

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

**REYNOLDS'S MOTIONS *IN LIMINE* NOS. 4 AND 5 TO EXCLUDE EVIDENCE AND
ARGUMENT REGARDING ANY REQUEST FOR, OR ALLEGED ENTITLEMENT
TO, ISSUANCE OF AN INJUNCTION, ENHANCED DAMAGES, OR ATTORNEY'S
FEES AND COSTS**

Pursuant to the Court's Scheduling Order (Dkt. 820), RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company ("Reynolds") respectfully moves this Court *in limine* to preclude Altria Client Services LLC, Philip Morris USA Inc., and Philip Morris Products S.A. (collectively, "PM/Altria") from soliciting or offering at trial the following:

1. Any evidence or argument regarding any request for, or alleged entitlement to, issuance of an injunction.
2. Any evidence or argument regarding any request for, or alleged entitlement to, enhanced damages or attorneys' fees and costs.

The grounds for this motion are set forth in the accompanying Memorandum in Support of Reynolds's Motions *in Limine* Nos. 4 and 5. A proposed order granting the requested relief is attached.

Dated: January 21, 2022

Respectfully submitted,

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

I hereby certify that on this 21st 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.

/s/ David M. Maiorana

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