



# EXHIBIT B

Case Clip(s) Detailed Report  
Tuesday, June 07, 2022, 11:20:36 PM

PMI v. RJR EDVa Trial

 Calderon, Kara (Vol. 01) - 11/12/2020

1 CLIP (RUNNING 00:09:11.169)

 Calderon,K\_111220\_ALL\_TRIMMED2

KC-ALL-FINAL 28 SEGMENTS (RUNNING 00:09:11.169)



1. PAGE 9:05 TO 9:08 (RUNNING 00:00:13.794)

05 Q. Good morning, Ms. Calderon. Would you  
06 please spell your full name for the record?  
07 A. Kara, K-a-r-a. Calderon,  
08 C-a-l-d-e-r-o-n.

2. PAGE 9:13 TO 9:21 (RUNNING 00:00:23.559)

13 Q. Who's your current employer?  
14 A. R.J. Reynolds Vapor Company.  
15 Q. And what do you do at R.J. Reynolds  
16 Vapor Company?  
17 A. I am the senior director of our fit for  
18 future for vapor and THP.  
19 Q. What does "fit for future" mean?  
20 A. I am in charge of strategy and pipeline  
21 development.

3. PAGE 14:13 TO 14:17 (RUNNING 00:00:13.646)

13 Q. My question is, Ms. Calderon, you  
14 understand that you're testifying today both in  
15 your personal capacity and as a corporate  
16 representative on behalf of RJRV, right?  
17 A. Yes, sir.

4. PAGE 54:03 TO 54:06 (RUNNING 00:00:09.796)

03 Q. Okay. And based on your experience, we  
04 discussed earlier, you're knowledgeable about how  
05 RJRV markets the Vuse products; is that fair?  
06 A. Yes, sir.

5. PAGE 83:07 TO 83:10 (RUNNING 00:00:10.337)

07 Q. And so based on your experience,  
08 consumers find it important to have a vaping  
09 product that feels like the cigarettes that they  
10 used to smoke before transitioning; is that right?

6. PAGE 83:12 TO 83:19 (RUNNING 00:00:29.287)

12 A. Some consumers, right? Again, broad --  
13 broad consumer base, what is good for you is  
14 different for me, which is different from Mr. Vitt  
15 is -- so for some consumers, a familiar experience  
16 is an important factor for them. For other  
17 consumers, they do not want a familiar experience.  
18 They want something completely different. So it  
19 really comes down to individual choice.

7. PAGE 83:20 TO 84:05 (RUNNING 00:00:23.341)

20 Q. But at least for some consumers, a  
21 familiar experience, in terms of the vaping device  
22 feeling like a traditional combustible cigarette,  
00084:01 is important to them; is that fair?  
02 A. Based off of the research that -- that  
03 I've gone through, for some consumers, a familiar

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04 experience, a cigalike experience is -- is  
05 something that they look for.

**8. PAGE 119:21 TO 120:09 (RUNNING 00:00:35.228)**

21 clarification. Are you familiar with the concept  
22 of -- of the e-liquid leaking from the cartridge  
00120:01 at any time, whether it's during use or in your  
02 purse?  
03 A. Yeah. So, yeah, so there have been, you  
04 know -- you know, throw my device in my -- in my  
05 purse, and liquid comes out, right? Consumers  
06 don't want that. I don't want that, right? So,  
07 yeah, so leakage, in terms of it coming out, yeah,  
08 that is -- that is something that we have heard  
09 and we have seen with products.

**9. PAGE 166:06 TO 166:13 (RUNNING 00:00:26.035)**

06 Q. Sure. When RJRV sells, for example, a  
07 Solo power unit by itself, it expects to makes  
08 additional sales of the cartridges for -- that are  
09 used with that Solo power unit, right?  
10 A. So to use the product, yes, you need  
11 the -- you need the power unit and the cartridge.  
12 So you need to buy both to -- to make the product  
13 work in its intended form.

**10. PAGE 166:16 TO 167:06 (RUNNING 00:00:41.253)**

16 Okay. And when RJRV sells a Solo power  
17 unit, for example, the cartridge -- it expects the  
18 consumer to purchase additional Solo cartridges  
19 after the initial cartridge runs out, right?  
20 A. Well, that would be -- that would be the  
21 model, right? Is that you -- you buy your power  
22 unit, and then what you need to continue using the  
00167:01 power unit are the cartridges.  
02 Q. Right. Have you heard -- that is the  
03 model. Have you heard of that model referred to  
04 as a razor/razor blade model?  
05 A. Yup. Razor/razor blades. Yup. Power  
06 units cartridges.

**11. PAGE 167:14 TO 167:18 (RUNNING 00:00:13.980)**

14 So the RJRV, with respect to the sales  
15 of the cartridges and power units, follows the  
16 razor/razor blade model; is that fair?  
17 A. That would be a fair representation of a  
18 model.

**12. PAGE 193:21 TO 194:03 (RUNNING 00:00:09.871)**

21 Q. So for the Solo, for at least part of  
22 the time it's been on the market since 2013, you  
00194:01 consider that product to have been a market  
02 leader; is that right?  
03 A. Yes.

**13. PAGE 200:08 TO 200:12 (RUNNING 00:00:12.778)**

08 Q. Okay. And since it was released in the  
09 market in August 2018, the Alto has been a  
10 successful product for RJRV, right?  
11 A. It -- we put a lot of emphasis on the  
12 Alto product, yes.

