

## Delaware Courts Expand Books and Records Inspection Rights under Section 220 to Allow Greater Access to Electronic Communications

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In two recent cases, the Delaware Supreme Court and Delaware Court of Chancery upheld demands for electronic communications in Section 220 books and records actions. In both *KT4 Partners LLC v. Palantir Technologies, Inc.* and *Schnatter v. Papa John's International, Inc.*, the courts observed that as modern record-keeping and business practices evolve in the digital age, so too should Delaware's interpretation of Section 220 evolve to match the corporate migration towards electronic communications.

Attached is the memorandum discussing the cases.

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