

**UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
OFFICE OF THE ADMINISTRATIVE LAW JUDGES**

In the Matter of

**Altria Group, Inc.
a corporation,**

and

**Juul Labs, Inc.
a corporation,**

Respondents.

Docket No. 9393

**RESPONDENT JUUL LABS, INC.’S MOTION FOR *IN CAMERA* REVIEW OF
CERTAIN TRIAL EXHIBITS**

Juul Labs, Inc. (“JLI”) respectfully moves under 16 C.F.R. § 3.45 for *in camera* treatment of confidential and competitively sensitive information on the parties’ final proposed exhibit lists. Documents and deposition testimony containing such information are identified in Exhibit 1 and the documents are attached as Exhibit 2. As explained here and in the accompanying declaration of Charles Roberts Robbins, Jr., Chief Growth Officer of JLI (the “Robbins Declaration,” attached as Exhibit 3), the public disclosure of this information “will likely result in a clearly defined, serious injury” to JLI. 16 C.F.R. § 3.45(b).

I. LEGAL STANDARD

Parties to a Rule 3 proceeding may move the Court to “obtain *in camera* treatment for material, or portions thereof, offered into evidence.” 16 C.F.R. § 3.45(b). *In camera* treatment is appropriate if public disclosure of the information is likely to “result in a clearly defined, serious injury to the person, partnership, or corporation requesting *in camera* treatment.” *Id.* “[M]aterial made subject to an *in camera* order will be kept confidential and not placed on the public record of the proceeding in which it was submitted.” 16 C.F.R. § 3.45(a). “Only respondents, their counsel,

authorized Commission personnel, and court personnel concerned with judicial review may have access thereto, provided that the Administrative Law Judge, the Commission and reviewing courts may disclose such *in camera* material to the extent necessary for the proper disposition of the proceeding.” 16 C.F.R. § 3.45(a).

In camera review may be appropriate not just for trade secrets and highly detailed cost data, but also a wide spectrum of ordinary business records “such as customer names, pricing to customers, business costs and profits, as well as business plans, marketing plans, or sales documents.” *In the Matter of 1-800 Contacts, Inc.*, 2017 FTC LEXIS 55, at *5-6 (F.T.C. April 4, 2017). In addition, “sensitive personal information”—like telephone numbers, home addresses, and/or social security numbers—within exhibits warrants *in camera* treatment. *In the Matter of Otto Bock*, 2018 WL 3491602, at *3 (F.T.C. July 2, 2018); 16 C.F.R. § 3.45(b)(3).

II. ARGUMENT

The parties’ final proposed exhibit lists in this case contain voluminous confidential and competitively sensitive material that, if disclosed, would cause serious harm to JLI. Protection is warranted for the documents (or selected portions thereof) in each of the below categories as trade secrets, business records which if disclosed would result in serious competitive injury to JLI, or sensitive personal information. The below chart lists each category of documents for which JLI seeks *in camera* treatment, the paragraph discussing each category in the Robbins Declaration, and the period of time for which JLI requests *in camera* treatment.

Category	Robbins Declaration	Period of Time for <i>In Camera</i> Treatment
Trade Secrets and Product Development	¶ 9	10 years
Financial Data	¶ 10	5 years
Pricing and Pricing Strategy	¶ 11	5 years
Sales and Marketing Strategy	¶ 12	5 years
Regulatory Strategy	¶ 13	5 years
Strategic Initiatives	¶ 14	5 years
Altria Services	¶ 15	5 years
Sensitive Personal Information	¶ 16	Indefinite

A. Trade Secrets and Product Development

The documents in this category meriting *in camera* treatment include information on trade secrets, such as the formulation of JLI’s e-liquid or technical specifications of its current and future products. *See In the Matter of 1-800 Contacts*, 2017 FTC LEXIS 55, at *5 (“Examples of trade secrets meriting indefinite *in camera* treatment include secret formulas, processes, other secret technical information, and information that is privileged.”)

This category also includes details regarding JLI’s product development plans dated from May 1, 2018. This information is competitively sensitive and the disclosure of this otherwise confidential material would allow competitors to copy JLI’s technology, develop commercial strategies designed to undermine JLI’s current products, or devise commercial strategies to better compete with JLI’s future products. Because JLI would experience a clearly defined, serious injury if its trade secrets and product development plans were publicly disclosed, JLI respectfully requests ten years of protection for these documents.

B. Financial Data

The documents in this category meriting *in camera* treatment contain detailed sales, costs, and margin data dated from May 1, 2018. *See In the Matter of 1-800 Contacts*, 2017 FTC LEXIS 55, at *9 (protecting “financial metrics, customer and supplier data, and market growth indicators.”); *see also In the Matter of McWane Inc.*, 2012 FTC LEXIS 143, at *26-27 (F.T.C. Aug. 17, 2012) (protecting “purchase and sales data”).

This financial data is fundamental to JLI’s operations, and because JLI is a privately held company this information is not publicly disclosed. Disclosure of this data would provide competitors and third parties insight into JLI’s financial and commercial performance, including details regarding its margins and profitability, and could be used by competitors of JLI to obtain a competitive advantage. Competitors also could use this confidential financial data to aid their development of strategies related to sales and marketing. For example, having knowledge of JLI’s margins for a particular product could allow a competitor to target JLI’s sales to particular distributors or customers. In addition, access to this data could undermine JLI’s negotiations with its trade partners. Because JLI would experience a clearly defined, serious injury if the financial data in these documents were publicly disclosed, JLI respectfully requests five years of protection for these documents.

C. Pricing and Pricing Strategy

The documents in this category meriting *in camera* treatment contain detailed information, dated after May 1, 2018, on JLI’s prices to its customers, how those prices are determined, and whether, when, and by how much to change prices. *See In the Matter of 1-800 Contacts*, 2017 FTC LEXIS 55, at *11 (protecting documents containing “pricing ... and internal analyses of customer demographics and buying patterns”); *see also In the Matter of McWane Inc.*, 2012 FTC LEXIS 143,

at *7-8 (protecting documents containing “customer data, pricing and cost information, business strategies, and negotiating strategies”).

This pricing information is competitively sensitive and its disclosure would provide JLI’s competitors with insight into JLI’s pricing methods and policies, causing harm to both JLI and potentially to consumers, as JLI’s competitors would have the very information antitrust laws were designed to keep out of competitors’ hands. Disclosure could also harm JLI’s relationships with its customers and undermine JLI’s negotiating positions, resulting in competitive and commercial harm to JLI. Because JLI would experience a clearly defined, serious injury if the information on pricing and pricing strategy in these documents were publicly disclosed, JLI respectfully requests five years of protection for these documents.

D. Sales and Marketing Strategy

The documents in this category meriting *in camera* treatment contain detailed information, dated after May 1, 2018, regarding JLI’s strategy and considerations related to sales and marketing. *See In the Matter of 1-800 Contacts*, 2017 FTC LEXIS 55, at *11 (protecting documents containing “marketing and bidding strategies”).

By way of example, this category includes documents that provide insight on JLI’s commercial planning related to shelf space and marketing with particular retailers. These materials serve as the basis for the formulation of JLI’s business plans, and disclosure of these confidential materials would provide JLI’s competitors with previously unavailable details regarding JLI’s sales and marketing strategies, which they could use in their own negotiations with retailers or as they consider marketing plans to compete with JLI. Disclosure of this information to JLI’s competitors could also harm consumers, as the antitrust laws are designed to prevent competitors from gaining access to this type of information. Moreover, disclosure could undermine JLI’s relationships and negotiating positions with its customers, resulting in competitive and commercial harm to JLI.

Because JLI would experience a clearly defined, serious injury if the information on sales and market strategy in these documents were publicly disclosed, JLI respectfully requests five years of protection for these documents.

E. Regulatory Strategy

The documents in this category reflect JLI's efforts and analyses related to its PMTA filings with the FDA and its interactions with that agency related to the PMTA filing. The documents also contain details regarding clinical and other studies conducted in connection with the PMTA filing. This information is sensitive because it provides direct insight into JLI's regulatory strategy and deliberative process related to its PMTA filing and its interactions with the FDA, JLI's primary regulator. Disclosure of this information could impact JLI's pending PMTA before the FDA, the granting of which is essential to JLI's ability to continue to operate. In addition, providing competitors with insight into this information may give them an unfair advantage over JLI in the PMTA process, resulting in competitive and commercial harm to JLI. Because JLI would experience a clearly defined, serious injury if the information on regulatory strategy in these documents were publicly disclosed, JLI respectfully requests five years of protection for these documents.

F. Strategic Initiatives

The documents in this category meriting *in camera* treatment contain information on strategic initiatives under consideration by JLI since May 1, 2018. *See In re 1-800 Contacts, Inc.*, 2017 FTC LEXIS 55, at *9 (protecting documents including "evaluations of market factors, market risks, company advantages, company disadvantages, and company risks, and which also review future strategic plans"); *see also In the Matter of McWane Inc.*, 2012 FTC LEXIS 143, at *7-8 (protecting documents "which contain . . . business strategies, and negotiating strategies").

These documents reflect consideration by the JLI Board of Directors of potential transactions, consideration of financing options and timing, other strategic initiatives, and contain confidential information regarding the company's strategic direction. Disclosure of this information could result in serious injury to JLI because it would reveal JLI's internal analyses of its business and provide direct insight into the company's deliberative process with respect to strategic initiatives. Moreover, disclosure of this information could undermine JLI's position in future corporate transactions or financing efforts. Because JLI would experience a clearly defined, serious injury if the information on strategic initiatives in these documents were publicly disclosed, JLI respectfully requests five years of protection for these documents.

