

**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 MOTION TO EXCLUDE THE TESTIMONY OF PAUL K. MEYER

Pursuant to the Court's Scheduling Order (Dkt. No. 820), RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company ("Reynolds") respectfully move the Court for an order under Federal Rule of Evidence 702 excluding the testimony of Paul K. Meyer, damages expert for Altria Client Services LLC, Philip Morris USA Inc., and Philip Morris Products S.A. (collectively, "PM/Altria"). Specifically, Reynolds moves to exclude Mr. Meyer's opinions regarding royalties for the alleged infringement of U.S. Patent Nos. 6,803,545 ('545 patent); 9,814,265 ('265 patent); 10,104,911 ('911 patent); and 10,420,374 ('374 patent).

The grounds for this motion are set forth in the accompanying Memorandum in Support of Reynolds's Motion to Exclude the Testimony of Paul K. Meyer. A proposed order granting the requested relief is attached.

Dated: January 21, 2022

Respectfully submitted,

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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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