

**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-LMB-TCB

**REYNOLDS'S RULE 50(a) MOTION FOR JUDGMENT AS A  
MATTER OF LAW OF INVALIDITY OF '911 PATENT**

RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company (collectively, "Reynolds") respectfully moves this Court for judgment as a matter of law of invalidity of the '911 Patent. The grounds for this motion are set forth in the accompanying Memorandum in Support of Reynolds's Motion for Judgment as a Matter of Law of Invalidity of '911 Patent. A proposed order granting the requested relief is attached.

Reynolds waives oral argument on this motion pursuant to Local Rule 7(E).

Dated: June 14, 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 14th 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.

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