

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

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

Plaintiff,

v.

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

Defendants.

Case No. 1:20-cv-00393-LO-TCB

STIPULATION OF DISMISSAL

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company (collectively, “Plaintiffs”) and Defendants Altria Client Services LLC (“ACS”), Philip Morris USA, Inc. (“PM USA”), and Philip Morris Products S.A. (“PMPSA”) stipulate that Defendants Altria Group, Inc. (“AGI”) and Philip Morris International Inc. (“PMII”) should be dismissed from this case without prejudice.

WHEREAS, Plaintiffs served the Summons and Complaint on Defendants AGI and PMII on or about April 13, 2020.

WHEREAS, those Defendants’ responses to the Complaint are due on May 4, 2020.

WHEREAS, Defendants AGI and PMII represent that they are each holding companies that have not engaged in the manufacture, use, sale, offer for sale or importation of any accused products.


WHEREAS, Defendants ACS, PM USA, and PMPSA agree that they will not use the absence of AGI and/or PMII from the case as a basis to resist discovery, and that they will not make any substantive argument during the case that is based, in whole or in part, on the absence of AGI and/or PMII from the case.

WHEREAS, in view of the foregoing, Plaintiffs consent to the dismissal of AGI and PMII from this action, without prejudice.

NOW, THEREFORE, Plaintiffs, PMII and AGI hereby stipulate and agree as follows:

1. All claims in this action against PMII and AGI are hereby dismissed without prejudice pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure.
2. PMII and AGI submit and consent to the jurisdiction of this Court solely for the purposes of enforcing this stipulation, and to adjudicate or resolve any disputes regarding its terms, interpretation, application, or requirements. Plaintiffs, ACS, PM USA, and PMPSA submit and consent to the jurisdiction of this Court for the purposes of enforcing this stipulation, and to adjudicate or resolve any disputes regarding its terms, interpretation, application, or requirements.

SO ORDERED this 5th day of May, 2020.

/s/ 
Liam O'Grady

Dated: May 1, 2020

Respectfully submitted,

By: /s/ Maximilian A. Grant

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