G. Altria Services

The documents in this category contain detailed pricing and cost information related to commercial services provided to JLI by Altria in connection with Altria's investment in JLI and merit *in camera* treatment. For example, the documents discuss the cost to JLI of the distribution and warehousing services Altria provided and that reduced JLI's distribution costs. This is confidential information regarding JLI's costs, and it would be harmful to JLI's negotiations with other service providers if this information became public. Because JLI would experience a clearly defined, serious injury if the pricing and cost information related to commercial services provided to JLI by Altria in these documents were publicly disclosed, JLI respectfully requests five years of protection for these documents.

H. Sensitive Personal Information

The documents in this category provide details regarding named individuals' compensation, their job performance, or their personal phone numbers. *See In re Otto Bock*, 2018 WL 3491602, at *3; 16 C.F.R. § 3.45(b)(3). Information regarding compensation and job performance is particularly sensitive and its disclosure within JLI is limited to the named individual and those who

need it to perform their job. Disclosure of this material could have the effect of embarrassing the named individuals or impacting their careers, and personal phone numbers need not be disclosed to the public in connection with this case. JLI respectfully requests indefinite protection for these documents.

III. CONCLUSION

Given the serious risk that public disclosure of these materials would cause serious injury to JLI's business or reveal personal identifying information, JLI respectfully requests an *in camera* order to protect the documents from public disclosure.

Dated: May 7, 2021

By: s/ David I. Gelfand

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[PROPOSED] ORDER

Upon consideration of Respondent Juul Labs, Inc.'s ("JLI") Motion for *In Camera* Review of Certain Trial Exhibits, it is hereby

ORDERED, that JLI's motion is GRANTED, and it is further

ORDERED, that pursuant to Rule 3.45(b) of the Federal Trade Commission Rules of Practice, 16 C.F.R. § 3.45(b), the documents identified in Exhibit 1 to the Motion, and any related trial testimony, shall be subject to *in camera* treatment and will be kept confidential and not placed on the public record of this proceeding.

Date: _____

D. Michael Chappell
Chief Administrative Law Judge

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
RX0012 PX0031	Responses and Objections to Complaint Counsel's First Set of Interrogatories to Juul Labs, Inc. 10/16/2020 and Objections to Complaint Counsel's First Set of	10/16/2020	RX0012-001	RX0012-037	Regulatory Strategy; Strategic Initiatives	Pages 009-014; 022-23; 026-030	Five years
RX2001 PX2160	JUUL Response to the Request for Additional Information and Documentary Materials	10/10/2019	RX2001-001	RX2001-006	Pricing and Pricing Strategy; Sales and Marketing Strategy; Regulatory Strategy;	Pages 017-018; 034-040; 041-042; 058-060; 082-098; 100-110	Five years
RX0078 PX7025	Burns JLI Deposition	1/27/2021	RX0078-001	RX0078-267	Sensitive Personal Information	Pages 117:21; 186:16-22; 188:22-	Indefinite
RX0124 PX7039	Robbins JLI Deposition	2/5/2021	RX0124-001	RX0124-228	Pricing and Pricing Strategy	110:2-4; 111:9-12; 111:16; 112:24-25; 113:5-6; 113:11-12; 113:16-17; 113:19-20; 113:22-25; 114:3-	Five years
RX0079 PX7009	Burns JLI IH Deposition	1/23/2020	RX0079-001	RX0079-101	Pricing and Pricing Strategy; Financial Data; Strategic	27:21-28:2; 33:12; 48:13-50:4	Five years
RX0080 PX7024	Crosthwaite Altria/JLI Deposition	1/25/2021	RX0080-001	RX0080-294	Sensitive Personal Information	9:21-22; 39:14-42:15; 59:6; 59:18	Indefinite
RX0114 PX7035	Masoudi JLI Deposition	2/3/2021	RX0114-001	RX0114-132	Sensitive Personal Information; Strategic Initiatives; Privileged Material (PX2508 and PX2511 were clawed back	7:3; 27:11-21; 121:9-11; 121:21-22	Indefinite
RX0121 PX7021	Pritzker JLI Deposition	1/21/2021	RX0121-001	RX0121-224	Strategic Initiatives	25:5-23	Five years
RX0128 PX7032	Valani JLI Deposition	2/1/2021	RX0128-001	RX0128-158	Sensitive Personal Information	82:11; 108: 5; 108:19.	Indefinite

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
RX0129 PX7011	Valani JLI IH Deposition	2/5/2020	RX0129-001	RX0129-084	Strategic Initiatives; Regulatory Strategy	109:14; 109:24-110:5; 182:1.	Five years
RX0084 PX7008	Cullen JLI IH Deposition	1/20/2020	RX0084-001	RX0084-087	Altria Services; Sales and Marketing Strategy; Regulatory Strategy	33:6-17; 36:8-12; 39:12-15; 40:6-8; 46:8-14; 52:10-15; 55:7-10; 59:13-17; 60:14-15; 61:12-19; 62:1, 8-15, 19-23; 63:5-6; 65:8-9; 67:11-20; 68:14-25; 69:2-14, 18-24; 70:3-24; 71:8-13; 72:21-25; 73:12-13, 17-20; 74:3-23; 91:13-25; 93:23-25; 94:1-2; 95:8-11; 96:13-22; 103:24-25; 104:1; 108:9-14; 111:1-7; 112:1-5, 12-16; 113:7-12; 114:6-11; 115:21-23; 119:7-9, 20-25; 120:4-8; 121:17-25; 122:1-25;	Five years
RX0088 PX7005	Danaher JLI IH Deposition	12/10/2019	RX0088-001	RX0088-088	Sensitive Personal Information; Strategic Initiatives	159:7-19; 160:2-12; 192:3-20; 206:13-14	Indefinite

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
RX0116 PX7027	Murillo Altria Deposition	1/22/2021	RX0116-001	RX0116-210	Sensitive Personal Information; Altria Services; Regulatory Strategy	26:2; 73:22; 79:6-11; 85:21-25; 86:1-25; 90:15-19; 91:7-12, 16-25; 92:1-17; 93:23-25; 94:25; 95:1-17; 98:7-11;	Indefinite
RX1986	US Country Review Deck - June 2019	6/1/2019	RX1986-001	RX1986-114	Pricing and Price Strategy; Sales and Marketing Strategy;	All pages	Five years
RX1985	US Country Review Deck - April 2019	4/1/2019	RX1985-001	RX1985-105	Pricing and Price Strategy; Sales and Marketing Strategy;	All pages	Five years
PX0009	Document: JUUL Narrative Response	12/06/2019	PX0009-001	PX0009-026	Sensitive Personal Information	Pages 7-25	Indefinite
PX2005	Email from Eric Omwega to Kevin Burns, Tim Danaher, Mark Ginn, et al. re: Altria w/Attach: 20180517 Altria Threat	05/17/2018	JLIFTC00634479	JLIFTC0063449 8	Altria Services	Pages 3-10, 12-19	Five years
PX2017	Email from William Herbert to Anjuli Droll re: Please print 3 copies of each doc w/Attach: JUUL Investor Presentation - 03.12.18.pdf; Presentation Script (v1.2 3.12.17).docx; Investor FAQ (v1.2 3.12.18).docx	03/12/2018	JLIFTC01615968	JLIFTC0161602 1	Financial Data	Page 28	Five years
PX2024	Email from Nicholas Pritzker to Howard Willard, William Gifford, Riaz Valani, et al. re: Meet?	08/15/2018	JLIFTC00621811	JLIFTC0062181 2	Sensitive Personal Information	Page 2	Indefinite

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX2025	Email from Kevin Burns to Nicholas Pritzker, Riaz Valani re: meet?	08/15/2018	JLIFTC00621819	JLIFTC00621820	Sensitive Personal Information	Page 2	Indefinite
PX2035	Notes: PMTA	00/00/0000	JLIFTC00149380	JLIFTC00149383	Regulatory Strategy	All pages	Five years
PX2051	McKinsey & Company Document: JUUL Core team working session	06/22/2018	JLIFTC00552624	JLIFTC00552624	Financial Data; Sales and Marketing Strategy	Pages 6-10, 16-23, 26-28	Five years
PX2056	JUUL Spreadsheet: Market Share	00/00/0000	JLIFTC00203274	JLIFTC00203275	Pricing and Price Strategy	All pages	Five years
PX2059	Juul Presentation: BoD Discussion	07/26/2018	JLIFTC01619829	JLIFTC01619845	Financial Data	Pages 11-12, 19	Five years
PX2060	Juul Presentation: Confidential Private Placement Memorandum	8/00/2018	JLIFTC01621248	JLIFTC01621249	Financial Data; Sales and Marketing Strategy	Pages 40, 67, 69-70, 72-74, 85	Five years
PX2061	Juul Document: Confidential Information Memorandum	10/00/2018	JLIFTC01786442	JLIFTC01786550	Financial Data	Page 44	Five years
PX2067	Email from William Herbert to Tim Danaher re: Investor Presentation w/Attach: JUUL Investor Presentation - 03.13.18.pdf	03/14/2018	JLIFTC00798264	JLIFTC00798295	Financial Data	Page 28	Five years
PX2068	Email from Jeffrey Gordon to Fax Herbert, Tim Danaher re: Delaware Life IC Questions	06/11/2019	JLIFTC02082584	JLIFTC02082586	Sensitive Personal Information; Financial Data	Pages 1-3	Indefinite (Page 1); Five years (Pages 2-3)
PX2070	Email from Tim Danaher to Tim Danaher re: Notes for leadership call	06/12/2019	JLIFTC02082597	JLIFTC02082598	Financial Data	All pages	Five years
PX2071	Email from Fax Herbert to Tim Danaher re: Bullets	06/20/2019	JLIFTC02082656	JLIFTC02082657	Financial Data	All pages	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX2074	Email from Tim Danaher to Emre Eler, Keith Canton re: JPM and JUUL: EL	06/07/2019	JLIFTC02085135	JLIFTC02085139	Financial Data	All pages	Five years
PX2098	Email from Sean Hazlett to Tim Danaher, Joseph Schmidt re: 4Q18 Earnings and Altria Services Agreement Documents for Tomorrow's Meeting w/Attach: JUUL 4Q18 Earnings Script V21 020619.docx; JUUL 4Q18	02/07/2019	JLIFTC00158250	JLIFTC00158283	Financial Data	Page 13	Five years
PX2104	Email from Tim Danaher to Kevin Burns re: Call tomorrow. w/Attach: 04.19.18_final	04/20/2018	JLIFTC00169901	JLIFTC00169906	Financial Data	Pages 3-4	Five years
PX2117	Email from Mark Jones to Tim Danaher re: Completed: Please DocuSign: 22. JUUL Labs Board Minutes (28OCT2018).docx; 21. JUUL Labs Board Minutes (1... w/Attach: 1. _JUUL_Labs_Board_Minut	11/08/2018	JLIFTC00775638	JLIFTC00775704	Strategic Initiatives	Pages 9, 32	Five years
PX2127	Email from Tim Danaher to Kevin Crosthwaite re: JUUL Labs: BOD Materials w/Attach: 190425_April_BOD_vPreread.pdf	04/22/2019	JLIFTC02082131	JLIFTC02082193	Financial Data; Strategic Initiatives; Trade Secrets and Product Development; Altria Services	Pages 5-8, 11-17, 19-20, 22-27, 38-41, 44, 47, 48-50, 51	Five years (Pages 5-8, 11-17, 19-20, 44, 47, 51); Ten years (Pages 22-27, 48-50)

