

*Heather L. Smith*  
CLERK OF THE COURT

1 **ORDR**  
2 **SMITH LEGAL GROUP**  
3 **Kurt A. Smith, Esq.**  
4 Nevada Bar No.10764  
5 **Austin M. Woo, Esq.**  
6 Nevada Bar No. 16155  
7 1701 N. Green Valley Parkway, Suite 8E  
8 Henderson, Nevada 89074  
9 Telephone: (702) 410-5001  
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11 info@thelegalsmith.com  
12 *Attorneys for Plaintiff*

8 **EIGHTH JUDICIAL DISTRICT COURT**  
9 **FAMILY DIVISION**  
10 **CLARK COUNTY, NEVADA**

10 **THOMAS ANTHONY HUGGINS,**

Case No.: D-25-717626-P

11 **Plaintiff,**

Dept. No.: E

12 **vs.**

13 **VANESSA OLIVEIRA NOCELLI,**

14 **Defendant.**

16 **ORDER FOR SERVICE BY ALTERNATIVE MEANS**

17 Upon consideration of the EX PARTE APPLICATION FOR ORDER FOR  
18 SERVICE BY ALTERNATIVE MEANS and supporting declarations and/or  
19 affidavits, the Court finds that service of the **Complaint for Custody, Summons,**  
20 **and Joint Preliminary Junction** upon the Defendant under NRCP 4.2, 4.3, and  
21 4.4(a) is impracticable, or that pursuant to the information presented to the Court in  
22 the Ex Parte Application, it is prudent for the Defendant, VANESSA OLIVEIRA  
23 NOCELLI, to be served via ALTERNATIVE MEANS.

24 ///

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26 ///

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28

SMITH LEGAL GROUP  
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HENDERSON, NEVADA 89074  
(702) 410-5001 FAX (702) 410-5005

## ORDERS OF THE COURT

**IT IS FURTHER ORDERED** that the Plaintiff shall serve the Compliant for Custody, Summons, and Joint Preliminary Injunction to the Defendant via U.S. Certified Mail, Return Receipt requested and First-Class Mail at the Defendant's last known address at Av. Gen. Justo, 365 – 2 Andar, Rio de Janeiro, 20021-130, Brazil.

**IT IS FURTHER ORDERED** that the Plaintiff shall email the Complaint for Custody, Summons, and Joint Preliminary Injunction to the Defendant's email at vanessaplux@gmail.com.

**IT IS FURTHER ORDERED** that the Plaintiff shall text the Complaint for Custody, Summons, and Joint Preliminary Injunction to the Defendant's phone number at +55 (21) 9699-13667.

/// IT IS FURTHER ORDERED that the Plaintiff shall effectuate service on the Defendant by publication for a period of four (4) consecutive weeks.

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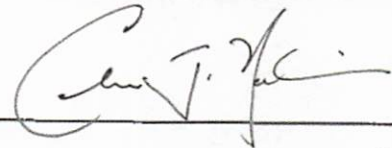
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///

1           **IT IS FURTHER ORDERED** that the Plaintiff shall file a(n)  
2  
3 Declaration/Affidavit of Service of Alternative Means with this Court upon  
4 effectuating service on the Defendant, VANESSA OLIVEIRA NOCELLI, by the  
5 alternative means as outlined herein.

6           **IT IS SO ORDERED.**

Dated this 30th day of October, 2025



CD

038 066 5772 A544  
Charles J. Hoskin  
District Court Judge

13 Respectfully submitted by:  
14 **SMITH LEGAL GROUP**



16 **Kurt A. Smith, Esq.**  
17 Nevada Bar No. 10764  
18 **Austin M. Woo, Esq.**  
19 Nevada Bar No. 16155  
20 1701 N. Green Valley Pkwy., Suite 8E  
21 Henderson, Nevada 89074  
22 Telephone: (702) 410-5001  
23 Facsimile: (702) 410-5005  
24 info@thelegalsmith.com  
25 *Attorneys for Plaintiff*

