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EXHIBIT 8

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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,

Civil Action No. 1:20-cv-393

v.

ALTRIA CLIENT SERVICES LLC; PHILIP MORRIS USA INC.; and PHILIP MORRIS PRODUCTS S.A.,

Defendants and Counterclaim Plaintiffs.

AMENDED AND SUPPLEMENTAL EXPERT REPORT OF JOHN ABRAHAM RELATING TO U.S. PATENT NO. 10,104,911

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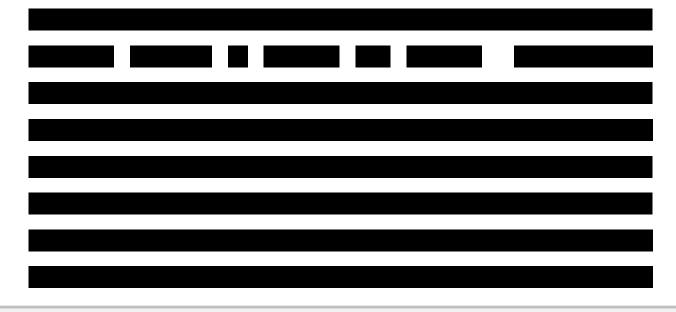
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4. "wherein the leakage prevention means comprises at least one cavity in a wall of the aerosol forming chamber, for collecting liquid condensate formed from the aerosol forming substrate"

22. As explained below, the VUSE Alto literally meets this limitation because it includes a "leakage prevention means [that] comprises at least one cavity in a wall of the aerosol forming chamber, for collecting liquid condensate formed from the aerosol forming substrate."

23. As shown in the images below from my analysis of the CAD files that RJR recently produced and my teardown analysis of the Alto, the Alto includes "a leakage prevention means [that] comprises at least one cavity in a wall of the aerosol forming chamber, for collecting liquid condensate formed from the aerosol forming substrate." RJREDVA_001642024; DEF_PUB_EDVA50000034. *See also* RJREDVA_001285356-RJREDVA_001285368 at RJREDVA_001285367; RJREDVA_001449196-RJREDVA_001449208 at

RJREDVA_001449207.



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24. Further, these cavities are used "for collecting liquid condensate formed from the aerosol forming substrate" because

Thus, the Alto includes

"a leakage prevention means [that] comprises at least one cavity in a wall of the aerosol forming chamber, for collecting liquid condensate formed from the aerosol forming substrate," under the plain meaning of those terms.

25. RJR argues that the Alto does not include a "leakage prevention means [that] comprises at least one cavity in a wall of the aerosol forming chamber, for collecting liquid condensate formed from the aerosol forming substrate." *See* RJR's Resp. to Interr. No. 1 (Dec. 2, 2020) at 70-71. *See also* RJR's Resp. to Interr. No. 1 (Mar. 5, 2021) at 64. With respect to its originally-produced Alto CAD drawings (produced at RJREDVA_001526194-95), which RJR later stated were inaccurate, RJR argued that the Alto cavities are not "in a wall of the aerosol-forming chamber," as required by claim 1 of the '911 Patent,

RJR's Resp. to Interr. No. 1 (Dec. 2, 2020) at 70-71. With respect to its recently produced Alto CAD drawings (produced at RJREDVA_001642024-27), RJR further argues

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