

DELAWARE LAW SCHOOL 2025 CASE SUMMARIES

Saunders v. Lightwave Logic, Inc. (470, 2024)—This is the plaintiff’s appeal from the Superior Court’s opinion granting the defendants’ motion for summary judgment. In 2023, the plaintiff filed an action against the defendants for negligence and conversion based on the escheatment of his shares in one of the defendants to the State in 2017. After the Superior Court denied the defendants’ motion to dismiss based on the three-year statute of limitations, the parties engaged in limited discovery concerning the statute of limitations and the applicability of the inherently unknowable injury doctrine. The defendants then moved for summary judgment, which the Superior Court granted. The court held that the inherently unknowable injury doctrine did not apply and the three-year statute of limitations barred the plaintiff’s claims. On appeal, the plaintiff argues that the Superior Court erred in: (i) concluding that the inherently unknowable injury did not apply; and (ii) finding that there were no material issues of disputed fact precluding summary judgment.

Pearson v. State (268, 2024)— This is the defendant’s appeal from his convictions for multiple crimes, including sexual abuse of a child by a person in a position of trust, authority, or supervision. At trial, the defendant moved for a judgment of acquittal on the sexual abuse charges, arguing that the State failed to present evidence that he was in a position of trust, supervision, or authority with respect to the child. The Superior Court denied the motion, finding that there was sufficient evidence the defendant was a person of trust, supervision, or authority. On appeal, the defendant argues that his sexual abuse convictions must be reversed because: (i) no rational trier of fact could find that he (a volunteer deputy fire chief) was a person of trust, authority, or supervision with respect to the child (a volunteer junior firefighter in a different company); and (ii) the statutory definition of a person in a position of trust, authority, or supervision was unconstitutionally vague as applied to him.