1 **CSERV**

2  
3 DISTRICT COURT  
CLARK COUNTY, NEVADA

4  
5  
6 In the Matter of the Petition by: CASE NO: D-25-717626-P  
7 Thomas Huggins, Petitioner. DEPT. NO. Department E  
8

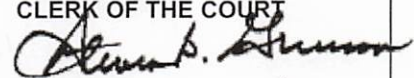
9 **AUTOMATED CERTIFICATE OF SERVICE**

10 This automated certificate of service was generated by the Eighth Judicial District  
11 Court. The foregoing Order was served via the court's electronic eFile system to all  
12 recipients registered for e-Service on the above entitled case as listed below:

13 Service Date: 10/30/2025

14 Kurt Smith info@thelegalsmith.com

15 Bailey Gunderson bailey@thelegalsmith.com  
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1 **SEI**  
2 **SMITH LEGAL GROUP**  
3 **Kurt A. Smith, Esq.**  
4 Nevada Bar No. 10764  
5 **Austin M. Woo, Esq.**  
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11 [info@thelegalsmith.com](mailto:info@thelegalsmith.com)  
12 *Attorney for Plaintiff*

CASE NO: D-25-717626-P  
Department: To be determined

8 **EIGHTH JUDICIAL DISTRICT COURT**  
9 **FAMILY DIVISION**  
10 **CLARK COUNTY, NEVADA**

11 THOMAS ANTHONY HUGGINS,  
12 Plaintiff,  
13 vs.  
14 VANESSA OLIVEIRA NOCELLI,  
15 Defendant.

Case No.: D-25-717626-P  
Dept. No.:

**SUMMONS  
(CUSTODY)**

16 **NOTICE! YOU HAVE BEEN SUED, THE COURT MAY DECIDE AGAINST**  
17 **YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN**  
18 **21 DAYS. READ THE INFORMATION BELOW**

19 **TO THE DEFENDANT:** A Civil Complaint has been filed by the Plaintiff against  
20 you for the relief set forth in the Complaint.

21 **COMPLAINT FOR CUSTODY**

22 1. If you intend to defend this lawsuit, within 21 days after this Summons is  
23 served on you exclusive of the day of service, you must do the following:

24 a. File with the Clerk of this Court, whose address is shown below, a formal  
25 written response to the Complaint in accordance with the rules of the Court,  
26 with the appropriate filing fee.

27 b. Serve a copy of your response upon the attorney whose name and address  
28 is shown below.

2. Unless you respond, your default will be entered upon application of the  
plaintiff and this Court may enter a judgment against you for the relief demanded



1 in the Complaint, which could result in the taking of money or property or other  
2 relief requested in the Complaint.

3 3. If you intend to seek the advice of an attorney in this matter, you should do  
4 so promptly so that your response may be filed on time.

5 4, The State of Nevada, its political subdivisions, agencies, officers,  
6 employees, board members, commission members and legislators, each have 45  
7 days after service of this summons within which to file an answer to the complaint.  
8

9 STEVEN D. GRIERSON  
10 CLERK OF COURT

11  
12 10/1/2025

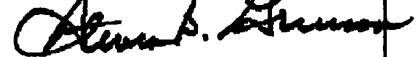
13 By: Deputy Clerk Laura Maquilon Date  
14 Family Courts and Services Center  
15 601 North Pecos Road  
16 Las Vegas, Nevada 89155

17 Regional Justice Center  
200 Lewis Avenue  
Las Vegas, Nevada 89155

18 Issued at request of:  
19 **SMITH LEGAL GROUP**

20 */s/ Kurt A. Smith*

21 **Kurt A. Smith, Esq.**  
22 Nevada Bar No. 10764  
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24 Henderson, Nevada 89074  
25 Telephone: (702) 410-5001  
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*Attorney for Plaintiff*



