

INTRODUCTION TO THE 2025-2026 EDITION

The Arizona Construction Law Annotated 2025-2026 Edition provides concise reference work for those in the legal, construction, and government procurement industries of the regulatory topics of interest to those fields. It includes up-to-date references to Arizona's constitutional, statutory, and regulatory framework on the subjects of construction law and government procurement.

Highlights of this year's edition include:

- Amendments to Title 9 outlining building permits; third-review, immunity applicability.
- New § 9-500.52 and 11-296.30. Construction; summertime hours; prohibition on restrictions.
- *Aroca v. Tang Inv. Co. LLC*, finding that if an action is not brought under a note secured by mortgage or deed of trust or a trustee's sale or action to foreclose is not commenced within the six-year statute of limitations governing such an action, the lien will continue to exist on the property, and in such a situation, a party may file suit to obtain a quiet title judgment to clear up that clouded title; however, if such suit is never brought, lien will automatically expire under statute governing expiration of mortgage or deed of trust after specified period of years.
- Action to quiet title to real property may proceed where underlying debt remains unpaid but six-year statute of limitations for suit on that debt has expired; overruling *Aroca v. Tang Inv. Co. LLC*, 259 Ariz. 302, 565 P.3d 1054 (2025) (overruling *Provident Mut. Bldg.-Loan Ass'n v. Schwertner*, 15 Ariz. 517, 140 P. 495 (1914), *Farrell v. West*, 57 Ariz. 490, 114 P.2d 910 (1941), *Manicom v. CitiMortgage, Inc.*, 236 Ariz. 153, 336 P.3d 1274 (App. 2014), as corrected (Nov. 19, 2014), *De Anza Land & Leisure Corp. v. Raineri*, 137 Ariz. 262, 669 P.2d 1339 (App. 1983), and *RCBT Holdings, LLC v. CIT Bank, N.A.*, 1 CA-CV 16-0177, 2017 WL 1739111, at *1 (App. May 4, 2017)).