

# 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.

Civil Action No. 1:20-cv-393

**ALTRIA CLIENT SERVICES LLC, PHILIP MORRIS USA INC., AND  
PHILIP MORRIS PRODUCTS S.A.'S FIRST SET OF REQUESTS FOR PRODUCTION  
(NOS. 1-157)**

Pursuant to Rules 34 and 26 of the Federal Rules of Civil Procedure, 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 respond in writing and produce the documents and things requested below within thirty (30) days of service, or at such other time and place as the parties may agree upon, at the offices of Latham & Watkins LLP, 555 Eleventh Street NW, Suite 1000, Washington, DC 20004.

**DEFINITIONS**

The following definitions and instructions apply to these requests as well as other discovery requests that may be propounded to Plaintiffs, including interrogatories and requests for admission.

of lost profits, price erosion, or a reasonable royalty under 35 U.S.C. § 284 (including a reasonable royalty rate and a reasonable royalty base) for the RJR Asserted Patents, as well as any notice provided by marking the number of the RJR Asserted Patents or any Related Patent on any product or device used, sold, or offered for sale by or under Counterclaim Defendants' authority or the authority of Counterclaim Defendants' predecessors-in-interest.

**REQUEST FOR PRODUCTION NO. 99:**

Documents sufficient to identify each of Counterclaim Defendants' products that Counterclaim Defendants contend compete with the Accused Products.

**REQUEST FOR PRODUCTION NO. 100:**

Documents sufficient to identify the market in which Counterclaim Defendants contend Counterclaim Defendants' products compete with the Accused Products, and the market share associated with each product in the market.

**REQUEST FOR PRODUCTION NO. 101:**

Documents sufficient to identify any non-infringing alternatives to the RJR Asserted Patents.

**REQUEST FOR PRODUCTION NO. 102:**

All Documents that evidence and/or refer to any Communication between Counterclaim Defendants and any Person, including Counterclaim Defendants' internal Communications, meeting minutes, and notes of meetings, referring to any patents or patented technologies directed to electronic cigarettes that Counterclaim Defendants have licensed.

**REQUEST FOR PRODUCTION NO. 103:**

All licenses or contracts entered into by Counterclaim Defendants related to any patents or patented technologies related to electronic cigarettes that Counterclaim Defendants have licensed.

Dated: August 11, 2020

By: /s/ Maximilian A. Grant  
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