1 **CMPS**  
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11 [info@thelegalsmith.com](mailto:info@thelegalsmith.com)  
12 *Attorneys for Plaintiff*

CASE NO: D-25-717626-P  
Department: To be determined

8 **EIGHTH JUDICIAL DISTRICT COURT**  
9 **FAMILY DIVISION**  
10 **CLARK COUNTY, NEVADA**

10 **THOMAS ANTHONY HUGGINS,**  
11 **Plaintiff,**  
12 **vs.**  
13 **VANESSA OLIVEIRA NOCELLI,**  
14 **Defendant.**

Case No.:

Dept. No.:

15 **COMPLAINT FOR CUSTODY**

17 COMES NOW THE PLAINTIFF, THOMAS ANTHONY HUGGINS ("Dad")  
18 by and through his Attorney of Record, Kurt A. Smith, Esq. of SMITH LEGAL  
19 GROUP, and for his causes of action against the Defendant, VANESSA OLIVEIRA  
20 NOCELLI ("Mom") avers and alleges as follows:  
21

22 **I.**  
23 **JURISDICTION**

24 1. This Court has jurisdiction over the Parties and the subject matter  
25 of this action pursuant to NRS 125, as Plaintiff has been a resident of the State of  
26 Nevada for at least six (6) weeks prior to the filing of this Complaint.  
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jurisdiction pursuant to UCCJEA to enter Orders regarding Custody and custody-related matters.

7. The periods of residence, places where the Minor Child(ren) have lived within the last five (5) years, and associated information are listed in the following table:

Child's Name	Place of Birth	Birth Date	Gender
TERI JULIETA OLIVEIRA NOCELLI HUGGINS	Brazil	April 9, 2014	Female
Period of Residence	State of Residence	Person Child Lived With	Relationship
October 2023 – Present	Las Vegas	Plaintiff	Father
January 29, 2019 – October 2023	Alabama	Plaintiff	Father
April 9, 2014 – January 29, 2019	Brazil	Plaintiff and Defendant	Parents

8. The Plaintiff is not aware of any other case concerning the Child(ren).

9. The Plaintiff does not know of any person not a Party to this proceeding who has physical custody or claims to have physical custody or visitation rights with respect to any child subject to this proceeding.

V.  
**PATERNITY**

10. Pursuant to NRS 126.053, Paternity is confirmed through voluntary acknowledgement. Plaintiff is listed on the Child's Birth Certificate as the natural father.

VI.  
**ADDITIONAL FACTS**

11. The Child has exclusively lived with Dad for the past six (6) years.

12. Mom has little to no contact with the Child.

13. Mom lives in Brazil. Mom will not disclose her address to Dad.

14. The Child used to have a Brazilian and U.S. passport. However, the Child's U.S. passport has expired, and Mom refused to assist Dad in renewing the passport.

15. Dad travels extensively and wants to be able to bring the Child with him, however he cannot do so without a passport for the Child.

16. Mom has stated in the past that she will only assist Dad with the Child's passport if Dad gets Mom her U.S. Citizenship.

17. Mom is Bi-Polar and suffers from extreme mood swings.

18. Mom has applied for U.S. Citizenship multiple times, however Mom has had a breakdown during each Hearing and was denied citizenship each time.

19. About three (3) or four (4) years ago, Dad facilitated a visit between Mom and the Child in the Bahamas. Dad paid for both Mom and the Child

1 to have a trip. Dad got Mom and the Child a room at Atlantis. However, Mom could  
2 only handle one (1) day before giving the Child back to Dad.

3  
4 20. The last time Mom had a phone call with the Child was one (1) to  
5 two (2) years ago.

6  
7 **VII.**  
8 **LEGAL CUSTODY**

9 21. Dad is a fit and proper person to have Sole Legal Custody of the  
10 Child.

11  
12 **VIII.**  
13 **PHYSICAL CUSTODY**

14 22. Dad is a fit and proper person to have Sole Physical Custody of  
15 the Children.

