

**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.	)	Case No. 1:20-cv-00393-LO-TCB
	)	
ALTRIA CLIENT SERVICES LLC; PHILIP	)	
MORRIS USA, INC.; and PHILIP MORRIS	)	
PRODUCTS S.A.,	)	
	)	
Defendants and Counterclaim Plaintiffs.	)	
	)	

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**PLAINTIFFS’ MOTION FOR RELIEF FROM STIPULATION ON DEPOSITION  
DATES IN LIGHT OF NEW INJUNCTION-RELATED CONTENTIONS FROM PHILIP  
MORRIS PRODUCTS S.A.**

Plaintiffs RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company (collectively, “Reynolds”) respectfully move for relief from the parties’ stipulation on deposition dates. As set forth in the Memorandum in Support of Plaintiffs’ Motion For Relief, the Court should relieve Reynolds from the stipulation on deposition dates in light of new injunction-related contentions from Philip Morris Products S.A.

Counsel for Plaintiffs conferred with counsel for PMP regarding this issue via telephone on June 11, 2021. PMP stated that it will oppose this Motion.

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

Dated: June 11, 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 11th day of June, 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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