

**The AIPLA's 2025-2026
Giles Sutherland Rich Memorial
Moot Court Competition**

Pocah, Inc. v. Tiana Technologies Corp.
Case No. 2025-GSR

Problem Materials:

This year's problem materials include:

1. This problem prompt.
2. The Joint Appendix.

Overview:

In this patent infringement and antitrust case, Plaintiff Pocah, Inc. ("Pocah"), which manufactures the "Pocah-Car," an electric vehicle ("EV") based on Pocah's trendy, collectible plush characters with clever grins and eleven teeth, alleges that Defendant Tiana Technologies Corp. ("Tiana") infringes its '245 patent relating to automobile headlights. Tiana alleges that Pocah violated the Sherman Act by monopolizing, attempting to monopolize, and tying products relating to the Pocah-Car, including Pocah-Car services and parts.

This is an appeal of the district court's order granting Tiana's motion for summary judgment of noninfringement and Pocah's motion to dismiss Tiana's antitrust counterclaims. The Eastern District of Gilesead, which is in the Fourth Circuit, granted both parties' motions on the same day. The parties timely appealed to the Federal Circuit.

Patent-in-Suit:

The Patent-in-Suit is United States Patent GSR946,245 ("the '245 patent"). The '245 patent is directed to a vehicle headlight control system that controls the light distribution of a headlight.

Issues on Appeal:

- 1) Whether the district court properly construed the disputed claim terms of the '245 patent in granting summary judgment of noninfringement; and
- 2) Whether the district court properly dismissed Tiana's antitrust counterclaims.

Background:Plaintiff Pocah, Inc.:

Pocah, founded in 2005, is a collectible company well known for its proprietary toys and figurines, including products sold in a “blind box” format. Pocah sells collectibles based on its in-house characters. Pocah's characters include the “Pocah-Pocah,” a line of plush-toy monsters with large eyes, sly expressions, and eleven teeth. Pocah has quickly become a force as a toy company that caters to adults and children alike. Consumers often think of Pocah products as “affordable luxury.” Pocah also has theme songs for some of its toy characters. Pocah's products tend to sell out quickly. Many customers, when seeking to purchase Pocah's more popular products, purchase the products from Pocah's website, in which the consumer can pay for and reserve products for pick-up.

In 2015, Pocah, going beyond the collectible toy market, released the “Pocah-Car,” a small, entry-level electric vehicle whose design was influenced by its toy collectibles. The Pocah-Car's popular features include electronic touchscreens in the vehicle, whose content includes photos, short films, and music featuring its characters. The Pocah-Car is priced about ten percent above comparable electric vehicles (“EVs”). In addition, the Pocah-Car is available in a wide range of unusual, popular colors. As an option, Pocah even offers “blind box” color options, which have proven popular. From an engineering standpoint, the Pocah-Car is similar to average EVs. The Pocah-Car has become one of the most popular automobiles in the world.

As part of its automobile business model, Pocah has sought to create a Pocah “ecosystem,” thereby capitalizing on the aftermarket of its automobile parts and services. Along

corresponding lines, Pocah-Car’s entertainment service options include short films, music, and sound effects from the Pocah characters.

With respect to auto parts, Pocah has a portfolio of patents relating to the Pocah-Car. For various features, Pocah has sought to create “lock-and key” features in its automobiles, thereby impairing consumers’ ability to use non-Pocah auto parts. The Patent-in-Suit (“the ’245 patent”) relates to automobile headlight systems.

Defendant Tiana Technologies Corp.:

Tiana is a leading online marketplace that sells a broad range of products. Tiana works with thousands of third-party sellers. In addition, Tiana makes and sells many house-branded products, including commodity products such as power strips, water filters, and auto parts. Tiana’s website includes customer reviews and product instructions. Tiana’s brick-and-mortar business operations have included some automobile services. Tiana provided some unauthorized automobile services for Pocah Cars. In addition, Tiana purchased approximately 20 to 30 Pocah Cars as company vehicles.

In this case, Tiana’s accused products are its replacement automobile headlight systems that can be used in the Pocah-Car.

Challenges to Pocah’s Automobile Replacement Parts Business Strategy:

Despite the popularity of Pocah’s toys, characters, and its Pocah-Car, Pocah’s restrictions on the automobile parts aftermarket have been unpopular. Pocah’s other efforts to create an entertainment ecosystem have been less controversial. Like many other industrial products, the Pocah-Car has been discussed in the “Right to Repair” movement.

The Case Below:

On January 6, 2025, Pocah filed a patent infringement suit in the Eastern District of Gilesead. The Complaint accused Tiana of infringing the ’245 patent, which is directed to automobile headlight systems. In its Answer, Tiana asserted Sherman Act counterclaims, alleging

that Pocah has monopolized, attempted to monopolize, and illegally tied products and services, *e.g.*, by tying Pocah-Car services and parts to the sale of the Pocah-Car.

During the initial Case Management Conference, Tiana sought leave to file an early motion for summary judgment of noninfringement and moved for early claim construction. After Tiana twice amended its antitrust counterclaims, Pocah moved to dismiss the antitrust counterclaims. After construing the disputed terms, the court granted Tiana's motion for summary judgment of noninfringement. The court also granted Pocah's motion to dismiss the antitrust counterclaims.

Pocah appealed the district court's grant of summary judgment of noninfringement. Tiana cross-appealed the order dismissing the Sherman Act counterclaims.

Record Facts:

The record on appeal is generally confined to the facts presented herein, along with the documents and evidence transmitted in the Joint Appendix, which consist of the Patent-in-Suit, the two district court opinions at issue, Tiana's Excerpted Answer and Counterclaims, and the deposition testimony excerpts from Pocah's fact witness, Margaret George, and Tiana's fact witness, Dr. Annie Lucas.