


# EXHIBIT A

Case Clip(s) Detailed Report  
Tuesday, June 07, 2022, 10:11:57 PM

**PMI v. RJR EDVa Trial**

 **Hunt, Eric (Vol. 01) - 11/16/2020**

**1 CLIP (RUNNING 00:01:25.510)**

 Hunt,E\_111620\_ALL\_TRIMMED2

**EH-ALL-FINAL 10 SEGMENTS (RUNNING 00:01:25.510)**



**1. PAGE 12:17 TO 12:18 (RUNNING 00:00:08.661)**

17 Q. And what is your current role at Reynolds?  
18 A. I'm a senior manager in vapor product development.

**2. PAGE 21:11 TO 21:13 (RUNNING 00:00:15.194)**

11 MR. WATSON: Yes. Let's mark -- so the  
12 record is clear, Exhibit 3 is the document Bates  
13 labeled RJRITC\_001360053.

**3. PAGE 21:20 TO 22:01 (RUNNING 00:00:08.248)**

20 Q. Okay. So, Mr. Hunt, let me try this again. This  
21 document that I have on the screen here, Exhibit 3,  
22 this is part of the Vuse Alto PMTA that Reynolds  
00022:01 provides to the FDA?

**4. PAGE 22:02 TO 22:03 (RUNNING 00:00:06.255)**

02 A. Yes, this appears to be Section H of the Vuse Alto  
03 PMTA.

**5. PAGE 57:03 TO 57:06 (RUNNING 00:00:17.635)**

03 Q. Okay. So the Vuse Alto device includes this reservoir  
04 which holds the liquid formulation; is that right?  
05 A. Yes, that is correct. There is -- there's a reservoir  
06 for holding bulk liquid in the Vuse Alto cartridge.

**6. PAGE 59:02 TO 59:03 (RUNNING 00:00:04.514)**

02 By the ceramic wick being porous, that  
03 means it's permeable to liquid. Right?

**7. PAGE 59:04 TO 59:08 (RUNNING 00:00:15.791)**

04 A. Yes. I would say, as long as the liquid -- as long as  
05 the liquid has the correct properties to be permeable  
06 within the -- within the pores created in the ceramic  
07 body, yes.  
08 Q. It would be permeable to gas?

**8. PAGE 59:11 TO 59:11 (RUNNING 00:00:03.096)**

11 A. Yes, I would say it would be permeable to a gas.

**9. PAGE 68:04 TO 68:05 (RUNNING 00:00:05.017)**

04 Q. So would the -- does the ceramic wick allow transport  
05 of liquid across it?


**10. PAGE 68:08 TO 68:08 (RUNNING 00:00:01.099)**

08 A. Yes, it does.


**TOTAL: 1 CLIP FROM 1 DEPOSITION (RUNNING 00:01:25.510)**

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**PMI v. RJR EDVa Trial**

 **Hunt, Vol. 2, Eric (Vol. 01) - 04/14/2021**

**1 CLIP (RUNNING 00:03:39.443)**

 Hunt,E\_041421\_ALL\_TRIMMED2

**EH-ALL2-FINAL 14 SEGMENTS (RUNNING 00:03:39.443)**



**1. PAGE 448:05 TO 448:06 (RUNNING 00:00:10.641)**

05 MR. RAVULA: Can we pull up tab 44 on the  
06 screen, and let's call this Exhibit, I think, 40.

**2. PAGE 448:16 TO 449:09 (RUNNING 00:01:04.445)**

16 Q Are you able to see that on your screen,  
17 Mr. Hunt?  
18 A I am.  
19 Q Okay. So this first page of Exhibit 40  
20 shows a CAD image of the Vuse Alto mouthpiece  
21 looking from the bottom. Is that a fair statement?  
22 A Yeah, that's a fair statement. It's in  
00449:01 wire mode, so it's kind of really hard to kind of  
02 see. But, yeah, that's a fair statement.  
03 Q The oval at the center is the exit hole  
04 through which aerosol exits the mouthpiece to go  
05 into the user's mouth, correct?  
06 A Yes, that is correct.  
07 Q Bordering the top of the oval exit hole is  
08 a raised lip, right?  
09 A Yes, that's correct.

**3. PAGE 450:18 TO 450:22 (RUNNING 00:00:16.958)**

18 Q Can we turn to the next page, please.  
19 This is a CAD image of the Vuse Alto  
20 mouthpiece looking from the bottom with the spaces  
21 between the raised lips and the inner wall of the  
22 mouthpiece colored red.

**4. PAGE 451:01 TO 451:08 (RUNNING 00:00:27.669)**

00451:01 Do you see that?  
02 A I do.  
03 Q If you were looking into the mouthpiece  
04 from the view of a consumer using the Alto, you  
05 wouldn't see that these spaces, correct?  
06 A That is correct.  
07 Q The spaces colored red are symmetric,  
08 right?

**5. PAGE 451:10 TO 451:15 (RUNNING 00:00:18.121)**

10 A Yes, I think they're symmetric as opposed  
11 to both sides -- or to that side of the oval, or to  
12 the oval in general, the long portion of the oval,  
13 yes.  
14 Q And they have the same dimensions, right?  
15 A Yes.

**6. PAGE 451:16 TO 451:17 (RUNNING 00:00:05.725)**

16 Q Can we pull up tab 45, which will be  
17 Exhibit 41, please.

**7. PAGE 451:22 TO 452:01 (RUNNING 00:00:02.074)**

22 Q Are you able to see that on your screen,

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00452:01 Mr. Hunt?

**8. PAGE 452:02 TO 452:08 (RUNNING 00:00:16.034)**

02 A I am.  
03 Q All right. So the first page of  
04 Exhibit 41 has a CAD image showing a close-up of the  
05 space between the upper raised lip and the inner  
06 wall of the Alto mouthpiece with that space colored  
07 red.  
08 Do you see that?

**9. PAGE 452:10 TO 452:10 (RUNNING 00:00:01.034)**

10 A I do.

**10. PAGE 456:17 TO 456:19 (RUNNING 00:00:08.115)**

17 Q Sure. You agree that condensate could  
18 form in the area between the raised lip and the  
19 inner wall of the mouthpiece of the Alto, correct?

**11. PAGE 456:20 TO 456:21 (RUNNING 00:00:06.632)**

20 A I agree that a portion of that space,  
21 condensate could form on the seal.

**12. PAGE 457:14 TO 457:19 (RUNNING 00:00:18.868)**

14 Q And you have no reason to doubt that the  
15 distance between the top left of the outer wall of  
16 the raised lip and the inner wall of the mouthpiece  
17 is approximately 0.92 millimeters, right?  
18 A That's correct. I don't have any reason  
19 to doubt that that's approximately the length.

**13. PAGE 460:02 TO 460:05 (RUNNING 00:00:08.649)**

02 Q Reynolds has not made any changes to the  
03 design of the cartridges of the accused products  
04 since October 2018, right?  
05 A Yes, that's correct.

**14. PAGE 460:11 TO 460:14 (RUNNING 00:00:14.478)**

11 Q And Reynolds does not have any current  
12 plans to change the design of the cartridges of the  
13 accused products, correct?  
14 A That is also correct -- statement.

**TOTAL: 1 CLIP FROM 1 DEPOSITION (RUNNING 00:03:39.443)**