

**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.: 1:20cv00393-LO-TCB

REYNOLDS'S TRIAL WITNESS LIST

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and the Court's Scheduling Orders (Dkt. 97, 99, 461, 535), R.J. Reynolds Vapor Company ("Reynolds") submits the following list of witnesses that Reynolds expects to present at trial and those that Reynolds may call at trial if the need arises, either in person, through deposition designations, or through videotaped deposition, for trial on claims related to United States Patent Numbers 6,803,545, 9,814,265, 10,104,911, 10,420,374, and 10,555,556 asserted by Altria Client Services LLC ("ACS"), Philip Morris USA, Inc. ("PM USA"), and Philip Morris Products S.A. ("PMP"). Reynolds reserves the right to submit a new, amended, or supplemental witness list on issues related to PMP's equitable claim for injunctive relief as discovery on that issue remains ongoing. Reynolds also reserves the right to submit a new or supplemental witness list for subsequent trial on claims related to Reynolds's United States Patent Nos. 9,814,238, 9,901,123, 9,930,915, and 10,492,542. Reynolds also may call any person identified on the witness list submitted by ACS, PM USA, and PMP. Reynolds also may call witnesses not included on this list in rebuttal. The

inclusion of witnesses on this list is subject to Reynolds's forthcoming motion for summary judgment, Reynolds's motions to exclude, Reynolds's *Daubert* motions, Reynolds's motions *in limine*, and other pre-trial motions.

For those witnesses Reynolds may call by deposition, Reynolds's list of deposition designations is attached as Exhibit A. For deposition designations identified on the witness list of ACS, PM USA, and PMP, Reynolds reserves the right to counter-designate testimony.

Reynolds's Will Call List

1. Travis Blalock (live)
2. David Clissold (live)
3. Sean Daugherty (live)
4. James Figlar (live)
5. Thomas Fuller (live)
6. Eric Hunt (live)
7. Kelly Kodama (live)
8. Robert Ripley (live or by deposition)
9. Jeffrey Suhling (live)
10. Ryan Sullivan (live)

Reynolds's May Call List

1. Noori Moyad Brifceni (live or by deposition)
2. Kara Calderon (live)
3. Olivier Yves Cochand (live or by deposition)
4. Brandie Davis (live or by deposition)
5. Grier S. Fleishhauer (live or by deposition)

6. Moira Gilchrist (live or by deposition)
7. Nick Gilley (live)
8. Eric Hawes (live or by deposition)
9. Charles Higgins (live or by deposition)
10. Masja Hoogland (live or by deposition)
11. Edward Kiernan (live or by deposition)
12. Martin King (live or by deposition)
13. Henry Lam (live or by deposition)
14. Loi Ying Liu (live or by deposition)
15. Richard Lute (live or by deposition)
16. Pierpaolo Magnani (live or by deposition)
17. Michael Manson (live or by deposition)
18. Minilogic Device Corporation Ltd. (live or by deposition)
19. Panasonic Corporation (live or by deposition)
20. Scott Peddycord (live)
21. Arno Rinker (live or by deposition)
22. Smart Chip Microelectronic Co., Ltd. (live or by deposition)
23. Michel Thorens (live or by deposition)

Dated: May 21, 2021

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Respectfully submitted,

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*Counsel for Plaintiffs RAI Strategic Holdings, Inc.
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CERTIFICATE OF SERVICE

I hereby certify that on May 21, 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.

Dated: May 21, 2021

/s/ David M Maiorana

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