

EXHIBIT 2

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VIA E-MAIL

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555 Eleventh Street, NW, Suite 1000
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Re: *RAI Strategic Holdings, Inc. v. Altria Client Services LLC*
Case No. 1:20-cv-00393-LO-TCB (E.D. Va.)

Dear Max:

Plaintiffs RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company (“Reynolds”) hereby stipulate that, if the Patent Trial and Appeal Board (“PTAB”) institutes the pending *inter partes* review petition in IPR 2021-00586 challenging the patentability of claims 1 and 9-13 of U.S. Patent Number 10,104,911, then Reynolds will not pursue as to the challenged claims any ground raised or that could have been reasonably raised in the IPR in the above-captioned litigation, 1:20-cv-00393.

To avoid any doubt, if the PTAB declines institution of IPR2021-00586, Reynolds reserves the right to pursue these invalidity grounds in the parallel litigation.

Very truly yours,



David M. Maiorana

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