

EXHIBIT 2

**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

JOINT NOTICE OF ADDITIONAL AGREED MOTIONS *IN LIMINE*

All parties in this case stipulate to the following motions *in limine*. In addition to the agreed motions *in limine* 1-8 listed in Dkt. 822, all parties agree that they, their counsel, representatives, and all witnesses called by them (whether live or by deposition) will not mention, refer to, interrogate about, or attempt to convey to the jury in any manner, either directly or indirectly, any of the matters set forth below without obtaining a favorable ruling from this Court outside the presence of the jury. Should any party violate this stipulation, the parties agree that they can seek a curative instruction from the Court to the jury to disregard the evidence; understanding that the parties retain their right to additional relief.

9. **Alleged race- and class-based marketing of menthol products.** Neither party will present argument, evidence, or testimony that Reynolds or any other company targets menthol products to any racial or class group. For example, Reynolds will not offer argument, evidence, or testimony that it did not market menthol products to or target African Americans with menthol products, and PMI/Altria will not in response interrogate any witness regarding such targeting or marketing.
10. **Alleged youth marketing of menthol products.** Neither party will present argument, evidence, or testimony that Reynolds or any other company targets menthol products to youth. For example, Reynolds will not offer argument, evidence, or testimony that it has not targeted youths with, or that it was unaware of youth use of, menthol or other non-tobacco flavored products, and PMI/Altria will not in response interrogate any witness regarding such targeting or marketing.
11. **Prospective FDA action regarding menthol or flavored tobacco products.** Neither party will present argument, evidence, or testimony connected to PMT authorization of menthol products, other than the undisputed fact that such PMT authorization requests remain pending with the FDA.
12. **Allegations made against the Parties in product-liability cases.** Neither party will present argument, evidence or testimony regarding the substance of the allegations made by plaintiffs in cigarette product liability cases. For instance, neither party will ask questions such as:
 - “What were the allegations against Reynolds or Phillip Morris/Altria in product liability cases?”

- “If you had to summarize for the jury in this case what the allegations were in the product liability cases, what would you tell them?”

13. Prior exclusion of expert testimony or opinion. Neither party will present argument, evidence, testimony, or suggestion related to the exclusion of any expert’s prior testimony or opinion in this case or any other case based on any court’s orders limiting the scope of testimony.

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