

**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,

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

v.

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

Defendants and
Counterclaim Plaintiffs.

**PHILIP MORRIS' MOTION TO INCLUDE A SUMMARY OF CLAIM
CONSTRUCTIONS IN THE JUROR NOTEBOOKS**

Altria Client Services LLC, Philip Morris USA, Inc., and Philip Morris Products S.A. (collectively "Philip Morris") respectfully move this Court to include in the juror notebooks a one-page chart summarizing the Court's claim construction rulings for relevant terms from the Asserted Patents in this case.

The grounds for this motion are set forth in the accompanying Memorandum In Support of Philip Morris' Motion to Include A Summary of Claim Constructions in The Juror Notebooks. A proposed order granting the requested relief is attached.

Dated: June 7, 2022

Respectfully submitted,

By: /s/ Maximilian A. Grant

Maximilian A. Grant (VSB No. 91792)

max.grant@lw.com

Lawrence J. Gotts (VSB No. 25337)

lawrence.gotts@lw.com

Matthew J. Moore (*pro hac vice*)

matthew.moore@lw.com

Jamie Underwood (*pro hac vice*)

jamie.underwood@lw.com

LATHAM & WATKINS LLP

555 Eleventh Street, N.W., Suite 1000

Washington, DC 20004

Telephone: (202) 637-2200

Facsimile: (202) 637-2201

Clement J. Naples (*pro hac vice*)

clement.naples@lw.com

LATHAM & WATKINS LLP

885 Third Avenue

New York, NY 10022-4834

Tel: (212) 906-1200; Fax: (212) 751-4864

Gregory J. Sobolski (*pro hac vice*)

greg.sobolski@lw.com

LATHAM & WATKINS LLP

505 Montgomery Street, Suite 2000

San Francisco, CA 94111

Telephone: (415) 391-0600

Facsimile: (415) 395-8095

Brenda L. Danek (*pro hac vice*)

brenda.danek@lw.com

LATHAM & WATKINS LLP

330 North Wabash Avenue, Suite 2800

Chicago, IL 60611

Tel: (312) 876-7700; Fax: (312) 993-9767

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

By: */s/ Elizabeth Stotland Weiswasser*
W. Sutton Ansley (VSB No. 80085)
sutton.ansley@weil.com
Robert T. Vlasik III (*pro hac vice*)
robert.vlasik@weil.com
Stephanie Adamakos (*pro hac vice*)
stephanie.adamakos@weil.com
WEIL, GOTSHAL & MANGES LLP
2001 M Street, NW, Suite 600
Washington, DC 20036
Tel: (202) 682-7000; Fax: 202-857-0940

Elizabeth Stotland Weiswasser (*pro hac vice*)
elizabeth.weiswasser@weil.com
Anish R. Desai (*pro hac vice*)
anish.desai@weil.com
WEIL, GOTSHAL & MANGES LLP
767 5th Avenue
New York, NY 10153
Tel: (212) 310-8000; Fax: 212-310-8007

Adrian C. Percer (*pro hac vice*)
adrian.percer@weil.com
WEIL, GOTSHAL & MANGES LLP
201 Redwood Shores Parkway
Redwood Shores, CA 94065
Tel: (650) 802-3000; Fax: 850-802-3100

*Counsel for Plaintiffs Altria Client Services
LLC and Philip Morris USA Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 7th 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/ Maximilian A. Grant

Maximilian A. Grant (VSB No. 91792)

max.grant@lw.com

LATHAM & WATKINS LLP

555 Eleventh Street, N.W., Ste. 1000

Washington, DC 20004

Tel: (202) 637-2200; Fax: (202) 637-2201