

EXHIBIT 4 (PUBLIC)

JONES DAY

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DIRECT NUMBER: (312) 269-4215
JMICHALIK@JONESDAY.COM

November 3, 2020

CONTAINS CBI - SUBJECT TO
PROTECTIVE ORDER

VIA ELECTRONIC MAIL

Jennifer Koh, Esq.
Latham & Watkins, LLP
12670 High Bluff Drive
San Diego, California 92130
Jennifer.Koh@lw.com

Re: RAI Strategic Holdings, Inc. v. Altria Client Services LLC, Case No. 1:20-cv-00393-LO-TCB (E.D. Va.)

Dear Jennifer:

We are in receipt of the [REDACTED] License Agreement produced on Friday, October 30. The license agreement refers to certain [REDACTED] (e.g., section 6.3.1). However, we have not received evidence of such [REDACTED], which are relevant and responsive to Reynolds's requests for production (e.g., RFP 243). Furthermore, the agreement references the use of [REDACTED] but Defendants have not produced communications or documents relating to [REDACTED], which also are relevant to Reynolds's requests for production (e.g., RFP 243).

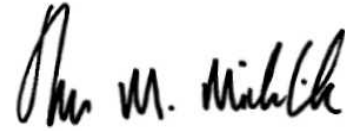
We are also in receipt of ALTRIA_IQOS_EDVA0000001757. Please provide a native version of this document.

Finally, please confirm that Defendants have produced all agreements (settlement or otherwise) or licenses covering patents related to e-cigarette technology.

Please confirm Defendants will produce [REDACTED] and any other agreements related to e-cigarette technology no later than November 5. Otherwise, let us know when you are available to meet and confer on November 5.

Jennifer Koh, Esq.
November 3, 2020
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Sincerely,

A handwritten signature in black ink that reads "John M. Michalik". The signature is written in a cursive style with a large initial "J" and "M".

John M. Michalik

JONES DAY

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November 6, 2020

CONTAINS CBI - SUBJECT TO
PROTECTIVE ORDER

VIA ELECTRONIC MAIL

Jennifer Koh, Esq.
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Re: RAI Strategic Holdings, Inc. v. Altria Client Services LLC, Case No. 1:20-cv-00393-LO-TCB (E.D. Va.)

Dear Jennifer:

We are following up regarding our November 3, 2020, letter regarding missing documents pertaining to license and other agreements. As a reminder, we are still awaiting the production of any additional documents relating to [REDACTED] and the native of ALTRIA IQOS EDVA0000001757. Furthermore, the [REDACTED]

[REDACTED] (see, e.g., PMP_EDVA00001375), which have not been produced. Such agreements are responsive to at least RFP Nos. 18, 19, 27, 28, 33, 63, 243, and 261. In addition, the [REDACTED]

[REDACTED] all of which are responsive to at least RFP Nos. 109, 207, 274, and 275. While we were able to locate [REDACTED] from public filings, we have not located [REDACTED].

Please produce these agreements by close of business on November 9.

Sincerely,



John M. Michalik

JONES DAY

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November 16, 2020

CONTAINS CBI - SUBJECT TO
PROTECTIVE ORDER

VIA ELECTRONIC MAIL

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Re: RAI Strategic Holdings, Inc. v. Altria Client Services LLC, Case No. 1:20-cv-00393-LO-TCB (E.D. Va.)

Dear Jennifer:

We are following up on our November 3, and November 6, 2020, letters regarding missing documents pertaining to license and other agreements.

Defendants still have failed to produce the following documents despite our requests:

- A native file version of ALTRIA_IQOS_EDVA0000001757;
- Any additional documents relating to [REDACTED] License Agreement, including communications about [REDACTED] (see, e.g., section 6.3.1);
- The [REDACTED] (see, e.g., PMP_EDVA00001375);
- The [REDACTED] (see, e.g., PMP_EDVA00001375); and
- The [REDACTED] (see, e.g., PMP_EDVA00001375).

Additionally, Defendants have failed to produce at least the following documents related to [REDACTED] (PMP_EDVA00001413-39):

- [REDACTED] (see section 2.3);

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