

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

PHILIP MORRIS PRODUCTS S.A.,

Plaintiff,

v.

R.J. REYNOLDS VAPOR COMPANY,

Defendant.

Case No. 1:20-cv-00393-LMB-WEF

ORAL ARGUMENT REQUESTED



**REPLY IN SUPPORT OF PHILIP MORRIS' MOTION FOR A PERMANENT
INJUNCTION OR, ALTERNATIVELY, AN ONGOING ROYALTY**

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The following abbreviations are used in this reply brief.

Parties

Abbreviation	Term
Philip Morris	Plaintiff Philip Morris Products S.A.
Reynolds	Defendant R.J. Reynolds Vapor Company

Citations

Abbreviation	Term
Mot.	Brief in Support of PMP's Motion for a Permanent Injunction or, Alternatively, an Ongoing Royalty, Dkt. 1411
Opp.	Defendant's Memorandum in Opposition to Plaintiff's Motion for a Permanent Injunction or, Alternatively, an Ongoing Royalty, Dkt. 1421

Terms

Abbreviation	Term
'265 patent	U.S. Patent No. 9,814,265
'911 patent	U.S. Patent No. 10,104,911
Alto	VUSE Alto
CC	combustible cigarette
FDA	U.S. Food and Drug Administration
HNB	heat not burn
ITC	U.S. International Trade Commission
LEO	ITC Limited Exclusion Order
MRTP	Modified Risk Tobacco Product
PMTA	Premarket Tobacco Product Application
PRRP	potentially reduced risk product
PTAB	Patent Trial and Appeal Board
Solo G2	VUSE Solo G2

All emphasis added, and internal quotation marks and citations omitted, unless otherwise noted.

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