

EXHIBIT 2

From: SurendraKumar.Ravula@lw.com
Sent: Wednesday, May 4, 2022 12:29 PM
To: Michalik, John M.; RJREDVA; cmolster@molsterlaw.com
Cc: pmiedva.lwteam@lw.com; Altria.RJRV@weil.com
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (E.D. Va.) - Claims / Prior Art Reduction

**** External mail ****

John: We disagree with your characterizations below. Thanks for re-confirming Reynolds' opposition to PMI/Altria's April 29 motion.

Kumar Ravula
Pronouns: he/him/his

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330 North Wabash Avenue, Suite 2800 | Chicago, IL 60611
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From: Michalik, John M. <jmichalik@JonesDay.com>
Sent: Wednesday, May 4, 2022 11:13 AM
To: Ravula, Kumar (CH) <SurendraKumar.Ravula@lw.com>; RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
Cc: #C-M PMIEDVA - LW TEAM <pmiedva.lwteam@lw.com>; Altria.RJRV@weil.com
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (E.D. Va.) - Claims / Prior Art Reduction

Kumar - -

Your email misstates the facts surrounding our exchange leading up to PM/Altria's April 29 motion.

First, your April 25 email incorrectly counted the number of prior art combinations Reynolds had identified for the asserted claims of the '911 patent in the parties' joint submission on April 20. In an April 27 email, I informed you that you had incorrectly counted and explained how you had done so. You then requested that the parties submit a "supplemental filing" regarding Reynolds's identification of prior art combinations, and I responded that Reynolds saw no reason to submit another filing repeating the same prior art combinations the parties already jointly submitted on April 20. We then held a meet and confer, also on April 27, in which I explained again how you had incorrectly counted the number of prior art combinations in the April 20 joint filing. You responded that, with my explanation, you understood how many - - and which - - combinations Reynolds had identified for the claims of the '911 patent. After I explained Reynolds's identification of prior art combinations for the '911 patent during our call, you asked again if Reynolds would agree to a "supplemental filing", and I repeated that Reynolds saw no need to file another paper repeating the same prior art combinations already jointly submitted on April 20. After being corrected on Reynolds's identification of prior art combinations for the '911 patent, you never asserted that Reynolds had identified an excessive or unreasonable number. Then PM filed its motion on April 29.

This email also confirms Reynolds stands by its April 20 identification of prior art combinations for claim 2 of the '911 patent and will be filing its opposition to PM's April 29 motion today.

John M. Michalik
Partner
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jmichalik@jonesday.com

***Please note our new address effective April 25, 2022**

From: SurendraKumar.Ravula@lw.com <SurendraKumar.Ravula@lw.com>
Sent: Tuesday, May 3, 2022 5:47 PM
To: Michalik, John M. <jmichalik@JonesDay.com>; RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
Cc: pmiedva.lwteam@lw.com; Altria.RJRV@weil.com
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (E.D. Va.) - Claims / Prior Art Reduction

**** External mail ****

John,

When we met and conferred today, you accused me of not having properly raised our request that RJR reasonably reduce its identification of prior art combinations down from 6 combinations for claim 2 of the '911 patent. That is false. We discussed it on the meet and confer on April 27, 2022 (before we filed our motion) and we requested in writing that RJR reduce its combinations prior to that. Simply put, RJR has refused to reduce its combinations.

For the sake of potentially resolving the dispute, we ask one more time: ***does RJR agree to reduce its prior art combinations for claim 2 of the '911 patent ?***

If you confirm RJR is willing to do so in writing by tomorrow (prior to filing your opposition), then the parties can jointly update the Court.

Kumar Ravula
Pronouns: he/him/his

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From: Ravula, Kumar (CH)
Sent: Tuesday, May 3, 2022 4:28 PM
To: Michalik, John M. <jmichalik@JonesDay.com>; RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
Cc: #C-M PMIEDVA - LW TEAM <pmiedva.lwteam@lw.com>; Altria.RJRV@weil.com
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (E.D. Va.) - Claims / Prior Art Reduction

John,

Further to our meet and confer and to clarify our proposal from yesterday, PMI/Altria will agree to withdraw claim 4 of the '374 Patent if Reynolds will agree to the addition of claim 13 of the '911 Patent.