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX2142	Document: 4(c)-1 Project Tree Board of Directors Meeting Presentation	12/19/2018	PX2142-001	PX2142-001	Financial Data	Pages 6, 45-47, 64, 67, 70-81	Five years
PX2155	Email from William Herbert to Tim Danaher, Vittal Kadapakkam re: Mgmt Presentation & Script w/Attach: JUUL Investor Presentation - 03.13.18.pdf; Presentation Script (v2.2)	03/13/2018	JLIFTC00518656	JLIFTC00518690	Financial Data	Pages 15, 27	Five years
PX2157	Email from Tim Danaher to Emre Eler re: Draft Materials w/Attach: JUUL Investor Presentation 5.22.2018 (v6).pdf; JUUL- Model Update - vF.pdf; JUUL Teaser_JPM.pdf; JUUL	05/27/2018	JLIFTC00791399	JLIFTC00791448	Financial Data	Pages 15, 29, 37-40, 43-45	Five years
PX2177	Email from Lou Stefanski to Craig Brommers, Ann Hoey, Harsh Tiwari, et al. re: Global Marketing US Altria - Weekly Campaign Overview (06-14-2019) w/Attach: Global Marketing US Altria - Weekly Campaign Overview (06-14-2019).pdf	06/14/2019	JLIFTC02044958	JLIFTC02044963	Altria Services	Page 4	Five years
PX2180	Email from Tim Danaher to Kevin Burns re: Financials for BOD with August actuals w/Attach: 18-09-24 JUUL Aug YTD and 2018 forecast BoD.pdf; JUUL BOD MD&A	09/27/2018	JLIFTC00045164	JLIFTC00045168	Financial Data	Pages 2-5	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX2186	Email from tableau.reporting@juul.com to flash_report_emea@juul re: Flash Report - EMEA, 03/14/2019 w/Attach: Flash_Report_-_EMEA-2019-03-13.pdf; CHE ExecutiveSummary-2019-03-	03/13/2019	JLIFTC00067807	JLIFTC00067842	Financial Data	All pages	Five years
PX2188	Email from Aman Rangrass to CJ Watson, Jacob Turner, Alex Cantwell, et al. re: Prep for tomorrow's workshop on fixtures w/Attach: 20190122 1930 Fixtures workshop_v9.pdf	01/21/2019	JLIFTC00386116	JLIFTC00386135	Sales and Marketing Strategy; Altria Services	Pages 7, 10, 11, 12, 14, 16, 18	Five years
PX2189	Email from Ryan Durham to Alex Cantwell, Aman Rangrass re: Documents for AGDC interaction discussion w/Attach: 20190301 Commercial Route to	03/04/2019	JLIFTC00667731	JLIFTC00667820	Altria Services; Sales and Marketing Straetgy	Page 6, 12-13, 18-20, 22, 34-35, 38, 40, 83, 85	Five years
PX2193	Email from Jared Fix to Jed Cullen re: ASA w/Attach: ASA - Regulatory Affairs Decision Deck - DRAFT ACP-WP.pdf	03/11/2019	JLIFTC00721158	JLIFTC00721169	Regulatory Strategy	All pages	Five years
PX2196	Email from Peter Hagstrom to Evan Price, Nelson Baltazar re: Input Requested by Monday - SC All Hands Deck	03/15/2019	JLIFTC01778284	JLIFTC01778285	Altria Services	Page 1	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX2208	Email from Brian An to Jared Fix, Aman Rangrass, Jed Cullen re: Altria services cost summary w/Attach: Altria Services Agreement Master Tracker 8.9.2019.pdf	08/10/2019	JLIFTC02253920	JLIFTC02253922	Altria Services	Page 3	Five years
PX2213	JUUL Spreadsheet: DCLAltriaShipped Order Items,093019.xlsx	10/01/2019	JLIFTC02318467	JLIFTC02318467	Altria Services	All pages	Five years
PX2220	Email from Nelson Baltazar to Brian An, David Dickey, Jed Cullen, et al. re: Altria Services	08/07/2019	JLIFTC02246866	JLIFTC02246885	Altria Services	Page 1, 5, 9, 11, 14, 16, 18-19	Five years
PX2225	Email from Bob Robbins to Kate Morgan, Joseph Lunn, Jacob Turner, et al. re: inserts	02/01/2019	JLIFTC00728663	JLIFTC00728665	Altria Services	Pages 1-2	Five years
PX2226	Email from Jed Cullen to Alex Cantwell, Brian An, Marc Batchan, et al. re: Fixture Services 2020E+ Budget	04/22/2019	JLIFTC02244336	JLIFTC02244337	Altria Services	All pages	Five years
PX2229	Email from Victor Tsai to Jared Fix re: Prep for Services Review w/Attach: 20190729_AGDC_Sales & Marketing Services Review_v1 O. pdf; 20190729_AGDC_INTERNAL ONLY_Services Review_v1 O.pdf; 20190729_AGDC_INTERNAL	07/24/2019	JLIFTC02062200	JLIFTC02062232	Altria Services	Pages 1, 2, 4, 8, 14, 16, 27, 28, 30, 41, 42, 44, 46, 50, 56, 58	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX2232	Email from Ann Hoey to Kevin Burns, Joe Lunn, Aaron Schildkrout, et al. re: Altria - Marketing Workback Plan Summary w/Attach: Marketing Slides for 3.4.19	03/04/2019	JLIFTC00071058	JLIFTC00071072	Altria Services	Pages 12, 14-15	Five years
PX2235	Email from Brian Sloan to Exec Team, Sid Breja, Sean Hazlett re: Final board deck for presentation w/Attach: BOD Materials (2019.01.31)_Presentation Draft 013019 vFINAL	01/30/2019	JLIFTC00660718	JLIFTC00660822	Financial Data; Regulatory Strategy; Trade Secrets and Product Development	Pages 8, 10-15, 24-25, 46, 46-50, 56-61, 64	Five years (Pages 5, 7-8, 10-11, 12-15, 24-25, 36, 46-50, 64); Ten years (Pages 56-61)
PX2238	Email from Jared Fix to board fwd@juul.com, Jason Schneider, Kevin Crosthwaite re: July MOR w/Attach: MOR July vFinal.pdf	09/08/2019	JLIFTC00000002	JLIFTC00000028	Financial Data; Strategic Initiatives	Pages 3, 5, 7, 8, 9, 15-25	Five years
PX2243	Email from Tim Danaher to Riaz Valani, Zach Frankel, Kevin Crosthwaite, et al. re: JUUL Labs Compensation Committee: UWC approval of 08/26/2019 minutes and CoAcceleration for Monika Fahlbusch w/Attach: [multiple attachments]	09/10/2019	JLIFTC00003404	JLIFTC00003603	Sensitive Personal Information	All pages	Indefinite

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX2252	Email from Charlie Guenther to marc@juul.com, afaust@juul.com, Michelle Hsiao, et al. re: Invitation: Consumer pricing regroup @ Wed May 30, 2018 8am - 9am (PDT) (charlie_guenther@mckinsey.com) w/Attach: JUUL -	05/30/2018	JLIFTC00878562	JLIFTC00878650	Pricing and Pricing Strategy	All pages	Five years
PX2258	Email from Jamin Agosti to Lisa Stanton, Jonathan Chou, Alex Tinucci, et al. re: Project Tree - Darsana - Paperwork and Wire Process w/Attach: clean.zip;	12/20/2018	JLIFTC00929159	JLIFTC00929777	Financial Data	All pages	Five years
PX2262	Email from Tim Danaher to Bob Robbins; Kevin Burns, Jerry Masoudi, et al. re: Project Tree: Richard commercial items discussion	12/14/2018	JLIFTC00605098	JLIFTC00605099	Altria Services	Page 1	Five years
PX2264	Email from Vittal Kadapakkam to Tim Danaher, Zach Frankel, Chirag Patel, et al. re: Distribution Model w/Attach: Project Tree Cash	12/16/2018	JLIFTC00927309	JLIFTC00927313	Sensitive Personal Information	All pages	Indefinite

