded, by a respondent’s own admission,

1 to bleed a father into surrendering the protection of his family.

2 Respondent’s Motion, with his sworn declaration, argues that his audience is inert and that
3 any fear of third-party action is “ludicrous” and “fanciful.” (Mot. at 11; Richie Decl. ¶ 9). However,
4 on July 10, 2026, he asked his followers to locate and find Petitioner and his family within thirty
5 minutes; his followers delivered, and Respondent published photographs of the family—including
6 the minor children—and celebrated his followers’ action. (Kane Decl. ¶¶ 9-10; Coy Decl. ¶¶ 6-7,
7 Exs. 5-6.) Respondent’s Motion is based on a premise that his audience will do nothing, but the
8 record shows Respondent’s “army” will act and run down a family on his command.

9 The Motion fails at both steps of the analysis. *First*, Respondent has not carried his burden
10 as to the conduct the petition actually challenges—a targeted campaign that takes an adjudicated-
11 false kidnapping narrative, targets a child, broadcasts it to a mobilized audience, and directs that
12 audience to locate Petitioner’s family. Respondent frames the entire petition as an attack on
13 “journalism,” but the claim for relief Petitioner seeks is based on stalking and harassing conduct,
14 not commentary, and the anti-SLAPP statute does not immunize the deployment of an audience
15 against a family. *Second*, Petitioner readily makes the requisite “minimal merit” showing. At this
16 stage, the Court may not weigh that showing against Respondent’s evidence, resolve conflicts, or
17 decide the “very close call” the prior bench already recognized this case to be. (*See Baral v. Schnitt*
18 (2016) 1 Cal.5th 376, 384-85.) The petition filed in this case is supported by admissible evidence
19 on every element: a course of conduct directed at Petitioner and his family, an adjudicated-false
20 narrative that serves no legitimate purpose, substantial and documented emotional distress, and a
21 likelihood of continuation which Respondent’s own escalation confirms. That is all prong two
22 requires. (*See id.*) The Motion should accordingly be denied and fees and costs should be awarded.

23 **II. RELEVANT BACKGROUND**

24 **A. The Petition Challenges Respondent’s Conduct, Not His Commentary About** 25 **Public Allegations.**

26 Petitioner is the sole legal and physical custodial parent of his six-year-old daughter,
27 Kensington. (Kane Decl. ¶ 2.) He lives with his fiancée, Mara Teigen; Kensington; and the couple’s
28 three children, Iverson (4), Hendrix (3), and Penelope (1). (*Id.*; Teigen Decl. ¶ 3.) Ms. Teigen has

1 helped raise Kensington since Kensington was an infant and is one of her principal caregivers. (*Id.*)
2 Kensington’s biological mother, Deanna “Anna” Kane, has no custodial rights; multiple courts in
3 the United States and Canada have entered orders against Ms. Kane, including orders prohibiting
4 her from publicly claiming that Kensington was “kidnapped” or “stolen” by Mr. Kane and Ms.
5 Teigen. (Kane Decl. ¶ 3, Exs. 1-2.)

6 Respondent, seeing an opportunity to launch and publicize his podcast, adopted Ms. Kane’s
7 false claims and amplified and broadcast them to his audience. Since then, he has published 80 to
8 100 posts and stories about Petitioner and his family on his Instagram account with additional
9 content expected between now and the hearing date. (Kane Decl. ¶ 4.) He does not merely repeat
10 Ms. Kane’s claims; he inflames them. He tells his audience that Kensington has been kidnapped and
11 must be “rescued,” “saved,” and “freed”; he directs his followers to find Petitioner and his family;
12 and he has published photographs of the children, including Petitioner’s one-year-old. (*Id.*) He sells
13 and profits from “FREE KENSINGTON” merchandise bearing the six-year-old’s name on his
14 website, dirtyarmy.org. (*Id.* ¶ 5; Teigen Decl. ¶ 6.) That social media campaign—the mobilization
15 of a named audience around an adjudicated-false kidnapping narrative, coupled with directives to
16 locate and dox the family—is the conduct the petition challenges.

17 Petitioner seeks conduct-based relief, that Respondent: (i) stop soliciting, directing, or
18 encouraging third parties to locate, follow, surveil, photograph, film, or approach Petitioner and the
19 members of his household; (ii) stop publishing the family’s location and whereabouts; and (iii) stop
20 publishing photographs of the minor children. As set forth below, the falsity of the kidnapping
21 narrative matters for two reasons: it establishes that the course of conduct serves no legitimate
22 purpose; and it explains why strangers who believe the narrative seek out and confront the family.
23 (Petition; Kane Decl. ¶¶ 4, 8–10, 12.)

24 **B. The Petition Was Filed Before the Events of July 2026; Those Events Confirm**
25 **Its Premise and Refute Respondent’s Arguments.**

26 On or about July 10, 2026, the family was at Disneyland in Anaheim celebrating Petitioner’s
27 mother’s sixtieth birthday. (Teigen Decl. ¶ 14.) That day, Respondent published an Instagram story
28 announcing that he was “Looking for Monster Kane & Co.,” reporting that “[a]ccording to the Dirty

1 Army they are at Disneyland,” and challenging his followers: “Let’s test the Dirty Army. Can
2 anyone grab a pic in next 30 minutes[.]” (Kane Decl. ¶ 9; Teigen Decl. ¶ 14; Coy Decl. ¶ 6, Ex. 5.)
3 Within the window, a stranger photographed the family—including the one-year-old—and
4 Respondent published the photograph above the caption “That was fast. DA Strong!” (Kane Decl.
5 ¶ 10; Teigen Decl. ¶ 15; Coy Decl. ¶ 7, Ex. 6.) He also published a photograph of Kensington
6 captioned “Kensington is at Disneyland. She is in America.” (Coy Decl. ¶ 5, Ex. 4.) The day before,
7 on July 9, 2026, Respondent’s counsel wrote to Petitioner’s counsel stating that he could have his
8 client “ask his audience to find Kane.” (Coy Decl. ¶ 2, Ex. 1.)

9 And on or about July 15, 2026, Ms. Kane—Respondent’s collaborator, who is forbidden
10 herself from making these exact publications—reposted multiple photographs of Petitioner secretly
11 taken by strangers and broadcast where he had been “spotted.” (Kane Decl. ¶ 12; Teigen Decl. ¶ 8;
12 Coy Decl. ¶ 8, Exs. 7–8.) On information and belief, Ms. Kane obtained those photographs from
13 Respondent or from the same followers Respondent directed to locate and photograph the family;
14 the images she published are a product of the campaign Respondent set in motion.

15 **C. Respondent’s Audience Has Acted on His Content and Has Confronted the**
16 **Family in Person in Public.**

17 The premise of the petition—that Respondent’s campaign foreseeably drives strangers to
18 confront and target this family—is borne out by a pattern of in-person incidents since May, when
19 Respondent’s campaign started. Strangers have approached Ms. Teigen repeatedly. At a mall, a self-
20 identified follower of Ms. Teigen confirmed Ms. Teigen’s identity, told Ms. Teigen in front of her
21 children that she “kidnapped” one of the children, followed Ms. Teigen and her children, and
22 shouted “kidnapper” at Ms. Teigen in a crowded public place. (Teigen Decl. ¶ 10.) At an airport, a
23 stranger asked to photograph Ms. Teigen, who was with her children, and then said, “Is it nice to
24 have your kids with you when you stole someone else’s kid?” (*Id.* ¶ 11.) In a grocery-store parking
25 lot, a man watched Ms. Teigen and her children from his car and then screamed Respondent’s own
26 merchandise slogan—“FREE KENSINGTON”—at her while she buckled her one-year-old into a
27 car seat; she drove away shaking and had to pull over. (*Id.* ¶ 13.) And in late June 2026, a man
28 followed Petitioner and three of his children through a mall for several minutes, photographing

1 them, until a bystander warned Petitioner; the man’s phone held photographs and videos of the
2 children. (Kane Decl. ¶ 8.)

3 The slogan the man in the grocery-store parking lot shouted is not incidental. Respondent
4 manufactures, sells, and profits from “FREE KENSINGTON” t-shirts and hats. (Kane Decl. ¶ 5;
5 Teigen Decl. ¶ 6.) When a stranger screams a respondent’s own merchandise slogan at a mother in
6 a parking lot, the connection between the campaign and the harassing conduct is not conjecture.

7 **D. The Harm Is Documented, and Respondent Has Never Justified It.**

8 Ms. Teigen has largely stopped leaving her home with the children because almost every
9 time she does, a stranger confronts her and her children. (Teigen Decl. ¶ 21.) Since Respondent’s
10 campaign began, she has experienced severe physical and emotional symptoms she had never
11 experienced before, and she is now receiving professional care she did not need before Respondent
12 began publishing about her family. (*Id.* ¶ 22.) Ms. Teigen has described those effects in general
13 terms deliberately: Respondent broadcasts what is filed in this record to more than 500,000 people.
14 She is prepared to testify in greater detail at the evidentiary hearing, in camera or under seal. (*Id.*)
15 The children have been withdrawn from camp, from soccer, and from the family’s club; Kensington
16 is permitted at one friend’s home. (Kane Decl. ¶ 17; Teigen Decl. ¶¶ 23–24, 27.) These are the
17 changes made necessary because of the increase in public and threatening confrontations by
18 strangers—strangers who are taking Respondent’s baseless allegations as truth and acting on them.

19 **E. Respondent’s Campaign Has Continued Through the Filing of This Opposition,**
20 **and He Now Sells the Proceeding Itself.**

21 Respondent’s campaign did not pause for this litigation; it has made a spectacle of it. On
22 July 23, 2026, Respondent published a joint post with Ms. Kane on Instagram, with a clip of his
23 interview with Ms. Kane and the caption: “Dirty Army, we are going to make change. I feel it. –
24 nik.” (Coy Decl. ¶ 9, Exs. 11–12.) That same day, he published a story on Instagram, with the same
25 clip, the phrase “FREE KENSINGTON” displayed across the clip, and a follower’s message:
26 “BRING KENSINGTON HOME NOW!!” (*Id.* ¶ 10, Ex. 13.)

27 Respondent’s and Ms. Kane’s respective audiences answered in the comments to the joint
28 post—“#FREEKENSINGTON These lawyers need to be held accountable”; “FREE

1 KENSINGTON”; and, to Ms. Kane, that she “will absolutely get Kensington back.” (*Id.* ¶ 11, Ex.
2 14.) On a post he moderates, Respondent replied himself: “I’ll see everyone in August. Pack a
3 lunch.” (*Id.*) Six days later, on July 29, 2026, Ms. Kane published a story reporting that a
4 collaboration reel (presumably with Respondent) had drawn 1,507,504 views; 958,424 accounts
5 reached; and 633 new follows, captioned “love you guys thank you so much.” (*Id.* ¶ 12, Ex. 15.)

6 On August 4, 2026, Respondent published a story announcing, “TRIAL DATES SET” and
7 telling his audience that Petitioner and Ms. Kane had been “Ordered to Appear In Person to Testify”
8 at the August 26 and September 8 hearings. (*Id.* ¶ 15, Ex. 17.) No such order exists. (*Id.* ¶ 16.)
9 Respondent paired that announcement with a composite image of himself and Petitioner squaring
10 off in front of a courthouse, the words “FREE KENSINGTON” printed across the bottom, and a
11 graphic red arrow pointing at a link soliciting “LEGAL FUND DONATIONS.” (*Id.* ¶ 15, Ex. 17.)

12 **F. The Court Has Made Multiple Rulings that Demonstrate “Minimal Merit.”**

13 This Court granted Petitioner’s request for a temporary restraining order on his initial
14 showing in this case, and after the hearing on July 7, 2026, it denied Respondent’s motion for an
15 undertaking related to this Motion. When the Court dissolved the temporary restraining order via its
16 Minute Order on June 18, 2026 (the “June 18 Minute Order”), it did so while describing the matter
17 as a “very close call,” denying Respondent’s requests for fees and sanctions, and stating expressly
18 that the dissolution “should not be interpreted as a vindication of respondent’s free speech
19 arguments.” (June 18 Minute Order at pp. 2-3.) Petitioner has separately applied ex parte to reinstate
20 and expand the temporary restraining order based on the escalating conduct described in this section.
21 After reviewing and considering the application, the opposition, and reply, ***the Court found that***
22 ***Respondent’s conduct was harassing, “served no legitimate purpose,” and is “not constitutionally***
23 ***protected.”***¹ (See Minute Order dated August 6, 2026 at pp. 2-3 (emphases added), Coy Decl. ¶ 17,
24 Ex.18.) This is plainly a case with “minimal merit.”

25 **III. LEGAL STANDARD**

26 A special motion to strike is evaluated in two steps. At the first step, the moving defendant
27

28 ¹ The Court declined on a separate ground: that on the record then before it, it could not “presently”
find the conduct ongoing or likely to recur. (*Id.* at p. 3.)

bears the threshold burden of showing that the challenged claim “aris[es] from” protected activity—that is, that the act underlying the claim, and on which liability is based, was an “act in furtherance of the person’s right of petition or free speech . . . in connection with a public issue.” (Code Civ. Proc., § 425.16, subd. (b)(1); *Baral, supra*, 1 Cal.5th at 396; *Bonni v. St. Joseph Health Sys.* (2021) 11 Cal.5th 995, 1009.) Only if the defendant carries that threshold burden does the analysis proceed.

At the second step, the plaintiff need only “state[] a legally sufficient claim” and make “a prima facie factual showing sufficient to sustain a favorable judgment”—that is, show the claim has “at least minimal merit.” (*Baral, supra*, 1 Cal.5th at 384-85; *Bonni, supra*, 11 Cal.5th at 1009.) That burden is deliberately modest. The court should “accept[] the plaintiff’s evidence as true, and evaluate[] the defendant’s showing only to determine if it defeats the plaintiff’s claim as a matter of law.” (*Baral, supra*, 1 Cal.5th at 385 [citation omitted].)

IV. ARGUMENT

A. The Motion Was Filed for an Improper Purpose.

The anti-SLAPP statute exists “to encourage continued participation in matters of public significance” and to allow the early dismissal of meritless suits that would chill protected speech. (Code Civ. Proc., § 425.16, subd. (a).) It is not a fee-generating engine, and it is not a tool for financially exhausting an opponent into surrender. Yet, that is precisely how Respondent has described his own strategy.

Speaking on his own podcast after the July 7, 2026 hearing, Respondent explained the purpose behind his motion practice in this case. He gleefully said: “[Petitioner] has no idea because we’re papering so hard and . . . coming from every single angle,” “[t]his thing’s going to cost him,” the “goal is 2.5,” and “*if we can keep going on this . . . and he’s just financially drained, he’s going to come to the table and he’s going to be like, I’m over it.*” (Coy Decl. ¶ 13, Ex. 16 (emphasis added).) Read in Respondent’s own words, the object of this litigation—including this Motion and Respondent’s other pleadings—is not to vindicate protected speech. (*See id.*) It is to run up Petitioner’s costs until he abandons his family’s protection, and to extract a seven-figure fee award along the way. (*See id.*)

Respondent and his counsel described the other half of the strategy on the same broadcast.

1 Mr. Randazza told the audience, “I love that I lose at the trial level,” and Respondent responded,
2 “*that’s why I want to lose. I want to appeal.*” (Coy Decl. ¶ 14, Ex. 16 (emphasis added).)

3 These admissions bear directly on this Motion. They confirm that the Motion was not filed
4 for a proper purpose under the anti-SLAPP statute and what it contemplates. The Motion is not a
5 shield for legitimate speech against meritless litigation. It is the opposite—an offensive instrument,
6 wielded to burden a meritorious petition into abandonment. Moreover, it undercuts the legitimate-
7 purpose defense at the core of Respondent’s prong-two argument. A respondent who publicly
8 describes his objective as intending to financially drain a concerned father until he quits cannot
9 credibly maintain that the campaign underlying this litigation serves a bona fide purpose of public
10 discourse.² The Court should not lend the anti-SLAPP statute to the use Respondent has openly
11 announced for it.

