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30-2026-01575619-CU-HR-CJC - ROA # 31 - DAVID H. YAMASAKI, Clerk of the Court By E. efilinguser, Deputy Clerk.

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EVANDER FRANK KANE

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE

EVANDER FRANK KANE,

Petitioner,

v.

HOOMAN ABEDI KARAMIAN A/K/A NIK RICHIE,

Respondent.

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

PETITIONER EVANDER KANE'S OPPOSITION TO RESPONDENT'S EX PARTE APPLICATION FOR AN ORDER VACATING TEMPORARY RESTRAINING ORDER

Ex Parte Hearing:
Date: June 17, 2026
Time: 1:30 p.m.
Dept: C64

Petitioner Evander Frank Kane ("Petitioner") hereby opposes the *Emergency Ex Parte Application for an Order Vacating Unconstitutional Harassment Restraining Order Against Nik Richie* ("Application") filed on June 15, 2026 by Respondent Hooman Abedi Karamian *aka* Nik Richie ("Respondent").

Inexplicably, and with reckless disregard, Respondent tries to hide behind the manufactured veil of "protected speech" and distract from the real issue at hand—**ensuring the safety of a minor child**. The narrowly tailored TRO does just that. While not impugning any free speech rights, the limited TRO merely protects the minor child from Respondent's posts which clearly are directed to incite his followers. Alleging that the minor child was "kidnapped" by her father (completely false as full custody was awarded to Petitioner) is akin to falsely yelling fire in a crowded theater. Harm is anticipated and has occurred. Furthermore, Respondent has assisted in circumventing the California domestic violence restraining order and the Canadian declaratory judgment—both of which the Court has taken judicial notice of—restraining the mother of the minor child from harassing behavior,. The TRO does nothing more than prevent the continuing violation of those orders. The TRO should remain in place, if no reason other than to protect this child.

On June 8, 2026, the Court issued a narrowly focused *Temporary Restraining Order* ("TRO") protecting Petitioner and his minor daughter from further conduct by Respondent, including but not limited to, conduct that harasses, intimidates, stalks, and disturbs the peace of Petitioner and his daughter. (TRO at p. 2, ¶ 5.) The TRO further ordered Respondent "to cease any posting to social media alleging petitioner had kidnapped his daughter" and "prohibited [Respondent] from posting anything to social media . . . regarding petitioner or his daughter Kensington as described or relayed to respondent by Deanna Kane." (TRO at p. 8, Attachment 5a(4).)

For the reasons set forth herein, the Court should deny the Application in its entirety. The June 30, 2026 hearing is when and where the Court should decide the merits of the TRO by clear and convincing evidence on a complete record.

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I. INTRODUCTION

Respondent's *emergency* Application attacks an order that does not exist. The Court's TRO is narrow and conduct-focused. It does not, as the Application repeatedly insists, forbid Respondent from blanket "reporting" on Petitioner. The TRO in its limited scope specifically restrains Respondent from two discrete things: (1) publishing the demonstrably false claim that Petitioner "kidnapped" his own minor daughter, of whom Petitioner has sole legal and physical custody; and (2) serving as the publication conduit for Deanna Kane *aka* Anna Kane, who is independently restrained by court order from posting about Petitioner and the child. Respondent remains free to criticize Petitioner. However, Respondent is not free to manufacture a false kidnapping narrative aimed at a five-year-old or to knowingly launder a restrained party's prohibited speech through his own platform. The Respondent's posts are clearly designed to incite Respondent's followers and has put the minor child at significant risk that someone will act upon this false narrative of kidnapping.

The Application is the wrong motion at the wrong time. Even if they are without merit, the arguments in the Application can and should be made at the June 30, 2026 hearing. The full evidentiary hearing on the TRO—fifteen days away—is when and where the statute requires the Court to decide the merits by clear and convincing evidence on a complete record. Code of Civ. Proc. ("CCP"), § 527.6(i). Restraining orders for good cause are constitutional and speech that harasses and stalks persons is not protected. *Huntingdon Life Sciences, Inc. v. Stop Huntingdon Animal Cruelty USA, Inc.* (2005) 129 Cal.App.4th 1228, 1250 ("In California, speech that constitutes 'harassment' within the meaning of section 527.6 is not constitutionally protected, and the victim of the harassment may obtain injunctive relief."); *see Virginia v. Black* (2003) 538 U.S. 343, 359-60 (stating that threats and intimidation are not protected by freedom of speech and free press).

