

EXHIBIT 7

(PUBLIC)

From: Michalik, John M.
Sent: Monday, January 10, 2022 7:48 PM
To: Brett.Sandford@lw.com; pmiedva.lwteam@lw.com
Cc: RJREDVA; cmolster@molsterlaw.com
Subject: RE: Case No: 1:20-cv-00393-LO-TCB (MIL follow up)
Attachments: (JD comments) DRAFT Stipulation Re Agreed MILs.docx; Change-Pro Redline - DRAFT Stipulation Re Agreed MILs and (JD comments) DRAFT Stipulation Re Agreed MILs.pdf

Brett - -

Attached is a clean copy of the proposed stipulation incorporating our edits along with a comparison of our clean version tracking the changes against the version you sent this morning.

John M. Michalik
Partner
[JONES DAY® - One Firm WorldwideSM](#)
77 West Wacker
Chicago, Illinois 60601-1692
Office +1.312.269.4215
Mobile +1.312.315.5926
jmichalik@jonesday.com

From: Brett.Sandford@lw.com <Brett.Sandford@lw.com>
Sent: Monday, January 10, 2022 6:16 PM
To: Michalik, John M. <jmichalik@JonesDay.com>; pmiedva.lwteam@lw.com
Cc: RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
Subject: RE: Case No: 1:20-cv-00393-LO-TCB (MIL follow up)

**** External mail ****

Thank you, John. If Reynolds has edits to the draft stipulation we sent, we would appreciate receiving those edits before the M&C tomorrow so that we have time to consider your position/edits.

Thanks,
Brett

Brett M. Sandford

LATHAM & WATKINS LLP
505 Montgomery Street | Suite 2000 | San Francisco, CA 94111-6538
D: +1.415.395.8150

From: Michalik, John M. <jmichalik@JonesDay.com>
Sent: Monday, January 10, 2022 4:14 PM
To: Sandford, Brett (Bay Area) <Brett.Sandford@lw.com>; #C-M PMIEDVA - LW TEAM <pmiedva.lwteam@lw.com>
Cc: RJREDVA <RJREDVA@jonesday.com>; cmolster@molsterlaw.com
Subject: RE: Case No: 1:20-cv-00393-LO-TCB (MIL follow up)

Email Attachment 1

**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.

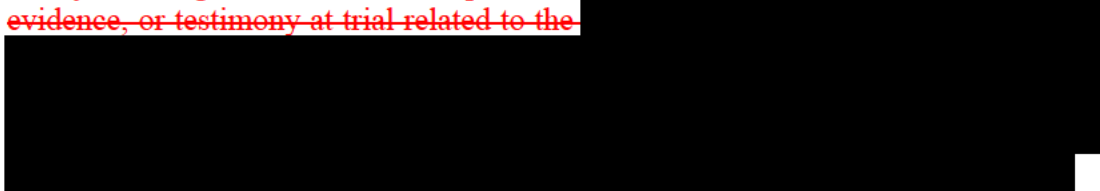
Defendants and
Counterclaim Plaintiffs.

Case No. 1:20-cv-00393-LO-TCB

DRAFT JOINT NOTICE OF AGREED MOTIONS *IN LIMINE*

All parties in this case stipulate to the following motions *in limine*. All parties agree that they, their counsel, representatives, and all witnesses called by them (whether live or by deposition) will not mention, refer to, interrogate about, or attempt to convey to the jury in any manner, either directly or indirectly, any of the matters set forth below without obtaining a favorable ruling from this Court outside the presence of the jury.

~~1. **Non-comparable Agreements.** No party will refer to non-comparable agreements or licenses at trial for the purpose of suggesting the amount of a reasonable royalty. For clarity, this agreement does not preclude any party from presenting argument, evidence, or testimony at trial related to the~~



~~2. **Withdrawn Claims or Defenses.** No party will refer to any claims or defenses raised by any party in this case that have been withdrawn, resolved, or that the jury will not be asked to decide at trial.~~

~~3. **Unelected or Undisclosed Prior Art.** Reynolds will not argue that any of the following references are invalidating prior art to the applicable patents under 35 U.S.C. §§ 102 and/or 103.~~

~~A. **U.S. Patent No. 10,104,911**~~

- ~~• Any reference other than Xia (CA 2641869), Cho (KR 20 2009 0003871), Choi (KR 10 0933516), Han (U.S. Patent No. 8,156,944), Yang (CN 201123395Y), Shizumu (WO 01/39619 A1), Murphy (WO 2009/135729), and Egilmex (U.S. Patent No. 4,945,929)~~

~~B. **U.S. Patent No. 6,803,545**~~

- ~~• Any reference that was raised or could have been reasonably raised in IPR2021-00725, including all references cited in Reynolds' response to Interrogatory No. 2.~~

~~C. **U.S. Patent No. 10,555,556**~~

- ~~• Any reference that was raised or could have been reasonably raised in IPR2021-00585, including all references cited in Reynolds' response to Interrogatory No. 2.~~

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.