



The Zelle LLP Midwest Monitor: Heartland Insurance Review

The Midwest Monitor is your quarterly resource for news and issues concerning first and third-party property insurance law in the Midwest. Each issue distills the latest trends and rulings shaping claims handling and insurance litigation in Midwestern jurisdictions.

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In this first issue, you will find brief analyses of recent developments shaping the regional landscape, including a case law update on Minnesota courts treatment of code-compliance costs and appraisal timing in *New Oil Christian Center v. GuideOne Mutual Insurance Co.*, as well as enforcement of policy provisions barring pre-award interest on appraisal awards under Minnesota statutes and recent appellate decisions. We also preview emerging liability issues to keep an eye on in 2026.

To view a pdf of this issue, click [here](#).

If you are interested in additional information regarding any of the topics discussed, please reach out to the author directly. If you would like to see any topics discussed in the Midwest Monitor, please reach out to our editors Laura Bartlow, Lindsey Davis, and Mackenzie Moy.