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX2265	Email from Tim Danaher to Hardeep Singh, Jeffrey Gordon, Jonathan Fraser, et al. re: Diligence Meeting w/Attach: 18-12-11 JUUL - Cash Analysis_final.pdf; Comp Deck - Project Tree	12/14/2018	JLIFTC00927407	JLIFTC00927485	Sensitive Personal Information; Financial Data; Strategic Initiatives	Pages 5-11, 13-18, 18-24, 25	Five years (Pages 5-11, 13-18, 25); Indefinite (Pages 18-24)
PX2266	Email from Chirag Patel to Fax Herbert, Vittal Kadapakkam re: Latest model w/Attach: Project Tree Cash	12/19/2018	JLIFTC00928464	JLIFTC00928466	Sensitive Personal Information	All pages	Indefinite
PX2267	Email from Bob Robbins to Theodore Edlich, Kevin Crosthwaite, Jerry Masoudi, et al. re: Tree commercial services agreement w/Attach: Tree - Services Term Sheet (Execution).docx	12/19/2018	JLIFTC01097795	JLIFTC01097799	Altria Services	All pages	Five years
PX2276	Email from Tim Danaher to Kevin Burns, Vittal Kadapakkam re: Nielsen stats and concepts w/Attach: 10-01-09 Nielsen Tobacco All Channel Report Period Ending.pdf; 18-07-24 JUUL Nielsen Data File.xlsx	08/18/2018	JLIFTC00412294	JLIFTC00412311	Strategic Initiatives	Page 1	Five years
PX2278	Email from Elizabeth Becker to Elizabeth Copeland, William Gardner, Ryan Black, et al. re: Questions for McKeganey	10/29/2019	JLIFTC-LIT00014988	JLIFTC-LIT00014989	Regulatory Strategy	All pages	Five years
PX2281	Email from Joe Murillo to Elizabeth Copeland re: C1 Device - FYI	10/30/2019	JLIFTC-LIT00015152	JLIFTC-LIT00015152	Regulatory Strategy	All pages	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX2305	Email from Howard Willard to Nicholas Pritzker re: Talk?	07/28/2018	JLIFTC_NP_001174	JLIFTC_NP_001174	Sensitive Personal Information	Page 1	Indefinite
PX2327	Email from Vittal Kadapakkam to Nicholas Pritzker, Vittal Kadapakkam, Riaz Valani,	02/01/2018	JLIFTC_NP_000001	JLIFTC_NP_000001	Sensitive Personal Information	All pages	Indefinite
PX2328	Email from Kevin Burns to Nicholas Pritzker, Kevin Burns and Riaz Valani re: <no subject>	10/25/2018	JLIFTC_NP_001463	JLIFTC_NP_001463	Sensitive Personal Information	All pages	Indefinite
PX2335	Email from Bob Robbins to Kevin Burns re: 181217 store reset cost estimate wav 1.xlsx w/Attach: 181217 store reset cost estimate	12/17/2018	JLIFTC00036187	JLIFTC00036188	Altria Services; Sales and Market Strategy; Financial Data	All pages	Five years
PX2343	Email from Eric Omwega to Kevin Burns re: 2019 BDF Discussion Document w/Attach: 20180601 BDF Proposal for 2019_vF.pdf	06/01/2018	JLIFTC00054387	JLIFTC00054410	Sales and Marketing Strategy	All pages	Five years
PX2351	Email from Nicole LaFlamme to Kevin Burns re: Your PROJECT TREE Agreement w/Attach: Kevin Burns - Agreement (1).docx (1).pdf	12/21/2018	JLIFTC00080474	JLIFTC00080476	Sensitive Personal Information	All pages	Indefinite
PX2357	Email from Riaz Valani to Riaz Valani, Nicholas Pritzker, Zach Frankel, et al. re:	11/28/2018	JLIFTC_RV_001032	JLIFTC_RV_001032	Sensitive Personal Information	All pages	Indefinite

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX2358	Email from Rudy Lawrence to Jiteender Manik, Kirk Phelps, David Foster, et al. re: Competitive Advantage Discussion w/ Kevin	05/17/2019	JLIFTC-LIT00844465	JLIFTC-LIT00844467	Altria Services	All pages	Five years
PX2365	Email from Stebbin Rinehart to Alex Cantwell, Brad Ferkol, Candy Tans, et al. re: 7/1 I Consumables Exec Weekly Update w/Attach: Consumables Weekly Dashboard 19-0701.pdf	07/01/2019	JLIFTC-LIT00867596	JLIFTC-LIT00867614	Trade Secrets and Product Development	All pages	Ten years
PX2367	Email from Joanna Engelke to Kevin Burns, Jared Fix, Healy Oppenheimer, et al. re: PMTA tracker slides - work in process for review/feedback w/Attach: 190717 PMTA	07/18/2019	JLIFTC-LIT00867676	JLIFTC-LIT00867677	Regulatory Strategy	All pages	Five years
PX2368	Email from Joanna Engelke to Kevin Burns, Ashley Gould, Josh Vose, et al. re: PMTA Presentation for Review Monday w/Attach: 190719 Board	07/21/2019	JLIFTC-LIT00867678	JLIFTC-LIT00867679	Regulatory Strategy	All pages	Five years
PX2369	Email from Jared Fix to board-fwd@juul.com, Jason Schneider, Jerry Masoudi, et al. re: Document for tomorrow's M&A call w/Attach: 190618 - BoD M&A Approval.pdf	06/19/2019	JLIFTC-LIT00867694	JLIFTC-LIT00867709	Strategic Initiatives	All pages	Five years
PX2371	Email from Kevin Burns to Kevin Crosthwaite re: Regulatory guidance on JUUL proposed inhalation studies	08/08/2019	JLIFTC-LIT00867805	JLIFTC-LIT00867807	Regulatory Strategy	All pages	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX2372	Email from Tim Danaher to Bob Robbins, Kevin Burns and Jerry Masoudi re: Note to BOD on price reduction rationale, strategy and estimated impact w/Attach: 20190827_2019 Americas	08/29/2019	JLIFTC-LIT00867924	JLIFTC-LIT00867957	Pricing and Pricing Strategy; Sales and Marketing Strategies	Pages 3, 6-10, 11-15, 18, 21-25, 26-30	Five years
PX2374	Email from Willie McKinney to Kevin Burns, Jerry Masoudi and Joanna Engelke re: Altria Considerations for PMTA Filing Strategy w/Attach: Final_PreRead_ALCS Considerations for Establishing Filing Strategy_for JUUL	09/19/2019	JLIFTC-LIT00868141	JLIFTC-LIT00868142	Regulatory Strategy	All pages	Five years
PX2378	Email from William Wright to Joseph O'Hara, Ramsey Atallah and David Cook re: combustible nic content in aerosol	05/29/2018	JLIFTC01481132	JLIFTC01481138	Trade Secrets and Product Development	All pages	Ten years
PX2379	Document: Re our pod strength	00/00/0000	JLIFTC01481133	JLIFTC01481138	Trade Secrets and Product	All pages	Ten years
PX2384	Email from Nina Mottolese re: Invitation: Dinyar Devitre; Riaz Valani & Harry Clark lunch @ Thu Dec 2018 1pm - 2pm (EST)	12/06/2018	JLIFTC_RV_000045	JLIFTC_RV_000046	Sensitive Personal Information	Page 1	Indefinite
PX2401	Email from Nicholas Pritzker to Howard Willard and Riaz Valani re: Talk?	08/07/2018	JLIFTC_RV_000270	JLIFTC_RV_000270	Sensitive Personal Information	Page 1	Indefinite

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX2407	Email from Riaz Valani to Nina Mottolese re: Updated invitation: Dinyar Devitre; Riaz Valani & Harry Clark lunch @ Wed Dec 5; 2018 12pm - 1pm (EST) (rvalani@gacapital.com)	11/27/2018	JLIFTC_RV_000418	JLIFTC_RV_000419	Sensitive Personal Information	All pages	Indefinite
PX2408	iMessage Archives\2018-08-26	08/22/2018	JLIFTC_RV_000435	JLIFTC_RV_000438	Sensitive Personal Information	All pages	Indefinite
PX2409	iMessage Archives\2018-09-06	09/05/2018	JLIFTC_RV_000439	JLIFTC_RV_000440	Sensitive Personal Information	All pages	Indefinite
PX2410	iMessage Archives\2018-10-24	10/24/2018	JLIFTC_RV_000442	JLIFTC_RV_000444	Sensitive Personal Information	All pages	Indefinite
PX2411	iMessage Archives\2018-11-01	10/28/2018	JLIFTC_RV_000447	JLIFTC_RV_000449	Sensitive Personal Information	All pages	Indefinite
PX2412	iMessage Archives\2018-11-01	10/28/2018	JLIFTC_RV_000450	JLIFTC_RV_000451	Sensitive Personal Information	All pages	Indefinite
PX2413	iMessage Archives\2018-11-26	11/26/2018	JLIFTC_RV_000452	JLIFTC_RV_000453	Sensitive Personal Information	All pages	Indefinite
PX2418	Email from Riaz Valani to Riaz Valani, Matt and Kevin Burns re: [Chat #11302]	12/05/2018	JLIFTC_RV_000754	JLIFTC_RV_000754	Sensitive Personal Information	All pages	Indefinite
PX2419	Email from Hank Handelsman to Riaz Valani, Isaac Pritzker, Nick Pritzker, et al. re:	06/03/2018	JLIFTC_RV_000760	JLIFTC_RV_000760	Sensitive Personal Information	All pages	Indefinite
PX2420	Email from Dinyar Devitre to Riaz Valani re: [Chat #16728]	10/29/2018	JLIFTC_RV_000782	JLIFTC_RV_000782	Sensitive Personal Information	All pages	Indefinite
PX2421	Email from Dinyar Devitre to Riaz Valani re: [Chat #16730]	10/30/2018	JLIFTC_RV_000784	JLIFTC_RV_000784	Sensitive Personal Information	All pages	Indefinite

