

No. 17-____

IN THE
Supreme Court of the United States

R. J. REYNOLDS TOBACCO COMPANY,
Petitioner,

v.

SHARON BLOCK, as personal representative of Lillian
Kaplan, deceased,
Respondent.

**On Petition For A Writ Of Certiorari
To The Florida District Court of Appeal for the
Fourth District**

PETITION FOR A WRIT OF CERTIORARI

BENJAMIN M. FLOWERS
JONES DAY
325 John H. McConnell
Blvd., Suite 600
Columbus, OH 43215
(614) 469-3939

MICHAEL A. CARVIN
Counsel of Record
YAAKOV ROTH
JONES DAY
51 Louisiana Ave., N.W.
Washington, D.C. 20001
(202) 879-3939
mcarvin@jonesday.com

*Counsel for Petitioner
R. J. Reynolds Tobacco Co.*

QUESTIONS PRESENTED

This case presents questions also raised in the petition for a writ of certiorari filed September 15, 2017, in *R.J. Reynolds Tobacco Co. v. Graham*, No. 17-415.

1. When there is no way to tell whether a prior jury found particular facts against a party, does due process permit those facts to be conclusively presumed against that party in subsequent litigation?

2. Are strict-liability and negligence claims based on the findings by the class-action jury in *Engle v. Liggett Group, Inc.* preempted by the many federal statutes that manifested Congress's intent that cigarettes continue to be lawfully sold in the United States?

**PARTIES TO THE PROCEEDING
AND RULE 29.6 STATEMENT**

The plaintiff below was Lillian Kaplan. After Ms. Kaplan passed away, respondent Sharon Block was substituted as personal representative of her estate.

The defendant below was petitioner R.J. Reynolds Tobacco Company. The complaint also named as defendants Philip Morris USA Inc., Lorillard, Inc., Lorillard Tobacco Company, Liggett Group LLC, and Vector Group, Ltd., but those entities were dismissed before trial and were not parties to the appeal.

Petitioner R.J. Reynolds Tobacco Company is a wholly owned subsidiary of R.J. Reynolds Tobacco Holdings, Inc., which is a wholly owned subsidiary of Reynolds American Inc. ("RAI"), which in turn is an indirect, wholly owned subsidiary of British American Tobacco p.l.c., a publicly held corporation.

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