

EXHIBIT 14

From: Smith, Alexis Adian <asmith@jonesday.com>
Sent: Thursday, March 24, 2022 5:07 PM
To: Sandford, Brett (Bay Area); 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; 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,

We write as a follow up to our meet and confer. We stand by our position that the negotiations between Reynolds and Fontem regarding the Fontem-RJRV agreement are not relevant or discoverable in this matter under FRCP 26, as stated in Reynolds's objections to PM/Altria's request for production 224 (in March 2021) and in our opposition to PM/Altria's motion to compel a deposition on topic 28 (in April 2021). Judge Buchanan agreed that the negotiations of that agreement were inappropriate for discovery. See Dkt. 586 (Transcript from the April 16, 2021 hearing) at 7.

We are aware that Altria obtained the Fontem-RJRV negotiations from Fontem in the MDNC matter in June of 2021. Those documents contain Reynolds CBI, and they should have been and should continue to be treated as such under the MDNC protective order. With full reservation of all objections to the relevance and admissibility of those documents, Reynolds provides its consent to Altria's production of the Fontem-RJRV negotiations Altria obtained in MDNC to be produced by Altria in the EDVA matter provided that: (1) the documents are treated as Reynolds's CBI under the EDVA protective order, and (2) Altria obtains consent from Fontem to produce them in EDVA.

Regards,
Lexi

Alexis Smith (Lexi) ([bio](#))
Partner

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[Los Angeles, CA 90071](#)
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asmith@jonesday.com

From: Brett.Sandford@lw.com <Brett.Sandford@lw.com>
Sent: Wednesday, March 23, 2022 10:12 AM
To: Smith, Alexis Adian <asmith@jonesday.com>; 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; 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.)

**** External mail ****

4 pm ET today works. Please use the dial-in information below. Thanks.

Dial-In Number: 1-877-214-1533

Access Code: 2623840#

Brett M. Sandford

LATHAM & WATKINS LLP

505 Montgomery Street | Suite 2000 | San Francisco, CA 94111-6538

D: +1.415.395.8150

From: Smith, Alexis Adian <asmith@jonesday.com>

Sent: Wednesday, March 23, 2022 10:07 AM

To: Sandford, Brett (Bay Area) <Brett.Sandford@lw.com>; RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com

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; 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,

Your statements below about are incorrect. Nonetheless, we can be available to meet and confer at 4 pm ET today. If you wish to discuss this then, please circulate a dial-in.

Regards,

Lexi

Alexis Smith (Lexi) ([bio](#))

Partner

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asmith@jonesday.com

From: Brett.Sandford@lw.com <Brett.Sandford@lw.com>

Sent: Tuesday, March 22, 2022 6:29 PM

To: Smith, Alexis Adian <asmith@jonesday.com>; 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; 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.)

**** External mail ****

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

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505 Montgomery Street | Suite 2000 | San Francisco, CA 94111-6538
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From: Smith, Alexis Adian <asmith@jonesday.com>

Sent: Tuesday, March 22, 2022 4:48 PM

To: Sandford, Brett (Bay Area) <Brett.Sandford@lw.com>; RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com

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; rvarnam@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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asmith@jonesday.com

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; rvarnam@williamsmullen.com; cbrannon@williamsmullen.com; Matthew.Sieger@weil.com; ashores@williamsmullen.com; Stephanie.Adamakos@weil.com; Eric.Westerhold@weil.com

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**** 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 Buchanan about the alleged irrelevancy of RJR's communications and settlement negotiations with Fontem.

Regards,

Brett M. Sandford

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505 Montgomery Street | Suite 2000 | San Francisco, CA 94111-6538
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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
Cc: #C-M PMIEDVA - LW TEAM <pmiedva.lwteam@lw.com>; Weiswasser, Elizabeth <Elizabeth.Weiswasser@weil.com>; Lender, David <david.lender@weil.com>; Desai, Anish <anish.desai@weil.com>; Percer, Adrian <adrian.percer@weil.com>; Vlasis, Robert <robert.vlasis@weil.com>; Van Arnam, Robert C. <rvanarnam@williamsmullen.com>; cbrannon@williamsmullen.com; Sieger, Matthew <Matthew.Sieger@weil.com>; Shores, Andrew <ashores@williamsmullen.com>; Adamakos, Stephanie <Stephanie.Adamakos@weil.com>; Westerhold, Eric <Eric.Westerhold@weil.com>
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

LATHAM & WATKINS LLP

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