

Exhibit 14
Public Redacted
Version

**CONTAINS CONFIDENTIAL BUSINESS INFORMATION
SUBJECT TO PROTECTIVE ORDER**

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

**Before the Honorable Clark S. Cheney
Administrative Law Judge**

In The Matter Of

**CERTAIN TOBACCO HEATING ARTICLES
AND COMPONENTS THEREOF**

Investigation No. 337-TA-1199

**RESPONDENTS ALTRIA CLIENT SERVICES LLC'S, ALTRIA GROUP, INC.'S, AND
PHILIP MORRIS USA INC.'S EIGHTH SUPPLEMENTAL RESPONSES AND
OBJECTIONS TO COMPLAINANTS RAI STRATEGIC HOLDINGS, INC.'S, R.J.
REYNOLDS VAPOR COMPANY'S, AND R.J. REYNOLDS TOBACCO COMPANY'S
FIRST SET OF INTERROGATORIES (NOS. 1-19)**

Pursuant to the United States International Trade Commission's Rules of Practice and Procedure, 19 C.F.R. §§ 210.27 and 210.29, Respondents Altria Client Services LLC, ("ACS") Altria Group, Inc., ("AGI"), and Philip Morris USA Inc., ("PM USA"), (collectively, "Altria"), by their undersigned attorneys, hereby supplement their responses to Complainants' RAI Strategic Holdings, Inc., ("RAI"), R.J. Reynolds Vapor Company ("RJR"), and R.J. Reynolds Tobacco Company's ("RJRT"), (collectively, "Complainants") First Set of Interrogatories Nos. 1-19¹ as follows:

¹ As acknowledged in the Parties' correspondence of May 20 and 21, 2020, Complainants have withdrawn their Interrogatory No. 20, originally served on May 18, 2020. As such, Respondents do not provide any response to that Interrogatory.

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that penetrates the tobacco stick, including any research and development efforts undertaken by You relating to the use of such a heating blade. Include in Your response the Identity of each Document by production number that supports Your answer.

RESPONSE TO INTERROGATORY NO. 3:

Altria incorporates all of its general objections and reservations of rights as if specifically alleged herein. Altria objects to this Interrogatory to the extent it seeks information protected from disclosure by the attorney-client privilege, work product immunity, common interest, or any other applicable privilege or protection. Altria objects to this Interrogatory because it seeks information that is outside the scope of the investigation, and is not relevant to the claim or defense of any party, to the extent it requests information regarding products other than heat-not-burn systems. Altria objects to this Interrogatory to the extent it seeks material subject to third-party confidentiality restrictions. Altria objects to this Interrogatory to the extent the documents or information requested are publicly available and/or equally available to the requesting party. Altria objects to this Interrogatory to the extent the documents or information requested are not in Altria's possession, custody, and/or control. Altria objects to this Interrogatory as overly broad, unduly burdensome, vague, and ambiguous as to the phrase "Your decision." Altria objects to this Interrogatory as overly broad, unduly burdensome, vague, and ambiguous as to the phrase "heating element" and "heating blade." Altria objects to this Interrogatory as overly broad and unduly burdensome on the grounds that it is unbounded in time. Altria objects to this Interrogatory as prematurely seeking disputed legal and factual contentions. Altria objects to this Interrogatory as premature to the extent it seeks claim construction or expert opinions before the appropriate deadlines.

Response: Subject to the foregoing exceptions and without waiving its objections, Altria

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states:

[REDACTED]

[REDACTED] Altria has not yet completed its investigation of the facts, and Altria reserves the right to supplement and/or amend this response as further information becomes available.

INTERROGATORY NO. 4:

Identify all patents and/or patent applications that include patent claims that You contend cover any aspect of the IQOS® system, including the system itself, components of the system, and/or the use of either of the foregoing. Include in Your response the Identity of each Document by production number that supports Your answer.

RESPONSE TO INTERROGATORY NO. 4:

Altria incorporates all of its general objections and reservations of rights as if specifically alleged herein. Altria objects to this Interrogatory to the extent it seeks information protected from disclosure by the attorney-client privilege, work product immunity, common interest, or any other applicable privilege or protection. Altria objects to this Interrogatory because it seeks information that is outside the scope of the investigation, and is not relevant to the claim or defense of any party. Altria objects to this Interrogatory to the extent it seeks material subject to third-party confidentiality restrictions. Altria objects to this Interrogatory to the extent the documents or information requested are not in Altria's possession, custody, and/or control. Altria objects to this Interrogatory as overly broad, unduly burdensome, vague, and ambiguous as to the phrase "use" of the IQOS® system.

Response: Subject to the foregoing exceptions and without waiving its objections, Altria states:

Altria is willing to meet and confer to determine what relevant information, if any,

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Complainants are seeking with this Interrogatory.

FIRST SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 4 (JUNE 16, 2020):

Objections: Altria incorporates by reference its Specific Objections to this Interrogatory, served on May 28, 2020, as if fully stated herein.

Response: Altria further responds to this Interrogatory as follows:

Altria confirms that the IQOS® system has not been marked with any identification of patents covering the system.

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 4 (JULY 13, 2020):

Objections: Altria incorporates by reference its Specific Objections to this Interrogatory, served on May 28, 2020, as if fully stated herein.

Response: Altria further responds to this Interrogatory as follows: [REDACTED]

[REDACTED]

Altria reserves the right to supplement and/or amend this response as further information becomes available, and/or after responsive, non-privileged documents are otherwise produced.

INTERROGATORY NO. 5:

For each Product identified in response to Interrogatory No. 1, Identify all entities that sell or offer for sale each said Product for importation into the United States, import said Products into the United States, and/or offer for sale or sell said Products after they have been imported into the United States, and state the place of business of each entity and geographical location where each of the foregoing activities is or has been performed. Include in Your response the Identity of each Document that supports Your answer, as well as the individuals most knowledgeable thereof.

RESPONSE TO INTERROGATORY NO. 5:

Altria incorporates all of its general objections and reservations of rights as if specifically alleged herein. Altria objects to this Interrogatory to the extent it seeks information protected from

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