12 **B. Respondent Has Not Carried His Threshold Burden as to the Conduct the**
13 **Petition Actually Challenges.**

14 Respondent’s prong-one argument rests on a substitution of facts and claims that are
15 different from the claims raised in the petition. Respondent recasts the petition as an attack on his
16 “journalism” and then—with that strawman standing—Respondent argues, at length, that
17 journalism about a public figure is protected, demonstrating only that the strawman he erected was
18 defeated. (*See* Mot. at 7-9.) Whether some other activity of Respondent would qualify as protected
19 speech is beside the point, because the anti-SLAPP inquiry does not ask whether the defendant
20 engaged in *some* protected activity somewhere in the dispute; it asks whether the specific course of
21 conduct on which the requested relief rests is protected. (*Baral, supra*, 1 Cal.5th at 396.) On that
22 question—the only question at prong one—Respondent has not carried his burden.

23 **1. The petition is mainly focused on a directed campaign to mobilize an**
24 **audience against the family, not general commentary about Petitioner.**

25 The relief Petitioner seeks is conduct-based, as set forth above. The conduct on which that
26 relief rests is not Respondent’s opinion of Petitioner. It is on Respondent’s use of an audience of
27

28 ² As stated below, Petitioner respectfully requests that the Court issue sanctions against Respondent
for vexatious litigation tactics and for filing this Motion for an improper purpose.

1 more than 500,000 people as an instrument—taking an adjudicated-false claim that a child is
2 wrongfully being held captive, telling that audience she must be “freed,” and directing them to locate
3 the family. (Kane Decl. ¶ 4.) Mobilizing an “army” to find, follow, and surveil a specific family is
4 conduct, not commentary. It does not become “speech in connection with a public issue” because
5 the directive is typed into a social-media post rather than spoken aloud.

6 Respondent’s own authority illustrates the distinction. In *Thomas v. Quintero* (2005) 126
7 Cal.App.4th 635, the conduct challenged was “demonstrating and leafleting”—a respondent
8 standing outside a church distributing handbills about the petitioner. (*Id.* at 640, 642-44.) The Court
9 of Appeal held that this was protected speech about a public dispute, and that speech about a person,
10 addressed to third parties, could not alone constitute a “course of conduct.” (*Id.* at 662-63.) The
11 *Quintero* court reversed because the petitioner’s evidence was “woefully inadequate to meet even
12 the minimal standard of proof required by the civil harassment statute.” (*Id.* at 662.) Here,
13 Respondent does not merely speak negatively about Petitioner; he tells hundreds of thousands of
14 people that a child must be freed from him, and he directly solicits those people, pointing them
15 toward the family—the Court has found this serves no legitimate purpose. (Aug. 6 Minute Order.)

16 This is why the framing matters. The Motion only addresses “protected activity” as to
17 Respondent’s interview of Ms. Kane and his commentary and reporting on past allegations about
18 Petitioner. Petitioner does not seek to enjoin such conduct. But the Motion fails to engage the
19 conduct that serves as the main and primary basis for Petitioner’s claims: the mobilization of a
20 named audience around a false captivity narrative and the direction of that audience to the family.
21 A defendant does not carry his threshold burden by showing that some of his activity is protected
22 while ignoring the main conduct the petition actually challenges. (*Baral, supra*, 1 Cal.5th at 396.)
23 The events of July 2026 make the point concrete—Respondent’s directive to locate and dox
24 Petitioner and his family is the same directed conduct, in its starkest form, and is demonstrative of
25 the harm and threats of harm that stem from the false kidnapping narrative.

26 **2. At a minimum, the petition is a “mixed” claim, and the unprotected conduct**
27 **survives, defeating the Motion.**

28 Even if the Court concludes that some of the challenged activity *is* protected, the petition

1 plainly rests on unprotected conduct—the false kidnapping narrative, the directives to his base, the
2 deployment of Respondent’s “army,” and the doxing and publication of the family’s location. Under
3 *Baral*, when a claim rests on both protected and unprotected activity, the unprotected components
4 are not stricken; the court strikes only those “claims for relief” that are supported solely by
5 allegations of protected activity, and allegations of unprotected activity are not subject to the anti-
6 SLAPP statute. (*Baral, supra*, 1 Cal.5th at 394 (“Allegations of protected activity that merely
7 provide context . . . cannot be stricken under the anti-SLAPP statute.”).) The conduct-based relief
8 Petitioner seeks survives regardless of how the Court treats Respondent’s commentary.

9 **C. Petitioner Readily Establishes Minimal Merit.**

10 Because Respondent has not carried his prong-one burden as to the challenged conduct, the
11 Court need not reach prong two. But even if it does, the petition has far more than the “minimal
12 merit” required. The Court should accept Petitioner’s evidence as true and not weigh it against
13 Respondent’s. (*Baral, supra*, 1 Cal.5th at 384-85.) On that initial evidence, the Court agreed that
14 Petitioner’s claim was legally sufficient and factually substantiated, and it issued a TRO to prevent
15 further harm pending a hearing. (TRO at Attachment 5a(4).) On that standard, each disputed element
16 is supported by admissible evidence that establishes the proper legal basis for the petition’s claims.

17 **1. Respondent’s premise that his audience would never act—the foundation of**
18 **his prong-two argument—has been disproved by his own conduct.**

19 Respondent’s prong-two argument hinges primarily on two baseless arguments. Respondent
20 treats the petition as a complaint for defamation, which it is not—the main part of Respondent’s
21 fallacious argument. (Mot. at 12.) And Respondent contends that no one would ever act on his posts.
22 Respondent declared that he “had no reason to think anyone would harm Mr. Kane, or his daughter
23 Kensington,” and that the suggestion was “ludicrous.” (Mot., Richie Decl. ¶ 9.) The Motion
24 dismisses Petitioner’s concern as “[h]ypothetical fanciful audience reaction” and insists that “[n]o
25 court in the history of the United States has ever accepted so tenuous a connection.” (Mot. at 11.)

26 The record refuted that premise before Respondent ever filed this Motion, and his conduct
27 since has removed any doubt. Respondent asked his audience to locate the family within thirty
28 minutes; the audience located and photographed them inside the window; and Respondent published

1 the photograph and celebrated it. (*See* § IV.B.2, *ante*; Kane Decl. ¶¶ 9–10; Coy Decl. ¶¶ 6–7, Exs.
2 5–6.) Conduct Respondent’s own declaration calls “ludicrous” and “fanciful” is conduct he solicited
3 and obtained. At prong two, where Petitioner’s evidence is accepted as true and Respondent’s is
4 weighed only for whether it defeats the claim as a matter of law, Respondent’s inert-audience
5 premise cannot support the relief he seeks.

6 **2. Respondent’s conduct is a “course of conduct directed at” the family under**
7 ***the controlling reasonable-foreseeability standard.***

8 Respondent argues that because his posts were addressed to his audience rather than sent
9 directly to Petitioner, they cannot be a “course of conduct directed at” Petitioner. (Mot. at 9-12;
10 Code Civ. Proc., § 527.6(b)(3).) The authority Respondent relies upon shows the opposite.

11 In *People v. Peterson* (2023) 95 Cal.App.5th 1061, which Respondent cites as “[t]he closer
12 analogue” (Mot. at 10), and in *People v. Planchard* (2025) 109 Cal.App.5th 157, which Respondent
13 cites and attempts to cabin (Mot. at 9-10), the courts addressed precisely this question: whether
14 public posts, not sent directly to the target, can constitute a course of harassing conduct directed at
15 that target. The answer is “yes.” *Planchard* holds that a respondent’s “conduct is not immunized by
16 making his posts available to the [public] under circumstances where it is reasonably foreseeable
17 that either [the target] would see them or they would be relayed to [the target] by a third party.”
18 (*Planchard, supra*, 109 Cal.App.5th at 173.) The court explained that “[t]he fact that [the defendant]
19 did not send these posts directly to [the victim] is irrelevant” because “[t]he content of [the] posts
20 was sufficiently alarming such that it was reasonably foreseeable that the posts would prompt
21 another to pass them on to [the victim]” or to act. (*Id.* at 170-71.) The statute does not require the
22 perpetrator to direct a course of conduct at the victim; instead, “it is sufficient that the nature of the
23 conduct makes it reasonably foreseeable that the victim would become aware of it.” (*Id.* at 169.)

24 Here, that standard is satisfied many times over—and on facts materially stronger than in
25 *Planchard*. Respondent did not merely post content that was foreseeable a third party might relay;
26 he expressly asked hundreds of thousands of third parties (if not more) to locate the family, and they
27 did. Foreseeability is not a matter of inference where the directed result *actually* occurred. When
28 Respondent published “Can anyone grab a pic in next 30 minutes,” it was not merely foreseeable

1 that his audience would act on the family—it was the stated objective. (Kane Decl. ¶¶ 9-10.)

2 Respondent’s effort to distinguish *Planchard* proves Petitioner’s point. He emphasizes that
3 the *Planchard* defendant “convinced a third party” to act against the victim, while Respondent
4 supposedly “did not assist Ms. Kane in threatening anyone” and never enlisted anyone against
5 Petitioner and his family. (Mot. at 10.) But that is exactly what Respondent has done, and not for
6 the first time. He published, amplified, and commercialized the directive to “FREE
7 KENSINGTON”—telling a mobilized audience that a child must be liberated from the parent
8 lawfully entitled to her custody—and on July 10 he enlisted that audience to locate the family and
9 publicly dox their whereabouts. The distinction Respondent draws to escape *Planchard* instead
10 brings him within it. And his reliance on *Peterson* is misplaced for the opposite reason: the *Peterson*
11 court found that the specific speech there was constitutionally protected on its facts. The *Peterson*
12 court did not find that public posts can never constitute directed conduct. (Mot. at 10-11.)

13 **3. The conduct serves “no legitimate purpose,” particularly the conduct**
14 ***directed at a six-year-old—a point Respondent has never addressed.***

15 Section 527.6 reaches a course of conduct that “serves no legitimate purpose.” (Code Civ.
16 Proc., § 527.6, subd. (b)(3).) Respondent’s entire legitimate-purpose defense rests on the purported
17 public interest in past allegations against a professional athlete. (Mot. at 8-9, 12.) Even assuming
18 that interest is genuine as to Petitioner, it does not reach Ms. Teigen and the four children under the
19 age of seven. The Court also has already rejected the litigation-related justification offered as to the
20 soliciting and posting pictures of Petitioner and his family online. (Coy Decl., Ex. 18.)

21 Respondent has never explained—not in this Motion and not in any of his multiple prior
22 filings—what legitimate purpose is served by telling his half a million followers and the public at
23 large that a child is “kidnapped” by their lawful custodial parent and by selling and profiting from
24 merchandise emblazoned not merely with the child’s name, but with the demand/directive that she
25 be “freed”—which tells every purchaser and every passerby that she is being held against her will.
26 Further, Respondent cannot demonstrate what legitimate purpose is served by directing his audience
27 to locate and photograph Petitioner, Ms. Teigen, and their children, so he can publicly dox the
28 family’s location. The children plainly are not public figures and none of them entered any public

1 controversy. No public discourse is served by broadcasting a child’s location at a theme park and
2 directing followers to photograph her. Because the “no legitimate purpose” element is one
3 Respondent must negate to defeat the petition, and because he has offered no purpose whatsoever
4 on these issues, he cannot show that Petitioner’s claim lacks “minimal merit” as to them. (*Cf. E.G.*
5 *v. M.L.* (2024) 105 Cal.App.5th 688, 699–705 (stating that social-media posts publishing a person’s
6 pictures and information together with accusations of complicity in kidnapping and child abuse
7 constituted harassment supporting a three-year restraining order).) *E.G. v. M.L.* is directly on point,
8 as the respondent in that case published petitioner’s photographs and identifying information on
9 social media alongside accusations that she was complicit in child abuse—the Court of Appeal held
10 that the posts were a course of conduct that served no legitimate purpose and the conduct was not
11 constitutionally protected, supporting the basis for a civil harassment restraining order. (*Id.*)

12 Respondent’s August 4, 2026 publication removes any remaining doubt about purpose. He
13 told an audience of more than 500,000 people that this Court had ordered Petitioner and Ms. Kane
14 to appear and testify—which it did not—and packaged that falsehood as a promotional fight poster
15 bearing the merchandise slogan (“FREE KENSINGTON”), with a red arrow pointed at a donation
16 link. (*See* Coy Decl. ¶¶ 15–16, Ex. 17.) The Court identified the “crass commercialization” of
17 Kensington’s name on June 18. However, in the seven weeks since, Respondent has extended it to
18 the proceeding itself. (Coy Decl. ¶¶ 9–11, 15, Exs. 11, 13–14, 17.)

19 **4. Respondent’s true-threat arguments do not defeat minimal merit.**

20 Respondent invokes *Brandenburg v. Ohio* (1969) 395 U.S. 444 and argues that Petitioner
21 cannot establish incitement to imminent lawless action. (Motion at 11.) But Petitioner’s claim does
22 not depend on satisfying *Brandenburg*—yet another strawman argument. Section 527.6 reaches a
23 “course of conduct” that alarms and harasses and serves no legitimate purpose. Respondent’s
24 conduct is actionable as directed harassment and foreseeable stalking under *Planchard* and *E.G.*
25 regardless of whether it also satisfies “incitement” under *Brandenburg*.

26 To the extent Respondent frames the question as one of true threats, the governing standard
27 confirms rather than defeats the petition: the speaker need only have “consciously disregarded a
28 substantial risk that his communications would be viewed as threatening.” (*Counterman v. Colorado*

(2023) 600 U.S. 66, 69.) Having watched his audience locate the family on command and then celebrated it, Respondent cannot claim ignorance. After all, the Court already found that this was a knowing and willful course of conduct directed at Petitioner and his family, “serv[ing] no legitimate purpose,” causing “substantial emotional distress.” (August 6 Order at pp. 1-2.)

5. *The “kidnapper” statements are false assertions of fact, not protected hyperbole—and Respondent has never justified them.*

Respondent argues that calling Petitioner a “kidnapper” is non-actionable “rhetorical hyperbole.” (Mot. at 12.) That characterization does not withstand scrutiny on this record.

It is not hyperbole to tell an audience that a specific, identified child “must be rescued,” “saved,” and “freed” from a named man, and then to direct that audience to find the man. Respondent does not tell his followers that Petitioner is metaphorically a bad father; he tells them a child is being unlawfully held, insinuates that she is being subjected to abuse and needs to be liberated, and he points them to where she is located with her lawful parent. That is a factual assertion—the child is being unlawfully held—and it is demonstrably false: Petitioner is Kensington’s sole lawful custodial parent, a fact established by court order, and Ms. Kane is under orders in two countries prohibiting the very claim. (Kane Decl. ¶¶ 2-3, Exs. 1-2.) A statement that is provably false by reference to a custody order is not “imaginative expression” or “rhetorical hyperbole”; it is a false statement of fact that Respondent has deployed to mobilize strangers, and is a statement those strangers have used, repeated, and directly confronted Petitioner with.

On the question of Respondent’s knowledge, he says only that he “did not consider” the custody order to establish falsity of Ms. Kane’s statements because Respondent said, “Ms. Kane was not present at the hearing.” (Richie Decl. ¶ 16.) Ms. Kane had every opportunity to appear at that hearing and chose not to. Respondent’s decision not to “consider” a custody order that was in front of him raises, at minimum, a triable question of reckless disregard for the truth. (*See id.*)

6. *Respondent’s reliance on the DVRO and Canadian judgment attacks a theory the petition does not require.*

Respondent devotes his final argument to the proposition that the 2024 California domestic violence restraining order and the 2025 Canadian judgment are invalid or unenforceable and do not

1 bind him. (Mot. at 13-15.) This argument misses the point. Petitioner does not seek to enforce either
2 order against Respondent, and the petition does not rise or fall on them. The orders are relevant for
3 a narrow and different purpose: they establish, as a matter of undisputed judicial record, that the
4 “kidnapping” narrative Respondent broadcasts is false, and that Ms. Kane—Respondent’s
5 collaborator—is judicially barred from making the very statements Respondent amplifies. It does
6 not matter whether Respondent is personally bound—the orders bear on falsity, Respondent’s
7 reckless disregard for the truth, and on the absence of any legitimate purpose.

