

**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 FOR
LEAVE TO SERVE SUPPLEMENTAL EXPERT REPORTS**

Pursuant to Rules 16, 26, and 37 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, "PMP/Altria"), by counsel, hereby move for leave to serve supplemental expert reports, as requested in PMP/Altria's Memorandum in Support of this Motion.

Pursuant to Local Rules 7(e) and 7(j), the undersigned counsel hereby certifies that counsel for the parties conferred telephonically on April 30, 2021, in an effort to resolve the issues raised in this Motion, but were unable to do so. In support of this Motion, PMP/Altria 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 30, 2021

Respectfully submitted,

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Morris USA Inc., and Philip Morris
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CERTIFICATE OF SERVICE

I hereby certify that on this 30th 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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