

**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

R.J. REYNOLDS VAPOR COMPANY’S MOTION TO COMPEL DEFENDANT PHILIP MORRIS PRODUCTS S.A. TO DESIGNATE RULE 30(b)(6) WITNESSES RELATING TO PHILIP MORRIS PRODUCTS S.A.’S CLAIM FOR A PERMANENT INJUNCTION

Plaintiffs RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company (collectively, “Reynolds”) respectfully move under Federal Rule of Civil Procedure 37(a)(3)(B) and Local Civil Rule 37 for an order compelling Defendant Philip Morris Products S.A. (“PMP”) to designate a corporate witness or witnesses to testify on the full scope of purported facts underlying PMP’s claim for permanent injunctive relief and make those witnesses available at least five days after Defendants’ completion of additional injunction-related document discovery.

Counsel for RJRV conferred with counsel for PMP regarding this issue via written correspondence between April 19, 2021, and May 14, 2021, and via telephone on May 13, 2021. Despite RJRV’s counsel’s good faith effort to resolve the discovery matters at issue, counsel could not reach an agreement.

In support of this Motion, RJRV submits contemporaneously herewith a proposed order and a memorandum.

Dated: May 14, 2021

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Respectfully submitted,

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*Counsel for Plaintiffs RAI Strategic Holdings,
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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of May, 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/ David M. Maiorana

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