Respondent does not identify any irreparable harm, especially considering the short, and presently temporary, duration; indeed, Respondent has continued to make social media posts about Petitioner in apparent disregard of the TRO. (*See, e.g.*, Instagram, @nikrichie,

https://www.instagram.com/reel/DZkpeMQR21V/ (retrieved June 16, 2026).) There is no emergency; the TRO is constitutional; and thus the Court should deny the Application in its entirety and let the noticed hearing proceed as scheduled on June 30, 2026. Moreover, Petitioner would ask the Court to hold Respondent in contempt for violation of the TRO.

II. RELEVANT BACKGROUND

Petitioner holds sole legal and physical custody of his daughter, Kensington, age five. (Kane Decl. ¶ 3.)[1] Petitioner's ex-wife, Deanna Kane, is restrained by court order from posting on social media about Petitioner, his fiancée, and his children, including Kensington. (Kane Decl. ¶¶ 4-6, Exs. A, B.) Both of those orders were attached to the petition and placed before the Court. (Kane Decl. Ex. A, B.)

On May 21, 2026, Respondent published an interview with Deanna Kane on YouTube and promoted it on Instagram and his website, dirtyarmy.org, with commentary asserting that Petitioner "kidnapped" or "stole" Kensington. (*See* Kane Decl. at ¶¶ 7-9.) He also offers for sale and sells "FREE KENSINGTON" merchandise tied to that narrative. (*Id.* at ¶ 14; *see also* https://dirtyarmy.org (retrieved June 16, 2026).) After Petitioner's counsel demanded that the conduct stop, Respondent refused and escalated his misconduct—even going so far as to publicly taunt Petitioner and his counsel. (Kane Decl. at ¶¶ 11-13, Exs. C, D.)

On June 4, 2026, Petitioner's counsel emailed Respondent to advise him that Petitioner would be seeking a civil harassment restraining order against him on June 5, 2026. (*See* Proof of Service filed June 12, 2026, Ex. A.) The Application's repeated statements that Respondent was not informed of the request for a restraining order before it was filed are false. Indeed, on June 5, 2026, Respondents' counsel sent a response letter, stating in relevant part: "We are … in receipt of Mr. Coy's threat to seek an injunction against Mr. Richie today (sent last night). … I presume that if you were not bluffing, the court laughed at you today when you tried to get a prior restraint. I've seen **idiot judges** give them out in other states, and even then, they don't last long. If you managed

[1] All references herein to "Kane Decl." mean the Declaration of Evander Frank Kane filed on June 5, 2026 with the Request for Civil Harassment Restraining Orders.

to secure an injunction, go ahead and email it to me. We'll make short work of that." (Exhibit 1 attached hereto (emphasis added).)

On June 8, 2026, the Court issued the TRO, supported by written findings (TRO at p. 8, Attachment 5a(4)), and set a noticed hearing for June 30, 2026. The Court expressly took judicial notice of both the California domestic violence restraining order and the Canadian default judgment—recognizing the latter as a Canadian order—and was free to, and did, consider their terms.

On June 11, 2026, upon receipt of the issued TRO, Petitioner's counsel served the relevant papers on Respondent's counsel. (*See* Proof of Service filed June 12, 2025; *see also* Ex. 1 at p. 3 ("No need to trouble yourself with formal service.").) On June 12, 2026, Respondent posted the Notice of Court Hearing to his Instagram account, stating: "YESSSSSSSSS!!!!! Let's dance [] Time to show the world what I can do. Thank you Evander Kane… this is going to be so much fun …." (Instagram, @nikrichie, https://www.instagram.com/p/DZf0j8hv09y/?ig_mid=BD93F96B-0D1D-4B71-AC0D-A4EE6EA43764&utm_source=igweb (retrieved June 16, 2026).)

