

Filed on behalf of: Philip Morris Products S.A.

Entered: October 8, 2021

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

R.J. REYNOLDS VAPOR COMPANY,
Petitioner,

v.

PHILIP MORRIS PRODUCTS S.A.,
Patent Owner.

Case IPR2021-00826
Patent 9,814,265

**PATENT OWNER'S
SUPPLEMENTAL RESPONSE**

TABLE OF AUTHORITIES**Page(s)****CASES**

<i>Apple Inc. v. Fintiv, Inc.</i> , IPR2020-00019, Paper 11 (Mar. 20, 2020)	3
<i>Cisco Sys., Inc. v. Estech Sys., Inc.</i> , IPR2021-00329, Paper 13 (July 6, 2021)	2
<i>Sotera Wireless, Inc. v. Masimo Corp.</i> , IPR2020-01019, Paper 12 (Dec. 1, 2020).....	1, 2, 3

Exhibit List

Ex.	Description
2001	Declaration of Harold J. Walbrink in Support of Patent Owner's Preliminary Response
2002	Curriculum Vitae of Harold J. Walbrink
2003	Complaint for Patent Infringement, <i>RAI Strategic Holdings, Inc. v. Altria Client Services LLC</i> , No. 1:20-cv-00393-LO-TCB (E.D. Va. Apr. 9, 2020), ECF No. 1
2004	Defendants Altria Client Services LLC and Philip Morris USA Inc.'s Partial Answer to Complaint and Counterclaims, <i>RAI Strategic Holdings, Inc. v. Altria Client Services LLC</i> , No. 1:20-cv-00393-LO-TCB (E.D. Va. June 29, 2020), ECF No. 39
2005	Defendant Philip Morris Products S.A.'s Partial Answer to Complaint and Counterclaims, <i>RAI Strategic Holdings, Inc. v. Altria Client Services LLC</i> , No. 1:20-cv-00393-LO-TCB (E.D. Va. June 29, 2020), ECF No. 40
2006	Order, <i>RAI Strategic Holdings, Inc. v. Altria Client Services LLC</i> , No. 1:20-cv-00393-LO-TCB (E.D. Va. Aug. 10, 2020), ECF No. 79
2007	Joint Proposed Discovery Plan Pursuant to Rule 26(f), <i>RAI Strategic Holdings, Inc. v. Altria Client Services LLC</i> , No. 1:20-cv-00393-LO-TCB (E.D. Va. Sept. 2, 2020), ECF No. 97
2008	Rule 16(b) Scheduling Order, <i>RAI Strategic Holdings, Inc. v. Altria Client Services LLC</i> , No. 1:20-cv-00393-LO-TCB (E.D. Va. Sept. 8, 2020), ECF No. 99
2009	Claim Construction Order, <i>RAI Strategic Holdings, Inc. v. Altria Client Services LLC</i> , No. 1:20-cv-00393-LO-TCB (E.D. Va. Nov. 4, 2020), ECF No. 360
2010	Order, <i>RAI Strategic Holdings, Inc. v. Altria Client Services LLC</i> , No. 1:20-cv-00393-LO-TCB (E.D. Va. Dec. 4, 2020), ECF No. 426

Ex.	Description
2011	Order, <i>RAI Strategic Holdings, Inc. v. Altria Client Services LLC</i> , No. 1:20-cv-00393-LO-TCB (E.D. Va. Dec. 7, 2020), ECF No. 432
2012	Order, <i>RAI Strategic Holdings, Inc. v. Altria Client Services LLC</i> , No. 1:20-cv-00393-LO-TCB (E.D. Va. Feb. 16, 2021), ECF No. 456
2013	Order, <i>RAI Strategic Holdings, Inc. v. Altria Client Services LLC</i> , No. 1:20-cv-00393-LO-TCB (E.D. Va. Feb. 19, 2021), ECF No. 461
2014	Joint Motion to Modify Scheduling Order, <i>RAI Strategic Holdings, Inc. v. Altria Client Services LLC</i> , No. 1:20-cv-00393-LO-TCB (E.D. Va. Mar. 30, 2021), ECF No. 534
2015	Order, <i>RAI Strategic Holdings, Inc. v. Altria Client Services LLC</i> , No. 1:20-cv-00393-LO-TCB (E.D. Va. Mar. 31, 2021), ECF No. 535
2016	Order, <i>RAI Strategic Holdings, Inc. v. Altria Client Services LLC</i> , No. 1:20-cv-00393-LO-TCB (E.D. Va. May 20, 2021), ECF No. 634
2017	Minutes Entry for Final Pretrial Conference, <i>RAI Strategic Holdings, Inc. v. Altria Client Services LLC</i> , No. 1:20-cv-00393-LO-TCB (E.D. Va. May 21, 2021), ECF No. 657
2018	Petitioner's Reply to the Patent Owner Preliminary Response, <i>Philip Morris Products, S.A. v. RAI Strategic Holdings, Inc.</i> , IPR2020-00921, Paper 7 (Sept. 18, 2020)
2019	Patent Owner's Sur-Reply to Petitioner's Reply to Patent Owner's Preliminary Response, <i>Philip Morris Products, S.A. v. RAI Strategic Holdings, Inc.</i> , IPR2020-00921, Paper 8 (Sept. 29, 2020)
2020	Decision, <i>Philip Morris Products, S.A. v. RAI Strategic Holdings, Inc.</i> , IPR2020-00921, Paper 9 (Nov. 16, 2020)
2021	Petitioner's Reply to the Patent Owner Preliminary Response, <i>Philip Morris Products, S.A. v. RAI Strategic Holdings, Inc.</i> , IPR2020-01094, Paper 7 (Nov. 25, 2020)

Ex.	Description
2022	Patent Owner's Sur-Reply to Petitioner's Reply to Patent Owner's Preliminary Response, <i>Philip Morris Products, S.A. v. RAI Strategic Holdings, Inc.</i> , IPR2020-01094, Paper 8 (Dec. 10, 2020)
2023	Decision Denying Institution, <i>Philip Morris Products, S.A. v. RAI Strategic Holdings, Inc.</i> , IPR2020-01094, Paper 9 (Jan. 25, 2021)
2024	RESERVED
2025	Invalidity Expert Report of Dr. Jeffrey C. Suhling Regarding Invalidity of U.S. Patent No. 9,814,265, <i>RAI Strategic Holdings, Inc. v. Altria Client Services LLC</i> , No. 1:20-cv-00393-LO-TCB (E.D. Va. Feb. 24, 2021)
2026	RESERVED
2027	Transcript of Deposition of Jeffrey C. Suhling, <i>RAI Strategic Holdings, Inc. v. Altria Client Services LLC</i> , No. 1:20-cv-00393-LO-TCB (E.D. Va. May 28, 2021)
2028	U.S. Patent No. 6,634,864
2029	Decision Granting Request for Rehearing and Granting Institution of <i>Inter Partes</i> Review, <i>Philip Morris Products, S.A. v. RAI Strategic Holdings, Inc.</i> , IPR2020-00921, Paper 13 (Aug. 5, 2021)

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