

EXHIBIT 3

**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.: 1:20cv00393-LO-TCB

**PLAINTIFFS RAI STRATEGIC HOLDINGS, INC. AND R.J. REYNOLDS VAPOR
COMPANY'S THIRD SET OF REQUESTS FOR PRODUCTION TO DEFENDANTS
ALTRIA CLIENT SERVICES LLC, PHILIP MORRIS USA, INC., AND PHILIP
MORRIS PRODUCTS S.A. (NOS. 243–272)**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Plaintiffs RAI Strategic Holdings, Inc. (“RAI”) and R.J. Reynolds Vapor Company (“RJR”) (collectively, “Plaintiffs”), by their undersigned attorneys, hereby request Defendants Altria Client Services LLC (“ACS”), Philip Morris USA, Inc. (“PM USA”), and Philip Morris Products S.A. (“PMP”) (collectively, “Defendants”) respond in writing and produce the Documents and things requested below in accordance with the Definitions and Instructions contained herein, and serve such documents on Plaintiffs’ counsel, Jones Day, 901 Lakeside Avenue, Cleveland, Ohio 44114, within the time prescribed by the Federal Rules of Civil Procedure.

DEFINITIONS

1. “ACS” shall each mean and refer to Altria Client Services LLC, including without limitation all of its corporate locations, and all predecessors, predecessors-in-interest, and all past

REQUEST NO. 256:

For each Allegedly Practicing Altria Product, Documents sufficient to Identify the gross revenue, net profits, profit margins, and fixed and variable costs attributable to the Allegedly Practicing Altria Product on a quarterly basis.

REQUEST NO. 257:

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

REQUEST NO. 258:

Documents sufficient to Identify the market in which Defendants contend Defendants' Products compete with the Reynolds Accused Products, and the market share associated with each Product in the market.

REQUEST NO. 259:

Documents sufficient to Identify any non-infringing alternatives to the Altria Accused Products.

REQUEST NO. 260:

Documents sufficient to Identify any non-infringing alternatives to the Reynolds Accused Products.

REQUEST NO. 261:

All licenses, including inbound or outbound licenses, or contracts entered into by Defendants related to any patents or patented technologies concerning electronic cigarettes that Defendants have licensed.

Dated: September 23, 2020

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Respectfully submitted,

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