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX2422	Email from Riaz Valani to Riaz Valani and Dinyar Devitre re: [Chat #16731]	10/30/2018	JLIFTC_RV_000785	JLIFTC_RV_000785	Sensitive Personal Information	All pages	Indefinite
PX2423	Email from Riaz Valani to Riaz Valani re: [Chat #16770]	12/05/2018	JLIFTC_RV_000812	JLIFTC_RV_000812	Sensitive Personal Information	All pages	Indefinite
PX2425	Email from Kevin Burns to Riaz Valani and Nick Pritzker re: [Chat #18768]	11/16/2018	JLIFTC_RV_000837	JLIFTC_RV_000837	Sensitive Personal Information	All pages	Indefinite
PX2426	Text message from Riaz Valani to Peter Gross re:	12/13/2018	JLIFTC_RV_000856	JLIFTC_RV_000856	Sensitive Personal Information	All pages	Indefinite
PX2427	Text message from Riaz Valani to Peter Gross re:	11/29/2018	JLIFTC_RV_000858	JLIFTC_RV_000858	Sensitive Personal Information	All pages	Indefinite
PX2428	Text message from Peter Gross to Riaz Valani re: [SMS	11/28/2018	JLIFTC_RV_000860	JLIFTC_RV_000860	Sensitive Personal Information	All pages	Indefinite
PX2429	Text message from Riaz Valani to Peter Gross re:	11/28/2018	JLIFTC_RV_000861	JLIFTC_RV_000861	Sensitive Personal Information	All pages	Indefinite
PX2430	Calendar Entry: re: Project Tree - Antitrust w/Attach: CalendarEntry_#1067.ics	12/13/2018	JLIFTC_RV_000864	JLIFTC_RV_000865	Sensitive Personal Information	Page 1	Indefinite
PX2431	Calendar Entry: re: Invitation: Call w/David Wise, Altria @ Tue Nov 27; 2018 9am - 9:30am (PST)	11/27/2018	JLIFTC_RV_000873	JLIFTC_RV_000875	Sensitive Personal Information	Page 1	Indefinite
PX2432	Calendar Entry: re: Project Richard	10/25/2018	JLIFTC_RV_000886	JLIFTC_RV_000887	Sensitive Personal Information	Page 1	Indefinite
PX2433	Calendar Entry: re: Project Richard Call re Issues list	10/19/2018	JLIFTC_RV_000888	JLIFTC_RV_000889	Sensitive Personal Information	Page 1	Indefinite
PX2435	Text message from Bruce Gates to Riaz Valani and Bruce Gates re: [Chat	01/14/2020	JLIFTC_RV_000949	JLIFTC_RV_000949	Sensitive Personal Information	All pages	Indefinite

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX2436	Email from Riaz Valani to Riaz Valani, Nick Pritzker, Zach Frankel, et al. re: [Chat #35442]	11/28/2018	JLIFTC_RV_001029	JLIFTC_RV_001029	Sensitive Personal Information	All pages	Indefinite
PX2437	Email from Riaz Valani to Riaz Valani, Nick Pritzker, Zach Frankel et al. re: [Chat #35447]	11/29/2018	JLIFTC_RV_001033	JLIFTC_RV_001033	Sensitive Personal Information	All pages	Indefinite
PX2438	Email from Dinyar Devitre to Riaz Valani re: [Chat #44703]	12/10/2018	JLIFTC_RV_001144	JLIFTC_RV_001144	Sensitive Personal Information	All pages	Indefinite
PX2439	Email from Riaz Valani to Riaz Valani, Adam Bowen and Janie Monsees re: [Chat #26500]	01/10/2020	JLIFTC_RV_001248	JLIFTC_RV_001249	Sensitive Personal Information	All pages	Indefinite
PX2440	Email from Riaz Valani to Zach Frankel, K.C. Crosthwaite, Nick Pritzker, et al. re:	01/21/2020	JLIFTC_RV_001259	JLIFTC_RV_001259	Sensitive Personal Information	All pages	Indefinite
PX2469	JUUL Presentation: M&A Decisions Appendix - Project Zest	06/25/2019	JLIFTC-LIT00870991	JLIFTC-LIT00871027	Strategic Initiatives	All pages	Five years
PX2474	Email from Bob Robbins to Kevin Burns re: [StratFin I Street Research] Tobacco - MO Announces Cig List Price Increases -	09/19/2018	JLIFTC00044323	JLIFTC00044324	Pricing and Pricing Strategy	Page 1	Five years
PX2486	Email from Aman Rangrass to Marc Batchan, Alex Cantwell, Jacob Turner et al. re: Pricing materials for check-in with Kevin w/Attach: JUUL - Pricing Check-in -	06/04/2018	JLIFTC00557570	JLIFTC00557644	Pricing and Pricing Strategy; Financial Data	Pages 4, 6-9, 13-15, 18-24, 27-29, 35, 38	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX2526	Email from Sean Hazlett to Tim Danaher re: Marianas info request - Juul w/Attach: JUUL Marianas Request 120418.pdf	12/03/2018	JLIFTC00160470	JLIFTC00160481	Financial Data; Strategic Initiatives	Pages 6, 10-12	Five years
PX2534	Confidential Declaration of Tim Danaher	10/26/2018	JLIFTC00865621	JLIFTC00865652	Trade Secrets and Product Development; Financial Data	Pages 15, 20, 21, 26, 28-31	Five years (Pages 20, 21, 26, 28-31); Ten years (Page 15)
PX2536	Email from Tim Danaher to Jerry Masoudi re: Distribution Details w/Attach: Comp Deck - Project Tree	12/14/2018	JLIFTC-LIT00937156	JLIFTC-LIT00937170	Sensitive Personal Information; Strategic Initiatives	Pages 3-8, 9-13, 14-15	Indefinite (Pages 9-13); Five years (Pages 3-8, 14-15)
PX2537	Document: Phone Records	00/00/0000	JLIFTC-LIT00976878	JLIFTC-LIT00976879	Sensitive Personal Information	All pages	Indefinite
PX2538	Document: Phone Records	00/00/0000	JLIFTC-LIT00976885	JLIFTC-LIT00976886	Sensitive Personal Information	All pages	Indefinite
PX2539	Document: Phone Records	00/00/0000	JLIFTC-LIT00976890	JLIFTC-LIT00976890	Sensitive Personal Information	All pages	Indefinite
PX2540	Document: Phone Records	00/00/0000	JLIFTC-LIT00976897	JLIFTC-LIT00976898	Sensitive Personal Information	All pages	Indefinite
PX2558	Email from Howard Willard to Nicholas Pritzker; Howard Willard	10/11/2018	JLIFTC_NP_001412	JLIFTC_NP_001412	Sensitive Personal Information	All pages	Indefinite
PX2566	Burns Call Log	01/21/2021	JLIFTC-LIT00868527	JLIFT-LIT00868527	Sensitive Personal Information	All pages	Indefinite
PX2594	Juul Presentation: Steam MRD	7/00/2018	JLIFTC00154304	JLIFTC00154304	Trade Secrets and Product Development; Pricing and Pricing	All pages	Ten years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX2598	Email from Fax Herbert to Vittal Kadapakkam re: Darsana Investor Meeting Agenda w/Attach: Cohort Analysis v6.pdf; Darsana-D1_Diligence_list.xlsx - D1 Diligence.pdf; Diligence Response 5.29.18.pdf; JUUL-Forecast Contextualization - v7.pdf; JUUL-Model Upd	05/30/2018	JLIFTC00513558	JLIFTC00513655	Financial Data; Regulatory Strategy	Pages 22-26, 29-33, 34, 36-38, 72-73, 79-88	Five years
PX2599	Email from jacob@juul.com to Kevin Burns re: Latest BOD Materials w/Attach: BOD Materials (2018.05.08)_v13.pdf	05/06/2018	JLIFTC00634879	JLIFTC00634933	Sensitive Personal Information; Financial Data; Strategic Initiatives; Trade Secrets and Product	Pages 6, 32-35, 38-40, 42-44, 51-55	Indefinite (Page 6); Five years (Pages 32-35, 38-40, 51-55); Ten years (Pages 42-44)
PX2615	Spreadsheet: Steam design model v3	05/14/2018	JLIFTC00153798	JLIFTC00153798	Trade Secrets and Product Development; Sales	All pages	Ten years
PX2619	Document: Standard Operating Procedure for Preparation of In-House Menthol Sal	10/26/2017	JLIFTC01275131	JLIFTC01275134	Trade Secrets and Product Development	All pages	Ten years
PX4373	Crosthwaite RFP 19 Log	01/15/2021	PX4373-001	PX4373-001	Sensitive Personal	All pages	Indefinite
RX1403	Email from K. Burns to N. Pritzker, et al. re: Decks - Richard and Bob attaching	06/11/2018	JLIFTC_NP_001068	JLIFTC_NP_001093	Financial Data	Pages 20, 22, 24-26	Five years
RX1409	Email from N. Pritzker to H. Willard re: {Unverified} Call tomorrow 3ET	12/14/2018	JLIFTC NP 002100	JLIFTC NP 002100	Sensitive Personal Information	All pages	Indefinite