On June 15, 2026, Petitioner's counsel was informed that the Superior Court of California, County of Santa Clara, ordered that the Canadian default judgment is registered and enforceable in California.[2]

III. ARGUMENT

A. The Application is procedurally improper; these issues belong at the June 30 hearing.

Ex parte relief requires an affirmative showing of irreparable harm, immediate danger, or another statutory basis for bypassing a noticed motion. Cal. Rules of Court, rule 3.1202(c). Respondent makes no such showing. The TRO is interim by design and expires at the June 30 hearing, where Respondent may file a response (form CH-120) and litigate every issue he raises

[2] Upon receipt of the signed order, Petitioner's counsel will provide the Court and Respondent's counsel with a copy.

there on a full record under the clear-and-convincing-evidence standard of Code of Civil Procedure section 527.6(i).

Respondent's own papers concede the proper course here. He asks that the Court, in the alternative, treat the Application as his opposition to the TRO and to proceed at the hearing. (App. at p. 10 n.6.) That is exactly what the Application is—an opposition to the TRO—and these arguments belong at the imminent, already-calendared evidentiary hearing, where the Court decides these issues in accordance with the Code of Civil Procedure.

The claimed "emergency" is further undercut by Respondent's own conduct: he has continued to make social media posts about Petitioner in violation of the TRO. A party who is disregarding the order he considers intolerable cannot credibly claim that fifteen days' delay will irreparably harm him. Moreover, Respondent misrepresents the notice procedures for restraining orders under California law—Respondent was properly put on notice and the June 30 hearing is his opportunity to be heard.

B. The TRO is a narrow, conduct-based order, not a prior restraint on journalism.

The Application is a strawman. Despite Respondent's histrionics, the TRO does not enjoin blanket reporting on Petitioner. Respondent's recurring premise that he is "restrained from talking about" various subjects is simply false. Sections 2.1.1 through 2.1.6 of the Application are irrelevant as to the issue of the TRO because the order does not prohibit Respondent from completely commenting, posting, or talking about Petitioner. Rather, the order restrains a far narrower course of conduct: posting that Petitioner "kidnapped" his minor child (a statement the Court found false on its face in light of Petitioner's lawful custody) and republishing content and statements that Deanna Kane is herself enjoined from posting pursuant to court order.

Balboa Island Village Inn, Inc. v. Lemen (2007) 40 Cal.4th 1141, a defamation case, demonstrates that the TRO should not be vacated if the relief is narrowly tailored. *See id.* at 1159-60. Here, the TRO does not purport to adjudicate defamation; it is an interim section 527.6 order, which the statute expressly authorizes pending the noticed hearing at which the merits are decided. *See* CCP § 527.6(d)-(g). To the extent Respondent contends the TRO's findings should be tested or

its scope refined, that is the function of the June 30 hearing—not an emergency *ex parte* application. The "kidnapping is false" finding, moreover, rests on the undisputed fact of Petitioner's custody, not on any contested defamation ruling. Respondent himself provides no evidence to dispute Petitioner's custody. *Balboa Island* confirms that narrowly tailored relief is permissible; accordingly, the TRO should not be vacated.

People v. Peterson (2023) 95 Cal.App.5th 1061, on which Respondent relies, is distinguishable—it is a far more attenuated "course of conduct." The conviction there rested on generalized political criticism and a "confusing" letter—pure protected commentary. *See id.* at 1065, 1067. Here, the case involves a targeted campaign asserting a specific false fact (kidnapping) about a custodial parent, coupled with the amplification of a restrained party's prohibited speech. A reasonable person would understand Respondent's speech to be a deliberate continued course of conduct that involved more than a mere mention of Petitioner or his minor daughter. *See id.* at 1069 ("Direct threats of violence are not necessary, but something more than the mere mention of the [protected person] was required."). Respondent made Petitioner and his daughter the focus of his social media account and webpage—based directly on the premise that Petitioner's daughter was kidnapped and needs to be "rescued" by one of Respondent's nearly 500,000 followers, of which he calls the "Dirty Army." (*See* Kane Decl. ¶¶ 8, 10, 13-14; https://dirtyarmy.org (retrieved June 16, 2026) (stating on the top banner of Respondent's website: "**FREE KENSINGTON . . . CALLING ON THE DIRTY ARMY . . . LET'S BRING THEM HOME**").)

