

Complaint Dismissed for Failure to Distinguish Trade Secrets from General Business Information

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In July 2026, in *Signant Health Hold Corp. v. Definium Therapeutics, Inc.*, No. 26-114-GBW (D. Del.), Judge Gregory Williams dismissed a complaint bringing claims of trade secret misappropriation under the Defense of Trade Secrets Act (DTSA) and state law claims of breach of contract and violation of the Delaware Uniform Trade Secrets Act, finding that the plaintiff failed to properly identify a trade secret under DTSA and declining to exercise supplemental jurisdiction over the state law claims.

Definium Therapeutics, Inc. is a clinical-stage pharmaceutical company focused on the research and development of psychedelic-based therapeutics. Signant Health is an evidence generation company that provides electronic clinical outcome assessment for clinical trials. Signant pled that its services and platform were not “generic, off-the-shelf capabilities” and instead represented “years of investment, innovation, and refinement.” Definium retained Signant for a successful Phase 2 clinical trial but contracted with another vendor, EMA, for its Phase 3 trial. Signant alleged that EMA had never conducted a Phase 3 trial and lacked the know-how to do so but was working to develop a cheaper, “knockoff” of Signant’s platform. Signant alleged that Definium’s director of global clinical development held an undisclosed financial stake in EMA and provided EMA confidential information that Definium learned about Signant from the Phase 2 trial.

The court noted that while the “misappropriated trade secret must be identified with enough specificity to place a defendant on notice of the bases for the claim being made against it, [Signant] need not spell out the details of the trade secret to avoid dismissal.” However, the court found that Signant only identified broad categories of information that did not “meaningfully distinguish the alleged protected information from general business information, nor do they provide facts sufficient to narrow or define the alleged trade secrets at issue.” Signant’s identification of its alleged trade secrets included “its market strategies, proprietary data architecture, clinical trial methodologies, pricing models, and data quality monitoring procedures” as well as “its pricing data, proprietary data structures, operating procedures, methodologies, training programs, and data quality monitoring procedures.” As a result, the court found that Signant’s allegations failed to

identify with reasonable particularity the information about which trade secret protection was claimed. After declining to exercise supplemental jurisdiction over the state law misappropriation and contract claims, the court dismissed the complaint without prejudice.

Signant has since filed a motion for leave to amend its complaint, which is pending.

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