

EXHIBIT 2

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. 1:20-cv-00393-LO-TCB

**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, Altria Client Services LLC, Philip Morris USA Inc., and Philip Morris Products S.A. request that RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company answer each interrogatory set forth below separately and fully, in writing and under oath, in accordance with the definitions and instructions contained herein, within thirty (30) days after service of the interrogatories. Altria Client Services LLC, Philip Morris USA Inc., and Philip Morris Products S.A. request that RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company make any production of documents in connection with answers to these interrogatories at the office of Latham & Watkins LLP, 555 Eleventh Street NW, Suite 1000, Washington, DC 20004.

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, non-infringing 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.

INTERROGATORY NO. 8:

Describe the complete factual and legal basis for Your contention that You are entitled to any injunctive relief, including any irreparable injury You have allegedly suffered, and why such injury is irreparable, why remedies available at law, such as monetary damages, are inadequate to compensate for that injury, why, considering the balance of hardships between You and Defendants, a remedy in equity is warranted, why the public interest would not be disserved by a permanent injunction, and identify the three (3) individuals most knowledgeable of the foregoing, and all Documents and things (by Bates number) You intend to rely on to support Your contention.

INTERROGATORY NO. 9:

For each RJR Asserted Claim, describe in detail and identify the facts and circumstances of the conception and reduction to practice of the purported claimed invention, and any intervening

contentions; and identify the three (3) most knowledgeable Persons about the facts described in Your contentions.

Dated: August 11, 2020

/s/ Maximilian A. Grant

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