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**14. PAGE 200:20 TO 201:01 (RUNNING 00:00:09.029)**

20 Q. And you said earlier, "We put a lot of  
21 emphasis on the Alto product." Were you speaking  
22 from a marketing perspective in that answer?  
00201:01 A. Yes.

**15. PAGE 201:04 TO 201:10 (RUNNING 00:00:21.707)**

04 Is the majority of the investment, from  
05 a marketing perspective, put into the Alto as  
06 compared to the other Vuse products at this time?  
07 A. We would need to get those exact numbers  
08 from -- from finance, but, yes, Alto is our -- our  
09 premier product, and -- and that's what we  
10 emphasize.

**16. PAGE 202:16 TO 202:22 (RUNNING 00:00:18.278)**

16 Does RJR have any plans, that you're aware of, to  
17 stop selling each of the Vuse products, meaning  
18 the Ciro, Solo, Vibe, and Alto, in the United  
19 States?  
20 A. To stop selling them?  
21 Q. Yes.  
22 A. Not that I'm aware of.

**17. PAGE 259:16 TO 259:22 (RUNNING 00:00:20.902)**

16 Q. And so Exhibit 11 is a printout of the  
17 vapor overview from RJR Vapor's website, right?  
18 A. It appears to be, yes, sir.  
19 Q. Okay. And on the second page, it's --  
20 RJRV is describing the Alto, Vibe, Ciro and Solo,  
21 correct?  
22 A. Yes, sir.

**18. PAGE 260:02 TO 260:13 (RUNNING 00:00:29.188)**

02 sorry. For the Alto, RJRV is describing the Alto  
03 as having an innovative ceramic wick and alloy  
04 heating element.  
05 Do you see that?  
06 A. Yes, sir.  
07 Q. Okay. So does that refresh your  
08 recollection as to RJRV has, in fact, promoted the  
09 innovative ceramic wick and alloy heating element  
10 in the Alto, correct?  
11 A. In terms of here, the innovative ceramic  
12 wick and alloy heating element are being called  
13 out for a Vuse Alto.

**19. PAGE 266:12 TO 266:18 (RUNNING 00:00:16.751)**

12 Q. Okay. And you've seen Exhibit 13  
13 before?  
14 A. Yes, sir.  
15 Q. What is Exhibit 13?  
16 A. Exhibit 13 is a general market  
17 assessment of a variety of different vapor  
18 products.

**20. PAGE 268:08 TO 268:12 (RUNNING 00:00:10.790)**

08 Q. So looking at the page ending in Bates  
09 610, you see a reference TF16. What product is  
10 that?  
11 A. Yes. That is the product that is  
12 currently known as Vuse Alto.

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**21. PAGE 269:18 TO 270:01 (RUNNING 00:00:19.142)**

18 Q. Okay. And one of the areas which this  
19 study identified the Alto as outperforming other  
20 products is that it has a quiet draw, right?

21 A. Quiet draw, no mess, no leaking,  
22 mouth -- mouthpiece -- that should be feel -- and  
00270:01 ease of use.

**22. PAGE 270:02 TO 270:07 (RUNNING 00:00:14.518)**

02 Q. Right. And -- and the -- the second  
03 area in which this study identified the Alto as  
04 outperforming other products is that it has no  
05 leaking, correct?

06 A. That is one of the areas that Alto  
07 outperforms is leaking -- no leaking.

**23. PAGE 273:07 TO 273:10 (RUNNING 00:00:11.133)**

07 Q. Okay. So the ability of the Alto to  
08 prevent leaking was significantly higher than the  
09 other competitive products in this study. Is that  
10 what column is saying?

**24. PAGE 273:12 TO 273:12 (RUNNING 00:00:00.562)**

12 A. That is.

**25. PAGE 277:17 TO 278:12 (RUNNING 00:01:03.034)**

17 Q. Right. And below the box we were just  
18 looking at, the fact that the battery was easy to  
19 charge and stayed charged for a long time was a  
20 feature in the Alto that was identified as what  
21 users liked most about the Alto, correct?

22 A. Yes. Battery easy to charge and stay  
00278:01 charged for a long time.

02 Q. And then in the box above that to the  
03 right, another feature identified as what users  
04 like about the Alto, at least in this study, is  
05 the "Small size and oval shape made it easy and  
06 comfortable to fit in my pocket"; is that right?

07 A. Yes, sir. That's what it says.

08 Q. And are all three of those benefits,  
09 based on your experience, of the Alto to users?

10 A. Those are three of the benefits to Alto,  
11 not leaking, battery life, and consistency, shape,  
12 size, comfortable, easy to use.

**26. PAGE 279:03 TO 279:07 (RUNNING 00:00:21.474)**

03 Q. What -- what is Exhibit 14?

04 A. Exhibit 14 looks like a working document  
05 of some evaluation of when Alto was coming into  
06 market and reassessing the brand and the marketing  
07 around Vuse Alto.

**27. PAGE 279:08 TO 279:11 (RUNNING 00:00:08.017)**

08 Q. Okay. And you say it's a working  
09 document. Are you indicating that this is a draft  
10 and not a final version?

11 A. Yes.

**28. PAGE 290:08 TO 290:14 (RUNNING 00:00:23.739)**

08 Q. In the first bullet point here on RJRV  
09 is identifying -- is saying that they want to  
10 elevate the importance of the FEELM heater

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