

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA

Robert Helton v. USAA General Indemnity Company, et al.

Helton v. USAA General Indemnity Company, et al., No. CV-25-03822-PHX-KML (D. Ariz. Dec. 17, 2025) ·
No. No. CV-25-03822-PHX-KML · Decided December 17, 2025

SUMMARY

The United States District Court for the District of Arizona denied Robert Helton’s motion to remand his underinsured-motorist coverage, breach-of-contract, and bad-faith action against USAA General Indemnity Company. The court held that the amount in controversy exceeded \$75,000 based on Helton’s pre-suit damages calculations, with potential punitive damages and attorneys’ fees providing additional support for diversity jurisdiction.

CASE DETAILS

COURT	United States District Court for the District of Arizona
WRITING FOR THE COURT	Krissa M. Lanham
JURISDICTION	United States District Court for the District of Arizona
DECIDED	December 17, 2025
DOCKET	No. CV-25-03822-PHX-KML
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to remand an insurance-coverage action removed from Arizona state court on diversity-jurisdiction grounds, arguing that the amount in controversy did not exceed \$75,000.
STANDARD OF REVIEW	After the amount in controversy was contested, the parties were required to submit proof, and the court determined by a preponderance of the evidence whether the amount-in-controversy requirement was satisfied.
PRECEDENTIAL VALUE	unpublished, nonprecedential district-court order

TOPICS

- subject matter jurisdiction
- civil procedure
- insurance coverage
- uninsured motorist
- insurance bad faith

PRACTICE AREAS

civil procedure

insurance coverage

underinsured motorist benefits

removal and remand

diversity jurisdiction

QUESTIONS PRESENTED

1. Whether USAA established by a preponderance of the evidence that more than \$75,000 was in controversy for purposes of diversity jurisdiction.
2. Whether Helton's pre-suit damages demand and the damages alleged in his complaint established the amount in controversy without a detailed valuation of punitive damages or attorney's fees.

HOLDINGS

1. The amount in controversy exceeded \$75,000 because Helton's undisputed pre-suit communications established at least \$198,230.42 in compensatory damages before accounting for the \$100,000 paid by State Farm.
2. Prospective attorney's fees must be included in the amount-in-controversy analysis when recoverable under a statute or contract, although the court did not need to calculate them because compensatory damages alone satisfied the threshold.

KEY QUOTATIONS

“To remove the case from state court, USAA’s notice of removal was required to “include only a plausible allegation that the amount in controversy exceeds the jurisdictional threshold.”” (at 2)

“Without Helton disputing his own estimate of damages, that estimate is sufficient to establish the amount in controversy.” (at 4)

FACTUAL BACKGROUND

In October 2023, Robert Helton was injured when a car struck him while he was riding a bicycle. The driver's insurer paid Helton its \$100,000 policy limit, after which Helton sought underinsured-motorist benefits under his USAA policy. Before filing suit, Helton claimed at least \$198,230.42 in medical expenses and lost earnings, and his complaint also sought contractual benefits, punitive damages, and attorney's fees.

PROCEDURAL HISTORY

Helton filed suit against USAA General Indemnity Company in Maricopa County Superior Court in September 2025, asserting claims for declaration of rights, breach of contract, and bad faith. USAA removed the case to the United States District Court for the District of Arizona based on diversity jurisdiction. The court denied Helton's motion to remand and denied as moot the parties' stipulation to stay.

DISPOSITION

other

CASES CITED

- Rieke v. ManhattanLife Assurance Co. of America, No. CV-20-00724-PHX-GMS, 2020 WL 3056123, at *1 (D. Ariz. June 9, 2020)
- Dart Cherokee Basin Operating Co., LLC v. Owens, 574 U.S. 81, 88-89 (2014)
- Ibarra v. Manheim Investments, Inc., 775 F.3d 1193, 1198 (9th Cir. 2015)
- Arias v. Residence Inn by Marriott, 936 F.3d 920, 922 (9th Cir. 2019)
- Cohn v. Petsmart, Inc., 281 F.3d 837, 840 (9th Cir. 2002)
- Greene v. Harley-Davidson, Inc., 965 F.3d 767, 772 (9th Cir. 2020)
- Fritsch v. Swift Transportation Co. of Arizona, LLC, 899 F.3d 785, 794, 796 (9th Cir. 2018)

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