

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

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

**Plaintiffs-Counterclaim
Defendants,**

v.

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

**Defendants-Counterclaim
Plaintiffs.**

Civil Action No. 1:20-cv-393

**COUNTERCLAIM PLAINTIFFS' UNOPPOSED MOTION FOR APPOINTMENT OF
COMMISSIONERS AND DIRECTION OF SUBMISSION OF HAGUE CONVENTION
APPLICATION FOR AUTHORIZATION OF THE DULY APPOINTED
COMMISSIONERS TO TAKE EVIDENCE PURSUANT TO ARTICLE 17 OF THE
HAGUE CONVENTION OF 18 MARCH 1970 ON THE TAKING OF EVIDENCE
ABROAD IN CIVIL OR COMMERCIAL MATTERS**

Counterclaim Plaintiffs Altria Client Services LLC, Philip Morris USA Inc., and Philip Morris Products S.A. (collectively, "Counterclaim Plaintiffs") move for the Appointment of Commissioners as set forth in the accompanying Memorandum in Support of Counterclaim Plaintiffs' Motion for Appointment of Commissioners, and Direction of Submission of Hague Convention Application for Authorization of the Duly Appointed Commissioners to Take Evidence Pursuant to Article 17 of the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters.

Pursuant to Local Rule 7(e), the undersigned counsel hereby certifies that counsel for the parties conferred March 5, 2021, and this motion is unopposed by RAI Strategic Holdings, Inc.

and R.J. Reynolds Vapor Company (collectively, “Counterclaim Defendants”).

WHEREFORE, for the reasons set forth more fully in the Memorandum in Support of this Motion, Counterclaim Plaintiffs respectfully request that the Court grant this motion. A proposed order for the Court’s consideration accompanies this motion.

Dated: March 5, 2021

Respectfully submitted,

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Counsel for Defendants-Counterclaim

*Plaintiffs Altria Client Services LLC, Philip
Morris USA Inc., and Philip Morris
Products S.A.*

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of March, 2021, a true and correct copy of the foregoing was served using the Court's CM/ECF system, with electronic notification of such filing to all counsel of record:

/s/ Maximilian A. Grant

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