Respondent's repeated assertions that Petitioner has "kidnapped" his own daughter create a foreseeable risk that one or more individuals in his audience may attempt to locate Petitioner or his daughter, confront him, or take matters into their own hands to "save" his daughter from what they have been falsely led to believe is an abusive and unlawful situation. Respondent's website literally "call[s]" on his followers to "free" Kensington and "bring [her] home." (*See id.*) This places both Petitioner's life and his daughter's life in real and immediate danger and a real fear of that danger. More egregiously, Respondent is profiting from his "kidnapping" narrative by offering for sale and

selling "FREE KENSINGTON" merchandise. (*See id.*) That is not analogous to *Peterson* and is not protected speech.[3]

Respondent misses the point on the Court's citation in the TRO to *People v. Planchard* (2025) 109 Cal.App.5th 157. The case does not set the standard for what *must* happen for conduct to be considered harassment; rather, it is simply an example. The Court, instead, looks to the definition under section 527.6 and compares that with Respondent's conduct, which meets the harassment definition. *See* CCP § 527.6(b)(3). Under section 527.6, the totality of Respondent's conduct—the full-length interview with Deanna Kane, the sharing of interview clips on social media with inflammatory language, the publication and amplification of statements designed to paint Petitioner as a kidnapper, calling on his followers to take action and "free" Kensington, the selling of "FREE KENSINGTON" merchandise, and the continued refusal to remove harmful and harassing content—constitutes a pattern of conduct that would cause a reasonable person to experience substantial emotional distress. (CCP § 527.6(b)(3) (defining "harassment").)

C. Respondent's conduct is an unprotected "course of conduct" under section 527.6.

Section 527.6 reaches not only credible threats but also 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." (CCP § 527.6(b)(3).) The totality of Respondent's conduct is what decides—not a single interview viewed in isolation. Respondent conducted the interview with Deanna Kane, promoted clips of the interview on Instagram with inflammatory language, refused to remove the interview or social media posts, sells "FREE KENSINGTON" merchandise, and continues to publish and amplify the kidnapping narrative—all directed at Petitioner and his minor child by name, and all serving no legitimate purpose. This course of conduct by Respondent would cause a reasonable person to suffer substantial emotional distress and actually causes substantial emotional distress to Petitioner. (*See* Kane Decl. at ¶¶ 19-22; CCP § 527.6(b)(3).) Indeed, selling

[3] And contrary to Respondents' attempted analogy, the Pentagon Papers case involved the classification of government secrets—not false accusations about the custody (and kidnapping) of a minor child. (*New York Times Co. v. United States* (1971) 403 U.S. 713, 730 (Stewart, J., concurring) ("I cannot say that disclosure of any of them [the documents] will surely result in direct, immediate, and irreparable damage to our Nation or its people.")).

merchandise and calling on hundreds of thousands of people to "free" a minor child goes beyond "journalism" and serves no legitimate purpose under section 527.6(b)(3).

Respondent's "journalist" label—though plainly overstated—does not immunize this course of conduct. Promoting clips on Instagram with one's own commentary and selling branded merchandise is not "newsgathering;" it is a monetized campaign built around a false narrative directed at Petitioner and his minor daughter. The Application ignores the Respondent's repeated inflammatory and false commentary about the legal custody of a child and conflates it with traditional journalism. Whether some press privilege applies or not does not authorize a person to act as the conduit for a party who is under a court order not to speak. Respondent's self-serving declaration that he "intended no harm" does not control either; section 527.6 turns on the objective course of conduct and its foreseeable effect, not on the actor's self-serving stated intent. Broadcasting a kidnapping accusation to a mass audience while merchandising "FREE KENSINGTON" speaks for itself.[4] (*See* Kane Decl. ¶¶ 8, 10, 13-14; https://dirtyarmy.org (retrieved June 16, 2026).)

