

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

**Zoryan Institute for Contemporary Armenian Research & Documentation v. Fox Point Pictures, LLC; Theodore Bogosian; Does**

**1-50**

Zoryan Institute · No. C.A. No. 24-109-JJM-AEM · Decided May 27, 2026

SUMMARY

The United States District Court for the District of Rhode Island denied Fox Point Pictures, LLC’s motion to dismiss for lack of subject-matter jurisdiction. The court held that the plaintiff had alleged a good-faith claim exceeding the \$75,000 amount-in-controversy requirement because payments made by other entities could count toward the plaintiff’s contractual obligations.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the District of Rhode Island                                                                                                                                                                                                                                                                                                                                                                                                                     |
| WRITING FOR THE COURT | John J. McConnell, Jr.                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| JURISDICTION          | United States District Court for the District of Rhode Island                                                                                                                                                                                                                                                                                                                                                                                                                     |
| DECIDED               | May 27, 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| DOCKET                | C.A. No. 24-109-JJM-AEM                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| PROCEDURAL POSTURE    | Defendants moved to dismiss the complaint for lack of subject matter jurisdiction, arguing that the amount in controversy did not exceed \$75,000 exclusive of interest and costs.                                                                                                                                                                                                                                                                                                |
| STANDARD OF REVIEW    | On a motion to dismiss for lack of subject matter jurisdiction, the court construes the complaint liberally, treats well-pleaded facts as true, and indulges reasonable inferences in the plaintiff’s favor. The plaintiff bears the burden of establishing jurisdiction, but dismissal is proper only when it appears to a legal certainty that the claim is for less than the jurisdictional amount. The court may look beyond the pleadings and consider documentary evidence. |
| PRECEDENTIAL VALUE    | Unknown                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

TOPICS

subject matter jurisdiction

motions to dismiss

breach of contract

contracts

commercial litigation

## PRACTICE AREAS

Civil procedure

Contracts

Commercial litigation

## QUESTIONS PRESENTED

1. Whether the amount-in-controversy requirement for diversity jurisdiction was satisfied despite evidence that entities other than Zoryan supplied some of the contract payments.
2. Whether defendants established to a legal certainty that Zoryan's breach-of-contract claim was worth less than \$75,000.

## HOLDINGS

1. Payments made by Zoryan Canada or other entities did not prevent satisfaction of the amount-in-controversy requirement because Zoryan remained liable as a party to the contract for the full contract amount, and the source of the funds used to fulfill its contractual obligation was not relevant to the contract terms.
2. The complaint alleged a good-faith claim exceeding the \$75,000 jurisdictional threshold, and defendants did not show to a legal certainty that the claim was worth less than that amount.

## KEY QUOTATIONS

*“Who supplied the money for Zoryan’s completion of its contractual obligations, is not relevant to the contract terms, which are solely between Zoryan and Fox Point Pictures.”* (Discussion)

*“Because the Defendant has not shown to a legal certainty that the Plaintiff’s claim is really for less than the jurisdictional amount, the Court DENIES Fox Point Pictures, LLC’s Motion to Dismiss.”* (Conclusion)

## FACTUAL BACKGROUND

Zoryan alleged that Fox Point Pictures, LLC and Theodore Bogosian breached a contract concerning a documentary film about the Armenian Genocide by failing to give Zoryan proper credit for its funding and involvement. The contract claim concerned approximately \$150,000 paid or allegedly payable under the contract. Defendants argued that Zoryan itself supplied only about \$60,000 and that other entities paid the balance, so the amount in controversy was below \$75,000.

## PROCEDURAL HISTORY

Zoryan filed a breach-of-contract complaint invoking diversity jurisdiction. Defendants challenged the amount-in-controversy requirement through a motion to dismiss. The district court denied the motion.

## DISPOSITION

other

## CASES CITED

- 315 U.S. 442, 446 (1942)
- 99 F.3d 1200, 1209-10 (1st Cir. 1996)
- 303 U.S. 283, 288-89 (1938)
- 516 F.3d 29, 33 (1st Cir. 2008)
- 57 F.4th 11, 14-15 (1st Cir. 2023)

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