We understand from the meet and confer today that Reynolds opposes the addition of claim 13 from the '911 Patent. Therefore, PMI/Altria will not be withdrawing claim 4 of the '374 Patent at this time.

Thanks,

Kumar Ravula

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From: Ravula, Kumar (CH) <[SurendraKumar.Ravula@lw.com](mailto:S SurendraKumar.Ravula@lw.com)>

Sent: Tuesday, May 3, 2022 12:01 PM

To: Michalik, John M. <jmichalik@JonesDay.com>; RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com

Cc: #C-M PMIEDVA - LW TEAM <pmiedva.lwteam@lw.com>; Altria.RJRV@weil.com

Subject: RE: Case No. 1:20-cv-00393-LO-TCB (E.D. Va.) - Claims / Prior Art Reduction

John,

We are available at 4 pm CT. Please use the dial-in below.

1-877-205-3155

180102

Kumar Ravula

Pronouns: he/him/his

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330 North Wabash Avenue, Suite 2800 | Chicago, IL 60611

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From: Michalik, John M. <jmichalik@JonesDay.com>

Sent: Tuesday, May 3, 2022 11:43 AM

To: Ravula, Kumar (CH) <[SurendraKumar.Ravula@lw.com](mailto:S SurendraKumar.Ravula@lw.com)>; RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com

Cc: #C-M PMIEDVA - LW TEAM <pmiedva.lwteam@lw.com>; Altria.RJRV@weil.com

Subject: RE: Case No. 1:20-cv-00393-LO-TCB (E.D. Va.) - Claims / Prior Art Reduction

Kumar - -

Reynolds accepts PM/Altria's withdrawal of claim 4 of the '374 patent. Reynolds opposes PM/Altria's attempt to add claim 13 of the '911 patent. PM/Altria's deadline to identify claims for trial was April 5, and Reynolds has been preparing for trial for a month based on PM/Altria's April 5 disclosure. We are available to meet and confer at 4:00 CT.

John M. Michalik

Partner

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***Please note our new address effective April 25, 2022**

From: SurendraKumar.Ravula@lw.com <SurendraKumar.Ravula@lw.com>
Sent: Tuesday, May 3, 2022 10:24 AM
To: RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
Cc: pmiedva.lwteam@lw.com; Altria.RJRV@weil.com
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (E.D. Va.) - Claims / Prior Art Reduction

**** External mail ****

Counsel: As a reminder, please let us know if RJR agrees to the modification below. If RJR opposes, please let us know when you are available for a meet and confer today. Thanks.

Kumar Ravula
Pronouns: he/him/his

LATHAM & WATKINS LLP
330 North Wabash Avenue, Suite 2800 | Chicago, IL 60611
D: +1.312.876.6555

From: Ravula, Kumar (CH)
Sent: Monday, May 2, 2022 3:28 PM
To: 'RJREDVA' <RJREDVA@jonesday.com>; 'cmolster@molsterlaw.com' <cmolster@molsterlaw.com>
Cc: #C-M PMIEDVA - LW TEAM <pmiedva.lwteam@lw.com>; 'Altria.RJRV@weil.com' <Altria.RJRV@weil.com>
Subject: Case No. 1:20-cv-00393-LO-TCB (E.D. Va.) - Claims / Prior Art Reduction

Counsel,

Counterclaim Plaintiffs identify claim 13 of the '911 Patent for trial, and withdraw claim 4 of the '374 patent. Our updated identification of claims for trial is below.

Please confirm that RJR agrees to this amendment and that RJR will provide its reasonable number of prior art references and combinations for claim 13 of the '911 patent by May 6 so that the parties can provide an updated submission to the Court. If RJR opposes, please let us know when you are available for a meet and confer tomorrow.

Patent	Claims
10,420,374	3, 5, 8, 10, 16, 18, 20, 24, 25
10,555,556	4
10,104,911	2, 11, 12, 13
9,814,265	1, 4, 17

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