8 **V. THE COURT SHOULD AWARD PETITIONER HIS FEES AND COSTS.**

9 Section 425.16, subdivision (c)(1), provides that if the court finds a special motion to strike
10 is frivolous or is solely intended to cause unnecessary delay, the court shall award costs and
11 reasonable attorney’s fees to the plaintiff, pursuant to section 128.5. (Code Civ. Proc., §§ 128.5,
12 426.16(c)(1).) Petitioner gives notice by this Opposition that he seeks such an award against
13 Respondent and his counsel. No separate motion is required, and a prevailing plaintiff may request
14 the award in his opposition papers. (*Changsha Metro Group Co., Ltd. v. Xufeng* (2020) 57
15 Cal.App.5th 1, 19-23; *id.* at 23 (“The request was proper because it was presented in Changsha’s
16 “responding papers.” (§ 128.5, subd. (c).)

17 The second ground is established by Respondent’s own words, almost a month after the
18 Motion was filed. He said the object of his motion practice is to “paper[]” Petitioner “so hard” that
19 this litigation will “cost him” until he is “financially drained” and “come[s] to the table,” with a
20 stated goal of “2.5” million—then told his audience he wants this Motion denied so that they may
21 appeal. (Coy Decl. ¶¶ 13-14, Ex. 16.) A litigant who announces publicly that he wants this Court to
22 deny the very motion he has filed is not seeking the early resolution the anti-SLAPP statute was
23 enacted to provide. He is seeking the delay and the expense that follow a denial.

24 Petitioner requests only the reasonable fees and costs he incurred in responding to and
25 arguing the Motion, according to proof. Respondent should bear the cost of his bad faith motion.

26 **VI. CONCLUSION**

27 For the foregoing reasons, Petitioner respectfully requests that the Court deny the Motion in
28 its entirety and award Petitioner his reasonable fees and costs incurred in responding to the Motion.

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DATED: August 7, 2026

BLANK ROME LLP

By: 

Joseph J. Mellema
Ryan F. Coy
Attorneys for Petitioner
EVANDER FRANK KANE

PROOF OF SERVICE - 1013a, 2015.5 C.C.P.

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

] ss.
]
]

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

On August 7, 2026, I served the foregoing documents described as **PETITIONER'S OPPOSITION TO RESPONDENT'S ANTI-SLAPP SPECIAL MOTION TO STRIKE** on the interested parties in **EVANDER FRANK KANE v. HOOMAN ABEDI KARAMIAN A/K/A NIK RICHIE; OCSC Case No.: 30-2026-01575619-CU-HR-CJC**, by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Marc J. Randazza | Alex Shepard
RANDAZZA LEGAL GROUP NIK RICHIE
8991 W. Flamingo Road, Suite B
Las Vegas, Nevada 89147
mjr@randazza.com | ajs@randazza.com

☐ (BY FEDERAL EXPRESS): I am "readily familiar" with the firm's practice of collection and processing correspondence via Federal Express Service. Under that practice it would be deposited in a FEDERAL EXPRESS service mailbox, in an envelope designated by the Federal Express with delivery fees paid or provided for, addressed to the individual at the address above. [C.C.P. § 1013(c)]

☐ (BY MAIL): I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with USPS on that same day with postage thereon fully prepaid in Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit. [C.C.P. §§ 1012 and 1013(a)].

☒ (BY ELECTRONIC SERVICE): I am "readily familiar" with the firm's practice of collection and processing (BY [Code of Civ. Proc. §1010.6] by eServing the document(s) listed above to the e-mail address(es) set forth above, or as stated on the service list per agreement in accordance with Code of Civil Procedure Section 1010.6, OR in accordance with Emergency Rule of Court 12(b)(1) during the COVID-19 crisis, by electronically eServing the document(s) listed above to the e-mail address(es) set forth as stated on the attached service list.

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

Executed on August 7, 2026, in Los Angeles, California.

Shauntell Bodden
Shauntell Bodden

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9 *Attorneys for Petitioner*
10 EVANDER FRANK KANE

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

13 EVANDER FRANK KANE,

14 Petitioner,

15 v.

16 HOOMAN ABEDI KARAMIAN A/K/A NIK
17 RICHIE,

18 Respondent.

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

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

**DECLARATION OF EVANDER
FRANK KANE IN SUPPORT OF
PETITIONER'S OPPOSITION TO
RESPONDENT'S ANTI-SLAPP
SPECIAL MOTION TO STRIKE**

*[Filed Concurrently with Petitioner's
Opposition; and Declarations of Mara
Teigen and Ryan F. Coy]*

Hearing:

Date: August 26, 2026

Time: 8:30 a.m.

Place: Dept. C65

1 I, **Evander Frank Kane**, declare as follows:

2 1. I am the Petitioner in this action. I submit this declaration in support of my
3 Opposition¹ in response to the Anti-SLAPP Motion filed by respondent Hooman Abedi Karamian
4 a/k/a Nik Richie (“Respondent”). I have personal knowledge of the facts stated below and, if called
5 as a witness, could and would competently testify to them.

6 2. I am the sole legal and physical custodial parent of my daughter Kensington, who is
7 6 years old. Kensington’s biological mother, Deanna Kane, also known as Anna Kane, is my former
8 wife. She has no custodial rights whatsoever. Kensington lives with me, my fiancée Mara Teigen,
9 and our three other children, Iverson (4), Hendrix (3), and Penelope (1). It is my duty and
10 responsibility to protect all of them from harm. In my related Ex Parte Application, I respectfully
11 request that the Court include Ms. Teigen and our three youngest children as protected persons
12 under any temporary restraining order and any restraining order after hearing in this proceeding.

13 3. Since the Santa Clara County Superior Court awarded me full custody approximately
14 five years ago, Ms. Kane has publicly and falsely claimed that Kensington was kidnapped from her.
15 That claim is entirely false, and it has been adjudicated as such—multiple courts in the United States
16 and Canada have issued permanent protective orders against Ms. Kane prohibiting exactly this
17 conduct. A true and correct copy of the domesticated court order registering the Canadian restraining
18 order against Ms. Kane is attached hereto as **Exhibit 1**. For most of those five years, Ms. Kane’s
19 false claims circulated among a limited audience and did not generally result in strangers
20 approaching, following, or confronting my family in public. Nonetheless, based on Ms. Kane’s
21 harassment and online conduct, on July 13, 2024, the provincial court in Alberta, Canada, where I
22 reside with my family, issued a warrant for the arrest for Ms. Kane for her online harassment and
23 alleged violations of Canadian law. A true and correct copy of the July 13, 2024 warrant for arrest
24 of Ms. Kane is attached hereto as **Exhibit 2**.

25 4. The unwanted attention from strangers changed dramatically when Respondent
26 deliberately took up Ms. Kane’s false accusations and weaponized them, amplifying her lies to his

27 _____
28 ¹ All capitalized terms used herein but not defined shall have the same meaning as ascribed to
them in the Opposition.

1 massive audience, which he calls the “Dirty Army.” I have personally reviewed Respondent’s
2 Instagram accounts, website, and podcast, and estimate that he has published 80 to 100 posts and
3 videos in the past few months about me or my family, along with an extended interview with Ms.
4 Kane, which are all publicly accessible to his more than 500,000 followers in addition to the general
5 public. In these posts, Respondent does not merely repeat Ms. Kane’s claims—he inflames them.
6 He tells his audience that my daughter has been kidnapped and must be “rescued,” “saved,” and
7 “freed.” He has directed his followers to go find me and my family. He has published photographs
8 of my children, including my one-year-old daughter. He has published or amplified our personal
9 information and whereabouts, turning my family into targets for followers inclined to act on his
10 incitement.

11 5. Respondent is also profiting from his harassment. He sells “FREE KENSINGTON”
12 t-shirts and hats bearing my six-year-old daughter’s name on his website, dirtyarmy.org. He is
13 commercially exploiting the lie that I kidnapped my own child—monetizing the harassment of a
14 child and her family.

15 6. Respondent was asked to stop in May 2026 through a formal cease and desist from
16 my attorneys. He contemptuously refused, publicly stating that a retraction was a “hard pass.” Since
17 then, he has not merely continued—he has deliberately and vindictively escalated. His conduct
18 makes clear that Respondent has used me and my family as props in a social media campaign built
19 on stalking, harassment, and the relentless endangerment of me and my family.

20 7. Since my original declaration dated June 4, 2026, which was attached to my petition
21 for a civil harassment restraining order, Respondent’s stalking behavior and harassing conduct has
22 not only continued—it has intensified to an alarming degree, directly endangering me, Ms. Teigen,
23 and all four of our children.

24 8. For example, on June 26, 2026, I was at a shopping mall with my three oldest children,
25 including Kensington, when a woman whom I did not know approached me and warned me that a
26 man behind us had been following us for 6-7 minutes and photographing my children. I confronted
27 the man and asked him whether he had been photographing us. He initially tried to deny it. I asked
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1 to see his phone, and sure enough it contained photographs and videos of me and my children that
2 he had taken without my knowledge or consent. I made him delete them. If that woman had not
3 intervened, I never would have known that a stranger was stalking my children through a public
4 mall. While I cannot confirm that this individual was a follower of Respondent, the timing—
5 occurring after Respondent’s campaign went viral—and the man’s behavior are consistent with the
6 stalking behavior Respondent has actively encouraged. Indeed, this appears to be exactly the type
7 of conduct that Respondent’s campaign is designed to encourage.

8 9. On or about July 10, 2026, our entire family—including my mother, whose birthday
9 we were celebrating—was at Disneyland in Anaheim, California. A stranger photographed my
10 family, including my one-year-old daughter, and published the photographs online. Respondent and
11 Ms. Kane both published and amplified those photographs. This was no coincidence: Respondent
12 had specifically told his followers to find me. They found me, at a children’s amusement park,
13 surrounded by my children and extended family. This occurred after the temporary restraining order
14 in this proceeding was dissolved, which plainly emboldened Respondent to escalate his attacks and
15 stalking of my family. A true and correct copy of the Instagram story published by Respondent on
16 July 10, 2026 is attached to the Coy Declaration as Exhibit 5. In the story, Respondent says he is
17 “Looking for Monster Kane & Co.”; says “According to the Dirty Army they are at Disneyland”;
18 and finally asks his followers to hunt down our family by stating: “Let’s test the Dirty Army. Can
19 anyone grab a pic in next 30 minutes [.]” (Coy Decl., Ex. 5.) I understand the “& Co.” to be
20 referencing Ms. Teigen and our children—Respondent is treating the surveillance of my family,
21 including my infant daughter, as a game for his followers.

22 10. Shortly thereafter, Respondent triumphantly published a photo of myself, Ms. Teigen,
23 and our one-year-old daughter at Disneyland, stating: “That was fast. DA Strong!” He was
24 celebrating the successful surveillance of my family by his “army” of followers. A true and correct
25 copy of the Instagram story published by Respondent on July 10, 2026 is attached to the Coy
26 Declaration as Exhibit 6. This is not commentary—it is the real-time coordination of stalking.

1 11. Although we have avoided appearing in public, especially with our minor child (the
2 subject of Mr. Richie’s harassment), this was a special occasion and at Disneyland where we felt
3 that the extensive Disney security and prolific monitoring by cameras, would lend itself to a possibly
4 safer environment. We were wrong and now feel we cannot even take our child to the “happiest
5 place on earth” without being subject to stalking and harassment via Respondent’s “Dirty Army.”

6 12. Respondent and Ms. Kane are working in close coordination. In many posts,
7 Respondent “collaborates” with Ms. Kane; Ms. Kane publicly thanks Respondent on her social
8 media for continuing to post about me and my family; and Ms. Kane shares photographs from
9 Respondent’s followers who stalk my family and me. For example, on or about July 15, 2026, Ms.
10 Kane shared multiple photos of me that were secretly taken by strangers and sent to her,
11 broadcasting my location and where I had been “spotted.” True and correct copies of these Instagram
12 stories published by Ms. Kane on or about July 15, 2026 are attached to the Coy Declaration as
13 Exhibits 7 and 8. This coordination between Respondent and Ms. Kane has created a surveillance
14 network in which my family is constantly tracked, photographed, and reported on by strangers
15 acting at Respondent’s direction.

16 13. Ms. Teigen—my fiancée and the woman who has raised Kensington since she was an
17 infant—has been confronted by hostile strangers repeatedly. She has been accosted at malls, at
18 airports, and in a grocery store parking lot and called a “kidnapper” in front of our children. I was
19 not present for some of those incidents and do not describe them here. She describes them in her
20 own declaration. These confrontations are a direct and foreseeable consequence of Respondent’s
21 campaign.

22 14. I have watched Respondent’s campaign destroy Ms. Teigen’s sense of safety. She has
23 largely stopped leaving our home with the children because she is afraid of being confronted or
24 followed, as she has already experienced. The toll on her has been severe, and she has needed
25 professional care that she never needed before Respondent’s campaign began in May 2026. I have
26 not described those matters in detail here; Ms. Teigen addresses them in her own declaration, and
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28

1 she can describe them further if the Court requires. Respondent has done this to a woman whose
2 only involvement is that she loves our daughter, Kensington.

3 15. The effect on me has been profound. I am publicly accused of being a kidnapper and
4 a rapist to hundreds of thousands of people, and those lies now define how strangers perceive and
5 approach my family. My profession as a professional hockey player means my schedule is public:
6 strangers know where I am, and—more dangerously—they know when I am not home and Ms.
7 Teigen is alone with our four young children. I do not sleep well knowing that one of Respondent’s
8 “army” or followers could show up at our door while I am away, believing they are there to “rescue”
9 my daughter from a kidnapper or otherwise to harm my family.

10 16. My fear is specific, credible, and urgent. Respondent has not told his followers merely
11 unfavorable things about me—he has told them that a child is being held captive by
12 kidnappers/rapists and needs to be rescued and freed. He has told them where we are. He has
13 rewarded them for finding us. I believe it is only a matter of time before someone in an audience of
14 that size, identifying as the *Dirty Army*, attempts to be the one who “saves” my daughter. And when
15 that happens, which is all the more likely given the in-person surveillance and confrontations,
16 Kensington—a six-year-old girl—is who they will come for.

17 17. Because of the constant fear for our family’s safety, our children’s lives have been
18 fundamentally diminished. Our children no longer attend summer camps, play recreational sports
19 with others, or participate in extracurricular activities outside of the house. We gave up our family
20 membership at our private club because we are afraid to take our children somewhere where our
21 family can be identified, photographed, and harassed. Kensington is allowed at one friend’s home—
22 a family who has known her since she was 3—and our children’s world has generally reduced to
23 our home and immediate family. Respondent has effectively imprisoned my children in their own
24 home.

25 18. As of the date of this declaration, Respondent has not stopped. His targeted social
26 media campaign against me and my family continues unabated. He continues to publish content
27 about my family, continues to post our location and direct his followers to find us, and continues to
28

1 sell merchandise bearing my six-year-old daughter's name. He has shown no willingness to stop,
2 no remorse, and no regard for the safety of my children.

3 19. Finally, Respondent's campaign has affected my ability to work and provide for my
4 family. The false accusations of kidnapping and rape have had a direct professional and financial
5 effect on both Ms. Teigen and me, and that pressure falls on the household in which Kensington and
6 our other children are being raised. Respondent is not merely harassing us—he is destabilizing every
7 aspect of our family's life while profiting from our suffering.

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I declare under penalty of perjury and under the laws of the State of California that the foregoing is true and correct. Executed on August 6, 2026.



Evander Frank Kane

Exhibit 1

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.

Case Number:
21FL002586

4 I ask that the attached order be registered with this court for entry into the California Law Enforcement and Telecommunications System (CLETS). My request is voluntary. I understand that registration of the order is not necessary for enforcement.

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

Date: 5/28/2026

Evander Kane

Type or print your name

DocuSigned by:
Evander Kane
DDB9D16B5A9043E...
Sign your name

(To be completed by court)

The attached Canadian Domestic Violence Protective/Restraining Order is registered and enforceable in California, and can be entered into CLETS, unless it ends or is changed by the court that made it.

