

NEWS RELEASE

Arizona Supreme Court
Administrative Office of the Courts

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Arizona Supreme Court Clarifies Underinsured Motorist Insurance Coverage Rules

PHOENIX – The Arizona Supreme Court today issued its decision in *State Farm Mutual Automobile Insurance Company v. Connor Balzan*, addressing how underinsured motorist (UIM) insurance coverage applies when multiple insurance policies are purchased by members of the same household.

The case involved Connor Balzan, who was injured in a car accident caused by another driver. After receiving the maximum available payments from the at-fault driver’s insurance and his own UIM policy, Balzan sought additional benefits from several other State Farm policies held by his parents.

Arizona law generally allows people to combine, or “stack,” UIM coverage from multiple policies unless an insurance company includes clear language limiting that practice. The Court was asked to decide whether married spouses who jointly purchase multiple insurance policies should be treated as “one insured” under Arizona’s anti-stacking law.

The Court held that spouses and purchasers who jointly obtain insurance coverage are considered “one insured” for purposes of the statute. The Court explained that the law focuses on the person or persons who make the decision to purchase the coverage, rather than on everyone who may be covered by the policy or who contributes money toward paying premiums.

Because Connor Balzan’s parents jointly purchased the household policies, State Farm properly applied its anti-stacking provision and limited recovery to one of those policies. As a result, the Court vacated part of the court of appeals’ memorandum decision and affirmed the superior court’s ruling in favor of State Farm.

The decision clarifies how Arizona’s uninsured and underinsured motorist insurance laws apply when multiple policies are purchased by the same household, and provides guidance for insurers, policyholders, and courts throughout the state.

Justice Maria Elena Cruz wrote the opinion, and all the justices joined.

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This summary is intended solely to notify the public about an Arizona Supreme Court Opinion. It is not to be considered an official commentary by the Court or any member of the Court, nor may it be cited as legal authority for any reason or purpose. The full Opinion is available [here](#) for those seeking details about the Court’s reasoning.

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