

Exhibit 2

From: Michalik, John M. <jmichalik@JonesDay.com>
Sent: Friday, June 25, 2021 9:24 AM
To: Koh, Jennifer (SD); #C-M PMIEDVA - LW TEAM
Cc: RJREDVA; Charles Molster
Subject: RE: RAI Strategic Holdings v. Altria Client Services (EDVa) - MIL and Daubert motions

Jennifer - -

Reynolds does not agree with Counterclaim-Plaintiffs' proposed schedule for motions in limine and Daubert motions. The Joint Proposed Discovery Plan Pursuant To Rule 26(f) submitted in the case calls for Daubert motions and motions in limine to be filed "in time to be heard at least two weeks before the applicable trial". (Dkt. 97 at 24.) Moreover, there are a number of issues that will have further clarity or be resolved between now and the parties' April 4, 2022, trial that will impact the issues on which the parties may want to move. Without providing an exhaustive list, we expect the Court's ruling on the parties' respective motions for summary judgment will impact the issues on which the parties file Daubert motions or move in limine. In addition, the Final Determination and expiration of the presidential review period in Inv. No. 337-TA-1199 – due in September 2021 and November 2021, respectively – also is likely to influence the issues on which the parties move the Court. As just one more example, the PTAB is expected to issue decisions on institution for Reynolds's IPR petitions against Counterclaim-Plaintiffs' asserted patents in September, October, and November of 2021. The PTAB's decisions on institution likewise may affect the issues on which the parties move in limine.

Thus, given these and other intervening deadlines between now and trial on Counterclaim-Plaintiffs' asserted patents that may affect the parties' filings, Reynolds proposes a schedule as follows that is more consistent with the timeline laid out in the Joint Discovery Plan and the regular practice in EDVA to have these types of motions argued shortly before trial:

Event	Deadline
Exchange MIL topics	December 3, 2021
Meet and confer on MIL topics	December 10, 2021
Opening MILs and Daubert motions	January 14, 2022
Oppositions to MILs and Daubert motions	January 28, 2022
Replies to MILs and Daubert motions	February 3, 2022

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From: Jennifer.Koh@lw.com <Jennifer.Koh@lw.com>

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Cc: pmiedva.lwteam@lw.com

Subject: RAI Strategic Holdings v. Altria Client Services (EDVa) - MIL and Daubert motions

**** External mail ****

Counsel,

Below is a proposed schedule for motions in limine and Daubert motions. Please let us know by Friday, June 25 whether you have any comments to the proposed schedule. Absent any comments from you, we will prepare a stipulation at that time. We are available to discuss if needed.

Event	Deadline
Exchange MIL topics	August 6 at 6 PM
Meet and confer on MIL topics	August 10 by 6 PM
Opening MILs and Dauberts	August 20
Oppositions to MILs and Dauberts	September 3
Replies to MILs and Dauberts	September 10

Regards,
Jennifer

Jennifer Koh

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