Date: 6/9/2026

Christine Garcia-Sen
Judge (or Judicial Officer)
Hon. Christine Garcia-Sen

Court Clerk Must Seal This Form and Attached Foreign Protection Order

This form sets forth the procedure to register a foreign protection order under Family Code section 6404:

1. No fee may be charged for the registration of the foreign protection order.
2. No court hearing is required to register the foreign protection order.
3. The case file containing this form and the attached foreign protection order must be sealed under Family Code section 6404(a).
4. Access to the foreign protection order is allowed only to law enforcement, the person who registered the order upon written request with proof of identification, the defense after arraignment on criminal charges involving an alleged violation of the order, or on further order of the court.

(Clerk will fill out this part.)

—Clerk's Certificate—

Clerk's Certificate

[seal]



I certify that this *Order to Register Canadian Domestic Violence Protective/Restraining Order* is a true and correct copy of the original on file in the court.

Date: 6/10/2026 Clerk, by /s/ P Newton, Deputy

This is a Court Order.

CERTIFIED COURT FILE NUMBER
by the Court Clerk as a true copy of
the document originally filed on Dec
18, 2024

2403 24820

COURT OF KING'S BENCH OF ALBERTA

Edmonton

JUDICIAL CENTRE

APPLICANT(S)

EVANDER KANE and MARA TEIGEN

RESPONDENT(S)

DEANNA KANE, also known as ANNA KANE,
also known as DEANNA SNOWBALL, also known
as DEANNA NYSTEAD

DOCUMENT

Restraining Order Without Notice and
Service Ex Juris Order

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF
PARTY FILING THIS
DOCUMENT

MICHELE J. REEVES, KC
Attia Reeves
Barristers & Solicitors
#200, 10525 Jasper Avenue, Edmonton, AB T5J 1Z4
T: 780-424-3334/F: 780-424-4252
Email: angi@reeveslaw.ca
File: 9587

Clerk's Stamp



DATE ON WHICH ORDER WAS PRONOUNCED: **December 18, 2024**

LOCATION OF HEARING: **Edmonton Law Courts, Edmonton, Alberta**

NAME OF JUSTICE WHO GRANTED THIS ORDER: **J. C. Leongard**

ON THE APPLICATION of the Applicant(s), EVANDER KANE and MARA TEIGEN

AND ON having heard representations of the Applicant(s);

AND ON having read the Affidavit of the Applicant(s), filed;

AND ON NOTING the Protection Order of Justice G.R. Fraser granted October 6, 2023, filed;

AND ON NOTING the permanent Restraining Order granted July 10, 2024 in the Superior Court of California, County of Santa Clara, USA;

AND ON NOTING that the Court is satisfied, pursuant to Rule 6.4 of the *Alberta Rules of Court*, that no notice to the Respondent(s) is necessary or that serving notice of the application on the Respondent(s) might cause undue prejudice to the Applicant(s);

IT IS ORDERED THAT:

1. The Respondent(s) DEANNA KANE, also known as ANNA KANE, also known as DEANNA SNOWBALL, also known as DEANNA NYSTEAD is specifically restrained from being within 300 yards of (275 metres) of:

(a) Evander Kane, Mara Teigen, Kensington Kane, and all children of Mara Teigen and Evander Kane;

- (b) the Applicants' residence;
- (c) the Applicant(s)' place of employment: Any NHL Arena, or public space in which the Applicant is required to attend for the purposes of his occupation
- (d) the Applicant(s)' other addresses: Any school or daycare being attended by the Applicants' children, including Kensington Kane

or from being within 275 metres of the Applicants, or the above children as set out in paragraph 1(a) above, anywhere else in the Province of Alberta, or within elsewhere in Canada.

2. The Respondent is hereby prohibited from posting anything to social media about the Applicants, the Applicants' children, about the parties' family dynamics, about KENSINGTON KANE, or the Respondent's parenting arrangements, about the court system, or about these or past legal proceedings or disparaging him or his family. The Respondent may not post about these topics on any form of social media, including but not limited to Instagram, Facebook X (formerly Twitter), or any other social media platform.
3. The Respondent(s) is/are restrained from harassing, molesting, watching, following, telephoning, or otherwise interfering with or contacting the Applicant(s), or their children, including Kensington Kane, either directly or indirectly, or by agent, including social media, anywhere in the Province of Alberta or anywhere else in Canada.
4. On a Respondent being in breach of any of the terms of this Order:
 - a. The Respondent may be charged under s. 13.1(1) of the *Protection Against Family Violence Act*; or
 - b. If the Respondent is not charged under s. 13.1(1) of the *Protection Against Family Violence Act*, any Police Officer is authorized to forthwith arrest that Respondent, and bring that Respondent, as soon as possible, before a Justice of the Court of King's Bench of Alberta to show reason why there should not be a finding of civil contempt.

However, that Respondent shall not be arrested unless that Respondent has previously been served with a copy of this Order, or if not served, is shown a copy of this Order by the Police Officer and, on being given an opportunity to do so, does not then obey it.

5. In making an arrest under this Order, a Police Officer is authorized to do anything necessary to carry out the arrest, including the use of as much reasonable force as may be necessary to make the arrest, and without warrant to enter any place where, on reasonable and probable grounds, the Police Officer believes that the Respondent may be found.
6. This Order is sufficient authority for the keeper of a correctional institution to hold a Respondent in custody pending appearance before a Justice of the Court of King's Bench of Alberta.
7. This Order remains in effect permanently and will not expire.
8. This matter will be back before the Court on that day at February 10, 2025 so that the Court may consider whether to renew the Order for a further period of time. If the Respondent(s) wish to appear on that date, the Respondent(s) shall file with this Honourable Court such affidavits as the Respondent(s) intend to rely on. The Respondent(s) shall arrange for a process server or other neutral party to serve the filed affidavits on the Applicant(s) by leaving a copy with each Applicant or leaving a copy, addressed to the Applicant(s), at the Applicant(s)' address for service at least 24 hours prior to the hearing. If any of the Respondent(s) do not appear, an order may be granted in that Respondent's absence.

at 11:00am in Urgent Chambers.

9. Any party may apply to amend, vary, or strike out the within Order on providing notice to the other party 5 days or more before the date the application is scheduled to be heard or considered.
10. The Respondent shall not be in breach of this Order in the following circumstances:
 - a. Any contact between the Applicant and the Respondent for the purpose of:
 - i) Arranging existing court-ordered parenting time to Kensington Kane;
 - ii) Exercising parenting time agreed to between the parties through mediation or through their counsel in writing;

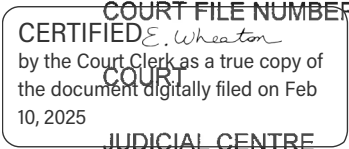
Shall not constitute a breach of this Order.

- b. The exercise of any parenting time granted to the Respondent in relation to KENSINGTON KANE by Order of a Court of competent jurisdiction granted after this Order, shall not constitute a breach of this Order.
 - c. Any contact between the Applicant and the Respondent for the purpose of arranging and attending court (including arranging for service of documents through a third party or service by email), mediation, counselling, meetings with legal counsel present, or any contact required for legal proceedings shall not constitute a breach of this Order.
11. **SERVICE:**

☒ A copy of this Order, together with a copy of the Statement of Claim and Affidavits relied on in support of this application shall forthwith be served on the respondent by emailing the documents to her at annakane0112@gmail.com and by couriering copies in care of her mother's address, being 15411 Collinson Avenue, East Pointe, Michigan, 48021, to be left with any adult at that residence, or if there is no answer, by leaving it at that address.
12. Service is deemed good, sufficient and valid five (5) days after emailing and couriering the documents.
13. The Respondent shall have 60 days to respond to the Statement of Claim.
14. Should the Respondent wish to file an Affidavit for the review of the within Order on February 10, 2025, she shall file and serve the Affidavit on counsel's office by January 17, 2025 and the Applicants shall have until February 7, 2025 to file a reply. The Respondent is at liberty to serve her filed Affidavit on counsel's office in care of angi@reeveslaw.ca.



Justice of the Court of King's Bench of Alberta



COURT FILE NUMBER
2403 24820

COURT OF KING'S BENCH OF ALBERTA

Edmonton

APPLICANT(S)

EVANDER KANE and MARA TEIGEN

RESPONDENT(S)

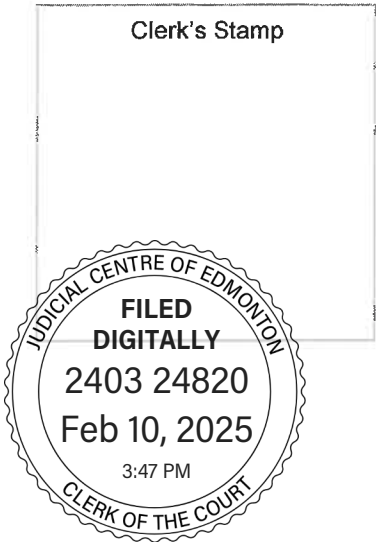
DEANNA KANE, also known as ANNA KANE,
also known as DEANNA SNOWBALL, also known
as DEANNA NYSTEAD

DOCUMENT

ORDER

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF
PARTY FILING THIS
DOCUMENT

MICHELE J. REEVES, KC
Attia Reeves
Barristers & Solicitors
#200, 10525 Jasper Avenue, Edmonton, AB T5J 1Z4
T: 780-424-3334/F: 780-424-4252
Email: angi@reeveslaw.ca
File: 9587



DATE ON WHICH ORDER WAS PRONOUNCED: February 10, 2025

LOCATION OF HEARING: Edmonton Law Courts, Edmonton, Alberta

NAME OF JUSTICE WHO GRANTED THIS ORDER: *JS Little*

ON THE APPLICATION of the Applicant(s), EVANDER KANE and MARA TEIGEN

AND ON having heard representations of the Applicant(s);

AND ON having read the Affidavit of Service of Angela Wieringa, filed January 30, 2025;

AND ON NOTING the Protection Order of Justice G.R. Fraser granted October 6, 2023, filed;

AND ON NOTING the permanent Restraining Order granted July 10, 2024 in the Superior Court of California, County of Santa Clara, USA;

AND UPON NOTING permanent Restraining Order granted by Justice J.C. Leonard December 18, 2024;

AND UPON NOTING paragraph 8 of Justice Leonard's Oder permitting the Defendant to appear to vary the Order;

AND ON NOTING the Defendant/Respondent did not attend or file/serve any material;

IT IS ORDERED THAT:

1. The Order of Justice J.C. Leonard, granted December 18, 2024 is confirmed and remains unvaried and permanent with no expiry pursuant to paragraph 7 of the Order.
2. Service on the Defendant is deemed valid effective December 24, 2024.

3. Failing the Defendant filing and serving a Statement of Defence in the within action, the Plaintiffs are entitled to enter a Notice of Default and submit for a Default Judgment on February 24, 2025.
4. A copy of this Order, is to be on the respondent by emailing the documents to her at annakane0112@gmail.com and by mailing a copy to the Defendant in care of her mother's mailing address.



Justice of the Court of King's Bench of Alberta

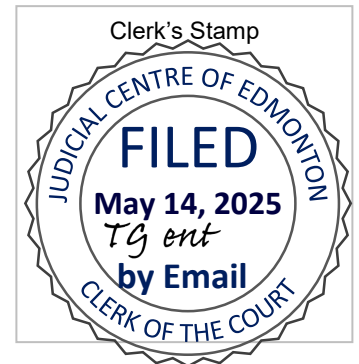
COURT FILE NUMBER 2403 24820

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE Edmonton

APPLICANT(S) EVANDER KANE and MARA TEIGEN

RESPONDENT(S) DEANNA KANE, also known as ANNA KANE,
also known as DEANNA SNOWBALL, also known
as DEANNA NYSTEAD



DOCUMENT DEFAULT JUDGMENT

ADDRESS FOR SERVICE AND
CONTACT INFORMATION OF
PARTY FILING THIS
DOCUMENT

MICHELE J. REEVES, KC
Attia Reeves
Barristers & Solicitors
#200, 10525 Jasper Avenue, Edmonton, AB T5J 1Z4
T: 780-424-3334/F: 780-424-4252
Email: angi@reeveslaw.ca
File: 9587

DATE ON WHICH ORDER WAS PRONOUNCED: May 14, 2025

LOCATION OF HEARING: Edmonton Law Courts, Edmonton, Alberta

NAME OF JUSTICE WHO GRANTED THIS JUDGMENT: K. L. Becker Brookes

UPON HAVING HEARD representations by counsel for the Plaintiffs;

AND ON NOTING the Protection Order of Justice G.R. Fraser granted October 6, 2023, filed;

AND ON NOTING the permanent Restraining Order granted July 10, 2024 in the Superior Court of California, County of Santa Clara, USA;

AND UPON NOTING the Permanent Restraining Order of Justice J. C. Leonard granted December 18, 2024;

AND UPON NOTING the Order of Justice J.S. Little granted February 10, 2025;

AND UPON NOTING the Defendant has not filed nor served a Statement of Defence and has been Noted in Default;

IT IS HEREBY ORDERED AND ADJUDGED THAT:

1. The Plaintiffs are hereby granted Judgement against the Defendant for damages, such damages to be assessed by a Justice of the Court of King's Bench on a date set by the Plaintiff without the necessity of notice to the Defendant or the Defendant's consent pursuant to Rule 6.4 of the Alberta Rules of Court.
2. The Plaintiffs shall have Judgment against the Defendant such that:

- A. The Defendant(s) DEANNA KANE, also known as ANNA KANE, also known as DEANNA SNOWBALL, also known as DEANNA NYSTEAD is specifically restrained from being within 300 yards of (275 metres) of:
- i. Evander Kane, Mara Teigen, Kensington Kane, and all children of Mara Teigen and Evander Kane;
 - ii. the Plaintiffs' residence;
 - iii. the Plaintiffs' places of employment: Any NHL Arena, or public space in which the Plaintiffs are required to attend for the purposes of their occupation;
 - iv. the Plaintiffs' other addresses: Any school or daycare being attended by the Plaintiffs' children, including Kensington Kane;
- or from being within 275 metres of the Plaintiffs, or the above children as set out in paragraph 2(a)(i) above, anywhere else in the Province of Alberta, or within elsewhere in Canada.
- B. The Defendant is hereby prohibited from posting anything to social media about the Plaintiffs, the Plaintiffs' children, about the parties' family dynamics, about KENSINGTON KANE, or the Defendant's parenting arrangements, about the court system, or about these or past legal proceedings or disparaging him or his family. The Defendant may not post about these topics on any form of social media, including but not limited to Instagram, Facebook X (formerly Twitter), or any other social media platform.
- C. The Defendant is/are restrained from harassing, molesting, watching, following, telephoning, or otherwise interfering with or contacting the Plaintiffs, or their children, including Kensington Kane, either directly or indirectly, or by agent, including social media, anywhere in the Province of Alberta or anywhere else in Canada.
- D. On the Defendant being in breach of any of the terms of this Order:
- a. The Defendant may be charged under s. 13.1(1) of the *Protection Against Family Violence Act*; or any such other applicable statute in the Peace Officer's discretion.
 - b. If the Defendant is not charged under s. 13.1(1) of the *Protection Against Family Violence Act*, or any such other applicable statute in the Peace Officer's discretion, any Police Officer is authorized to forthwith arrest that Respondent, and bring that Respondent, as soon as possible, before a Justice of the Court of King's Bench of Alberta to show reason why there should not be a finding of civil contempt.
 - c. The Despondent shall not be arrested unless that Despondent has previously been served with a copy of this Order, or if not served, is shown a copy of this Order by the Police Officer and, on being given an opportunity to do so, does not then obey it.
- E. In making an arrest under this Order, a Police Officer is authorized to do anything necessary to carry out the arrest, including the use of as much reasonable force as may be necessary to make the arrest, and without warrant to enter any place where, on reasonable and probable grounds, the Police Officer believes that the Defendant may be found.
- F. This Order is sufficient authority for the keeper of a correctional institution to hold a Defendant in custody pending appearance before a Justice of the Court of King's Bench of Alberta or such other superior Court jurisdiction should this Judgment be reciprocally enforced.
- G. This Order remains in effect permanently and will not expire.

