

**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

**REYNOLDS'S MOTION *IN LIMINE* TO EXCLUDE NEWLY ADDED REFERENCES
TO MENTHOL PRODUCTS AND ALLEGATIONS AGAINST REYNOLDS IN
PRODUCT-LIABILITY CASES**

RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company (collectively “Reynolds”) respectfully moves this Court *in limine* to preclude Altria Client Services LLC, Philip Morris USA Inc, and Philip Morris Products S.A. (collectively, “PM/Altria”) from soliciting or offering at trial the following:

1. Any evidence or argument related to alleged racial targeting, youth marketing, or prospective FDA action regarding menthol or flavored tobacco products.
2. Any evidence or argument related to allegations against Reynolds in product-liability cases.

The grounds for this motion are set forth in the accompanying Memorandum in Support of Reynolds's Motion *in Limine* to Exclude Newly Added References to Menthol Products and Allegations Against Reynolds in Product-Liability Cases. A proposed order granting the requested relief is attached.

Dated: June 6, 2022

Respectfully submitted,

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*Counsel for RAI Strategic Holdings, Inc. and
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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of June, 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/ David M. Maiorana

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