

**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

COUNTERCLAIM PLAINTIFFS' MOTION TO COMPEL

Pursuant to Rule 37(a) of the Federal Rules of Civil Procedure, and Local Rules 7 and 37, and the Court's Scheduling Order (Dkt. 99), Counterclaim Plaintiffs Altria Client Services, LLC ("ACS"), Philip Morris USA Inc. ("PM USA"), and Philip Morris Products S.A. ("PMP") (collectively, "Counterclaim Plaintiffs"), by counsel, hereby move to compel Reynolds' 30(b)(6) Deposition on Topics 28, 54, and 78, as requested in Counterclaim Plaintiffs' Memorandum in Support of this Motion.

Pursuant to Local Rules 7(E), 7(J), and 37(E), the undersigned counsel hereby certifies that counsel for the parties conferred telephonically on April 7, 2021, in an effort to resolve the issues raised in this Motion, but were unable to do so. In support of this Motion, Counterclaim Plaintiffs refer the Court to the accompanying Memorandum in Support, which is hereby incorporated by

reference as if fully set forth herein. A proposed order for the Court's consideration accompanies this Motion.

Dated: April 9, 2021

Respectfully submitted,

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Services LLC, and Philip Morris USA, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of April, 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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