

Exhibit 25
Public Redacted
Version

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

RAI Strategic Holdings,
Inc., et al.,
Plaintiffs,

Civil Action

-against-

No. 120 CV
00393

Altria Client Services LLC,
et al.,
Defendants.



VIDEO-RECORDED 30(b)(6)
DEPOSITION OF EDWARD KIERNAN
Zoom Recorded Videoconference
04/16/2021
1:21 p.m. CEST

REPORTED BY: AMANDA GORRONO, CLR
CLR NO. 052005-01
JOB NO. 192651

1 E. Kiernan

2 question?

3 Q. Yes, is it.

4 A. I assume that -- I'll make an
5 assumption that it is. I don't know
6 because I'm not often on LinkedIn, but,
7 yes.

8 Q. Okay. It lists here as your
9 current employer Philip Morris
10 International, but we established -- you
11 said your current employer is actually
12 Philip Morris Products right now; is that
13 correct?

14 A. That's correct.

15 Q. Okay. And I understand from
16 this that you're currently the director of
17 IP management at -- is that Philip Morris
18 Products?

19 A. Correct. But I actually -- like
20 I said, I'm not on LinkedIn often. They
21 change the title, so I actually have a
22 different title, currently.

23 Q. Okay. And what's your current
24 title?

25 A. Global head of IP management.

1 E. Kiernan

2 Q. And is that -- are you serving
3 in the same role with just a different
4 title, or is that a new --

5 A. Yes, no, same role, different
6 title.

7 Q. Okay. And so you've been in
8 this role for -- looks like a little more
9 than 3 years; is that correct?

10 A. Correct.

11 Q. And what are your
12 responsibilities as global head of IP
13 management?

14 A. To protect PMI's innovations and
15 set strategy with regard to the capture of
16 intellectual property.

17 Q. And does your role involve
18 protecting innovations and setting
19 strategy for both noncombustible and
20 combustible nicotine products?

21 A. Yes.

22 Q. And in this role as global head
23 of IP management, are you serving as a --
24 in a legal role?

25 A. No.

1 E. Kiernan

2 [REDACTED]
[REDACTED]
[REDACTED]

5 MR. SOBOLSKI: Objection;
6 outside of the scope, vague, lack of
7 foundation.

8 A. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

18 MR. SOBOLSKI: Objection;
19 outside the scope, asked and answered.

20 A. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

24 MR. SOBOLSKI: Same objections.

25 A. [REDACTED]

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