

**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  
FURTHER AMEND THEIR IDENTIFICATION OF CLAIMS FOR TRIAL**

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 further amend their identification of claims for trial, 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 May 3, 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: May 6, 2022

Respectfully submitted,

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Plaintiffs Altria Client Services LLC, Philip  
Morris USA Inc., and Philip Morris  
Products S.A.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of May, 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.

*/s/ Maximilian A. Grant*

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