

**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

**[PROPOSED] ORDER GRANTING REYNOLDS'S MOTION *IN LIMINE* NO. 6 TO
EXCLUDE ARGUMENT, EVIDENCE OR TESTIMONY REGARDING REYNOLDS
NOT OBTAINING OR RELYING ON AN OPINION OF COUNSEL**

Upon consideration of Reynolds's Motion *in Limine* No. 6, PM/Altria's Response, Reynolds's Reply, and arguments of the parties, **IT IS HEREBY ORDERED** that Reynolds's motion is **GRANTED**, and it is further **ORDERED** that PM/Altria shall not solicit or offer at trial:

1. Any argument, evidence, or testimony regarding Reynolds not obtaining or relying on an opinion of counsel or suggesting that Reynolds should have obtained one (and any other adverse inference related to an absence of an opinion of counsel).

ENTERED this ____ day of _____, 2022.

Alexandria, Virginia