16 23. That the Parties be put on notice of the requirements of NRS  
17 125C.0045(6), as follows:

18  
19 (a) PENALTY FOR VIOLATION OF ORDER: THE  
20 ABDUCTION, CONCEALMENT OR DETENTION OF  
21 A CHILD IN VIOLATION OF THIS ORDER IS  
22 PUNISHABLE AS A CATEGORY D FELONY AS  
23 PROVIDED IN NRS 193.130. NRS 200.359 provides that  
24 every person having a limited right of custody to a Child or  
25 any parent having no right of custody to the Child who  
26 willfully detains, conceals or removes the Child from a  
27 parent, guardian or other person having lawful custody or a  
28 right of visitation of the Child in violation of an order of this  
court, or removes the Child from the jurisdiction of the  
court without the consent of either the court or all persons  
who have the right to custody or visitation is subject to  
being punished for a category D felony as provided in NRS  
193.130.

24. That the Parties be put on notice that the terms of the Hague Convention of October 25, 1980, adopted by the 14th Session of the Hague Conference on Private International Law, apply if a parent abducts or wrongfully retains a Child in a foreign country.

25. That the Parties be put on notice that pursuant to NRS 125C.0045(7)-(8);

If a parent of a Child lives in a foreign country or has significant commitments in a foreign country:

i. The parties are also to acknowledge that the State of Nevada will be the habitual residence of the Child within the United States for the purposes of applying the terms of The Hague Convention as set forth in NRS 125C.0045(7).

ii. Upon motion of one of the parties, the court may order the parent to post a bond if the court determines that the parent poses an imminent risk of wrongfully removing or concealing the Child outside the country of habitual residence. The bond must be in an amount determined by the court and may be used only to pay for the cost of locating the Child and returning him/her to his/her habitual residence if the Child is wrongfully removed from or concealed outside the country of habitual residence. The fact that a parent has significant commitments in a foreign country does not create a presumption that the parent poses an imminent risk of wrongfully removing or concealing the Child.

26. That the Parties be put on notice that pursuant to the provisions of NRS 125C.006:

1. If primary physical custody has been established pursuant to an order, judgment, or decree of a court and the custodial parent intends to relocate his or her residence to a place outside of this State or to a place

1 within this State that is at such a distance that would substantially  
2 impair the ability of the other parent to maintain a meaningful  
3 relationship with the Child, and the custodial parent desires to take the  
4 Child with him or her, the custodial parent shall, before relocating:

5 (a) Attempt to obtain the written consent of the noncustodial parent  
6 to relocate with the Child; and

7 (b) If the noncustodial parent refuses to give that consent, petition  
8 the court for permission to relocate with the Child.

9 2. The court may award reasonable attorney's fees and costs to the  
10 custodial parent if the court finds that the noncustodial parent refused  
11 to consent to the custodial parent's relocation with the Child:

12 (a) Without having reasonable grounds for such refusal; or

13 (b) For the purpose of harassing the custodial parent.

14 3. A parent who relocates with a Child pursuant to this section  
15 without the written consent of the noncustodial parent, or the  
16 permission of the court is subject to the provisions of NRS 200.359.

## 17 IX. 18 VISITATION

19 27. Due to Mom's lack of stability and involvement in the Child's life,  
20 Dad requests that Mom's visitation be subject to Dad's sole discretion.

## 21 X. 22 CHILD SUPPORT

23 28. That Mom's Child Support obligation be determined pursuant to  
24 NAC 425.115(2) and NAC 425.140(1), based on the custodial schedule set forth in  
25 this Complaint.