D. The orders restraining Deanna Kane were fully disclosed and confirm Respondent's conduit role.

There was no concealment, and Respondent's Rule 3.3(d) accusation collapses on the face of the record. Petitioner attached both the California domestic violence restraining order and the Canadian declaratory judgment to the petition. (Kane Decl., Exs. A, B.) The Court took judicial notice of each, expressly recognized the Canadian order as a Canadian order, and was free to examine the orders directly. A party who attached the very orders he is accused of hiding has not misled anyone.

With respect to the California domestic violence restraining order, Respondent's "jurisdiction transferred to Canada" argument conflates two distinct things: the transfer of custody and visitation jurisdiction, on the one hand, and the order's independent personal-conduct restraints,

[4] The Application's argument analogizing Respondent's speech to political assassination attempts undermines Respondent's arguments by conceding that repeated inflammatory speech *can* inspire violence. (*See* App. at p. 7 n.4.)

on the other. (App. at p. 14.) A transfer of custody jurisdiction does not dissolve the other provisions in that same order. (*See* Kane Decl., Ex. A.)

And with respect to the Canada default judgment, the TRO does not enforce the Canadian judgment against Respondent. Instead, it is evidence that Deanna Kane is a restrained party whose prohibited speech Respondent is knowingly republishing and amplifying in violation of the default judgment. Indeed, Deanna Kane has publicly thanked Respondent for giving her a "platform," demonstrating that Respondent is knowingly and willfully amplifying Deanna Kane's prohibited speech that he knows—*at least* as to the kidnapping narrative—is false. (Kane Decl. at ¶ 14; Exhibit 2 attached hereto.) The SPEECH Act, which governs the recognition and enforcement of foreign *defamation* judgments, is therefore immaterial and beside the point. In any event, the Canadian default judgment has been domesticated by the Superior Court of California, County of Santa Clara. But even if the Court was to ignore the Canadian order, the TRO was properly granted as it rests on Respondent's own conduct, including the false kidnapping narrative he is perpetrating and profiting from.

E. The Court's interest in protecting a five-year-old is legitimate and substantial.

Respondent's papers say almost nothing about Petitioner's minor daughter, Kensington—understandably, because the Respondent's repeated focus on the child by name is the most damaging fact for his position. Branding a custodial parent a "kidnapper" to a large audience, and selling merchandise calling on followers to "free" the child, is not ordinary public commentary nor newsgathering. It foreseeably exposes a five-year-old to risk and serves no legitimate purpose. The Court's interest in protecting a minor from a course of conduct of this kind is well established and independently supports the narrow relief the Court ordered.

F. There is no basis for sanctions or fees.

Finally, Respondent's request for sanctions and fees should be wholesale rejected. A petition that was facially supported, that attached the very orders Respondent claims were concealed, and that the Court granted on written findings is the antithesis of frivolous or bad-faith conduct. Respondent's request under section 527.6(s) is, in any event, premature: it presupposes a prevailing

party, and there is none, especially not Respondent. On this record—where Petitioner's counsel fully disclosed the governing orders—the request for sanctions is itself improper and should be denied. Even if there was some duty to disclose that was violated (not so), any alleged omissions are curable through Respondent's presentation at the hearing on the TRO. Furthermore, ethical allegations are not a basis for vacating a lawfully issued TRO. Respondent's counsel, however, should understand ethical issues better, given their long list of disciplinary proceedings.

IV. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Court deny Respondent's Application in its entirety. The temporary restraining order should remain in full force and effect, and Respondent should present his arguments, if any, at the noticed hearing on June 30, 2026.

DATED: June 16, 2026

BLANK ROME LLP

By: */s/ Ryan F. Coy*__________________________
Joseph J. Mellema
Ryan F. Coy
Attorneys for Petitioner
EVANDER FRANK KANE

EXHIBIT 1

RANDAZZA
LEGAL GROUP

Marc J. Randazza, JD, MAMC, LLM
Licensed in AZ, CA, FL, MA, NV

5 June 2026

Via Email Only
Craig Weiner
<craig.weiner@blankrome.com>

Ryan Coy
<Ryan.coy@blankrome.com>

Re: Nik Richie adv. Evander Kane | Response to Demand Letter

Dear Attorneys Weiner and Coy:

This firm has the honor and privilege of representing Nik Lamas Richie. We are in receipt of your letter dated May 22, 2026, in which you request that Mr. Richie remove statements about your client, Evander Kane—including an interview between Mr. Richie and Mr. Kane's ex-wife, Deanna Kane ("Mrs. Kane")—issue a retraction, and not make further similar statements.

