

EXHIBIT 1

From: Michalik, John M. <jmichalik@JonesDay.com>
Sent: Monday, June 6, 2022 5:11 PM
To: Al-Marzoog, Sami (DC); Naples, Clement (NY); #C-M PMIEDVA - LW TEAM; Altria.RJRV@weil.com
Cc: RJREDVA; cmolster@molsterlaw.com
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (motion to preclude testimony elicited during June 3 deposition)

Sami - -

Reynolds does not accept PM's proposed edits to the Joint Agreed MILs 9-12. PM is the party that has injected the issues laid out in my June 5 emails into the case, not Reynolds, and Reynolds is the party seeking to confirm that the Court will not permit them to be raised in front of the jury. Reynolds has not, and will not, introduce them at trial. PM's suggestion that Reynolds may do so has no basis. Further, your proposed edits delete the specific guidance we intend to seek from the Court regarding the propriety of the questions directed to Dr. Figlar. To avoid further delay, we will be filing our motion shortly but remain open to attempting to reach a resolution on some or all of these issues in the form of a suitable set of Agreed MILs prior to appearing in Court on Wednesday morning.

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From: Sami.AlMarzoog@lw.com <Sami.AlMarzoog@lw.com>
Sent: Monday, June 6, 2022 3:19 PM
To: Michalik, John M. <jmichalik@JonesDay.com>; Clement.Naples@lw.com; pmiedva.lwteam@lw.com; Altria.RJRV@weil.com
Cc: RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (motion to preclude testimony elicited during June 3 deposition)

**** External mail ****

John,

Attached are our edits to the draft stipulation. Per our discussion, these stipulations of course have to apply to both parties so we have made this balanced.

Regards,

Sami Al-Marzoog

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From: Michalik, John M. <jmichalik@JonesDay.com>
Sent: Monday, June 6, 2022 9:24 AM
To: Naples, Clement (NY) <Clement.Naples@lw.com>; #C-M PMIEDVA - LW TEAM <pmiedva.lwteam@lw.com>;
Altria.RJRV@weil.com
Cc: RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (motion to preclude testimony elicited during June 3 deposition)

Clem --

Following up on our discussion last night, attached is our proposed Joint Notice of Agreed MILs 9-12. Please let us know by 2:00 if we have your permission to file.

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From: Clement.Naples@lw.com <Clement.Naples@lw.com>
Sent: Sunday, June 5, 2022 8:47 PM
To: Michalik, John M. <jmichalik@JonesDay.com>; pmiedva.lwteam@lw.com; Altria.RJRV@weil.com
Cc: RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (motion to preclude testimony elicited during June 3 deposition)

**** External mail ****

Thanks for the call, John and Chip. We look forward to your proposal on how to narrow or potentially eliminate these issues before burdening the Court. Have a nice night.

Clem

From: Michalik, John M. <jmichalik@JonesDay.com>
Sent: Sunday, June 05, 2022 7:55 PM
To: Naples, Clement (NY) <Clement.Naples@lw.com>; #C-M PMIEDVA - LW TEAM <pmiedva.lwteam@lw.com>;
Altria.RJRV@weil.com
Cc: RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (motion to preclude testimony elicited during June 3 deposition)

Clem --

Based on your questioning of Dr. Figlar on Friday, it appears the parties have different understandings of the Court's rulings. We can use the following dial in for our call at 8:30.

Dial in: 1.540.792.0192
Conference code: 616239#

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From: Clement.Naples@lw.com <Clement.Naples@lw.com>
Sent: Sunday, June 5, 2022 6:13 PM
To: Michalik, John M. <jmichalik@JonesDay.com>; pmiedva.lwteam@lw.com; Altria.RJRV@weil.com
Cc: RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
Subject: RE: Case No. 1:20-cv-00393-LO-TCB (motion to preclude testimony elicited during June 3 deposition)

**** External mail ****

John,

Can you let us know before the call what specifically from the below you believe is not already covered by the current MIL orders? We can talk at 8:30 tonight.

Thanks,

Clem

From: Michalik, John M. <jmichalik@JonesDay.com>
Date: Sunday, Jun 05, 2022, 4:53 PM
To: #C-M PMIEDVA - LW TEAM <pmiedva.lwteam@lw.com>, Altria.RJRV@weil.com <Altria.RJRV@weil.com>
Cc: RJREDVA <RJREDVA@jonesday.com>, cmolster@molsterlaw.com <cmolster@molsterlaw.com>
Subject: Case No. 1:20-cv-00393-LO-TCB (motion to preclude testimony elicited during June 3 deposition)

Counsel - -

Reynolds intends to file a motion to preclude PM/Altria from introducing at trial any evidence, testimony, or argument relating to alleged racial targeting, alleged youth marketing, prospective FDA action regarding menthol or flavored tobacco products, and allegations against Reynolds in product-liability cases, all of which were the subject of questions directed to Dr. Figlar during his June 3 deposition. Please provide your availability to meet and confer by 9:00 PM so we can raise this issue with the Court promptly.

John M. Michalik
Partner

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