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
RX1412	SMS messages between N. Pritzker and M. Stad	12/20/2018	JLIFTC_NP_002320	JLIFTC_NP_002320	Sensitive Personal Information	All pages	Indefinite
RX1415	October 2018 R. Valani Text Messages	10/24/2018	JLIFTC RV 000442	JLIFTC RV 000444	Sensitive Personal Information	All pages	Indefinite
RX1416	Chat #16771 between D. Devitre and R. Valani	12/10/2018	JLIFTC RV 000813	JLIFTC RV 000813	Sensitive Personal Information	All pages	Indefinite
RX1417	Chat #16782 between D. Devitre and R. Valani	12/17/2018	JLIFTC RV 000820	JLIFTC RV 000820	Sensitive Personal Information	All pages	Indefinite
RX1418	SMS messages between R. Valani and P. Gross	12/13/2018	JLIFTC RV 000856	JLIFTC RV 000856	Sensitive Personal Information	All pages	Indefinite
RX1419	JUUL US Revenue Review (2019)	01/25/2019	JLIFTC00018177	JLIFTC00018220	Financial Data; Altria Services	Pages 4-5, 7, 9, 20, 33-36, 45-46	Five years
RX1426	Email from B. Robbins to K. Burns re: FW: [StratFin Street Research] Tobacco - MO Announces Cig List Price Increases - Marlboro Prices Going Up \$0.10/Pack	09/19/2018	JLIFTC00044323	JLIFTC00044324	Pricing and Pricing Strategy	Page 1	Five years
RX1428	Email from E. Omwega to K. Burns et al. re: 2019 BDF Discussion Document				Altria Services; Sales and Marketing	All pages	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
RX1438	Email from K. Heidenreich to J. Turner et al. re: Documents for send-out, attaching 20190130 BDF Working Session v9.xlsx, 20190130 Commercial workshop_fixture briefing v5.pdf, 20190130 Commercial workshop_fixture briefing v5.pptx, Microsoft_Excel_Worksheet 12.xlsx, Microsoft_Excel_Worksheet 13.xlsx, Microsoft_Excel_Worksheet 2.xlsx, Microsoft_Excel_Worksheet 3.xlsx, Microsoft_Excel_Worksheet 4.xlsx, Microsoft_Excel_Worksheet 5.xlsx, Microsoft_Excel_Worksheet 6.xlsx, Microsoft_Excel_Worksheet 11.xlsx,	01/30/2019	JLIFTC00083186	JLIFTC00083235	Financial Data	Pages 1, 4-7, 9-18, 20, 22-24, 29-32, 35-37, 39-44, 46-50, 55-58	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
RX1439	Email from A. Cantwell to S. Patrick re: Fwd: *** Sales Alert *** Maroon Device Kit Limited Edition, attaching 20180921_2000ET_Ordering Guide - Maroon Included Distributor - Pre-11-1 Price, 848 DK Packing.pdf, 20180921_1900ET_Ordering	10/23/2018	JLIFTC00089804	JLIFTC00089811	Pricing and Pricing Strategy	All pages	Five years
RX1440	Email from A. Cantwell to M. Walter re:Fwd: BDF planning, attaching Chain BDF Structure.xlsx and Chain BDF	09/28/2018	JLIFTC00092799	JLIFTC00092803	Sales and Marketing Strategy	All pages	Five years
RX1447	Email from F. Herbert to T. Danaher et al. re: Sales & Marketing Presentation - Final, attaching Sales	11/14/2018	JLIFTC00264504	JLIFTC00264531	Sales and Marketing Strategy	All pages	Five years
RX1454	Email from M. Batchan to K. Cooke et al. re: Door plan vs. door cap	03/04/2019	JLIFTC00382085	JLIFTC00382086	Sales and Marketing Strategy; Altria	All pages	Five years
RX1455	Email from A. Rangrass to C. Watson et al re: Prep for tomorrow's workshop on fixtures, attaching 20190122 1930 Fixtures workshop v9.pdf	01/21/2019	JLIFTC00386116	JLIFTC00386135	Sales and Marketing Strategy; Altria Services	Pages 7, 10, 11, 12, 14, 16, 18	Five years
RX1458	Email from A. Cantwell to A. Saxena copying M. Batchan re: Fwd: Update fixture plan, attaching Altria Agreements	02/05/2019	JLIFTC00426752	JLIFTC00426769	Altria Services	All pages	Five years
RX1476	Email from J. Fix to K. Burns et al. re: Altria Services Update, attaching 20190405 - Altria Services Agreement Tracker.pdf	04/08/2019	JLIFTC00630391	JLIFTC00630393	Altria Services	All pages	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
RX1486	Email from R. Durham to A. Cantwell copying A. Rangrass re: FW: Documents for AGDC interaction discussion, attaching 20190301 Commercial Route to Marketv28 full	03/04/2019	JLIFTC00667641	JLIFTC00667730	Financial Data; Sales and Marketing Strategy	Pages 6, 12-13, 18-20, 22, 34-35, 38, 40, 48-52, 67, 82, 83, 85, 88-90	Five years
RX1489	Email from R. Durham to A. Rangrass copying A. Cantwell re: Fwd: Please DocuSign: SOW #5 Fixture and Sales Services - FINAL.docx, attaching 20190204 2019 BDF overview v3.pptx and 20190204 2019 BDF	02/04/2019	JLIFTC00668768	JLIFTC00668785	Altria Services	Pages 7-10, 12, 20-23, 25	Five years
RX1490	Email from A. Cantwell to K. Cooke copying M. Batchan re: Documents for review, attaching 20190214 Commercial Route to Marketv10 RVP (1).pdf, Sales territories & hiring.pdf, 20180622 SteerCo (with Kevin)_vF (1).PDF, Reset Blitz Pre Post Reset POGs Feb 2019 Final (1).pptx, Microsoft_Excel_Worksheet4.xlsx, Microsoft_Excel_Worksheet3.xlsx, Microsoft_Excel_Worksheet2.xlsx, Microsoft_Excel_Worksheet1.xlsx,	02/15/2019	JLIFTC00668796	JLIFTC00668895	Sales and Marketing Strategy	All pages	Five years
RX1493	Email from J. Fix to J. Cullen re: Fwd: ASA, attaching ASA - Regulatory Affairs Decision Dec - DRAFT ACP-WP.pdf	03/11/2019	JLIFTC00721158	JLIFTC00721169	Regulatory Strategy	All pages	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
RX1497	Email from M. Jones to T. Danaher re: Re: Completed: Please DocuSign: 22. JUUL Labs Board Minutes (28OCT2018).docx, 21. JUUL Labs Board Minutes (1... attaching, 1. _JUUL_Labs_Board_Minutes_(12JUL2018).docx.pdf, 4. _JUUL_Labs_Board_Minutes_(24JUL2018).docx.pdf, 3. _JUUL_Labs_Board_Minutes_(21JUL2018).docx.pdf, 2. _JUUL_Labs_Board_Minutes_(15JUL2018).docx.pdf, 5. _JUUL_Labs_Board_Minutes_(26JUL2018).docx.pdf, 6. _JUUL_Labs_Board_Minutes_-_Part_II_(26JUL18).docx.pdf, 7. _JUUL_Labs_Board_Minutes_(29JUL2018).docx.pdf, 8. _JUUL_Labs_Board_Minutes_(30JUL2018).docx.pdf, 9. _JUUL_Labs_Board_Minutes_(03AUG2018).docx.pdf, 10. _JUUL_Labs_Board_Minu	11/08/2018	JLIFTC00775638	JLIFTC00775704	Strategic Initiatives	Pages 9, 32	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
RX1502	Declaration of Tim Danaher	10/26/2018	JLIFTC00865621	JLIFTC00865652	Trade Secrets and Product Development; Financial Data	Pages 15, 20, 21, 26, 28-31	Ten years (Page 15); Five years (Pages 20, 21, 26, 28, 29, 30, 31)
RX1503	Email from D. McKay to board@juul.com et al. re: JUUL Board Meeting Materials, attaching DRAFT JUUL Board minutes - August 18 2017.docx, JUUL Board minutes (Oct. 15, 2017) (AG) (Clean).docx, and 17-1107 JUUL Board Meeting	11/06/2017	JLIFTC00913844	JLIFTC00913908	Pricing and Pricing Strategy; Sales and Marketing Strategy; Trade Secrets and Product Development	All pages	Ten years
RX1506	Email from F. Herbert to T. Danaher copying V. Kadapakkam re: JPM Pack, attaching JUUL Flavor Analysis 9.16.18.pdf, Investor FDA Response 9.16.18 vFinal.pdf, FDA- Letter-to- JUUL-reJUUL.pdf, HQ 508.joboptions	09/16/2018	JLIFTC00948226	JLIFTC00948237	Regulatory Strategy	All pages	Five years
RX1515	JUUL Ordering Guide	10/01/2018	JLIFTC01510868	JLIFTC01510869	Pricing and Pricing Strategy	All pages	Five years
RX1520	Email from P. Hagstrom to E. Price copying N. Baltazar re: FW: Input Requested by Monday - SC All Hands Deck for 3/20	03/15/2019	JLIFTC01778284	JLIFTC01778285	Altria Services	All pages	Five years
RX1528	Email from M. Batchan to J. DeSpain re: NJOY Overview	05/30/2019	JLIFTC02047124	JLIFTC02047217	Financial Data	Pages 19-21, 43-44, 56, 59, 62, 80, 82	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
RX1529	Email from A. Cantwell to B. Robbins et al. re: Fwd: [US Country Review] Meeting Materials, attaching 20190820_July 2019_US_Country Review_vF_0755CT.pdf	08/20/2019	JLIFTC02051593	JLIFTC02051754	Financial Data; Sales and Marketing Strategy; Pricing and Pricing Strategy	All pages	Five years
RX1530	Email from A. Cantwell to A. Flynn et al. re: US Headcount OPEX, attaching 20190820 July 2019 US Country Review vF 1520CT.pptx	08/22/2019	JLIFTC02056749	JLIFTC02056849	Financial Data; Sales and Marketing Strategy; Pricing and Pricing Strategy	All pages	Five years
RX1534	Email from V. Tsai to J. Fix et al. re: [Altria] Prep for Services Review, attaching 20190729_AGDC_Sales & Marketing Services Review_v1 0.pdf, 20190729_AGDC_INTERNAL ONLY_Services Review_v1 0.pdf, 20190729_AGDC_INTERNAL ONLY_Services Review_v1 0.pptx, 20190729_AGDC_Sales &	07/24/2019	JLIFTC02062200	JLIFTC02062232	Altria Services	Pages 1, 2, 4, 8, 14, 16, 27, 28, 30, 41, 42, 44, 46, 50, 56, 58	Five years
RX1535	Email from G. Ross to K. Cooke et al. re: NJOY ACE Weekly Syndicated Report: Nielsen Week Ending 07/27 and IRI Week	08/09/2019	JLIFTC02063796	JLIFTC02063798	Pricing and Pricing Strategy	Page 1	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
RX1536	Email from M. Saravanakumar to A. Cantwell et al. re: Draft for tomorrow's pricing workshop, attaching Pricing Deck Draft (1)_with execution (1).pptx, Microsoft Excel	08/13/2019	JLIFTC02064298	JLIFTC02064302	Pricing and Pricing Strategy	All pages	Five years
RX1537	Email from B. Robbins to K. Cooke, et al. re: 3PM US Region Call re Plan and Response, attaching US Country Review	08/25/2019	JLIFTC02068475	JLIFTC02068573	Financial Data; Sales and Marketing Strategy	All pages	Five years
