

EXHIBIT 13

From: Sandford, Brett (Bay Area)
Sent: Tuesday, March 22, 2022 9:29 PM
To: Smith, Alexis Adian; RJREDVA; cmolster@molsterlaw.com
Cc: #C-M PMIEDVA - LW TEAM; Elizabeth.Weiswasser@weil.com; david.lender@weil.com; anish.desai@weil.com; adrian.percer@weil.com; robert.vlasis@weil.com; rvanarnam@williamsmullen.com; cbrannon@williamsmullen.com; Matthew.Sieger@weil.com; ashores@williamsmullen.com; Stephanie.Adamakos@weil.com; Eric.Westerhold@weil.com; Ansley, Sutton
Subject: RE: RAI Strategic Holdings, Inc. v. Altria Client Services LLC - Case No. 1:20-cv-00393-LO-TCB (E.D. Va.)

Lexi,

Your response does not resolve our concerns—it does the opposite. You do not dispute that (i) Reynolds has possession of the documents discussed with the Court at the March 18 hearing and (ii) failed to produce them in this case. Suffice to say, your attempts to excuse Reynolds' failure to produce these documents (and all other documents responsive to PMI/Altria's pending document requests) on irrelevancy and timeliness grounds are incorrect. Please let us know when you are available to meet and confer tomorrow (other than 10-11 am PT). We suggest 2 pm ET.

Regards,

Brett M. Sandford

LATHAM & WATKINS LLP
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From: Smith, Alexis Adian <asmith@jonesday.com>
Sent: Tuesday, March 22, 2022 4:48 PM
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Cc: #C-M PMIEDVA - LW TEAM <pmiedva.lwteam@lw.com>; Elizabeth.Weiswasser@weil.com; david.lender@weil.com; anish.desai@weil.com; adrian.percer@weil.com; robert.vlasis@weil.com; rvanarnam@williamsmullen.com; cbrannon@williamsmullen.com; Matthew.Sieger@weil.com; ashores@williamsmullen.com; Stephanie.Adamakos@weil.com; Eric.Westerhold@weil.com; Ansley, Sutton <sutton.ansley@weil.com>
Subject: RE: RAI Strategic Holdings, Inc. v. Altria Client Services LLC - Case No. 1:20-cv-00393-LO-TCB (E.D. Va.)

Brett,

Please find correspondence regarding this issue attached.

Regards,
Lexi

Alexis Smith (Lexi) ([bio](#))
Partner
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[555 South Flower Street, Fiftieth Floor](#)
[Los Angeles, CA 90071](#)

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From: Brett.Sandford@lw.com <Brett.Sandford@lw.com>
Sent: Tuesday, March 22, 2022 11:42 AM
To: RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
Cc: pmiedva.lwteam@lw.com; Elizabeth.Weiswasser@weil.com; david.lender@weil.com; anish.desai@weil.com; adrian.percer@weil.com; robert.vlasis@weil.com; rvanarnam@williamsmullen.com; cbrannon@williamsmullen.com; Matthew.Sieger@weil.com; ashores@williamsmullen.com; Stephanie.Adamakos@weil.com; Eric.Westerhold@weil.com
Subject: RE: RAI Strategic Holdings, Inc. v. Altria Client Services LLC - Case No. 1:20-cv-00393-LO-TCB (E.D. Va.)

**** External mail ****

Counsel,

Having received no response to my email below, please let us know when you are available to meet and confer tomorrow (other than 10-11 am PT). As discussed at the March 18 hearing, we intend to file a motion for an order directing RJR to show cause why RJR (1) failed to produce responsive documents highly probative of damages and (2) made material misrepresentations to Judge Buchannan about the alleged irrelevancy of RJR's communications and settlement negotiations with Fontem.

Regards,

Brett M. Sandford

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From: Sandford, Brett (Bay Area) <Brett.Sandford@lw.com>
Sent: Monday, March 21, 2022 9:11 AM
To: RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
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Subject: RAI Strategic Holdings, Inc. v. Altria Client Services LLC - Case No. 1:20-cv-00393-LO-TCB (E.D. Va.)

Counsel,

As discussed at the March 18 hearing, it has come to our attention that, in the North Carolina litigation between Altria and Reynolds, Fontem produced certain documents and communications with Reynolds relating to the negotiation of the Fontem-RJR settlement agreement. Any such documents in Reynolds' possession, such as the documents discussed with Judge O'Grady at the March 18 hearing, are responsive to at least RFP No. 224. See RFP No. 224 ("... [A]ll non-privileged documents related to Reynolds's settlement with Fontem and/or relating to the Fontem agreement, including any communications with Fontem."); see also, e.g., RFP Nos. 102, 139, 146, 160. The documents are facially responsive and probative to Plaintiffs' damages claims.

Please confirm by 2 pm ET tomorrow that Reynolds will produce all documents responsive to RFP No. 224, including to any communications with Fontem regarding the negotiations of the Fontem-RJR settlement agreement. If you refuse,

please let us know if you are available to meet and confer before noon ET on Wednesday. We reserve all rights, including the right to seek additional depositions, supplement Mr. Meyer's damages reports, and file any appropriate motions with the Court.

Regards,

Brett M. Sandford

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