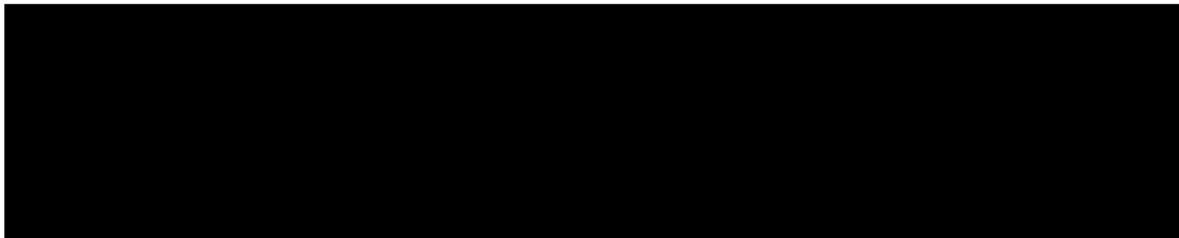


Exhibit B

Exhibit 48



Transcript of James Figlar, Ph.D.
Conducted on June 3, 2022

| | |
|--|---|
| <p style="text-align: center;">1</p> <p style="text-align: center;">IN THE UNITED STATES DISTRICT COURT OR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division</p> <p>RAI STRATEGIC HOLDINGS, : INC. and R.J. REYNOLDS : VAPOR COMPANY, : Plaintiffs/ : Counterclaim Defendants, : Case No. v. : :20 cv 00393 LO TCB</p> <p>ALTRIA CLIENT SERVICES LLC; : PHILIP MORRIS USA INC.; and : PHILIP MORRIS PRODUCTS S.A., : Defendants/ : Counterclaim Plaintiffs. :</p> <p style="text-align: center;">[REDACTED]</p> <p>VIDEOTAPED DEPOSITION of JAMES IGLAR, Ph.D. riday, June 3, 2022 6:54 a.m. CST</p> <p>Job No.: 450979 Pages: 75 Reported By: Michelle M. Yohler, CSR, RMR, CRR</p> <p style="text-align: center;">2</p> <p>Remote videotaped 30(b)(6) deposition of RAI STRATEGIC HOLDINGS, INC., and R.J. REYNOLDS VAPOR COMPANY by JAMES IGLAR, Ph.D., held remotely pursuant to notice before Michelle M. Yohler, CSR, RMR, CRR, a certified shorthand reporter, CSR No. 84 453 .</p> <p>7 8 9 0 2 3 4 5 6 7 8 9 20 2 22</p> | <p style="text-align: center;">3</p> <p style="text-align: center;">A P P E A R A N C E S</p> <p>ON BEHAL OF RAI STRATEGIC HOLDINGS, INC. and R.J. REYNOLDS VAPOR COMPANY: MR. MICHAEL S. QUINLAN JONES DAY 90 Lakeside Avenue Cleveland, Ohio 44 4 90 2 6.586.3939 msquinlan@jonesday.com</p> <p>0</p> <p>ON BEHAL OF ALTRIA CLIENT SERVICES LLC; PHILIP MORRIS USA INC.; and PHILIP MORRIS PRODUCTS S.A.: MR. CLEMENT NAPLES LATHAM & WATKINS, LLP 27 Avenue of the Americas New York, New York 0020 2 2.906. 200 clement.naples@lw.com</p> <p>9</p> <p>20</p> <p>2</p> <p>22 (Continued)</p> <p style="text-align: center;">4</p> <p style="text-align: center;">A P P E A R A N C E S C O N T I N U E D</p> <p>2</p> <p>3</p> <p>4 ALSO PRESENT: Mr. Michael Pietanza, Technician RJ Buckler, Videographer</p> <p>5 6 7 8 9 0 2 3 4 5 6 7 8 9 20 2 22</p> |
|--|---|

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1 MR. QUINLAN: Object to form. Beyond the
 2 scope.
 3 BY THE WITNESS:
 4 **A Again, you're asking me to -- you're**
 5 **asking me to forecast stock prices. If I could do**
 6 **that, you know, I probably would have retired from**
 7 **Reynolds a long time ago.**
 8 **But, you know, honestly, I don't know. I**
 9 **think stock prices for large companies are**
 10 **dependent on a multitude of factors. Could it?**
 11 **It might. I don't know.**
 12 **BY MR. NAPLES:**
 13 Q Would you consider the Vuse products in
 14 this case successful products?
 15 MR. QUINLAN: Object to form. Beyond the
 16 scope.
 17 Dr. Figlar -- you haven't asked a question
 18 that's relevant to his conversations with the five
 19 individuals, which is why we offered him up for
 20 this deposition, in about an hour.
 21 So I'm going to start instructing
 22 Dr. Figlar not to answer questions unless it's