RX1542	Email from J. Cullen to D. Bradley re: Fwd: Altria Update - 7/27/19, attaching Altria Services Agreement Master Tracker 7.27.19.pdf and 20190729_AGDC_Sales & Marketing Services	07/29/2019	JLIFTC02080886	JLIFTC02080905	Altria Services; Sales and Marketing Strategy	All pages	Five years
RX1543	Email from T. Danaher to K. Crosthwaite re: FW: JUUL Labs: BOD Materials, attaching 190425 April BOD vPreread.pdf	04/22/2019	JLIFTC02082131	JLIFTC02082193	Financial Data; Strategic Initiatives; Trade Secrets and Product Development; Altria Services	Pages 5, 6, 7, 8, 11-17, 22-27, 19-20, 38-41, 44, 47, 48-50, 51	Five years (Pages 5, 6, 7, 8, 11-17, 19-20, 38-41, 44, 47, 51); Ten years (Pages 22-27, 48-50)
RX1548	Email from V. Tsai to K. Cooke et al. re: Pre-Read for ITP Conversation, attaching ITP Overview and Implementation Process Final (1).pptx and 5 Signed SOW 5 Fixture and Sales	06/27/2019	JLIFTC02195679	JLIFTC02195694	Altria Services	All pages	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
RX1551	Email from A. Cantwell to N. LaFlamme et al. re: Americas Country Review 6/5/2019, attaching April 2019 Canada Country Review 6.4.19 vF.pdf and April 2019 US Country Review 6.4.19 vF.pdf	06/04/2019	JLIFTC02222581	JLIFTC02222727	Financial Data; Regulatory Strategy; Sales and Marketing Strategy	All pages	Five years
RX1552	Email from J. Cullen to A. Cantwell et al. re: Fixture Services 2020E +	04/22/2019	JLIFTC02244336	JLIFTC02244337	Altria Services	All pages	Five years
RX1565	4(c)-1 Project Tree Board of Directors Meeting Slides	01/31/2019	JLIFTC02316710	JLIFTC02316799	Financial Data	All pages	Five years
RX1570	JUUL Ordering Guide	07/24/2019	JLIFTC20000055	JLIFTC20000057	Pricing and Pricing Strategy	All pages	Five years
RX1571	JUUL Ordering Guide	07/24/2019	JLIFTC20000058	JLIFTC20000060	Pricing and Pricing Strategy	All pages	Five years
RX1576	ALCS Considerations for JUUL May 2020 Filing Strategy Discussion on October 20, 2020 Slides	10/09/2019	JLIFTC-LIT00790724	JLIFTC-LIT00790724	Regulatory Strategy	All pages	Five years
RX1577	Email from J. Murillo to S. Sinha re: Altria Service Credit for FY 20 and FY 21	02/29/2020	JLIFTC-LIT00825436	JLIFTC-LIT00825438	Altria Services	Pages 1-2	Five years
RX1579	Email from J. Murillo to E. Copeland et al. re: Altria Takeaways from JUUL Visit - October 21-22,	10/25/2019	JLIFTC-LIT00836811	JLIFTC-LIT00836812	Regulatory Strategy	All pages	Five years
RX1581	Email from A. Flynn to K.C. Crosthwaite et al. re: Altria Services, attaching Altria Spend 2 11.pdf	02/11/2020	JLIFTC-LIT00854323	JLIFTC-LIT00854326	Altria Services	Pages 1-2	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
RX1583	Email from C. Rehberger to A. Gould et al. re: PMTA Bi-Weekly Executive Update, attaching PMTA_Bi-Weekly Executive Update.pdf	09/11/2019	JLIFTC-LIT00863880	JLIFTC-LIT00863921	Regulatory Strategy		Five years
RX1584	Email from W. McKinney to K. Burns et al. re: Altria Considerations for PMTA Filing Strategy, attaching Final_PreRead_ALCS Considerations for Establishing Filing Strategy_for JUUL Governance	09/19/2019	JLIFTC-LIT00868141	JLIFTC-LIT00868142	Regulatory Strategy	All pages	Five years
RX1585	ALCS Immediate Considerations (Next 30	10/01/2019	JLIFTC-LIT00908495	JLIFTC-LIT00908498	Regulatory Strategy	All pages	Five years
RX1586	PMTA Work Stream Status Update Slides	10/15/2019	JLIFTC-LIT00908834	JLIFTC-LIT00908858	Regulatory Strategy	All pages	Five years
RX1596	Email from Contracts Team via DocuSign to T. Danaher re: Completed: Please DocuSign: Altria JUUL Labs SOW #28 Sales Services (Nov-Dec) (25OCT2019), attaching Altria JUUL Labs SOW #28 Sales Services (Nov -	10/28/2019	JLIFTC-LIT01124247	JLIFTC-LIT01124256	Altria Services	All pages	Five years
RX1598	Email from T. Duncan to F. Herbert et al. re: [AC/AWP] JLI - Follow Up Requests re SEC, attaching 4.3.4 - JUUL Investor Presentation	09/06/2019	JLIFTC-LIT01165414	JLIFTC-LIT01165435	Financial Data	Pages 12-14	Five years
RX1599	Email from A. Sidhu to A. Ozvald et al. re: Actions: 20 Nov 2019 PMTA Work Stream Status Weekly, attaching PMTA Weekly Work Stream Status Update Nov20	11/20/2019	JLIFTC-LIT01185417	JLIFTC-LIT01185446	Regulatory Strategy	All pages	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
RX1600	Email from A. deSouza to M. Misra et al. re: PMTA Weekly Work Stream Status Update 06Nov2019 - Actions Items, attaching PMTA Weekly Work Stream Status Update	11/07/2019	JLIFTC-LIT01185515	JLIFTC-LIT01185544	Regulatory Strategy	All pages	Five years
RX1601	Email from A. deSouza to J. McElhattan et al. re: PMTA Work Stream Status Update 09Oct2019 - Action Items & Minutes, attaching PMTA Weekly Work Stream Status Update 09Aug2019.pdf	10/10/2019	JLIFTC-LIT01185545	JLIFTC-LIT01185572	Regulatory Strategy	All pages	Five years
RX1602	JUUL Ordering Guide	08/26/2020	JLIFTC-LIT20000015	JLIFTC-LIT20000015	Pricing and Pricing Strategy	All pages	Five years
RX1603	JUUL Ordering Guide	02/28/2020	JLIFTC-LIT20000016	JLIFTC-LIT20000017	Pricing and Pricing Strategy	All pages	Five years
RX1604	JUUL Ordering Guide	01/07/2020	JLIFTC-LIT20000018	JLIFTC-LIT20000019	Pricing and Pricing Strategy	All pages	Five years
RX1605	JUUL Ordering Guide	04/24/2019	JLIFTC-LIT20000020	JLIFTC-LIT20000022	Pricing and Pricing Strategy	All pages	Five years
RX1606	JUUL Ordering Guide	11/19/2019	JLIFTC-LIT20000023	JLIFTC-LIT20000024	Pricing and Pricing Strategy	All pages	Five years
RX1607	JUUL Ordering Guide	08/26/2020	JLIFTC-LIT20000025	JLIFTC-LIT20000026	Pricing and Pricing Strategy	All pages	Five years
RX1608	JUUL Ordering Guide	02/28/2020	JLIFTC-LIT20000027	JLIFTC-LIT20000028	Pricing and Pricing Strategy	All pages	Five years
RX1609	JUUL Ordering Guide	04/24/2019	JLIFTC-LIT20000029	JLIFTC-LIT20000031	Pricing and Pricing Strategy	All pages	Five years
RX1610	JUUL Ordering Guide	11/22/2019	JLIFTC-LIT20000032	JLIFTC-LIT20000033	Pricing and Pricing Strategy	All pages	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
RX1614	Email from K. Burns to N. Pritzker and R. Valani re: Fwd: Decks - Richard and Bob, attaching JUUL Investor Presentation 5.1.2018.pdf and 04.19.18_final number sharing.pdf	06/12/2018	JLIFTC_NP_001067	JLIFTC_NP_001093	Financial Data; Sales and Marketing Strategy	Pages 21, 22, 25-27	Five years
RX1985	US Country Review Deck - April 2019	04/01/2019	RX1985-001	RX1985-105	Financial Data; Sales and Marketing Strategy; Pricing and	All pages	Five years
RX1986	US Country Review Deck - June 2019	06/01/2019	RX1986-001	RX1986-114	Financial Data; Sales and Marketing Strategy; Pricing and Pricing Strategy;	All pages	Five years
RX1987	US August Country Review (Q4 2019 and 2020 Action Plan)	08/01/2019	JLIFTC02056752	JLIFTC02056752	Financial Data; Sales and Marketing Strategy; Pricing and	All pages	Five years
RX1988	US August Country Review (Q4 2019 and 2020 Action Plan)	08/01/2019	JLIFTC02051595	JLIFTC02051754	Financial Data; Sales and Marketing Strategy; Pricing and	All pages	Five years
RX1989	JUUL Labs 2020 Device pricing strategy	07/25/2019	JLIFTC02050077	JLIFTC02050077	Pricing and Pricing Strategy	All pages	Five years
RX1991	Unlocking value via Revenue Growth Management ("RGM") - Consumer Pricing	06/05/2018	JLIFTC01930035	JLIFTC01930062	Pricing and Pricing Strategy	All pages	Five years
RX1993	Unlocking value via Revenue Growth Management ("RGM"), JUUL pricing	05/01/2018	JLIFTC01091866	JLIFTC01091952	Pricing and Pricing Strategy	All pages	Five years
RX1994	Channel margin update, JUUL discussion document	06/22/2018	JLIFTC00556824	JLIFTC00556862	Sales and Marketing Strategy; Pricing and	All pages	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
RX0120 PX7033	O'Hara JLI Deposition	2/2/2021	RX0120-001	RX0120-205	Sensitive Personal Information Trade Secrets and Product Development Strategic Initiatives	8:16-17; 155:9-157:25; 160:14-162:3; 162:17-164:12; 165:14-21; 166:19-173:7; 188:9-190:17;	Indefinite
RX1217	Expert Report of Kevin Murphy	3/15/2021	RX1217-001	RX1217-167	Pricing and Pricing Strategy	031; 032; 052; 053; 064; 065; 066; 068;	Five years
PX0001	JUUL Presentation: Regulatory, Clinical & Behavioral Programming,	11/17/2018	FTC-ALTRIA-00000654	FTC-ALTRIA-00000654	Regulatory Strategy	006-019	Five years
PX0002	JUUL Presentation: Financial November 2018	11/00/2018	FTC-ALTRIA-00001494	FTC-ALTRIA-00001494	Financial data	Complete	Five years
RX0046 PX0014	Document: JUUL - Ninth A&R Voting Agreement	1/28/2020	PX0014-001	PX0014-043	Strategic Initiatives	Complete	Five years
RX0045 PX0013	Cooperation Agreement	1/28/2020	RX0045-001	RX0045-018	Strategic Initiatives	Complete	Five years
RX0041	True-Up Convertible Security	12/20/2018	RX0041-001	RX0041-009	Strategic Initiatives	Complete	Five years
RX0040 PX6000	IP License Agreement	12/20/2018	RX0040-001	RX0040-007	Strategic Initiatives	Complete	Five years
RX0039	Eighth Amended and Restated Voting Agreement	12/20/2018	RX0039-001	RX0039-054	Strategic Initiatives	Complete	Five years
RX0037	Ninth Amended and Restated Right of First Refusal and Co-Sale	12/20/2018	RX0037-001	RX0037-050	Strategic Initiatives	Complete	Five years
RX0036	Ninth Amended and Restated Investors' Rights	12/20/2018	RX0036-001	RX0036-066	Strategic Initiatives	Complete	Five years