H. The Defendant shall not be in breach of this Order in the following circumstances:

Any contact between the Defendant and the Plaintiff for the purpose of:

- i) Arranging existing court-ordered parenting time to Kensington Kane;
- ii) Exercising parenting time agreed to between the parties through mediation or through their counsel in writing;

kb

I. The exercise of any parenting time granted to the Defendant in relation to KENSINGTON KANE by Order of a Court of competent jurisdiction granted after this Judgment shall not constitute a breach of this Order.

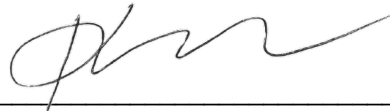
kb

kb

J. Any contact between the Plaintiff and the Defendant for the purpose of arranging and attending court (including arranging for service of documents through a third party or service by email), mediation, counselling, meetings with legal counsel present, or any contact required for legal proceedings shall not constitute a breach of this Order.

kb

K. Costs shall be reserved until the Assessment of Damages set out in Clause 1 herein.



Justice of the Court of King's Bench of Alberta

Exhibit 2



WARRANT FOR ARREST
Mandat d'arrestation

AG 421
REV 02/89
CRIMINAL CODE FORM 7
Code criminel formule 7

CANADA
PROVINCE OF ALBERTA/Province de Alberta
POLICE FILE NO/No du dossier de police: 23-860007
ENFORCEMENT AGENCY/Organisme chargé de l'application de la loi: EPS

FILE-TK NO/No de dossier: 240598672P1-01-001

PAGE 01

TO THE PEACE OFFICERS IN THE SAID PROVINCE:

Aux agents de la paix de ladite province:

THIS WARRANT IS ISSUED FOR THE ARREST OF

Le présent mandat est délivré pour l'arrestation de

KANE DEANNA, SARA JANE

SEX/sexe: F

DATE OF BIRTH/Date de naissance: 1986JAN12

OF/de NFA
AB

REFERRED TO IN THIS WARRANT AS THE ACCUSED.

ci-après appelé le prévenu.

BECAUSE THE ACCUSED HAS BEEN CHARGED WITH;

ATTENDU QUE le prévenu a été inculpé d'avoir;

BETWEEN THE 30TH DAY OF OCTOBER, 2023, AND THE 4TH DAY OF APRIL, 2024,
BOTH DATES INCLUSIVE, AT OR NEAR EDMONTON, ALBERTA, DID, WITHOUT LAWFUL
EXCUSE AND WITH INTENT TO HARASS A PERSON, REPEATEDLY COMMUNICATE, OR
CAUSE REPEATED COMMUNICATIONS TO BE MADE, WITH THEM BY MEANS OF
TELECOMMUNICATION, CONTRARY TO SECTION 372(3) OF THE CRIMINAL CODE OF
CANADA.

**** ADDITIONAL CHARGES ****

240598672P1-01-002 - 264(1) CC BETWEEN OCTOBER 30, 2023 AND APRIL 19, 2024 AT EDMONTON	EPS	23-860007
240598672P1-01-003 - 127(1) CC BETWEEN OCTOBER 30, 2023 AND APRIL 19, 2024 AT EDMONTON	EPS	23-860007

AND BECAUSE:

ATTENDU:

there are reasonable grounds to believe that it is
necessary in the public interest to issue this warrant for
the arrest of the accused [507(4), 512(1)];

qu'il y a des motifs raisonnables de croire qu'il est
nécessaire dans l'intérêt public de délivrer le présent
mandat pour l'arrestation du prévenu [507(4), 512(1)];

THEREFORE, YOU ARE ORDERED, IN HIS MAJESTY'S NAME, TO
IMMEDIATELY ARREST THE ACCUSED AND TO BRING THEM BEFORE

EN CONSÉQUENCE, IL VOUS EST ENJOINT PAR LES PRÉSENTES,
au nom de Sa Majesté, d'arrêter immédiatement le prévenu
et de l'amener devant

ME OR ANY OTHER JUSTICE OF THE PEACE IN AND FOR THE PROVINCE OF ALBERTA,

TO BE DEALT WITH ACCORDING TO LAW.

pour qu'il soit traité selon la loi.

TERMS AND CONDITIONS IF ANY:
Modalités:

SIGNED ON/Signé le 13TH DAY OF JULY, 2024
IN THE PROVINCE OF ALBERTA.

AT/à EDMONTON

dans la province d'Alberta.

ISSUED BY: W. FAULKNER

SIGNATURE OF JUDGE, PROVINCIAL COURT JUDGE, JUSTICE OR CLERK OF THE COURT
Signature du juge, du juge de la cour provinciale, du juge de paix ou du
greffier du tribunal

CANADA
PROVINCE OF ALBERTA
Province d'Alberta

ENDORSEMENT OF WARRANT
Visa du mandat

FORM 29
CRIMINAL CODE
SECTION 499 and
SUBSECTION 507(6) Paragraphe 507(6)

Formule 29

Code criminel

Article 499 et

WHEREAS THIS WARRANT IS ISSUED UNDER SECTION 507, 508 OR
512 OF THE CRIMINAL CODE IN RESPECT OF AN OFFENCE OTHER
THAN AN OFFENCE MENTIONED IN SECTION 522 OF THE CRIMINAL
CODE, I HEREBY AUTHORIZE THE RELEASE OF THE ACCUSED
PURSUANT TO SECTION 499 OF THAT ACT.

ATTENDU QUE le présent mandat est décerné en vertu des
articles 507, 508 ou 512 du code criminel, relativement à
une infraction autre que celles visées à l'article 522,
j'autorise par les présentes la mise en liberté du prévenu
en application de l'article 499 de cette loi.

DATED THIS/Fait le 13TH DAY OF JULY, 2024
IN THE PROVINCE OF ALBERTA.

AT/à EDMONTON

dans la province d'Alberta.

ORIGINATING COURT:
EDMONTON COURT OF JUSTICE
LAW COURTS BUILDING
1A SIR WINSTON CHURCHILL SQ.
EDMONTON, ALBERTA
T5J-0R2

CLERK OF THE COURT FOR THE JUSTICE OF THE PEACE
Greffier du tribunal pour le juge de paix

WARRANT EXECUTED THIS _____ DAY OF _____, _____ TIME _____ PLACE _____

PEACE OFFICER

PROOF OF SERVICE - 1013a, 2015.5 C.C.P.

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

] ss.
]
]

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

On August 7, 2026, I served the foregoing documents described as **DECLARATION OF EVANDER FRANK KANE IN SUPPORT OF PETITIONER'S OPPOSITION TO RESPONDENT'S ANTI-SLAPP SPECIAL MOTION TO STRIKE** on the interested parties in **EVANDER FRANK KANE v. HOOMAN ABEDI KARAMIAN A/K/A NIK RICHIE; OCSC Case No.: 30-2026-01575619-CU-HR-CJC**, by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Marc J. Randazza | Alex Shepard
RANDAZZA LEGAL GROUP NIK RICHIE
8991 W. Flamingo Road, Suite B
Las Vegas, Nevada 89147
mjr@randazza.com | ajs@randazza.com

☐ (BY FEDERAL EXPRESS): I am "readily familiar" with the firm's practice of collection and processing correspondence via Federal Express Service. Under that practice it would be deposited in a FEDERAL EXPRESS service mailbox, in an envelope designated by the Federal Express with delivery fees paid or provided for, addressed to the individual at the address above. [C.C.P. § 1013(c)]

☐ (BY MAIL): I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with USPS on that same day with postage thereon fully prepaid in Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit. [C.C.P. §§ 1012 and 1013(a)].

☒ (BY ELECTRONIC SERVICE): I am "readily familiar" with the firm's practice of collection and processing (BY [Code of Civ. Proc. §1010.6] by eServing the document(s) listed above to the e-mail address(es) set forth above, or as stated on the service list per agreement in accordance with Code of Civil Procedure Section 1010.6, OR in accordance with Emergency Rule of Court 12(b)(1) during the COVID-19 crisis, by electronically eServing the document(s) listed above to the e-mail address(es) set forth as stated on the attached service list.

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

Executed on August 7, 2026, in Los Angeles, California.

Shauntell Bodden
Shauntell Bodden

1 BLANK ROME LLP
Joseph J. Mellema (SBN 248118)
2 joseph.mellema@blankrome.com
3 4 Park Plaza | Suite 450
Irvine, CA 92614
4 Tel: 949.812.6038

5 Ryan F. Coy (SBN 324939)
ryan.coy@blankrome.com
6 2029 Century Park East | 6th Floor
7 Los Angeles, CA 90067
Telephone: 424.285.2194
8 Facsimile: 424.239.3434

9 *Attorneys for Petitioner*
10 EVANDER FRANK KANE

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

13 EVANDER FRANK KANE,

14 Petitioner,

15 v.

16 HOOMAN ABEDI KARAMIAN A/K/A NIK
17 RICHIE,

18 Respondent.

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

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

**DECLARATION OF MARA TEIGEN IN
SUPPORT OF PETITIONER'S
OPPOSITION TO RESPONDENT'S
ANTI-SLAPP SPECIAL MOTION TO
STRIKE**

*[Filed Concurrently with Petitioner's
Opposition; and Declarations of Evander
Frank Kane and Ryan F. Coy]*

Hearing:

Date: August 26, 2026

Time: 8:30 a.m.

Place: Dept. C65

1 I, **Mara Teigen**, declare as follows:

2 1. I am the fiancée of Petitioner Evander Kane. I submit this declaration in support of
3 Petitioner's Opposition¹ in response to the Anti-SLAPP Motion filed by respondent Hooman Abedi
4 Karamian a/k/a Nik Richie ("Respondent"). I have personal knowledge of the facts stated below
5 and, if called as a witness, could and would competently testify to them.

6 2. I am terrified for the safety of my children and myself. That fear grows worse with
7 each passing week because Respondent's conduct has not stopped—it has escalated. In the related
8 Ex Parte Application, Mr. Kane and I seek orders to protect us and our minor children, as well as
9 others around our family, from the increasingly frightening and disturbing threats, harassment, and
10 incitement by Respondent. In that Ex Parte Application, I respectfully requested that the Court
11 include me and our three youngest children as protected persons under any temporary restraining
12 order and any restraining order after hearing in this proceeding.

13 3. Mr. Kane and I reside together with his daughter, Kensington, who is 6 years old, and
14 our three other children, Iverson (4), Hendrix (3), and Penelope (1). Mr. Kane is Kensington's sole
15 legal and physical custodial parent. Kensington has lived in my home for approximately 5 years,
16 and I am one of her principal caregivers. I do her school drop-offs and pickups, care for her daily,
17 and she is my daughter in every way that matters.

18 4. Kensington's biological mother is Deanna Kane, also known as Anna Kane, Mr.
19 Kane's former wife. For years, Ms. Kane has publicly claimed that Mr. Kane and I "kidnapped" or
20 "stole" Kensington from her. That claim is false. Kensington lives with her father lawfully. I have
21 never taken part in taking any child from anyone.

22 5. I am familiar with Respondent's social media accounts, website, and podcast. I have
23 reviewed dozens of posts and videos he has published about Mr. Kane, Kensington, our other
24 children, and me. Respondent has specifically targeted me—he has told his audience "WE WILL
25 NOT let her and her R-Ape addict baby daddy get away with this," referring to me and Mr. Kane.
26 In substance, Respondent tells his audience that Kensington was kidnapped and directly implies she

27 ¹ All capitalized terms used herein but not defined shall have the same meaning as ascribed to
28 them in the Opposition.

1 is subject to abuse by claiming that she must be rescued, freed, and saved. He has expressly told his
2 followers to go find Mr. Kane. He has published photographs of our family, including of Kensington
3 and our other minor children. I understand Respondent's audience, which he refers to as his *Dirty*
4 *Army*, to number in excess of 500,000 followers in addition to the general public.

5 6. Respondent also sells merchandise bearing our daughter's name, which has been
6 available for months on his website: dirtyarmy.org. As of the date of this declaration, Respondent
7 is still selling "FREE KENSINGTON" t-shirts and hats on his website. He is profiting financially
8 from the harassment of my family and the exploitation of a six-year-old child's name.

9 7. Ms. Kane's accusations are not new to me. What is new is what happened after
10 Respondent began publishing about our family, including after he began publishing in collaboration
11 with Ms. Kane. Ms. Kane is subject to permanent court orders in both the United States and Canada
12 that prohibit her from making or disseminating these exact statements—yet Respondent has made
13 himself her instrument to circumvent those orders. Before Respondent's campaign, I was rarely
14 approached by strangers about Kensington. Since then—and particularly over the past two months
15 since Respondent began his social media campaign—the volume and the aggression of the attention
16 directed at me and at our children have escalated sharply. Ms. Kane's false and outlandish
17 accusations previously circulated within a limited audience, but Respondent delivered them
18 verbatim to a very large one and to people who he calls to act on them.

19 8. We know that Ms. Kane is working closely with Respondent because in many social
20 media posts Respondent "collaborates" with Ms. Kane; Ms. Kane publicly thanks Respondent on
21 her social media for continuing to publish about my family; and Ms. Kane shares photographs from
22 Respondent's followers who stalk my family and Mr. Kane. For example, on or about July 15, 2026,
23 Ms. Kane shared multiple photos of Mr. Kane that were secretly taken by strangers and sent to her,
24 broadcasting his location and where had been "spotted." True and correct copies of these Instagram
25 stories published by Ms. Kane on or about July 15, 2026 are attached to the Coy Declaration as
26 Exhibits 7 and 8.

1 9. Strangers now confront me in public because of Respondent's false accusations and
2 social media posts. I do not know these people. They know only what Respondent and Ms. Kane
3 have told them. I describe below the specific incidents I remember most clearly. There have been
4 others.

5 10. On at least two occasions at West Edmonton Mall, women approached me while I was
6 with my children. For example, on June 19, 2026, a woman (blonde, medium-build) who was herself
7 with her children introduced herself as a fan, said she followed me on social media, and asked if I
8 was Mara Teigen. When I answered, she said that she knew Ms. Kane and that what I was doing
9 was "horrific" and that I had "kidnapped her daughter." This was said in front of my children and
10 her own. I tried to walk away. She followed and yelled "kidnapper" at me as I left.

11 11. On another occasion, on May 18, 2026, at the Edmonton International Airport, a
12 woman (younger, dark hair) who I did not know asked to take a photograph with me. I told her I
13 was with my children. She responded with words to the effect of, "Is it nice to have your kids with
14 you when you stole someone else's kid?" My children heard this.

15 12. Similar confrontations have occurred in the past two months at the Edmonton
16 International Airport and at the Vancouver International Airport. Respondent has published
17 photographs of Mr. Kane and me taken at the airport, making it clear to his followers where to find
18 us when we travel. A true and correct copy of Respondent's Instagram story posted on June 18,
19 2026 showing photos taken of Mr. Kane and me with our children at the airport as well as
20 screenshots of text messages presumably between Respondent and Ms. Kane is attached to the Coy
21 Declaration as Exhibit 9. Ms. Kane reposted Respondent's same June 18, 2026 story on her
22 accounts, further demonstrating the collaboration of Respondent with Ms. Kane. A true and correct
23 copy of Ms. Kane's stories posted on her Instagram accounts sharing Respondent's June 18, 2026
24 story is attached to the Coy Declaration as Exhibit 10.

25 13. One of the incidents that frightened me most happened at a grocery store in Edmonton
26 in approximately early June 2026. I was loading groceries into my car in the parking lot with one of
27 my children. A man with a beard in dark clothing was sitting in his car watching me. As I was
28

1 putting my daughter Penelope into her car seat, he rolled down his window and began yelling “FREE
2 KENSINGTON” and “give Kensington back to Anna” at me. He was aggressive and hostile. I did
3 not know whether he was going to get out of his car. I was afraid for my physical safety and for my
4 daughter’s. The phrase he shouted—“FREE KENSINGTON”—is Respondent’s exact slogan, the
5 same phrase Respondent prints on t-shirts and hats and sells on his website. There is no question
6 where this man learned it. I got into my car and drove away. I was shaking so badly that I had to
7 pull over on the side of the road, where I sat and cried.