No.

Mr. Richie will not comply.

We are also in receipt of Mr. Coy's threat to seek an injunction against Mr. Richie today (sent last night).

Ok, lets dance.

This is a dispute about public allegations of rape against Mr. Kane, and how Mr. Kane's infidelity while he was married to Mrs. Kane caused Mrs. Kane to develop an STI, resulting in a traumatic stillbirth.

The statements mentioned in your letter are not the first instances of the public hearing about Mr. Kane's sexual misconduct; there has been reporting and discussion about the topic for the past decade. *See, e.g.*, Michael Mroziak, "Sabres' Evander Kane cleared in sex investigation," BUFFALO TORONTO PUBLIC MEDIA (Mar. 11, 2016);[1] Curtis Pashelka, "Evander Kane's wife Anna alleges physical, sexual abuse in restraining order filing," THE MERCURY NEWS (Sept. 22, 2021).[2]

You identify several statements by Mr. Richie and Mrs. Kane, most of which are from Mr. Richie's interview with her, published on YouTube. You claim that these statements are

[1] Available at: https://www.btpm.org/local/2016-03-11/sabres-evander-kane-cleared-in-sex-investigation.
[2] Available at: https://www.mercurynews.com/2021/09/22/evander-kanes-wife-anna-alleges-physical-sexual-abuse-in-reported-filing-for-restraining-order/.

"manifestly untrue," but you don't provide any specific denials of any statement or otherwise give Mr. Richie any reason to doubt the truth of the statements.

Instead, it appears you rely on a restraining order and default judgment against Mrs. Kane. The restraining order prohibits Mrs. Kane from "disturbing the peace" and contacting protected persons. It is, to say the least, a stretch to claim that this language prohibits her from informing the public about how Mr. Kane, a "well-known Canadian professional ice hockey player" and recipient of years of media scrutiny for his sexual misconduct, is a rapist. Even if it did, your grievance would be with Mrs. Kane alone, since the restraining order does not extend to anyone other than her.

The default judgment does prohibit Mrs. Kane from posting about Mr. Kane on social media, but it again does not extend to anyone other than Mrs. Kane. More fundamentally, it was issued by a Canadian court.

A Canadian court.

LOL

Not only does Mr. Richie have no respect for a Canadian court, but he doesn't really have all that much respect for anything in Canada.

Mr. Richie is a U.S. citizen and lives in the U.S. He is not a Canadian citizen, nor does he have any connection of any kind to Canada. No Canadian court may exercise jurisdiction over him, and no Canadian court has the power to enjoin him from doing anything. Furthermore, both the restraining order and default judgment were entered without Mrs. Kane's input, and there are no findings in these orders that any of Mrs. Kane's statements about Mr. Kane are false. They have no bearing on any claims your client could bring against Mr. Richie.

You threaten a defamation claim against Mr. Richie. I doubt that will go well for your client. Let's assume Mr. Kane files suit in California, where Mr. Richie lives. He would need to establish that the statements at issue are false, and I see nothing in your letter indicating that. Assuming you could prove they are false, Mr. Kane is a public figure and there has been online discussion about his sexual misconduct for years, meaning he would need to satisfy the actual malice standard. He would need to provide clear and convincing evidence that Mr. Richie published his statements and the interview with actual knowledge of falsity or reckless disregard for falsity. *Reader's Digest Assn. v. Superior Court*, 37 Cal.3d 244, 256 (1984); *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 344–45 (1974). To say this is a difficult standard to meet is an understatement. Any suit in California would also be met with a special motion to strike under California's Anti-SLAPP law, Cal. Code Civ. Proc. § 425.16. This law would not only allow Mr. Richie to dismiss such a lawsuit quickly, but also to recover his costs and attorneys' fees once the suit fails.

