

# EXHIBIT 2

**IN THE 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

**PHILIP MORRIS PRODUCTS S.A.'S OBJECTIONS TO  
REYNOLDS' SECOND 30(B)(6) DEPOSITION NOTICE**

Pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendant/Counterclaim Plaintiff Philip Morris Products S.A. (“Philip Morris”), by and through its undersigned attorneys, Latham & Watkins LLP, hereby provide its objections and responses to Plaintiffs/Counterclaim Defendants RAI Strategic Holdings, Inc. and R.J. Reynolds Vapors Company’s (collectively “Reynolds”) Second Notice of Rule 30(b)(6) Deposition of Philip Morris.

**PRELIMINARY STATEMENT**

Philip Morris objects to the Topics to the extent that they seek or impose requirements or obligations on Philip Morris that are inconsistent with those set forth in the Federal Rules of Civil Procedure, the Local Civil Rules for the U.S. District Court for the Eastern District of Virginia, or any other applicable rules or orders governing this case, including the scope of discovery agreed to by the parties in any procedural or discovery stipulation, written or otherwise. Philip Morris also objects to the Topics to the extent they seek information protected from disclosure by the attorney-client privilege, the work-product doctrine, the common interest privilege, any other evidentiary or discovery privilege, or are otherwise protected from disclosure.

Nothing in these responses should be construed as waiving rights or objections that might otherwise be available to Philip Morris, nor should Philip Morris’s responses to any of these Topics be deemed an admission of relevancy, materiality, or admissibility in evidence of the Topic or the response thereto. Further, any agreement to produce a witness on a particular Topic should not be construed as an admission that information responsive to that Topic exists or is in the possession, custody, or control of Philip Morris in its ordinary course of business. Philip Morris reserves the right to supplement and/or amend these responses as further information becomes available and/or after responsive, non-privileged documents are otherwise produced.

## OBJECTIONS TO DEFINITIONS

Philip Morris incorporates by reference its objections to definitions and instructions in its responses to Reynolds' First Notice of Rule 30(b)(6) Deposition, and Reynolds' Requests for Production and Interrogatories, as if fully set forth herein.

1. Philip Morris objects to Reynolds' definition of the term "ACS" and "PM USA" as vague, ambiguous, indefinite, overbroad, unduly burdensome, seeking the production of information that is not relevant and is not reasonably calculated to lead to the discovery of admissible evidence, and seeking the production of information that is not within Philip Morris's possession, custody, or control and is not reasonably accessible to Philip Morris upon reasonable diligence. In particular, Philip Morris objects to these definitions to the extent they seek to require Philip Morris to answer on behalf of any other person or entity. Philip Morris responds to these Topics on its own behalf only.

2. Philip Morris objects to Reynolds' definition of the terms "Altria Accused Product" and "Altria Accused Products" as vague, ambiguous, indefinite, overbroad, unduly burdensome, seeking the production of information that is not relevant and is not reasonably calculated to lead to the discovery of admissible evidence, and seeking the production of information that is not within Philip Morris's possession, custody, or control and is not reasonably accessible to Philip Morris upon reasonable diligence. Philip Morris objects to Reynolds' definition of the term "Altria Asserted Patents" as encompassing patents asserted by Altria Client Services LLC and Philip Morris USA Inc., which are separate entities from Philip Morris Products, S.A. The definition improperly conflates Philip Morris Products, S.A.; Altria Client Services; and Philip Morris USA, Inc. Philip Morris's responses are limited to the '265, '556, and '911 Patents.

3. Philip Morris objects to Reynolds' definition of the terms "Communication" and "Communications" as vague, ambiguous, indefinite, overbroad, unduly burdensome, seeking the production of information that is not relevant to any party's claim or defense and proportional to the needs of the case, seeking the production of information protected from disclosure by the attorney-client privilege, the work-product doctrine, or another applicable privilege, and/or immunity, and seeking the production of information that is not within Philip Morris's possession, custody, or control and is not reasonably accessible to Philip Morris upon reasonable diligence.

4. Philip Morris objects to Reynolds' definition of the terms "PMP," "Defendants," "Counterclaim Plaintiffs," "You," and "Your," as vague, ambiguous, indefinite, overbroad, unduly burdensome, seeking the production of information that is not relevant and is not reasonably calculated to lead to the discovery of admissible evidence, and seeking the production of information that is not within Philip Morris's possession, custody, or control and is not reasonably accessible to Philip Morris upon reasonable diligence. In particular, Philip Morris objects to these definitions to the extent they seek to require Philip Morris to answer on behalf of any other person or entity. Philip Morris responds to these Topics on its own behalf only.

5. Philip Morris objects to Reynolds' definition of the terms "document" or "documents" and "person" or "persons," as vague, ambiguous, indefinite, overbroad, unduly burdensome, seeking the production of information that is not relevant to any party's claim or defense and proportional to the needs of the case, seeking the production of information protected from disclosure by the attorney-client privilege, the work-product doctrine, or another applicable privilege and/or immunity, and seeking the production of information that is not within Philip Morris's possession, custody, or control and is not reasonably accessible to Philip Morris upon reasonable diligence.

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