COURT OF CHANCERY OF THE STATE OF DELAWARE

Forian Holdings LLC, et al. v. Symphony Health Solutions Corp., et al.

Forian Holdings · No. C.A. No. 2026-0686-LWW · Decided June 17, 2026

SUMMARY

The Delaware Court of Chancery determines the amount of a bond required to secure a Status Quo Order preserving the historical supply of commercial data to Forian Holdings LLC pending a preliminary injunction hearing. The court rejects the defendants' request for a $10 million bond as based on speculative downstream customer attrition and requires the plaintiffs to post a $437,000 bond. The court leaves open the possibility of revisiting the bond amount at the preliminary injunction hearing.

CASE DETAILS

COURT	Court of Chancery of the State of Delaware
WRITING FOR THE COURT	Lori W. Will
JURISDICTION	Delaware Court of Chancery
DECIDED	June 17, 2026
DOCKET	C.A. No. 2026-0686-LWW
DISPOSITION	other
PROCEDURAL POSTURE	The Court of Chancery determined the appropriate bond amount required under a Status Quo Order preserving the historical supply of commercial data pending a preliminary injunction hearing.
PRECEDENTIAL VALUE	published

TOPICS

injunction bonds · injunctions · commercial litigation · contracts · remedies

PRACTICE AREAS

civil procedure · commercial litigation · contracts · remedies

QUESTIONS PRESENTED

1. What amount of security should plaintiffs post to compensate defendants if the Status Quo Order is later determined to have been improvidently issued?
2. Whether the proposed $10 million bond was supported by sufficiently concrete evidence of potential harm or was based on speculative losses.

HOLDINGS

1. The plaintiffs must post a $437,000 bond as security for potential losses resulting from the Status Quo Order.

KEY QUOTATIONS

> *"“Because actual damages are uncertain, and because a wrongfully enjoined party has no recourse other than the security, the court should ‘err on the high side’ in setting the bond.”"* (at 2)

> *"That said, a bond cannot be predicated on speculative harm."* (at 3)

FACTUAL BACKGROUND

The Status Quo Order required defendants to continue supplying commercial data to Forian Holdings LLC pending a preliminary injunction hearing. Defendants claimed that potential objections by data suppliers could cause downstream customer attrition and sought a $10 million bond. Plaintiffs argued that $437,000, representing two months of contractual fees and reflecting the parties' contractual limitation of liability, was sufficient. Defendants did not provide evidence of upstream penalties, actual costs, or other non-speculative losses supporting the larger amount.

PROCEDURAL HISTORY

Following a June 2, 2026 bench ruling, the court entered a Status Quo Order requiring defendants to maintain the historical supply of commercial data to plaintiffs. The parties submitted competing proposals for the bond amount: defendants requested $10 million, while plaintiffs proposed no more than $437,000. The court ordered plaintiffs to post a $437,000 bond within three business days and reserved the possibility of considering a larger bond at the preliminary injunction hearing.

DISPOSITION

other

CASES CITED

- Guzzetta v. Serv. Corp. of Westover Hills, 7 A.3d 467, 470 (Del. 2010)
- Leon v. Orlando, 2024 WL 2862452, at *2 (Del. Ch. June 5, 2024)
- Steward Health Care Sys. LLC v. Tenet Bus. Servs. Corp., 2022 WL 3025587, at *6 (Del. Ch. Aug. 1, 2022)
- Comcast Cable Commc'ns Mgmt., LLC v. CX 360, Inc., 2025 WL 79953, at *2 (Del. Ch. Jan. 13, 2025)
- Health Intel. Co. v. Komodo Health, Inc., C.A. No. 2024-0702-LWW (Del. Ch. Aug. 5, 2024)

OPINION

Forian Holdings LLC v. Symphony Health Solutions Corp.

PER CURIAM.

COURT OF CHANCERY

OF THE

STATE OF DELAWARE

LORI W. WILL LEONARD L. WILLIAMS JUSTICE CENTER

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June 17, 2026 Michael A. Barlow, Esquire Blake Rohrbacher, Esquire Shannon M. Doughty, Esquire Kevin M. Gallagher, Esquire Quinn Emanuel Urquhart Andrew L. Milam, Esquire & Sullivan, LLP Saralynn G. Davis, Esquire 500 Delaware Avenue, Suite 1400 Richards, Layton & Finger, P.A. Wilmington, Delaware 19801 920 North King Street Wilmington, Delaware 19801 RE: Forian Holdings LLC, et al. v. Symphony Health Solutions Corp., et al., C.A. No. 2026-0686-LWW Dear Counsel: I write regarding your submissions on the appropriate amount of a bond in accordance with my June 2, 2026 bench ruling and subsequent Status Quo Order.1 The Status Quo Order preserves the status quo by requiring the defendants to maintain the historical supply of commercial data to Forian Holdings LLC pending a preliminary injunction hearing. 1 See Joint Letter Regarding Bond Amount (Dkt. 27) ("Letter") 1; Status Quo Order (Dkt. 16).

 The defendants request a bond of $10 million.2 This figure is based on estimates of downstream customer attrition that might occur if certain data suppliers object to providing further data to Symphony Health Solutions Corp. The plaintiffs, for their part, submit that a bond of no more than $437,000 is appropriate.3 This figure corresponds to two months of fees owed to the defendants under the operative contracts and aligns with the parties' bargained-for limitation of liability in Section 9.4 of the Master Services Agreement.4 "Because actual damages are uncertain, and because a wrongfully enjoined party has no recourse other than the security, the court should 'err on the high side' in setting the bond."5 If the bond is too high, the plaintiffs will ultimately recover the excess. But if the bond is too low and the Status Quo Order is later deemed improvidently issued, the defendants may suffer losses.6 2 See Letter at 8. 3 See id. at 4. 4 See id. at 4-5. 5 Guzzetta v. Serv. Corp. of Westover Hills, 7 A.3d 467, 470 (Del. 2010). 6 See Leon v. Orlando, 2024 WL 2862452, at *2 (Del. Ch. June 5, 2024); see also Steward Health Care Sys. LLC v. Tenet Bus. Servs. Corp., 2022 WL 3025587, at *6 (Del. Ch. Aug. 1, 2022).

 That said, a bond cannot be predicated on speculative harm.7 At the June 2 hearing, I directed the defendants to provide evidence, such as upstream penalty provisions or actual costs, to justify their $10 million calculation. The defendants have failed to do so, relying instead on hypotheticals about how third-party suppliers might react and the ensuing downstream consequences. The $437,000 figure advanced by the plaintiffs, by contrast, appropriately provides security in accordance with the economic realities of the parties' commercial relationship.8 It relies on metrics contemplated by the operative agreements rather than estimates of potential, indirect harm. The plaintiffs must post a bond in this amount within three business days of this letter. If necessary, I will take up whether a larger bond is warranted at the preliminary injunction hearing. IT IS SO ORDERED. Sincerely yours, Lori W. Will Lori W. Will Vice Chancellor 7 See Comcast Cable Commc'ns Mgmt., LLC v. CX 360, Inc., 2025 WL 79953, at *2 (Del. Ch. Jan. 13, 2025). 8 See Status Quo Order, Health Intel. Co. v. Komodo Health, Inc., C.A. No. 2024-0702-LWW (Del. Ch. Aug. 5, 2024).