

**IN THE 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.

Case No. 1:20-cv-00393-LO-TCB

**COUNTERCLAIM PLAINTIFFS' MOTION
TO LIMIT THE NUMBER OF PRIOR ART REFERENCES AND PRIOR ART
COMBINATIONS FOR THE '911 PATENT**

Pursuant to Local Rule 7 and the Court's Scheduling Order (Dkt. 99), Counterclaim Plaintiffs Altria Client Services, LLC, Philip Morris USA Inc., and Philip Morris Products S.A. (collectively, "PMP/Altria"), by counsel, hereby move to limit the number of prior art references and prior art combinations identified by Reynolds, as requested in PMP/Altria's Memorandum in Support of this Motion.

Pursuant to Local Rules 7(e) and 7(j), the undersigned counsel hereby certifies that counsel for the parties conferred telephonically on April 27, 2022, and Counterclaim Defendants stated that they oppose this Motion. In support of this Motion, PMP/Altria refer the Court to the accompanying Memorandum in Support, which is hereby incorporated by reference as if fully set forth herein. A proposed order for the Court's consideration accompanies this Motion.

Dated: April 29, 2022

Respectfully submitted,

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Morris USA Inc., and Philip Morris
Products S.A.*

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of April, 2022, a true and correct copy of the foregoing was served using the Court's CM/ECF system, with electronic notification of such filing to all counsel of record.

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