Bringing suit in Canada would not work any better for Mr. Kane, even if such a court could exercise jurisdiction over Mr. Richie. This is because any judgment rendered by a Canadian court would be unenforceable under the U.S. SPEECH Act, 28 U.S.C. § 4101, *et seq*., unless

the court applied speech protections consistent with U.S. law and the First Amendment to the U.S. Constitution. 28 U.S.C. § 4102(a)(1). Courts that have dealt with the SPEECH Act and Canada have found that a Canadian defamation judgment is not enforceable in the U.S. *See Trout Point Lodge, Ltd. v. Handshoe*, 729 F.3d 481 (5th Cir. 2013); *InvestorsHub.com, Inc. v. Mina Mar Group, Inc.*, 2011 U.S. Dist. LEXIS 87566, *6-7 (N.D. Fla. June 20, 2011 (finding that "Canadian law does not provide as much protection of speech as the First Amendment, federal law, and Florida law"); *see also Minority Television Project, Inc. v. F.C.C.*, 736 F.3d 1192, 1211 (9th Cir. 2013) ("No other nation—not even freedom-loving countries like Canada, England, Australia, New Zealand, and Israel—has protections of free speech and free press like those enshrined in the First Amendment") (Kozinski, J., dissenting). It is also possible to enforce a foreign judgment not based on such principles, but you would essentially have to litigate your claims from square one in a U.S. court to do so. 28 U.S.C. § 4102(a)(B).

With respect to your threat sent by Mr. Coy, I will just provide the whole thing here:

> *As you know, our firm represents Evander Kane. Please be advised that on behalf of Mr. Kane, we will seek a temporary restraining order against you in Orange County Superior Court tomorrow at the Central Justice Center in Santa Ana. The request will seek orders that prevent you from contacting, whether directly or indirectly, Mr. Kane and his daughter; require you to remove statements from your social media platforms that concern Mr. Kane and his daughter that are threatening, harassing, defamatory, or otherwise violate the protective orders against Deanna Kane a/k/a Anna Kane; and prohibit you from encouraging, soliciting, or assisting Ms. Kane in making or disseminating such statements.*

Dude.

You *think* that will work? Then lets roll.

Mr. Richie stands by all his and Mrs. Kane's statements noted in your letter. He has relied on Mrs. Kane, an eyewitness to Mr. Kane's misconduct, and has never had any reason to doubt her story. Mr. Richie will continue to make such statements about Mr. Kane. A California court will not order him to stop or find him liable for these statements, and a Canadian court would not have the ability to issue an enforceable injunction or damages award against him.

If you would like to be so utterly stupid as to seek a prior restraint against Mr. Richie, I am authorized to accept service of the complaint by email. No need to trouble yourself with formal service.

I presume that if you were not bluffing, the court laughed at you today when you tried to get a prior restraint. I've seen idiot judges give them out in other states, and even then, they don't last long. If you managed to secure an injunction, go ahead and email it to me. We'll make short work of that. If you have a hearing set for today, we will be happy

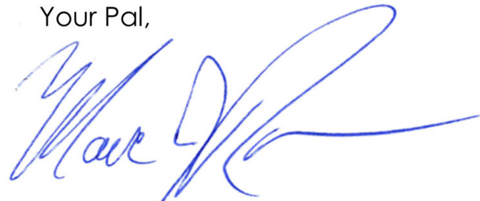
RANDAZZA
LEGAL GROUP

to get on Zoom or a phone hearing to listen to your presumably remarkable new theory as to how you can get an injunction in this circumstance.

If you would like to set a hearing for this on Monday or Tuesday, we would be thrilled to come to court to hear you articulate why you think you can get a prior restraint against Mr. Richie, or against anyone, anywhere, ever.

Your move. The smartest move is to chill out and tell your sex pest client about the First Amendment. If you don't, then we will.

