

EXHIBIT 5

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

RAI STRATEGIC HOLDINGS, INC. and
R.J. REYNOLDS VAPOR COMPANY,

Plaintiffs and Counterclaim
Defendants,

v.

ALTRIA CLIENT SERVICES LLC; PHILIP
MORRIS USA INC.; and PHILIP MORRIS
PRODUCTS S.A.

Defendants and Counterclaim
Plaintiffs.

Civil Action No. 1:20-cv-393-LO-TCB

[PROPOSED] VOIR DIRE QUESTIONS

The parties respectfully request that the Court include the following questions in voir dire:

1. Does any member of the jury panel know or been represented by any of the lawyers or law firms who were introduced to you?
2. Have you or any member of your family ever been employed by any Philip Morris entity or Altria entity, including Philip Morris Products S.A, Altria Client Services LLC, or Philip Morris USA Inc.?
3. Do you have negative views of any Philip Morris or Altria entity, including Philip Morris Products S.A., Altria Client Services LLC, or Philip Morris USA Inc.?
4. Have you or any member of your family ever been employed by any entity of British American Tobacco plc, including Reynolds American, Inc., RAI Strategic Holdings, Inc., R.J. Reynolds Tobacco Company, or R.J. Reynolds Vapor Company?

5. Do you have negative views of any Reynolds entity, including Reynolds American, Inc., RAI Strategic Holdings, or R.J. Reynolds Vapor Company.

6. Have you or any member of your immediate family ever owned stock in any Altria or Philip Morris entity?

7. Have you or any member of your immediate family ever owned stock in any British American Tobacco plc or Reynolds entity?

8. Have you heard or read anything about any legal dispute between Altria, Philip Morris, and Reynolds?

9. Have you or any member of your immediate family ever been employed by any company that makes or sells tobacco products, including e-cigarettes?

10. Have you or any member of your family ever used e-cigarette products? (If yes: Do you have any strong feelings about that product?)

11. Do you think e-cigarettes are more harmful than regular cigarettes, or pose greater health risks than regular cigarettes?

12. Whether you have ever used e-cigarettes or not, what opinions do you have about these products?

13. Have you read or heard anything the news about e-cigarettes (If yes: What have you read or heard)?

14. Do you or any member of your family know any of the following people that may be called to testify in this case:

- John P. Abraham
- Rui Batista
- Clinton Blake
- Travis N. Blalock

- Noori Brifcani
- Kara Calderon
- David B. Clissold
- Olivier Cochand
- Sean Daugherty
- Brandie Davis
- Flavien Dubief
- Stacy L. Ehrlich
- James Figlar
- Grier Fleischhauer
- Jean-Marc Flick
- Thomas F. Fuller
- Moira Gilchrist
- Nicholas Gilley
- John Hairfield Jr.
- Stephanie Harper
- Eric Hawes
- Charles Higgins
- Masja Hoogland
- Eric Hunt
- Kenneth A. Jansen
- Edward Kiernan
- Martin King
- Kelly R. Kodama
- Russell Kratzer
- Henry Lam
- Philipp Litzenberger
- Loi Ying Liu
- Richard Lute
- Pierpaolo Magnani
- Alexandre Malgat

- Michael Manson
- Joseph C. McAlexander III
- Paul K. Meyer
- Oleg Mironov
- Neal Nunnally
- John S. Peddycord
- Arno Rinker
- Robert Ripley
- Jeffrey C. Suhling
- Ryan Sullivan
- Michel Thorens
- Harold J. Walbrink

15. Have you or someone close to you ever been involved in a lawsuit, either as a plaintiff or defendant or otherwise?

16. Have you ever served on a jury before? (If yes: Were you the foreperson? Was a verdict reached? Describe the verdict?)

17. Do you or any member of your immediate family have any education or experience in the following areas:

- Electrical engineering or mechanical engineering;
- The tobacco industry;
- Product design, including design of e-cigarettes;
- The practice of law;
- Healthcare
 - If yes, was that experience in areas involving pulmonology (lung care) or oncology (cancer)?
- The negotiation of licenses or contracts involving intellectual property; and

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