8 14. On or about July 10, 2026, our family was at Disneyland in Anaheim, California for
9 my future mother-in-law’s sixtieth birthday. I had not wanted to go anywhere in public, but I made
10 an exception for the occasion. While we were there, a stranger photographed us, including our one-
11 year-old daughter, and those photographs were published online. Respondent and Ms. Kane both
12 published our presence there. I understand Respondent had told his followers to go find Mr. Kane,
13 and someone did. A true and correct copy of the Instagram story published by Respondent on July
14 10, 2026 is attached to the Coy Declaration as Exhibit 5. In the post, Respondent says he is “Looking
15 for Monster Kane & Co.”; says “According to the Dirty Army they are at Disneyland”; and then
16 directs his followers to hunt us down by stating: “Let’s test the Dirty Army. Can anyone grab a pic
17 in next 30 minutes []”. (Coy Decl. Ex. 5.) I understand the “& Co.” to be referencing myself and
18 my children. When I learned that Respondent’s followers had photographed us and that Respondent
19 was celebrating it online, I felt physically ill. The one time I agreed to leave the house for a family
20 event, we were tracked and surveilled within minutes.

21 15. Shortly thereafter, Respondent published a photo of myself, Mr. Kane, and our one-
22 year-old daughter at Disneyland, stating: “That was fast. DA Strong!” A true and correct copy of
23 the Instagram story published by Respondent on July 10, 2026 is attached to the Coy Declaration as
24 Exhibit 6. Respondent was celebrating the successful stalking of my family as entertainment for his
25 followers.

26 16. Although we have avoided appearing in public, especially with our minor child (the
27 subject of Mr. Richie’s harassment), this was a special occasion and at Disneyland where we felt
28

1 that the extensive Disney security and prolific monitoring by cameras, would lend itself to a possibly
2 safer environment. We were wrong and now feel we cannot even take our child to the “happiest
3 place on earth” without being subject to stalking and harassment via Respondent’s “Dirty Army.”

4 17. In late June 2026, while Mr. Kane was at a mall with the three oldest kids, a woman
5 warned him that a man had been following them for several minutes and photographing the children.
6 Mr. Kane confronted the man, who had photographs and videos of Mr. Kane and our children on
7 his phone. I was not present, and I describe this only because it is one of the reasons I now believe
8 our children are being followed and photographed wherever we go.

9 18. In nearly every one of these incidents, my children were with me or nearby. My
10 children have heard strangers call me a kidnapper. This causes confusion and has a very negative
11 effect on the children, particularly Kensington, who does not understand why people approach us
12 in public and why activities outside of the home have become more limited. These are young
13 children who do not understand why their mother is being confronted and screamed at by strangers
14 in public.

15 19. My greatest fear is that someone will take Kensington. Respondent has told hundreds
16 of thousands of people that she is being held by kidnappers and rapists and needs to be rescued—
17 and people are acting on that lie. I believe it is only a matter of time before one of them decides to
18 be the person who “rescues” her. My second fear is that someone will take one of our other children
19 in retaliation—to show us, as I have heard it put, “what it feels like.” I do not know who these people
20 are, what they are capable of, or how far they will go. The people confronting us are angry,
21 emboldened by Respondent’s encouragement, and angry people act out.

22 20. These public incidents at the mall, grocery store, and airport changed how I think
23 about my safety in an ordinary way. At least two of the women in these incidents confronted me
24 and called me a “kidnapper” were with their own children. If a woman standing next to her own
25 kids feels entitled to confront and scream at me in public, then I genuinely fear that anyone could
26 do worse. That is why I now feel unsafe around people I would ordinarily have no reason to fear.

1 21. The effect of this on me has been severe. For approximately the past two months, I
2 have largely stopped leaving my home with my children, because almost every time I do, someone
3 confronts me. I lie awake most nights. Our family's schedule is public—Mr. Kane's profession
4 means strangers know when he is out of town and when I am home alone with the children—and I
5 cannot sleep knowing that people who believe I am a kidnapper know where we live and know
6 when I am alone with them.

7 22. Since Respondent's campaign began, I have experienced severe physical and
8 emotional symptoms that I had never experienced before. I am receiving professional care for those
9 symptoms that I did not need before Respondent began publishing about my family. I have described
10 these effects in general terms rather than in detail, and I have done so deliberately. Respondent has
11 made my family the subject of a public campaign directed at hundreds of thousands of people, and
12 I am not willing to place my private medical information into a public court record that he will
13 republish to that audience. If the Court wishes to hear more, I am prepared to testify about these
14 matters in greater detail at the evidentiary hearing, in camera, or under seal.

15 23. I have fundamentally changed how my family lives to protect our children. We have
16 substantially increased security at our home, and we have put additional protective measures in
17 place at our children's school, including restrictions on photographs. She is permitted at only one
18 friend's home, whose mother we have known since Kensington was three, and that is the only child
19 permitted at ours. These are the security measures of a family living under siege.

20 24. In the past two months, we cancelled all of our children's summer camps and
21 extracurricular activities, including soccer, because we cannot know which parents will be present
22 and will not leave our children among strangers when we are not there. We also gave up our family
23 membership at our private club in Edmonton—a private club with swimming, tennis, and children's
24 programming that our children used regularly—because I was not willing to have them there where
25 they could be identified, photographed, or confronted.

26 25. I am now actively seeking full-time security for myself and the children for the periods
27 when Mr. Kane is away, because I do not feel safe alone with them. The fact that I cannot feel safe
28

1 in my own home without professional security demonstrates the severity of what Respondent has
2 done to our family.

3 26. Because of the increased attention caused by Respondent, I am afraid to say
4 Kensington's name in public.

5 27. Our children are living inside a very small world as a result. It is summer. They are
6 not at camp, not in sports, and not making friends. They see one another, one approved friend, their
7 grandparents, and some extended family. They are innocent in all of this, and they are the ones
8 whose lives have been narrowed most severely by Respondent's conduct.

9 28. Despite formal demands that Respondent stop, he has not. As of the date of this
10 declaration, Respondent is still publishing about our family and still selling merchandise bearing
11 Kensington's name. The Disneyland incident occurred on July 10, 2026—after the temporary
12 restraining order in this case was dissolved. The dissolution of that order plainly emboldened
13 Respondent. Nothing about the past two months suggests to me that this will stop on its own and
14 Respondent has continued to escalate his conduct towards our family with each passing week.

15 29. Finally, Respondent's campaign has destroyed my professional livelihood. I work as
16 a model and in social media. Brands have informed me they will no longer work with someone
17 being publicly called a kidnapper and an accomplice to child abuse. Although of no consequence
18 compared to the harm caused to my daughter and other children, this serves to demonstrate the
19 extraordinary reach and destructive power of Respondent's stalking behavior.

20 ///

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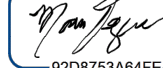
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1 I declare under penalty of perjury and under the laws of the State of California that the
2 foregoing is true and correct. Executed on August 6, 2026.

3 DocuSigned by:

4 

92D8753A64FE44D...

5 Mara Teigen

PROOF OF SERVICE - 1013a, 2015.5 C.C.P.

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

] ss.
]
]

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

On August 7, 2026, I served the foregoing documents described as **DECLARATION OF MARA TEIGEN IN SUPPORT OF PETITIONER'S OPPOSITION TO RESPONDENT'S ANTI-SLAPP SPECIAL MOTION TO STRIKE** on the interested parties in **EVANDER FRANK KANE v. HOOMAN ABEDI KARAMIAN A/K/A NIK RICHIE; OCSC Case No.: 30-2026-01575619-CU-HR-CJC**, by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Marc J. Randazza | Alex Shepard
RANDAZZA LEGAL GROUP NIK RICHIE
8991 W. Flamingo Road, Suite B
Las Vegas, Nevada 89147
mjr@randazza.com | ajs@randazza.com

☐ (BY FEDERAL EXPRESS): I am "readily familiar" with the firm's practice of collection and processing correspondence via Federal Express Service. Under that practice it would be deposited in a FEDERAL EXPRESS service mailbox, in an envelope designated by the Federal Express with delivery fees paid or provided for, addressed to the individual at the address above. [C.C.P. § 1013(c)]

☐ (BY MAIL): I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with USPS on that same day with postage thereon fully prepaid in Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit. [C.C.P. §§ 1012 and 1013(a)].

☒ (BY ELECTRONIC SERVICE): I am "readily familiar" with the firm's practice of collection and processing (BY [Code of Civ. Proc. §1010.6] by eServing the document(s) listed above to the e-mail address(es) set forth above, or as stated on the service list per agreement in accordance with Code of Civil Procedure Section 1010.6, OR in accordance with Emergency Rule of Court 12(b)(1) during the COVID-19 crisis, by electronically eServing the document(s) listed above to the e-mail address(es) set forth as stated on the attached service list.

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

Executed on August 7, 2026, in Los Angeles, California.

Shauntell Bodden
Shauntell Bodden

1 BLANK ROME LLP
Joseph J. Mellema (SBN 248118)
2 joseph.mellema@blankrome.com
3 4 Park Plaza | Suite 450
Irvine, CA 92614
4 Tel: 949.812.6038

5 Ryan F. Coy (SBN 324939)
ryan.coy@blankrome.com
6 2029 Century Park East | 6th Floor
7 Los Angeles, CA 90067
Telephone: 424.285.2194
8 Facsimile: 424.239.3434

9 *Attorneys for Petitioner*
10 EVANDER FRANK KANE

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

13 EVANDER FRANK KANE,

14 Petitioner,

15 v.

16 HOOMAN ABEDI KARAMIAN A/K/A NIK
17 RICHIE,

18 Respondent.

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

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

**DECLARATION OF RYAN F. COY IN
SUPPORT OF PETITIONER'S
OPPOSITION TO RESPONDENT'S
ANTI-SLAPP SPECIAL MOTION TO
STRIKE**

[Filed Concurrently with Petitioner's
Opposition; and Declarations of Evander
Frank Kane and Mara Teigen]

Hearing:

Date: August 26, 2026

Time: 8:30 a.m.

Place: Dept. C65

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1 his family were at Disneyland. He then published a photo of Mr. Kane's six-year-old daughter,
2 Kensington, stating: "Kensington is at Disneyland. She is in America." A true and correct copy of
3 Respondent's July 10, 2026 posts on his "Dirty Army" Instagram channel are attached hereto as
4 **Exhibit 4.**

5 6. On July 10, 2026, Respondent published another story on his Instagram saying he is
6 "Looking for Monster Kane & Co."; says "According to the Dirty Army they are at Disneyland";
7 and finally asks his followers to hunt down our family by stating: "Let's test the Dirty Army. Can
8 anyone grab a pic in next 30 minutes [.]" A true and correct copy of Respondent's July 10, 2026
9 Instagram story is attached hereto as **Exhibit 5.**

10 7. After Respondent's followers delivered, on July 10, 2026, Respondent posted a photo
11 of Mr. Kane, Ms. Teigen, and their one-year-old daughter at Disneyland. A true and correct copy of
12 Respondent's July 10, 2026 Instagram story with the photo is attached hereto as **Exhibit 6.**

13 8. Deanna "Anna" Kane and Respondent are frequent collaborators on social media
14 content. She will often share and repost pictures from Respondent and Respondent's followers. For
15 example, on or about July 15, 2026, Ms. Kane shared multiple photos of Mr. Kane that were secretly
16 taken by strangers and sent to her. True and correct copies of these Instagram stories published by
17 Ms. Kane on or about July 15, 2026 are attached hereto as **Exhibit 7** and **Exhibit 8.** Another
18 example was on June 18, 2026: a true and correct copy of Respondent's Instagram story posted on
19 June 18, 2026 showing photos taken of Mr. Kane, Ms. Teigen, and their children at the airport as
20 well as screenshots of text messages presumably between Respondent and Ms. Kane is attached
21 hereto as **Exhibit 9.** Ms. Kane reposted Respondent's same June 18, 2026 story on her accounts,
22 further demonstrating the collaboration of Respondent with Ms. Kane. A true and correct copy of
23 Ms. Kane's stories posted on her Instagram accounts sharing Respondent's June 18, 2026 story is
24 attached hereto as **Exhibit 10.**

25 9. Respondent continues to publish about Mr. Kane and his family. On July 23, 2026,
26 Respondent published a post to his Instagram account (@nikrichie) containing a clip of an interview
27 he conducted of Deanna "Anna" Kane on or about May 20, 2026. Instagram identifies the post as a
28 collaboration with @annaavakane, which is Ms. Kane's Instagram account. The post is captioned:

1 “Dirty Army, we are going to make change. I feel it. –nik.” A true and correct copy of Respondent’s
2 July 23, 2026 post is attached hereto as **Exhibit 11**. I reviewed the clip contained in that post on
3 July 31, 2026 and I prepared a transcript of it, which I then compared against the clip for accuracy.
4 A true and correct copy of that transcript of the clip posted by Respondent on July 23, 2026 is
5 attached hereto as **Exhibit 12**.

6 10. Also on July 23, 2026, Respondent published a story to his Instagram account
7 containing the same clip featuring Ms. Kane, with the words “FREE KENSINGTON” displayed
8 across the video and a message from a third party reshared over it reading “BRING KENSINGTON
9 HOME NOW!!” A true and correct copy of that story is attached hereto as **Exhibit 13**.

10 11. I reviewed the comments to Respondent’s July 23, 2026 post on or about July 30,
11 2026. The comments include “FREE KENSINGTON,” “#freekensington,” and
12 “#FREEKENSINGTON These lawyers need to be held accountable.” Another comment, addressed
13 to Ms. Kane, states that she “will absolutely get Kensington back.” Respondent posted a comment
14 of his own in reply to his followers, stating: “I’ll see everyone in August. Pack a lunch.” The post
15 reflects that comments on it have been limited and that at least one comment has been hidden. A
16 true and correct copy of the comments on the July 23, 2026 post is attached hereto as **Exhibit 14**.

17 12. On July 29, 2026, Ms. Kane published a story to her Instagram account
18 (@annaavakane). The story depicts a screenshot of a direct-message exchange in which a message
19 reports the performance metrics of an Instagram reel identified as a “Collaboration with
20 annaavakane,” including 1,507,504 views, 958,424 accounts reached, and 633 new follows, together
21 with the statement: “Anna the clip is still going. Hasn’t slowed down.” Ms. Kane published the
22 screenshot with the caption “love you guys thank you so much.” A true and correct copy of Ms.
23 Kane’s July 29, 2026 story is attached hereto as **Exhibit 15**.

24 13. On July 7, 2026, after the last court hearing in this case, Mr. Randazza appeared on
25 an episode of Respondent’s podcast, the “Dirty Army Podcast.”² During the episode, Respondent
26 spoke directly about this case and explained the true purpose behind his and his counsel’s excessive
27

28 ² Mr. Randazza specifically appeared on Episode 6, “The System – Pulling Back the Curtain on the
Legal System: Marc Randazza.”

1 motion practice, stating: “[Mr. Kane] has no idea because we’re papering so hard and go and coming
2 from every single angle. This thing’s going to cost him. Like my goal is 2.5. I think I I think if he
3 can get if he can if we can keep going on this and he’s he just financially drained, he’s going to
4 come to the table and he’s going to be like, I’m over it.” I understand Respondent’s “2.5” comment
5 within the context to have meant “\$2.5 million.” Mr. Randazza responded, stating: “I mean it’s one
6 it’s not a good idea to talk about your settlement strategy on camera.” I listened to the podcast
7 episode through Respondent’s public YouTube channel on July 30, 2026. The July 7, 2026 podcast
8 episode can be found at https://youtu.be/AYp6_xRZxvw?is=uC2xe3xD6vCwPwnL and the above
9 statements by Respondent and Mr. Randazza were made from 58:00-58:34. A true and correct copy
10 of a transcription of the relevant portions of Respondent’s podcast episode with Mr. Randazza is
11 attached hereto as **Exhibit 16**.

12 14. During the podcast episode with Mr. Randazza, Respondent and Mr. Randazza also
13 discussed how they like to lose at the trial court level, so that they can appeal. Mr. Randazza stated:
14 “I love that I lose at the trial level.” Respondent stated: “that’s why I want to lose. I want to appeal.”
15 These statements by Respondent and Randazza were made from 52:34-53:05 during the July 7,
16 2026 podcast episode and can be found in Exhibit 16.