Your Pal,



Marc J. Randazza

cc: Alex J. Shepard

EXHIBIT 2

5:03 55

annaavakane 1h

Electronically Received by Superior Court of California, County of Orange, 06/05/2026 12:41:35 PM.
30-2026-01575619-CU-HR-CJC - ROA # 4 - DAVID H. YAMASAKI, Clerk of the Court By S. Flores, Deputy Clerk.

CH-109 Notice of Court Hearing

Clerk stamps date here when form is filed.
FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
JUN 08 2026
DAVID H. YAMASAKI, Clerk of the Court
BY: M. SUCHY, DEPUTY

Fill in court name and street address:
Superior Court of California, County of Orange
Central Justice Center
700 Civic Center Drive West
Santa Ana, CA 92701

Court fills in case number when form is filed.
Case Number:
30-2026-01575619-CU-HR-CJC

① Person Seeking Protection

a. Your Full Name:
Evander Frank Kane

Your Lawyer (if you have one for this case):
Name: Ryan F. Coy State Bar No.: 324939
Firm Name: Blank Rome LLP

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

Address: 2029 Century Park East, 6th Floor
City: Los Angeles State: CA Zip: 90067
Telephone: 424-285-2194 Fax: 424-239-3434
Email Address: ryan.coy@blankrome.com

② Person From Whom Protection Is Sought

Full Name: Hooman Abedi Karamian a/k/a Nik Richie

The court will complete the rest of this form.

③ Notice of Hearing

A court hearing is scheduled on the request for restraining orders against the person in ②:

Hearing Date → Date: 6/30/26 Time: 8:30 AM
Dept.: C64 Room:

Name and address of court if different from above:
In Person

To the person in ②:

- If you attend the hearing (in person, by phone, or by videoconference) and the judge grants a restraining order against you, the order will be effective immediately, and you could be arrested if you violate the order.
- If you do not attend the hearing, the judge may still grant the restraining order that could last up to five years. After you receive a copy of the order, you could be arrested if you violate the order.

④ Temporary Restraining Orders *(Any orders granted are on form CH-110, served with this notice.)*

a. Temporary restraining orders for personal conduct and stay-away orders as requested in form CH-100, *Request for Civil Harassment Restraining Orders*, are *(check only one box below)*:

(1) ☑ All **GRANTED** until the court hearing.
(2) ☐ All **DENIED** until the court hearing. *(Specify reasons for denial in b, below.)*
(3) ☐ Partly **GRANTED** and partly **DENIED** until the court hearing. *(Specify reasons for denial in b, below.)*

Trying to Silence @nikrichie now for standing up for me and giving me a platform to speak my truth - Evander every single word I said was 💯 factual

Send message...

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

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 **June 16, 2026,** I served the foregoing document(s): **PETITIONER EVANDER KANE'S OPPOSITION TO RESPONDENT'S EX PARTE APPLICATION FOR AN ORDER VACATING TEMPORARY RESTRAINING ORDER** on the interested parties in this action addressed and sent as follows:

☐ **BY ENVELOPE:** by placing ☐ the original ☐ a true copy thereof enclosed in sealed envelope(s) addressed as indicated and delivering such envelope(s):

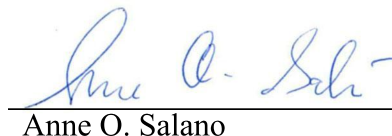
☐ **BY MAIL:** I caused such envelope(s) to be deposited in the mail at Los Angeles, California with postage thereon fully prepaid to the office or home of the addressee(s) as indicated. I am "readily familiar" with this firm's practice of collection and processing documents for mailing. It is deposited with the U.S. Postal Service on that same day, with postage fully prepaid, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

☐ **BY PERSONAL SERVICE:** I caused such envelope to be hand-delivered to the office or home of the addressee(s) as indicated. A proof of service will be executed by process server upon completion.

☒ **BY E-MAIL OR ELECTRONIC TRANSMISSION (EMAIL):** Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document(s) listed above to be transmitted to the person(s) at the e-mail address(es) as indicated. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was incomplete or unsuccessful.

☒ **STATE:** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **June 16, 2026**, at Los Angeles, California.



Anne O. Salano

SERVICE LIST

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

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