

Exhibit 20

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

RAI STRATEGIC HOLDINGS, INC. and
R.J. REYNOLDS VAPOR COMPANY,

Plaintiffs and Counterclaim Defendants,

v.

ALTRIA CLIENT SERVICES LLC; PHILIP
MORRIS USA, INC.; and PHILIP MORRIS
PRODUCTS S.A.,

Defendants and Counterclaim Plaintiffs.

Case No. 1:20cv00393-LO-TCB

**RAI STRATEGIC HOLDINGS, INC. AND R.J. REYNOLDS VAPOR COMPANY'S
OBJECTIONS AND RESPONSES TO ALTRIA CLIENT SERVICES LLC, PHILIP
MORRIS USA, INC., AND PHILIP MORRIS PRODUCTS S.A.'S FIRST SET OF
INTERROGATORIES (NOS. 1-11)**

Pursuant to Federal Rules of Civil Procedure 26 and 33, RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company (collectively, "Reynolds") hereby respond to Altria Client Services LLC, Philip Morris USA, Inc., and Philip Morris Products S.A.'s (collectively, "Defendants" or "Counterclaim Plaintiffs") First Set of Interrogatories (Nos. 1-11) as follows.

PRELIMINARY STATEMENT

Reynolds has not yet completed discovery relating to this case, and while it has made reasonable investigation for responsive information, its investigation of the facts is continuing. Reynolds objects to and will respond to these interrogatories as it interprets and understands each interrogatory as set forth. Reynolds's objections and responses to these interrogatories are made without prejudice to Reynolds's right to supplement, correct, or otherwise modify the objections and responses to the extent permitted under the Federal Rules of Civil Procedure, the Local Rules

information supporting Reynolds's contention that that the Accused Products and the activities of Defendants willfully infringe the RJR Asserted Patents. Reynolds' investigation is ongoing and, as discovery progresses, Reynolds reserves the right to supplement its response to this interrogatory in accordance with the Court's Scheduling Order and Fed. R. Civ. P. 26(e).

INTERROGATORY NO. 7:

For each Accused Product and RJR Asserted Claim, describe in detail and identify the factual and legal bases for Your claim for damages to which You contend You are entitled as a result of Defendants' alleged infringement, including without limitation, whether Your damages claims are based on lost profits, a reasonably royalty, or other damages theory, any royalty rate, royalty base, lost profits, disgorgements, enhanced damages, attorney's fees, or costs that You contend are appropriate, Your products that you contend compete with the Accused Products, noninfringing alternatives, the date You contend the hypothetical negotiation would have commenced with respect to each RJR Asserted Patent, the time period for which You contend You are entitled to collect damages from Defendants due to any alleged infringement of each RJR Asserted Patent, and whether the royalty base is based on the value of the entire product or a portion thereof (if so, identify the portion); identify all Documents and things supporting, contradicting, or otherwise relating to Your contentions; and identify the three (3) most knowledgeable Persons concerning the facts described in Your response and all Persons on which you intend to rely to support Your contentions.

OBJECTIONS:

Reynolds objects to this interrogatory as premature because it seeks information that is the subject matter of expert reports and discovery that are not yet due. Reynolds objects to this interrogatory to the extent that the response will require information and discovery from Defendants/Counterclaim Plaintiffs that has not yet been made available to Reynolds. Reynolds objects to this interrogatory as unduly burdensome to the extent it seeks an identification of "all" Documents and things supporting, contradicting, or otherwise relating to Reynolds's damages contentions. Reynolds objects to this interrogatory as composed of multiple discrete subparts under Fed. R. Civ. P. 33, which causes this interrogatory to count as more than one interrogatory.

RESPONSE:

Subject to and without waiving its objections, Reynolds responds as follows:

At this point in the case, Reynolds has not yet determined the full extent and/or nature of the injuries it has suffered and continues to suffer as a result of Defendants' infringement of each RJR Asserted Patent. Reynolds seeks damages to the extent permissible under the applicable laws for Defendants' infringement and, at a minimum, a reasonable royalty based on Defendants' sales of the Accused Products, together with interest and costs as fixed by the Court. Reynolds also intends to seek treble damages and attorneys' fees due to Defendants' willful infringement of the RJR Asserted Patents. As Reynolds receives information and documents from Defendants during discovery, Reynolds will supplement its response to this interrogatory in accordance with the Court's Scheduling Order, the deadlines related to expert discovery, and the Federal Rules of Civil Procedure.

Reynolds contends that its VUSE products and Defendants/Counterclaim Plaintiffs' IQOS products are all part of a category known as "potentially reduced-risk" products, and that each side's products compete.

Reynolds further states that the hypothetical negotiation date is the date when infringement began, which is subject to further investigation and discovery concerning when the Defendants/Counterclaim Plaintiffs first imported, sold, or offered to sell the IQOS products in the United States. The damages time period will also begin at the date of first infringement, which will be the subject of further discovery from Defendants/Counterclaim Plaintiffs.

Reynolds states that the following witnesses are generally knowledgeable about the RJR Accused Products, the facts concerning the market for those RJR Accused Products, and financial information concerning those RJR Accused Products: Kara Calderon (Reynolds's marketing and distribution of the RJR Accused Products) and Nick Gilley (Reynolds's financial information associated with the manufacture and sale of the RJR Accused Products).

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Respectfully submitted,

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