17 15. On August 4, 2026, Respondent published a story to his Instagram account
18 (@nikrichie). The story is headed by a “Dirty Army” banner and states: “Update: Evander Kane and
19 Former Wife Anna Kane Ordered to Appear In Person To Testify at Aug. 26 and Sept. 8 Hearings
20 in Nik Richie Case.” Immediately below that statement, the story displays a link sticker reading
21 “LEGAL FUND DONATIONS HERE – THANK YOU,” to which Respondent added a graphic red
22 arrow pointing at the link. Below the link, the story displays a composite promotional image
23 depicting Respondent and Mr. Kane facing one another in front of a courthouse, above the words
24 “TRIAL DATES SET,” the names “NIK RICHIE” and “EVANDER KANE,” the dates “AUGUST
25 26” and “SEPTEMBER 8, 9 & 10,” and, across the bottom, “FREE KENSINGTON.” I viewed and
26 captured this story on August 4, 2026. A true and correct copy of Respondent's August 4, 2026
27 Instagram story is attached hereto as **Exhibit 17**.

1 16. No order has been entered in this proceeding requiring Deanna “Anna” Kane to appear
2 in person or to testify at either the August 26, 2026 hearing or the September 8, 2026 hearing.
3 Further, no subpoena has been noticed or served by Respondent (or Petitioner) seeking Ms. Kane’s
4 testimony. I have not been served with any orders or papers requiring her testimony, and it does not
5 appear that such an order exists. The August 26, 2026 hearing is the hearing on Respondent’s Anti-
6 SLAPP Motion, and the September 8–10, 2026 hearing, as currently scheduled, is the evidentiary
7 hearing on the Petition. Neither proceeding is a “trial” nor requires Ms. Kane’s involvement or
8 participation whatsoever.

9 17. On August 6, 2026, the Court entered a minute order regarding Petitioner’s ex parte
10 application seeking to reinstate the TRO. A true and correct copy of the August 6, 2026 Minute
11 Order is attached hereto as **Exhibit 18**.

12 I declare under penalty of perjury under the laws of the State of California that the foregoing
13 is true and correct. Executed on August 7, 2026 at Los Angeles, California.

14
15
16 
17 _____
18 Ryan F. Coy
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Exhibit 1

Coy, Ryan

From: Marc Randazza <mjr@randazza.com>
Sent: Thursday, July 9, 2026 8:52 AM
To: Coy, Ryan; Mellema, Joseph
Cc: Alex Shepard
Subject: Service on Evander Kane

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.

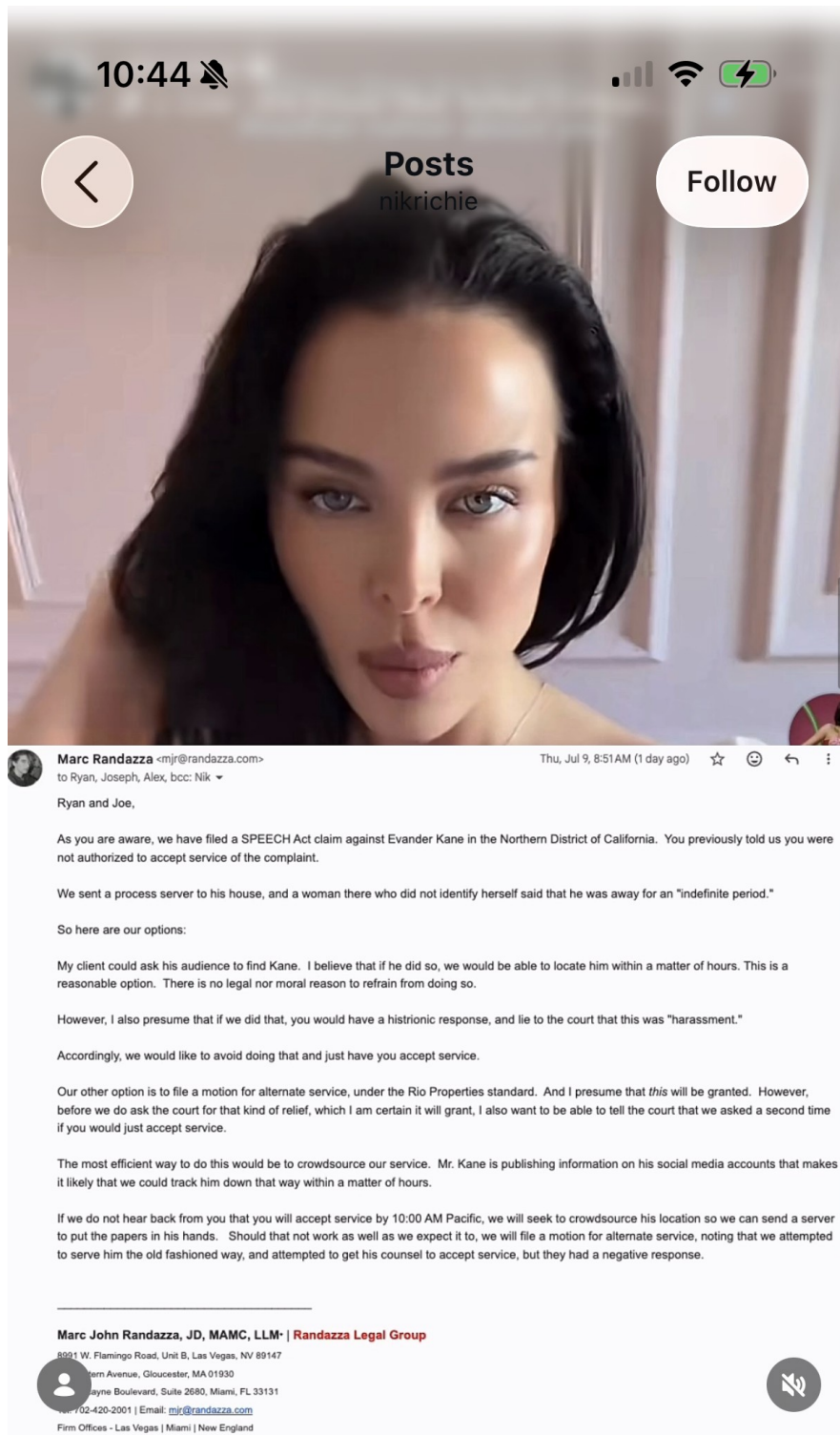
The most efficient way to do this would be to crowdsource our service. Mr. Kane is publishing information on his social media accounts that makes it likely that we could track him down that way within a matter of hours.

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.

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.

Exhibit 2



♡ 305 💬 97 ↻ 15 📌 73 📌

nikrichie DIRTY ARMY - Unfortunately Mr. Kane and Photoshop Rumor Channel Queen are on the run from legal service on another matter we have with Monster Kane. @nhl @edmontonoilers or DA Canada, if you know where this guy is located please let us know. As the Asian lady at their home told us "they have left indefinitely."

20 hours ago

Exhibit 3

10:40



nikrichie 20h

Watch full reel >

Follow



nikrichie

when they try to start
Another rumor about you

0:13



Marc Randazza <mjr@randazza.com>
to Ryan, Joseph, Alex, bcc: Nik

Thu, Jul 9, 8:51AM (1 day ago)



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

Contains: Snabang - Drake

Send message...



Exhibit 4

11:51

5G+ 57



Dirty Army

nikrichie · 4.4K members



Welcome to the Dirty Army.



According to DA intel - Evander, Mara and all kids ate currently in Los Angeles. If anyone knows there whereabouts please let me know.



44



8



Update: According to the Dirty Army they are at Disneyland



31



15



8

+2



If you spot them please take a pic



46



10



Kensington is at Disneyland. She is in America.



33



10



Exhibit 5



nikrichie 1h
Dirty Army

Follow

...



Looking for Monster Kane & Co.



Dirty Army
Channel • 3.9K members

Nik Richie

Update: According to the Dirty Army
they are at Disneyland

[Join channel](#)

***Let's test the Dirty Army.
Can anyone grab a pic in
next 30 minutes ❤️***

 Disneyland

Send message...



Exhibit 6



nikrichie 1h

Philharmonic Wind Or... >

Follow



That was fast. DA Strong!

Send message...

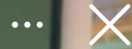


Exhibit 7

1:43



annaavakane 6h



"So how much to off
my exx"

"For you..
We will give you the
Friends+ family discount "

Send message...



Exhibit 8

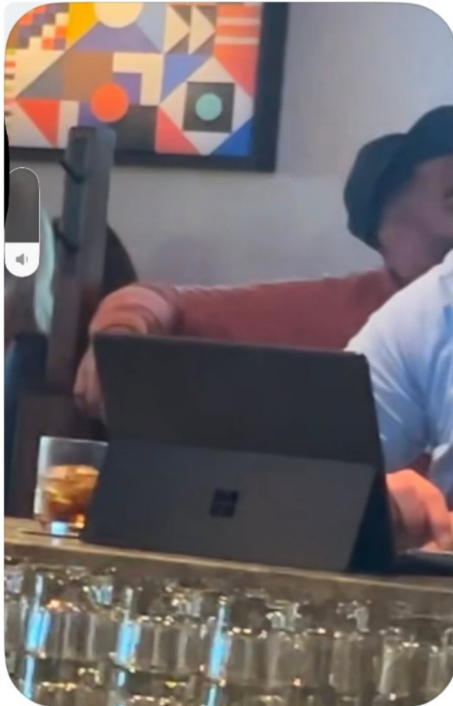
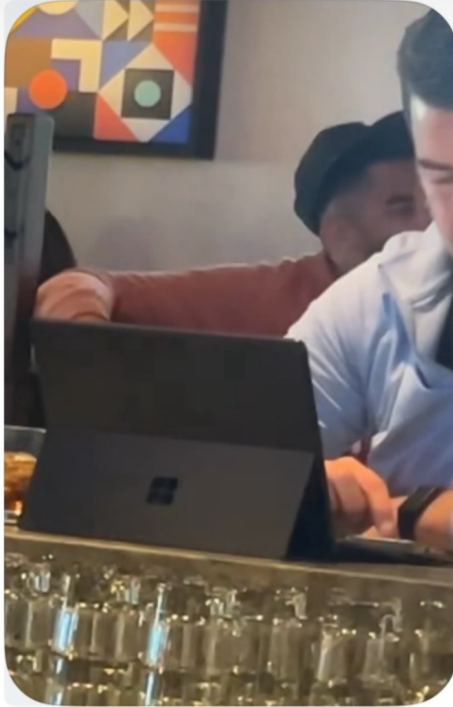
1:43

89



annaavakane 6h

EK spotted at Joey south common



Send message...



Exhibit 9

11:05



annaavakane 2h

Follow



FREE KENSINGTON

The best is that a Dirty Army member went up to him and said "hey you just lost to Nik Richie"

Yeah they were boarding a flight

Classic

Oh my God, that's fucking awesome

He's was calling his lawyer

That is hilarious.

God bless the Dirty Army.

What I would give for a transcript of that phone call

Can you imagine how fucking pissed off he must be?

It's only the beginning. Time to have fun.



Where is Channel, Monaco and Kensington!!!

Marc J. Randazza @marc... · 1m
Evander Kane, the NHL player, got a secret injunction against @nikrichie (Nik Richie), mak him take down an interview he did with Kane's He based it on the fact that Kane has a Canadian injunction against his ex wife, so an American journalist can't interview her. 1/



Send message...



Exhibit 10

11:08



nikrichie 20m
annakane ak 2h

Follow

...



FREE KENSINGTON

The best is that a Dirty Army member went up to him and said "hey you just lost to Nik Richie"

Yeah they were boarding a flight

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Marc J. Randazza 🇺🇸 🇮🇹 🇬🇧 @marc... · 1m
Evander Kane, the NHL player, got a secret injunction against @nikrichie (Nik Richie), mak him take down an interview he did with Kane's He based it on the fact that Kane has a Canadi injunction against his ex wife, so an American journalist can't interview her. 1/ 🇺🇸



Send message...



11:05



annaavakane 2h

Follow



FREE KENSINGTON

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Send message...



Exhibit 11

11:06



Posts
nikrichie

Follow



Liked by oana80m and others

nikrichie It was never about buying Kensington, it was about

11:08

43



nikrichie and annaavakane

↗ Hans Zimmer · Cornfield Chase

It was never about buying Kensington, it was about punishing and controlling the life of [@annaavakane](#) ❤️ and buying Channel bags for Mara.

Dirty Army, we are going to make change. I feel it.- nik

July 23



annaavakane



Newport Beach, California



spagettwest 1w

I haven't seen one woman you defend get their child back yet. Who will be the 1st one and when? Any predictions?



4



joeyangelina_ 1w

#FREEKENSINGTON These lawyers need to be held accountable.



9



montanaqh4 1w

FREE KENSINGTON ❤️



Comments on this post have been limited.

Exhibit 12

Transcript of @nikrichie and @annaavakane's July 23, 2026 post on Instagram re clip of Nik Richie and Anna Kane's May 20, 2026 interview (posted on YouTube on May 21, 2026)

Nik Richie: I think judges are narcissists as well. Like their egos are everything.

Anna Kane: They're so corrupt. There's so much corruption. The judges are friends golfing with the lawyers.

Nik Richie: Totally, it's all cash deals.

Anna Kane: It's all cash. And, especially in my case because Evander Kane's lawyers were sued, um, right after he represented Evander a woman sued them for charging her \$350,000 for three months of work. Evander told me in private mediation "I paid Travis Krepelka," please everyone Travis Krepelka is a horrible human, um, Krepelka law firm, uh, "I paid \$500,000 for Kensington, I paid them \$500,000 to take her." That's what her life was worth, to them, to him.

Exhibit 13

2:52



nikrichie 3h
Watch full reel >

Follow



nikrichie

0:41



FREE KENSINGTON



BRING KENSINGTON HOME NOW !! ❤️ ❤️ ❤️



Exhibit 14

2:50



Comments



julie.m.anderson.holburn 2h



1



baldieri7 2h

Nik , amazing work.



montanaqh4 3h

FREE KENSINGTON ❤️



3



michalene_thee_maltese 1h

[#freekensington](#)



joeyangelina_ 3h

[#FREEKENSINGTON](#) These lawyers need to be held accountable.



4



nikrichie 3h · Author

I'll see everyone in August. Pack a lunch.



9

Hidden by Instagram



jen.enzweiler 3h

He couldn't control her in the marriage anymore so he has to punish and destroy her. Too bad it's not working and she's stronger and truly making a difference in so many lives. [@annaavakane](#) you are amazing keep it up mama and you will absolutely get Kensington back ❤️👏



7

Comments on this post have been limited.