26 29. That the Parties be put on notice that, pursuant to NRS 125.450, a  
27 parent responsible for paying Child Support is subject to NRS 31A.025 to 31A.330,  
28 inclusive, and Sections 2 and 3 of Chapter 31A of the Nevada Revised Statutes,

1 regarding the withholding of wages and commissions for the delinquent payment of  
2 support. These statutes and provisions require that, if a parent responsible for paying  
3 Child Support is delinquent in paying the support of a Child that such person has been  
4 ordered to pay, then that person's wages or commissions shall immediately be subject  
5 to wage assignment, pursuant to the provision of the above-cited statutes.  
6  
7

8           30. That pursuant to NRS 125B.145, the parties, and each of them, be  
9 placed on notice the order for support may be reviewed at any time on the basis of  
10 changed circumstances. For the purposes of this subsection, a change of 20 percent or  
11 more in the monthly income of a person who is subject to an order for the support of  
12 a Child shall be deemed to constitute changed circumstances and require a review of  
13 modification of the order for the support of a Child. Moreover, also pursuant to NRS  
14 125B.145, the parties are on notice that the order for support will be reviewed by the  
15 court at least every three (3) years to determine whether the order should be modified.  
16 The review will be conducted upon the filing of a request by a parent or legal guardian  
17 of the Child; or the Nevada State Welfare Division of the District Attorney's Office,  
18 if the Division of the District Attorney has jurisdiction of the case.  
19  
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23                           **XI.**  
24                           **MEDICAL INSURANCE**

25           31. That Dad shall continue to maintain medical, dental, optical, and  
26 orthodontic insurance coverage for the Child(ren) as long as it is available through his  
27 employer at a reasonable cost, or through Medicaid. The Parties should be jointly  
28



1 responsible for any individual monthly premium costs, deductibles, co-pays, and  
2 medication maintenance on behalf of the Child(ren). Any out-of-pocket medical  
3 expenses attributable to the Child should be equally divided between the Parties  
4 subject to the 30/30 Rule.  
5

6  
7 **XII.**  
8 **TAX EXEMPTION**

9 32. That the right to claim the Child(ren) for the dependency  
10 exemption and/or deduction for income tax purposes attributable to the support of the  
11 Child(ren) shall be allocated pursuant to Section 152(c) of the Internal Revenue Code  
12 (26 U.S. Code § 152), as amended, or the corresponding provisions of any successor  
13 statute effective with the 2024 tax year and every year thereafter (the "Child Tax  
14 Credit").  
15

16  
17 **XIII.**  
18 **ATTORNEY'S FEES**

19 33. That Defendant should be responsible for Plaintiff's attorney's  
20 fees if Defendant opposes the reasonable relief requested herein.

21 **WHEREFORE**, Plaintiff prays for judgment against Defendant as follows:

- 22
- 23 1. That Dad be awarded the Sole Legal Custody designation as set  
24 forth herein.
  - 25 2. That Mom be awarded Sole Physical Custody as set forth herein.
  - 26 3. That a Visitation Schedule be set pursuant to the terms set forth  
27 herein.  
28

4. That Child Support be set pursuant to NAC 425 as set forth herein.
5. That Medical Insurance be provided for the Child(ren) as set forth herein.
6. That the Child Tax Credit/Tax Exemption be allocated as set forth herein.
7. That Defendant be responsible for Plaintiff's Attorney's Fees and Costs should Defendant oppose the reasonable relief requested herein.
8. That Plaintiff be granted any further relief as the Court deems just and proper.

DATED this 1 day of October 2025.

SMITH LEGAL GROUP



**Kurt A. Smith, Esq.**  
Nevada Bar No. 10764  
**Austin M. Woo, Esq.**  
Nevada Bar No. 16155  
1701 N. Green Valley Pkwy., Suite 8-E  
Henderson, Nevada 89074  
Telephone: (702) 410-5001  
[info@thelegalsmith.com](mailto:info@thelegalsmith.com)  
*Attorneys for Plaintiff*

**VERIFICATION OF COMPLAINT**

**TOM HUGGINS**, does hereby verify under penalty of perjury of the laws of the State of Nevada:

That I am the **Plaintiff** in the above-entitled action; that I have read the foregoing **Complaint for Custody** and I know the contents thereof; that the same is true of my own knowledge, except as to those matters therein stated on information and belief, and as to those matters, I believe them to be true.