Exhibit Number	Description	Date	Family Begin Bates	Family End Bates	In Camera Treatment	Partial or Complete In Camera Treatment	Duration of In Camera Treatment
PX5000	Expert Report of Dr. Dov Rothman	2/15/2021	PX5000-001	PX5000-152	Financial data Sales and Marketing Strategy Regulatory Strategy	008; 023; 078; 087; 089; 090; 091; 092; 093; 094; 096; 099	Five years
PX5001	Expert Rebuttal Report of Dr.	3/26/2021	PX5001-001	PX5001-055	Financial Data;	013; 014; 022; 023;	Five years

In the Matter of

Altria Group, Inc. UNITED STATES OF AMERICA
a corporation FEDERAL TRADE COMMISSION
and OFFICE OF THE ADMINISTRATIVE LAW JUDGES
Juul Labs, Inc.
a corporation,

Respondents.

Docket No. 9393

**DECLARATION OF CHARLES ROBERTS ROBBINS, JR. IN SUPPORT OF
RESPONDENT JUUL LABS, INC.'S MOTION FOR *IN CAMERA* REVIEW OF
CERTAIN TRIAL EXHIBITS**

I, Charles Roberts Robbins, Jr., declare as follows:

1. I am Chief Growth Officer for Juul Labs, Inc. ("JLI" or "Respondent").
2. I submit this declaration in support of Respondent JLI's Motion for *In Camera* Treatment of Certain Trial Exhibits (the "Motion") made in compliance with the Federal Trade Commission Rules of Practice for Adjudicative Proceedings, 16 C.F.R. § 3.45. JLI seeks *in camera* treatment for the trial exhibits and portions of exhibits identified in Exhibit 1.
3. I have personal knowledge of the competitive significance to JLI of the categories of documents described further below and the level of confidentiality associated with their contents. Based on my review of Exhibit 1, my conversations with the individuals who reviewed the documents at my direction, my knowledge of JLI's business, and my familiarity with the confidentiality protection afforded this type of information by JLI, I submit that disclosure of the exhibits listed in Exhibit 1 to the public and JLI's competitors would either result in clearly defined, serious injury to JLI or reveal sensitive personal information.
4. In the ordinary course of business, JLI would treat this information as strictly confidential and would limit its disclosure to employees that need to know it to perform their business function. JLI also takes reasonable steps to protect its network and electronically stored information to prevent access by outside parties.
5. Each exhibit identified in Exhibit 1 was designated as "Confidential Material" pursuant to the Protective Order entered on April 2, 2020.
6. The Motion is narrowly tailored to protect JLI's confidential information. JLI counsel carefully reviewed the exhibits and provided me with the exhibits identified in Exhibit 1. I reviewed Exhibit 1, and JLI counsel described to me the approach used to select the exhibits listed on Exhibit 1 and the categories of confidential information that appear in the listed exhibits.
7. For ease of reference, JLI has grouped the exhibits identified in Exhibit 1 into the following categories:
 - a. Trade secrets and product development
 - b. Financial data
 - c. Pricing and pricing strategy
 - d. Sales and marketing strategy
 - e. Regulatory strategy
 - f. Strategic initiatives
 - g. Altria services
 - h. Sensitive personal information
8. Each category describes materials that either (a) disclose confidential and competitively sensitive financial and business information, including proprietary business information, confidential pricing terms and structures, and information regarding margins and financial arrangements, or (b) reveal sensitive personal information. Competitors and third parties with access to this information would either gain a significant business advantage at the

15. **Altria services:** The documents in this category contain detailed pricing and cost information related to commercial services provided to JLI by Altria in connection with Altria's investment in JLI and merit *in camera* treatment. For example, the documents discuss the cost to JLI of the distribution and warehousing services Altria provided and that reduced JLI's distribution costs. This is confidential information regarding JLI's costs, and it would be harmful to JLI's negotiations with other service providers if this information became public. Because JLI would experience a clearly defined, serious injury if the pricing and cost information related to commercial services provided to JLI by Altria in these documents were publicly disclosed, this information should remain confidential for five years.

16. **Sensitive personal information:** The documents in this category provide details regarding a named individuals' compensation, their job performance, or their personal phone numbers. Information regarding compensation and job performance is particularly sensitive and its disclosure within JLI is limited to the named individual and those who need it to perform their job. Disclosure of this material could have the effect of embarrassing the named individuals or impacting their careers, and personal phone numbers need not be disclosed to the public in connection with this case. As a result, this information should remain confidential indefinitely.

17. Because disclosure of the exhibits described herein is likely to either reveal sensitive personal information or cause clearly defined, serious injury to JLI's financial and competitive position, JLI respectfully requests that the exhibits listed in Exhibit 1 be given *in camera* treatment.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this ___ day of May, 2021 in _____

By:



Charles Roberts Robbins, Jr.

Chief Growth Officer

Juul Labs, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on May 7, 2021, I caused a true and correct copy of the foregoing Motion for In Camera Review of Certain Trial Exhibits to be filed electronically using the FTC's electronic filing System, which will send notification of such filing to:

April Tabor
Acting Secretary
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-113
Washington, DC 20580
ElectronicFilings@ftc.gov

The Honorable D. Michael Chappell
Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Ave., NW, Rm. H-110
Washington, DC 20580

I also certify that I caused the foregoing document to be served via email to:

James Abell
Dominic Vote
Peggy Bayer Femenella
Erik Herron
Joonsuk Lee
Meredith Levert
Kristian Rogers
David Morris
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/s/ Linden Bernhardt

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