Exhibit 15

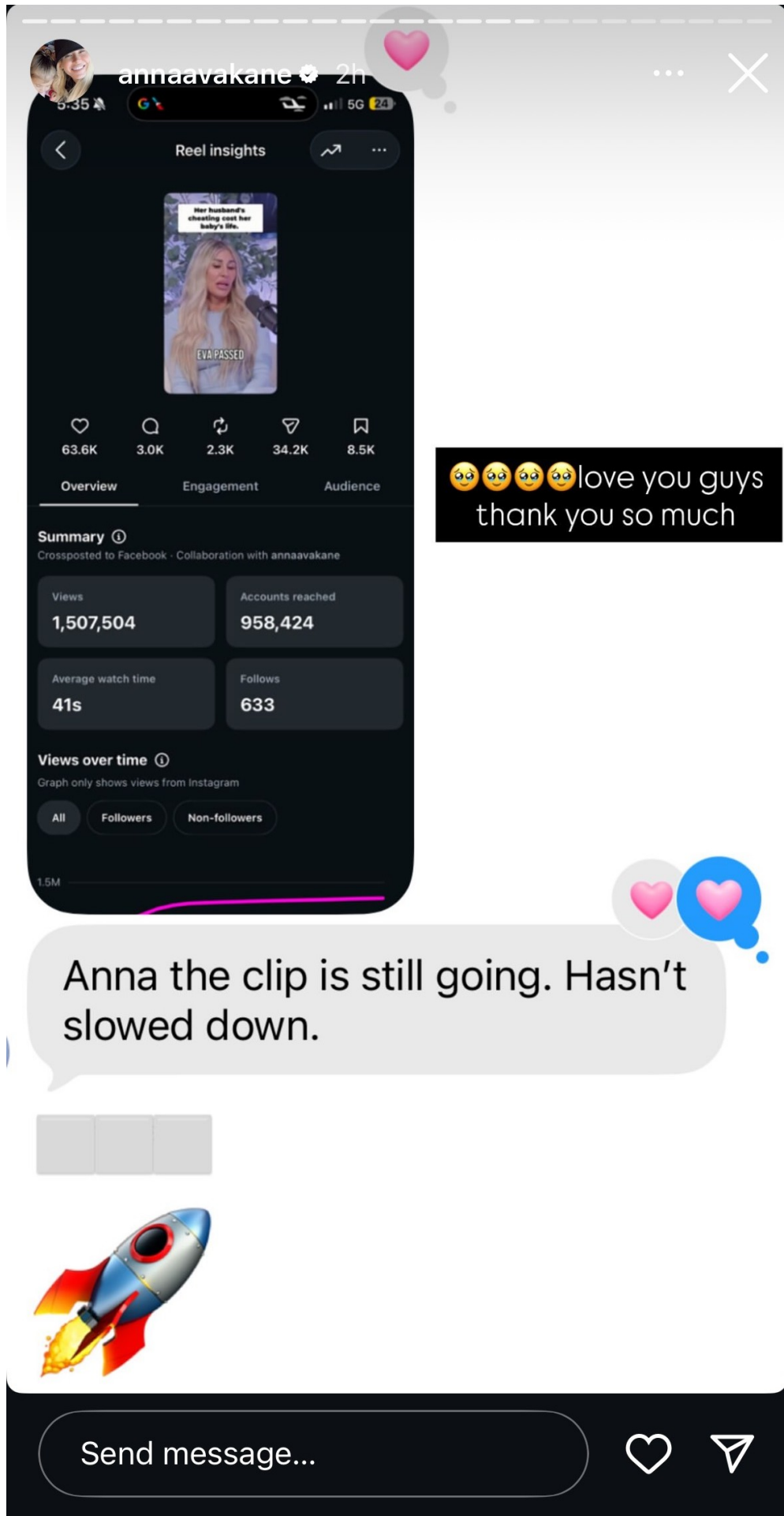


Exhibit 16

The System - Pulling Back the Curtain on the Legal System: Marc Randazza | Dirty Army Podcast Ep. 6, July 7, 2026

42:33-43:45

42:33

Randazza: Right. people get to talk. You get to to discuss what you want to discuss. Like the case that we were in court on today, you know, I don't want to

42:42

I can't go too far into it because, you know, this is it's an ongoing case, but where we have an NHL player and his

42:49

ex-wife and very high profile struggles with the law.

42:54

You interview her and then he wants to stop you from broadcasting that interview. I mean, it's that simple.

43:02

That is an absolutely grave first amendment violation as far as I'm concerned. And the the fact that the court initially gave them that

43:10

injunction, it only lasted for like 48 hours. But even those 48 hours, to me, that was just a that's just an abscess

43:19

in the First Amendment that you can never get back. Yeah. You know, and and to say, well, what's the big deal?

43:24

It's only two days. Well, then it's only three days. Then it's only three weeks.

43:28

Then it's only three months. then it's only three lifetimes, you know, three generations and next thing you know, you got

43:35

nothing. I mean, you have to yell and scream every time somebody tries to shut you down and shut you up because you get to report on matters of public concern.

43:45

That that's what we are as a country. Yeah.

52:24-53:37

52:24

Nik Richie: It's like Rocky won. So that like sometimes, and I told you this, like Yeah. We need to lose sometimes. Sure.

52:30

So, because it gets louder, it gets bigger. The the wave gets larger.

52:34

Randazza: Oh, look, some cases. I love that I lose at the trial level. Yeah.

52:39

You know, and I I mean, it's like like a thing that we're doing right now. Gee, man, I kind of hope we lose at the trial level. Yeah.

52:47

Because when the Look, Jones versus Dirty World doesn't mean [___] until it goes to the Sixth Circuit.

52:53

Right. Once it gets to the Sixth Circuit, now it's precedent that people cite forever.

Nik Richie: Well, that's why I want to lose. I want to appeal.

53:00

So, let's lose and get to a higher court.

53:02

Randazza: Yeah. I mean, I'm going to fight it to win. Yeah. But I'm thrilled to lose.

53:05

Nik Richie: Yeah. But it's also for me, it's also I want to give Anna and I want some of these and I don't let's not talk too much about it, but like I want to give them their platform and their voice

53:14

where they can confront their predator or their

Randazza: or at least just get their side of the story. Why shouldn't they?

53:20

I mean, he can he can hire a public relations company to say anything he wants. why can't she come sit down with a a journalist?

53:28

And that's all this was.

Nik Richie: It's like, "Hey, Anna, come out. Let's let's speak your truth and you say what you want to say." But these guys want to suppress

53:37

these women.

56:29-59:16

56:29

Randazza: It's unusual how quickly your case has moved.

Nik Richie: Really?

56:37

Randazza: Your case moved quickly because they went in, you know, like dirty-

Nik Richie: guns blazing

Randazza: No, guns blazing shows a bit of courage.

56:47

They went in there like underhanded little slimy rats, you know, sneaking in like the roach under the frigin door.

56:54

All right. And they went and get this secret injunction without even telling you that it was happening until they got it.

57:02

It's crazy. It's disgusting.

57:04

And it's why I don't like them. It's why I'm doing this case so much, because blank Rome, I tell you that fluff

57:12

Firm, when David Norcross was there had a lot of honor.

57:15

The way they're comporting themselves in this case, I don't think has very much honor. I, you know, normally you don't badmouth your opposing council on on uh on video.

57:23

But I I will I will badmouth them. I think it was an underhanded slimy thing that they did.

57:28

Um it was unamerican and I think they should be should feel ashamed for it.

Nik Richie: Well, it is it's a Canadian move.

57:36

Randazza: Well, it may be, but you know, it's it's a No, it's more like a North Korean move, but uh you know, it uh that they're gonna I don't know what their

57:44

motivation was. I mean, I can speculate, but it's irrelevant.

Nik Richie: It's money

57:48

Randazza: You know, the way they did it was dishonorable, but then we had to file an emergency motion. You hear that guy in there whining today that we filed emergency

57:56

motions and all this? Like, what do you expect? You [__] cry baby.

57:59

I know. It's crazy, right? So, you know, we had to go in there to get our free speech rights restored. I'm telling you. So now we got him back.

58:07

Nik Richie: He has no idea because we're papering so hard and go and coming from every single angle. This thing's going to cost him.

58:14

Like my goal is 2.5. I think I I think if he can get if he can if we can keep going on this and he's he just financially drained.

58:24

He's going to come to the table and he's going to be like, I'm over it. And I I don't

Randazza: I mean it's one it's not a good idea to talk about your settlement strategy on

58:32

camera. So I hope but look but it's not about that. You know what it ought to be in a in a in a world where you

58:40

have and look the judge I hope does the right thing on your anti-slab hearing and puts an end to this.

58:46

Right. You don't get to do what they're trying to do. Yeah. Not in America. Yeah.

58:52

Um and if she doesn't, you know, she'll do what she's going to do. Judges are going to judge.

58:57

She'll make her decision. We'll go to the appellate court if it isn't Well, frankly, it I guess it probably doesn't matter which one of us wins. We're going to the appellate court.

59:05

Um I I don't imagine they're going to give up.

59:08

So, we're going to the court of appeals anyway.

59:11

So, let's see uh which direction we go in.

Exhibit 17



nikrichie 4h
In The White Stripes · Seven No...

Dirty Army

Follow



Update: Evander Kane
and Former Wife
Anna Kane Ordered
to Appear In Person
To Testify at Aug. 26
and Sept. 8 Hearings
in Nik Richie Case



LEGAL FUND DONATIONS HERE - THANK YOU



Exhibit 18

**SUPERIOR COURT OF CALIFORNIA,
COUNTY OF ORANGE
CENTRAL JUSTICE CENTER**

MINUTE ORDER

DATE: 08/06/2026

TIME: 01:45:00 PM

DEPT: C65

JUDICIAL OFFICER PRESIDING: Jennifer McCartney

CLERK: M. Hernandez

REPORTER/ERM: None

BAILIFF/COURT ATTENDANT: None

CASE NO: **30-2026-01575619-CU-HR-CJC** CASE INIT.DATE: 06/05/2026

CASE TITLE: **Kane vs. Karamian**

CASE CATEGORY: Civil - Unlimited CASE TYPE: Harassment

EVENT ID/DOCUMENT ID: 74921435

EVENT TYPE: Ex Parte

MOVING PARTY: Evander Frank Kane

CAUSAL DOCUMENT/DATE FILED: Ex Parte Application - Other, 08/05/2026

APPEARANCES

No Appearance by all parties

There are no appearances by any party.

The Court has read and considered the 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 (ROA 93), the Declarations in Support of the Ex Parte Application (ROA 87, 89, and 91), Respondent's Opposition (ROA 97) and Petitioner's Reply (ROA 99).

The Court takes Judicial Notice of the previous filings in this matter, the 7/7/26 Minute Order, the 6/24/26 Minute Order, the 6/23/26 Minute Order, the 6/18/26 Minute Order, the 6/17/26 Minute Order, the 6/15/26 Minute Order, and the 6/8/26 Minute Order.

The Court has considered Respondent's prior arguments that his conduct constituted journalistic activity protected by the First Amendment and that Petitioner sought to restrain protected reporting. The Court rejects that characterization. Respondent's conduct in publishing Petitioner's location on social media, requesting that followers of his platform ("Dirty Army") locate Petitioner and his family, photograph them, and publish those photographs online bears no reasonable relationship to legitimate news gathering or reporting protected by the First Amendment.

Code of Civil Procedure section 527.6 authorizes injunctive relief where a petitioner has suffered harassment. As relevant here, harassment includes "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," where the conduct would cause a reasonable person to suffer substantial emotional distress and actually causes such distress. (*E.G. v. M.L.* (2024) 105 Cal.App.5th 688, 698.)

The Court finds that Respondent engaged in a knowing and willful course of conduct directed specifically at Petitioner and Petitioner's immediate family. Respondent publicly posted the family's location, subsequently confirmed that location, and solicited third parties to locate Petitioner, photograph Petitioner, Petitioner's fiancé, and their four minor children, and publish those photographs online.

The accompanying language—including "Let's test the Dirty Army. Can anyone grab a pic in next 30 minutes"—demonstrates that Respondent was actively encouraging members of the public to seek out Petitioner's family in real time.

Based upon the declarations submitted by Petitioner and Ms. Teigen, together with the evidence describing the reactions of the minor children when approached by strangers in public, the Court finds that Respondent's conduct seriously alarmed, annoyed, and harassed Petitioner and his immediate family. The Court further finds that such conduct would cause a reasonable person to suffer substantial emotional distress and that it did, in fact, cause substantial emotional distress to Petitioner, Ms. Teigen, and the children.

The Court further finds that Respondent's conduct served no legitimate purpose. Respondent contends that the purpose of the posts was to determine Petitioner's location for service of legal process. The Court is not persuaded. The evidence demonstrates that Respondent already knew Petitioner's location when the challenged post was made. If the objective had been solely to facilitate service of process, there would have been no apparent reason to invite followers to "test the Dirty Army" by obtaining and publishing photographs of Petitioner's family within thirty minutes. The Court finds that the conduct exceeded any legitimate litigation-related purpose and instead constituted the use of Respondent's social media platform to direct third parties toward Petitioner and his family in a manner reasonably calculated to intimidate and harass them.

Not all speech enjoys constitutional protection. California Penal Code section 653.2(a) criminalizes certain electronic communications intended to place another person or that person's immediate family in reasonable fear for their safety by encouraging unwanted physical contact or harassment by third parties. Although Respondent's conduct is not before this Court in a criminal proceeding, the statute illustrates that the Legislature has recognized that certain online conduct encouraging third-party harassment falls outside the protections ordinarily afforded to speech.

The Court recognizes that modern journalism is not limited to members of the institutional press and that individuals may engage in news reporting through social media platforms. However, the protections afforded to journalistic activity do not extend to conduct that intentionally directs members of the public to locate identified individuals, including minor children, photograph them without consent, and disseminate those images online when such conduct constitutes harassment. Likewise, advance notice that one intends to engage in such conduct does not immunize the conduct from legal scrutiny. Numerous lawful mechanisms exist to accomplish service of process without publicly disclosing the location of a litigant and his minor children or encouraging third parties to approach and photograph them.

Accordingly, the Court concludes that Respondent's challenged conduct was not constitutionally protected activity.

The Court must also determine whether the challenged conduct is ongoing or likely to recur. (*E.G. v. M.L.* (2024) 105 Cal.App.5th 688, 706.) In evaluating the likelihood of future harm, the Court may consider any delay in seeking injunctive relief. (See *O'Connell v. Superior Court* (2006) 141 Cal.App.4th 1452, 1481.)

Petitioner filed the present ex parte application on August 5, 2026, approximately twenty-seven days after the July 10, 2026 incident. The evidence before the Court reflects no subsequent public requests by Respondent directing followers to locate, photograph, or publish images of Petitioner or Petitioner's family following the July 10 incident. Although Petitioner identifies prior incidents, those incidents are remote in time and the present record does not establish that they were specifically attributable to Respondent's challenged conduct.

The Court recognizes that any future conduct by Respondent directing third parties to locate, approach, photograph, or publish images of Petitioner or Petitioner's children could constitute an ongoing course of harassment warranting injunctive relief. However, on the present record, the Court finds that the July 10

incident was isolated rather than part of an ongoing course of conduct.

Finally, the Court notes that Respondent's counsel, Marc J. Randazza, an attorney licensed in California and therefore subject to the duty of candor imposed by Rule 3.3 of the California Rules of Professional Conduct and Business and Professions Code section 6068, has affirmatively represented to the Court in writing that "there is no likelihood this alleged conduct will continue." The Court accepts counsel's representation as an officer of the Court. In light of that representation, together with the absence of evidence of subsequent similar conduct, the Court cannot presently find that the challenged conduct is ongoing or likely to recur as required under *E.G. v. M.L.*

As such, the Court **DENIES** the Petitioner's request to reinstate the temporary restraining order.

The Court **DENIES** the Petitioner's request to expand the scope of the already set evidentiary hearing on this matter.

The Court Clerk is to provide notice of the Court's ruling.

PROOF OF SERVICE - 1013a, 2015.5 C.C.P.

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

] ss.
]
]

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

On August 7, 2026, I served the foregoing documents described as **DECLARATION OF RYAN F. COY IN SUPPORT OF PETITIONER'S OPPOSITION TO RESPONDENT'S ANTI-SLAPP SPECIAL MOTION TO STRIKE** on the interested parties in **EVANDER FRANK KANE v. HOOMAN ABEDI KARAMIAN A/K/A NIK RICHIE**; OCSC Case No.: **30-2026-01575619-CU-HR-CJC**, by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Marc J. Randazza | Alex Shepard
RANDAZZA LEGAL GROUP NIK RICHIE
8991 W. Flamingo Road, Suite B
Las Vegas, Nevada 89147
mjr@randazza.com | ajs@randazza.com

☐ (BY FEDERAL EXPRESS): I am "readily familiar" with the firm's practice of collection and processing correspondence via Federal Express Service. Under that practice it would be deposited in a FEDERAL EXPRESS service mailbox, in an envelope designated by the Federal Express with delivery fees paid or provided for, addressed to the individual at the address above. [C.C.P. § 1013(c)]

☐ (BY MAIL): I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with USPS on that same day with postage thereon fully prepaid in Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit. [C.C.P. §§ 1012 and 1013(a)].

☒ (BY ELECTRONIC SERVICE): I am "readily familiar" with the firm's practice of collection and processing (BY [Code of Civ. Proc. §1010.6] by eServing the document(s) listed above to the e-mail address(es) set forth above, or as stated on the service list per agreement in accordance with Code of Civil Procedure Section 1010.6, OR in accordance with Emergency Rule of Court 12(b)(1) during the COVID-19 crisis, by electronically eServing the document(s) listed above to the e-mail address(es) set forth as stated on the attached service list.

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

Executed on August 7, 2026, in Los Angeles, California.

Shauntell Bodden
Shauntell Bodden