

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

PHILIP MORRIS PRODUCTS S.A.,

Plaintiff,

v.

R.J. REYNOLDS VAPOR COMPANY,

Defendant.

Civil Action No. 1:20-cv-00393-LMB-TCB

**PHILIP MORRIS' UNOPPOSED MOTION TO LIFT THE PARTIAL STAY ON
PHILIP MORRIS' CLAIM FOR PERMANENT INJUNCTIVE RELIEF**

Philip Morris respectfully moves the Court to lift the stay on Philip Morris' injunctive relief schedule and enter the proposed agreed briefing schedule. Philip Morris also requests the Court's guidance on whether (i) fact and/or expert declarations should be submitted with briefing on injunctive relief (as Reynolds contends) and (ii) such briefing is limited to injunctive relief or should also address the appropriate royalty rate for a compulsory license (as Reynolds contends).

The grounds for this motion are set forth in the accompanying Memorandum In Support of Philip Morris' Unopposed Motion to Lift the Partial Stay on Philip Morris' Claim for Permanent Injunctive Relieve. A proposed order granting the requested relief is attached.

Dated: June 28, 2022

Respectfully submitted,

By: /s/ Maximilian A. Grant

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Counsel for Plaintiff Philip Morris Products S.A.

CERTIFICATE OF SERVICE

I hereby certify that on this 28th 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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