## **EXHIBIT 7**

### **CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER**

## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

RAI STRATEGIC HOLDINGS, INC. and	)
R.J. REYNOLDS VAPOR COMPANY,	) Ciril No. 1-20 00202 LO TCD
	) Civil No. 1:20-cv-00393-LO-TCB
Plaintiffs and Counterclaim Defendants,	)
V.	)
v.	)
ALTRIA CLIENT SERVICES LLC; PHILIP	
MORRIS USA, INC.; and PHILIP MORRIS	
PRODUCTS S.A.,	)
	)
Defendants and Counterclaim Plaintiffs.	)
	)
	)

## REBUTTAL EXPERT REPORT OF DR. TRAVIS BLALOCK REGARDING NON-INFRINGEMENT OF U.S. PATENT NOS. 6,803,545 AND 10,420,374

Dated	3/24/21	J 71.76
		Dr. Travis N. Blalock



## CONFIDENTIAL BUSINESS INFORMATION – SUBJECT TO PROTECTIVE ORDER

## **TABLE OF CONTENTS**

I.	INTRODUCTION		
II.	PROFESSIONAL BACKGROUND		
III.	RELEVANT LEGAL STANDARDS	2	
A.	Legal Standard For Infringement	3	
B.	Dependent Claims	5	
C.	Indirect Infringement	5	
IV.	BASES OF OPINIONS AND MATERIALS CONSIDERED	6	
V.	SUMMARY OF CONCLUSIONS	6	
A.	The Accused VUSE Products Do Not Infringe The '545 Patent	6	
B.	The Accused VUSE Products Do Not Infringe The '374 Patent	7	
D.	Third-Party Products	8	
E.	Analysis Relevant To Damages	8	
VI.	THE ASSERTED PATENTS	9	
A.	'545 Patent	9	
B.	'374 Patent	12	
VII.	TECHNOLOGY BACKGROUND	15	
A.	'545 Patent	15	
	(i) Lithium Ion Batteries	15	
	(ii) Power Regulation	15	
	(iii) Background Of The '545 Patent	18	
VIII.	SUMMARY OF THE ACCUSED VUSE PRODUCTS	20	
A.	VUSE Alto	20	
B.	VUSE Solo	22	
C.	VUSE Vibe	24	
D.	VUSE Ciro	27	
IX.	THE ACCUSED VUSE PRODUCTS DO NOT INFRINGE THE ASSERTED CLAIMS OF THE '545 PATENT	29	
A.	The Accused VUSE Products Do Not Use PWM To Protect The Battery	29	
	(i) VUSE Alto	31	
	(ii) VUSE Solo	32	
	(iii) VUSE Vibe	33	



## CONFIDENTIAL BUSINESS INFORMATION - SUBJECT TO PROTECTIVE ORDER

	(iv)	VUSE Ciro	34
	(v)	None Of The Controllers Use PWM To "Prevent Damage" To The Lithium Ion Power Source	35
В.		he Accused VUSE Alto And Solo Do Not Include A Lithium Ion Power ource With Short Circuit Protection	38
	(i)	VUSE Alto	39
	(ii)	VUSE Ciro	40
X.	The second second	ACCUSED VUSE PRODUCTS DO NOT INFRINGE THE ASSERTED  MS OF THE '374 PATENT	41
A.		he Accused VUSE Products Do Not Meet The "Capacitor" Limitation Of ll Asserted Claims	41
В.		he Accused VUSE Products Are Not Configured To Detect A Blowing ction As Required By Claims 1, 24, And 25 Of The '374 Patent	47
	(i)	Claim 1 Of The '374 Patent	47
	(ii)	Claim 24 Of The '374 Patent	51
	(iii)	Claim 25 Of The '374 Patent	52
C.		he VUSE Alto, Solo, And Vibe Do Not Meet The "Controller" Requirement f Claims 16, And 22-25 Of The '374 Patent	55
	(i)	The Controller Claim Limitations	55
	(ii)	VUSE Alto	57
	(iii)	VUSE Solo	58
	(iv)	VUSE Vibe	60
XI.	THIR	D-PARTY PRODUCTS	61
XII.	ANA	LYSIS RELEVANT TO DAMAGES	67
Å.			67
B.	V.		60
	(i)	The Alleged Technical Value Of The '545 Patent Is Primarily Attributable To The Prior Art	
	(ii)		
C.			
D.	P	urported Benefits Of The '374 Patent	77
XIII.	CON	CLUSION	79



### CONFIDENTIAL BUSINESS INFORMATION – SUBJECT TO PROTECTIVE ORDER

### I. INTRODUCTION

- 1. My name is Travis Blalock. I am an electrical engineer and Associate Professor in the Department of Electrical and Computer Engineering at the University of Virginia. I submit this report at the request of counsel for RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company ("Reynolds") to offer my opinions concerning U.S. Patent Nos. 6,803,545 ("the '545 Patent") and 10,420,374 ("the '374 Patent"), which are assigned to Altria Client Services LLC ("Altria"), as well as the February 24, 2021 expert report of Joseph McAlexander (the "McAlexander Report").
- 2. I have been asked to provide my opinions and analysis on whether Reynolds's VUSE Solo, VUSE Ciro, VUSE Alto, and VUSE Vibe products (collectively, the "Accused VUSE Products") infringe asserted claims 1-4 and 7 of the '545 Patent and claims 1-10 and 16-25 of the '374 Patent ("the asserted claims"). It is my opinion that the Accused VUSE Products do not infringe any asserted claim of the '545 and '374 Patents. I summarize my opinions in greater detail in Section V and explain the full basis for my opinions in Sections VI-XII below.
- 3. I have also been asked to provide my opinions and analysis regarding whether two third-party products, the JUUL and MarkTen Elite, practiced the asserted claims of the '545 Patent if the Accused VUSE Products infringe the patent. As described in Section XI below, it is my opinion that both the JUUL and MarkTen Elite products practice at least one claim of the '545 Patent if the Accused VUSE Products infringe the patent.
- 4. Finally, I have also been asked to provide my opinions and analysis in response to certain portions of Mr. McAlexander's analysis relevant to damages, including his analysis of the technical comparability of the '545 and '374 Patents to



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