

No. 22-56052

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**IN THE UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT**

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R.J. REYNOLDS TOBACCO COMPANY; R.J. REYNOLDS VAPOR  
COMPANY; AMERICAN SNUFF COMPANY, LLC; SANTA FE NATURAL  
TOBACCO COMPANY, INC.; MODORAL BRANDS INC.; NEIGHBORHOOD  
MARKET ASSOCIATION, INC.; AND MORIJA LLC DBA VAPIN' THE 619,  
*Plaintiffs-Appellants,*

v.

ROBERT BONTA, IN HIS OFFICIAL CAPACITY AS ATTORNEY GENERAL  
OF CALIFORNIA; AND SUMMER STEPHAN, IN HER OFFICIAL CAPACITY  
AS DISTRICT ATTORNEY FOR THE COUNTY OF SAN DIEGO,  
*Defendants-Appellees.*

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On Appeal from the United States District Court  
for the Southern District of California  
No. 3:22-cv-01755 (Hon. Cathy Ann Bencivengo)

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**APPELLANTS' OPENING BRIEF**

**Action Necessary by November 29, 2022**

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## CORPORATE DISCLOSURE STATEMENT

In compliance with Federal Rule of Appellate Procedure 26.1, Appellants disclose the following:

- Appellant R.J. Reynolds Tobacco Company (“RJRT”) states that RJRT is a direct, wholly owned subsidiary of R.J. Reynolds Tobacco Holdings, Inc.; R.J. Reynolds Tobacco Holdings, Inc. is a direct, wholly owned subsidiary of Reynolds American Inc.; and Reynolds American Inc. is an indirect, wholly owned subsidiary of British American Tobacco, p.l.c., a publicly traded company.
- Appellant R.J. Reynolds Vapor Company (“RJRV”) states that RJRV is a direct, wholly owned subsidiary of RAI Innovations Company; RAI Innovations Company is a direct, wholly owned subsidiary of Reynolds American Inc.; and Reynolds American Inc. is an indirect, wholly owned subsidiary of British American Tobacco, p.l.c., a publicly traded company.
- Appellant American Snuff Company, LLC (“ASC”) states that ASC is a direct, wholly owned subsidiary of Conwood Holdings, Inc.; Conwood Holdings, Inc. is a wholly owned subsidiary of Reynolds American Inc.; and Reynolds American Inc. is an indirect, wholly owned subsidiary of British American Tobacco, p.l.c., a publicly traded company.
- Appellant Santa Fe Natural Tobacco Company (“SFNTC”) states that SFNTC is a direct, wholly owned subsidiary of Reynolds American Inc.; and Reynolds American Inc. is an indirect, wholly owned subsidiary of British American Tobacco, p.l.c., a publicly traded company.
- Appellant Modoral Brands Inc. (“Modoral”) states that Modoral is a subsidiary of RAI Innovations Company; RAI Innovations Company is a direct, wholly owned subsidiary of Reynolds American Inc.; and Reynolds American Inc. is an indirect, wholly owned subsidiary of British American Tobacco, p.l.c., a publicly traded company.
- Appellant Neighborhood Markets Association states that no parent corporation or publicly held corporation owning 10% or more of its stock exists.

- Appellant Morija, LLC dba Vapin' the 619 states that no parent corporation or publicly held corporation owning 10% or more of its stock exists.

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