

EXHIBIT 4

**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,**

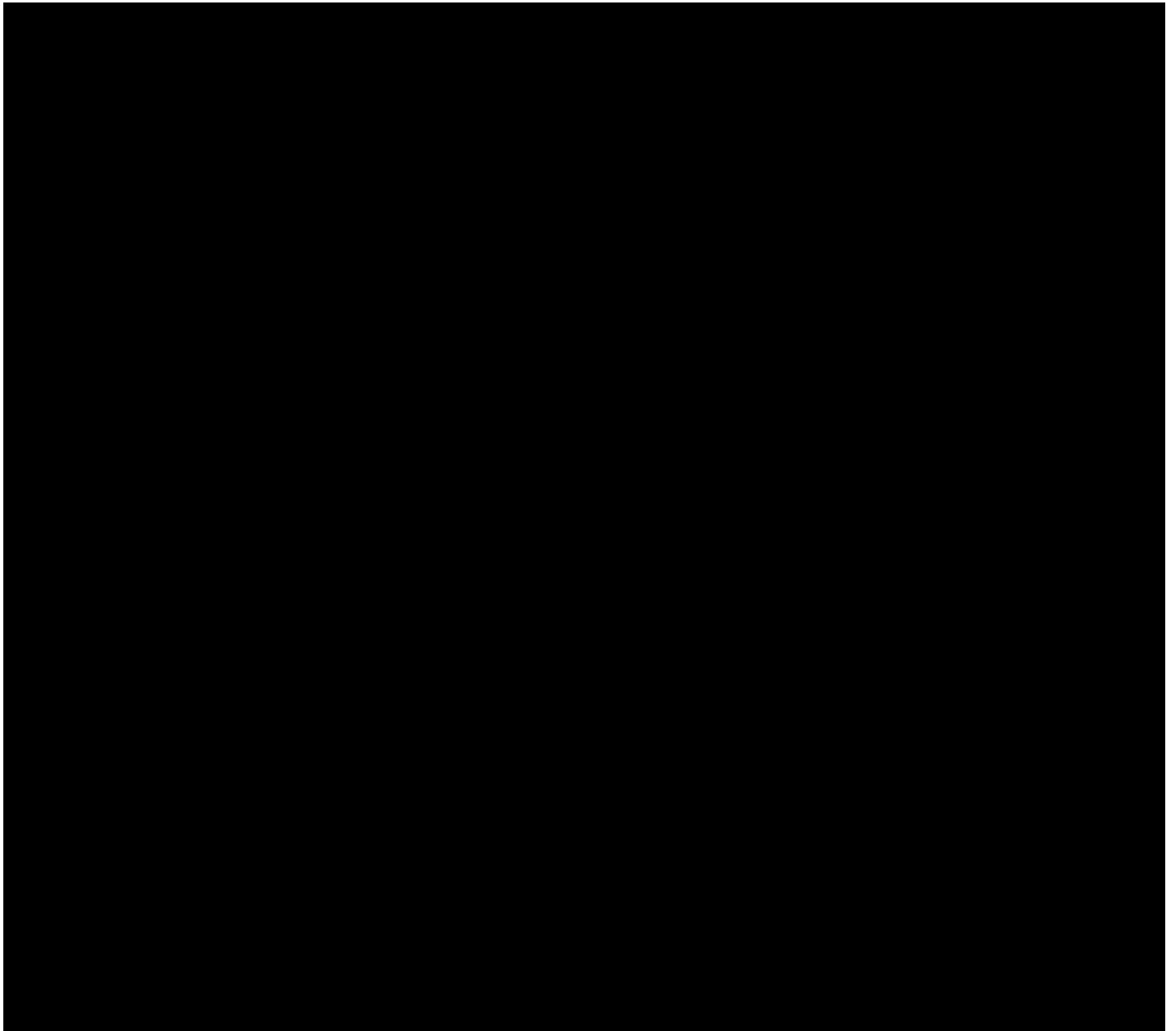
v.

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

**Defendants and Counterclaim
Plaintiffs.**

Civil Action No. 1:20-cv-393

**SUPPLEMENTAL OPENING EXPERT REPORT OF HAROLD J. WALBRINK
RELATING TO INFRINGEMENT**



3. “and a heating device, configured to be connected to the mouthpiece, comprising:”

50. The Accused Products include a heating device, configured to be connected to the mouthpiece. I annotated where the heating device is in the photograph below, which I took of a Vuse Alto that I disassembled.



51. The Alto PMTA refers to the heating device as a “Heater” shown as 7 in the Alto PMTA. The heater is “configured to be connected” to the mouthpiece described above. Specifically, a “Heater Top Cover” “positions the Heater subassembly” and silicon 3 is a “seal” between the Heater Top Cover and the mouthpiece described above (the cartomizer holder tap, silicon 4, cartomizer tube, and silicon 1). *Id.* at 1360082-86.

Figure H-10: Vuse Alto Cartridge Detailed View

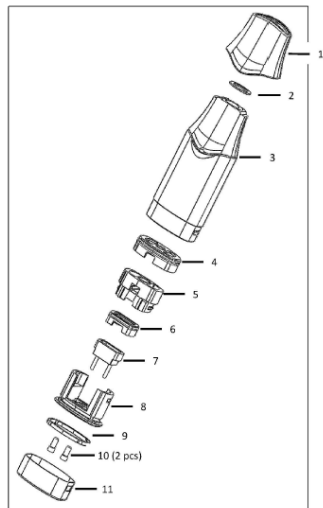


Table H-5: Vuse Alto Cartridge Components

#	Name/Description	Material
1	Cartomizer Holder Tap	Polycarbonate
2	Silicone 4	Silicone
3	Cartomizer Tube	Tritan (copolyester)
4	Silicone 1	Silicone
5	Heater Top Cover	Tritan (copolyester)
6	Silicone 3	Silicone
7	Heater	Silica ceramic wick, low chromium nickel-iron alloy resistive heating element, nickel wire
8	Heating Holder	Tritan (copolyester)
9	Silicone 2	Silicone
10	Thimble (2 pcs)	Gold-plated brass
11	Cartomizer Bottom Cover	Nickel-plated steel

52. The “heater” is a heating device because it heats up when power is applied to aerosolize e-liquid. RJRITC_001360053 at 1360086.

