

# Exhibit A

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE JUUL LABS, INC., MARKETING,  
SALES PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION

Case No. 3:19-md-02913-WHO

This Document Relates to:

ALL ACTIONS.

**MDL PLAINTIFFS' FOURTH SET OF REQUESTS  
FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS  
(DESIGN, INGREDIENTS, TESTING, AND MANUFACTURE)**

PROPOUNDING PARTY: MDL Plaintiffs

RESPONDING PARTY: Defendants JUUL Labs, Inc., Altria Group, Inc., Philip Morris USA Inc., Altria Client Services LLC, Altria Group Distribution Company, and Altria Enterprises LLC.

SET NUMBER: Fourth Set

**TO: The Above-Named Defendants and their Attorneys of Record:**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiffs, through undersigned counsel, propound the following Fourth Set of Requests for Production of Documents to Defendants JUUL Labs, Inc., Altria Group, Inc., Philip Morris USA Inc., Altria Client Services LLC, Altria Group Distribution Company, and Altria Enterprises LLC. Responses to these Requests for Production, or objections *in lieu* thereof, shall be served within 30 days after service of this document.

1 **I. Related Matters**

2 123. All written communications by or between JLI, or anyone working on its behalf, and any  
3 person who was not an employee of JLI but who was involved in any way with the design,  
4 development, testing, or manufacture of JUUL.

5 124. All documents constituting, containing or reflecting notes or transcripts of any  
6 discussion or meeting between officers or employees of JLI and any person who was not an  
7 employee of JLI but who was involved in any way with the design, development, testing, or  
8 manufacture of JUUL.

9 125. All documents constituting, containing, or reflecting any and all financial payments,  
10 contributions, or payments in kind made by you to any person or entity other than JLI or its  
11 employees who was involved in any way with the design, development, testing, or manufacture  
12 of JUUL.

13 126. All documents constituting, containing, or reflecting any and all financial payments,  
14 contributions, or payments in kind made by JLI or Altria, or on behalf of either, to any person:  
15 (a) who has published scientific or medical literature pertaining to ENDS generally or to JUUL  
16 specifically; or (b) who has provided consulting services to JLI in connection with JUUL  
17 including but not limited to (i) providing data, opinions, or reports intended for internal use, (ii)  
18 providing data, opinions, or reports for use in legal, regulatory, or legislative meetings or  
19 hearings, and/or (iii) expressing opinions at medical or scientific conferences.

20 127. All draft and final Premarket Tobacco Product Applications relating to JUUL, whether or  
21 not actually submitted.

22 Dated: May 8, 2020

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