

**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

**JOINT STIPULATION REGARDING AUTHENTICATION OF THIRD PARTY
DOCUMENTS**

Plaintiffs RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company (collectively “Reynolds” or “Counterclaim Defendants”) and Defendants Altria Client Services LLC, Philip Morris USA Inc., and Philip Morris Products S.A. (collectively, “Defendants” or “Counterclaim Plaintiffs”) (altogether “the Parties”) in an effort to simplify the upcoming trial with respect to certain documents produced by third parties in the above captioned-litigation, hereby submit their Stipulation Regarding Authentication of Third Party Documents as follows:

IT IS STIPULATED AND AGREED by the Parties:

1. For purposes of this action only, the following documents listed in Appendices A and B attached hereto (hereinafter “Third Party Documents”), which were produced by third parties in this action, are authentic and non-hearsay if offered at trial. The Third Party Documents require no additional or other foundational evidence or testimony in order to be admissible at trial.

2. The Parties agree that the Third Party Documents are authentic pursuant to Federal Rule of Evidence 901.

3. The Parties agree that the Third Party Documents are business records pursuant to Federal Rule of Evidence 803(6), and that they meet all of the requirements for admission as business records under Federal Rule of Evidence 803(6).

4. This stipulation does not serve as a waiver of any other objections a party may have with respect to third-party discovery or trial exhibits.

Dated: April 8, 2021

Respectfully submitted,

s/ Sanjiv P. Laud

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