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1 relevant in some way to his conversations, which
 2 is why we offered him up for this deposition.
 3 Dr. Figlar has to leave tomorrow for his
 4 flight to get here for trial. I'm not going to
 5 keep him there until 9:00, 10:00 at night so you
 6 can ask him a bunch of questions you could have
 7 asked him at his two other depositions.
 8 This is a limited deposition that we
 9 offered. The judge said you could take a limited
 10 deposition on the topics of what did he talk to
 11 these five people who he talked to after his
 12 deposition from Reynolds.
 13 So from now on, every question that you
 14 ask that's not even tangentially related to that,
 15 I'm going to instruct Dr. Figlar not to answer.
 16 MR. NAPLES: Were you at the hearing,
 17 Mike?
 18 MR. QUINLAN: I was.
 19 MR. NAPLES: You were. Were you -- so you
 20 were there when the judge said the kind of stuff
 21 that Reynolds pulled is the kind of thing that
 22 gets people disbarred, right? Were you there for

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1 that? Did you hear that, Mike?
 2 MR. QUINLAN: Are you --
 3 MR. NAPLES: Did you hear the judge say
 4 that I get to take Dr. Figlar's deposition in
 5 limited time to limited topics? Because I didn't
 6 hear that.
 7 So if you want to instruct him not to
 8 answer, you go right ahead. And I hope you're in
 9 Virginia because when we go over to the court at
 10 11:00, we're going to take a break, and I'm going
 11 to tell him what you're doing. In fact, I'm going
 12 to play for the judge these nonsense objections.
 13 So you do whatever you want, Mike, and
 14 then we'll see what the judge says at 11:00 this
 15 morning, okay? You got me? That's what's going
 16 to happen, Mike. So cut it out.
 17 I'm also going to count how much time
 18 you're wasting of Dr. Figlar right now, all right?
 19 Because your long, ridiculous objections are
 20 tiresome.
 21 And I already saw you get hammered in
 22 front of Judge O'Grady once, and I'd be happy to

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1 take you across the street and watch Judge
 2 Brinkema do it, all right? So cut it out, Mike.
 3 I'm sick of it.
 4 MR. QUINLAN: Mr. Naples --
 5 MR. NAPLES: Please read back my question.
 6 MR. QUINLAN: Mr. Naples, you're getting
 7 very upset, and I just want to note for the
 8 record --
 9 MR. NAPLES: You're wasting my time.
 10 You're wasting Dr. Figlar's time. I don't want to
 11 be here all day either, all right? So let's just
 12 cut the crap and get to the deposition and be done
 13 with this.
 14 MR. QUINLAN: That's what I'm trying to
 15 do. That's why I'm trying to get you --
 16 MR. NAPLES: Can you --
 17 MR. QUINLAN: -- ask questions that --
 18 MR. NAPLES: -- talking --
 19 MR. QUINLAN: -- relevant.
 20 MR. NAPLES: If you're going to do this,
 21 we're going to go off the record because I'm not
 22 going to waste my time with you doing this, so cut

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1 it out.
 2 Please read back the questions, Ms. Court
 3 Reporter.
 4 (WHEREUPON, the record was
 5 read by the reporter.)
 6 MR. QUINLAN: Object to form.
 7 BY MR. NAPLES:
 8 Q You can answer, Doctor.
 9 A Yes.
 10 Q Why?
 11 MR. QUINLAN: Object to form.
 12 BY THE WITNESS:
 13 A People buy them and use them and enjoy
 14 them.
 15 BY MR. NAPLES:
 16 Q Why are they successful for Reynolds?
 17 MR. QUINLAN: Object to form. I instruct
 18 Dr. Figlar, don't answer the question. It's
 19 beyond the scope. We're not going to do this.
 20 You're not going to be here all night.
 21 So, Dr. Figlar, I instruct you not to
 22 answer.

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1 BY MR. NAPLES:
 2 Q You can answer the question, Dr. Figlar.
 3 A I've been instructed not to. I usually
 4 follow the counsel's --
 5 Q You're the -- you're the client here, so
 6 you get to do whatever you want. You don't have
 7 to take his advice.
 8 A Understood. I won't answer this one.
 9 Q You're not going to answer if the Vuse
 10 products are successful?
 11 MR. QUINLAN: He's not going to answer the
 12 question because I told him not to because we're
 13 so far afield of why we offered this deposition.
 14 BY MR. NAPLES:
 15 Q How about, let me do it this way:
 16 Dr. Figlar, when you retired at the end of
 17 December 2020, why, in your view, were the Vuse
 18 products successful?
 19 A Because they were an alternative to
 20 combustible cigarettes that are likely less
 21 hazardous than smoking cigarettes. And they were
 22 the -- in my opinion, probably one of the best

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1 innovations that have come along to substitute for
 2 cigarettes.
 3 Kind of full stop. Better than
 4 heat-not-burn, better than Eclipse, better than
 5 IQOS, anything that's come before it. These
 6 products to me offered, you know, a good
 7 opportunity for people to do and use tobacco-type
 8 products and nicotine products in a different,
 9 potentially less risky way. So I think that's why
 10 they're successful.
 11 BY MR. NAPLES:
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]

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