

**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

**JOINT MOTION TO MODIFY SCHEDULING ORDER
SETTING *IN LIMINE*/DAUBERT MOTION DATES**

Pursuant to Federal Rule of Civil Procedure 16 and Local Rule 7, RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company (collectively, “Reynolds”) and Altria Client Services LLC, Philip Morris USA Inc., and Philip Morris Products S.A. (collectively, “Plaintiffs”) (together, the “Parties”) hereby submit this Joint Motion to modify the scheduling order (Dkt. 801) setting *in limine*/*Daubert* motion dates.

Good cause exists to grant this motion. *See* FED. R. CIV. P. 16(b)(4) (“A schedule may be modified only for good cause and with the judge’s consent.”). The requested modifications only alter the deadlines relating to the parties’ filings of Motions *in Limine* and *Daubert* motions. A hearing date on these motions has not yet been set. The modified deadlines will provide the parties with additional time to meet and confer to potentially negotiate additional stipulations that will narrow the issues for the Court to resolve. The briefing for these motions will still be completed before trial in this case. Accordingly, the prompt resolution of this case will not be affected and the requested modification will not impact any other deadlines.

The Parties request that the Court amend the Scheduling Order deadlines as follows:

Event	Current Deadline	Proposed Deadline
Opening MILs and Daubert motions	January 14, 2022	January 21, 2022
Oppositions to MILs and Daubert motions	January 28, 2022	February 11, 2022
Replies to MILs and Daubert motions	February 3, 2022	February 25, 2022

For the reasons above, the Parties respectfully request that the Court grant this motion and amend the deadlines in the Scheduling Order as set forth above. A proposed order is submitted herewith. The Parties agree to waive oral argument on this motion.

Dated: January 12, 2022

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of January, 2022, 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.

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