  
**TOM HUGGINS**  
*Plaintiff*







# Complaint for Custody (HUGGINS)

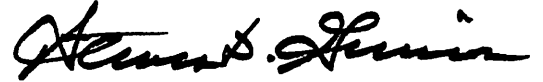
Final Audit Report

2025-09-30

Created:	2025-09-30
By:	Bailey Gunderson (bailey@thelegalsmith.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAABrie4JlykO5GBf5PnzIE7rYyUsOpCN_

## "Complaint for Custody (HUGGINS)" History

-  Document created by Bailey Gunderson (bailey@thelegalsmith.com)  
2025-09-30 - 8:33:40 PM GMT
-  Document emailed to Tom Huggins (tom@versusfc.com) for signature  
2025-09-30 - 8:33:47 PM GMT
-  Email viewed by Tom Huggins (tom@versusfc.com)  
2025-09-30 - 9:03:28 PM GMT
-  Signer Tom Huggins (tom@versusfc.com) entered name at signing as Thomas Huggins  
2025-09-30 - 10:52:48 PM GMT
-  Document e-signed by Thomas Huggins (tom@versusfc.com)  
Signature Date: 2025-09-30 - 10:52:50 PM GMT - Time Source: server
-  Agreement completed.  
2025-09-30 - 10:52:50 PM GMT



JPI

DISTRICT COURT  
CLARK COUNTY, NEVADA  
\*\*\*\*

CLERK OF THE COURT

IN THE MATTER OF THE PETITION BY: CASE NO: D-25-717626-P  
THOMAS HUGGINS, PETITIONER. DEPARTMENT E

**JOINT PRELIMINARY INJUNCTION**

**Notice: This injunction is effective upon the requesting party when issued and against the other party when served. This injunction shall remain in effect from the time of its issuance until trial or until dissolved or modified by the court.**

**TO: Plaintiff and Defendant:**

PURSUANT TO EIGHTH JUDICIAL COURT RULE 5.703, YOU, AND ANY OFFICERS, AGENTS, SERVANTS, EMPLOYEES OR A PERSON IN ACTIVE CONCERT OR PARTICIPATION WITH YOU, ARE HEREBY PROHIBITED AND RESTRAINED FROM:

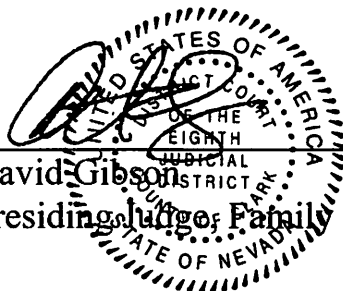
1. Transferring, encumbering, concealing, selling or otherwise disposing of any of your joint, common or community property of the parties or any property which is the subject of a claim of community interest, except in the usual course of conduct or for the necessities of life or for retention of counsel for the case in which this Injunction is obtained; or cashing, borrowing against, canceling, transferring, disposing of, or changing the beneficiaries of;
    - a. Any retirement benefits or pension plan held for the benefit (or election for benefit) of the parties or any minor child; or
    - b. Any insurance coverage, including life, health, automobile, and disability coverage;
- without the written consent of the parties or the permission of the court.

- 1 2. Molesting, harassing, stalking, disturbing the peace of or committing an assault or  
2 battery on the person of the other party or any child, stepchild, other relative or family  
3 pet of the parties.  
4 3. Relocating any child of the parties under the jurisdiction of the State of Nevada from  
5 the state without the prior written consent of all parties with custodial rights or the  
6 permission of the court.

October 1, 2025

7 DATED this 1st day of October, 2025:

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David Gibson  
Presiding Judge, Family Division

CERTIFIED COPY  
ELECTRONIC SEAL (NRS 1.190(3))