

NONPRECEDENTIAL DISPOSITION

To be cited only in accordance with FED. R. APP. P. 32.1

United States Court of Appeals
For the Seventh Circuit
Chicago, Illinois 60604

Submitted August 18, 2026*

Decided August 18, 2026

Before

MICHAEL B. BRENNAN, *Chief Judge*

AMY J. ST. EVE, *Circuit Judge*

JOHN Z. LEE, *Circuit Judge*

No. 25-3247

NATHAN JOHN HUIRAS,
Plaintiff-Appellant,

v.

NICOLE HUIRAS and WISCONSIN
DEPARTMENT OF CHILDREN AND
FAMILIES,
Defendants-Appellees.

Appeal from the United States District
Court for the Eastern District of
Wisconsin.

No. 25-CV-1416-JPS

J. P. Stadtmueller
Judge.

* The appellees were not served with process and are not participating in this appeal. We have agreed to decide the case without oral argument because the brief and record adequately present the facts and legal arguments, and oral argument would not significantly aid the court. FED. R. APP. P. 34(a)(2)(C).

ORDER

Nathan Huiras, seeking to modify his child support obligations, removed his state divorce proceedings to federal court. The district court remanded the case for lack of jurisdiction and imposed a five-year filing bar to sanction Huiras for his history of frivolous federal litigation. We dismiss Huiras's appeal of the remand order for lack of appellate jurisdiction, and we affirm the sanction.

The state court that adjudicated Huiras's divorce awarded his ex-wife custody of their children and ordered Huiras to pay child support. Huiras has unsuccessfully attempted to challenge those proceedings in federal court many times. *See, e.g., Huiras v. Huiras*, No. 25-1861 (7th Cir. Jul. 21, 2025); *In re Huiras*, No. 25-1415 (7th Cir. Mar. 31, 2025); *Huiras v. Cafferty*, No. 23-1385, 2023 WL 6566492 (7th Cir. Oct. 10, 2023); *Huiras v. Cafferty*, No. 22-3081, 2023 WL 4842323 (7th Cir. Jul. 28, 2023).

In 2025, after failing to persuade the state court to modify the child support order, Huiras removed the divorce proceedings to federal court, asserting diversity jurisdiction. *See* 28 U.S.C. §§ 1332(a), 1441(a). A magistrate judge recommended remanding the case to state court because Huiras did not sufficiently allege diversity jurisdiction and, alternatively, the domestic-relations exception to federal jurisdiction applied. The district judge adopted the report and recommendation and issued a judgment dismissing the case. The judge also imposed a filing bar, subject to modification or rescission after five years, to sanction Huiras for his repeated and frivolous attempts to litigate family law disputes in federal court.

On appeal, Huiras challenges the district court's jurisdictional determination. But we lack appellate jurisdiction to review a remand order based on a jurisdictional defect. 28 U.S.C. § 1447(d); *Kircher v. Putnam Funds Tr.*, 547 U.S. 633, 640 (2006). The district court's final order and judgment incorrectly dismissed the case, but we understand it to have adopted the magistrate judge's recommendation. So we construe the order to have remanded the proceedings back to state court for lack of jurisdiction, as required under 28 U.S.C. § 1447(c). *See Thompson v. Army & Air Force Exch. Serv.*, 125 F.4th 831, 836 (7th Cir. 2025) ("Section 1447(c) requires federal courts to remand cases where they lack subject matter jurisdiction.").

We can, however, review the district court's imposition of sanctions, *see Micrometl Corp. v. Tranzact Techs., Inc.*, 656 F.3d 467, 469–70 (7th Cir. 2011), which Huiras also challenges. Huiras argues that the five-year filing bar is overly broad. We review the court's chosen sanction for abuse of discretion, *Martin v. Redden*, 34 F.4th 564,

568 (7th Cir. 2022), and here the court's exercise of its discretion was sound. The court explained that Huiras had abused the judicial system by repeatedly attempting to litigate his family law disputes in federal court despite multiple judges' rejections of his claims, and the filing bar is tailored to curb that abuse. *See Support Sys. Int'l, Inc. v. Mack*, 45 F.3d 185, 186 (7th Cir. 1995). We add our own warning to Huiras that further frivolous filings in this circuit may result in other sanctions including a fine and a circuit-wide filing bar. *See id.* at 186–87.

We DISMISS the appeal of the district court's remand order and AFFIRM its imposition of a filing bar.