

# Exhibit B

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)**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Juul Labs, Inc. (“JLI”) serves its Responses and Objections to Plaintiffs’ Fourth Set of Requests for Production of Documents to Defendants (Design, Ingredients, Testing, and Manufacture) dated May 8, 2020 (the “Requests”):

**JLI’S RESPONSES AND OBJECTIONS TO DOCUMENT REQUESTS**

Unless otherwise noted, where JLI states that it will conduct a reasonable search it is agreeing to produce responsive, non-privileged documents to the extent they can be located after a search reasonably likely to identify reasonably accessible documents in accordance with the Court’s Order Re: Discovery of Electronically Stored Information (the “ESI Protocol,” ECF No. 323), and after the parties have negotiated and finalized searching protocols, including search terms, a discrete set of custodians, and such other conditions and processes as may be agreed upon by the parties or ordered by the Court, as discussed further in JLI’s General Objection No. 2. Additionally, JLI notes that, to date, it has already produced over 362,000 documents consisting of approximately 1.5 million pages, many of which contain information responsive to Plaintiffs’ requests.

**A. Policies & Procedures for Design, Development, Testing & Manufacture**

**REQUEST FOR PRODUCTION NO. 1:**

All past and current policies and procedures governing naming conventions for all tests of JUUL or JUUL’s e-vapor, including naming conventions for all testing protocols.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 126:**

2 JLI objects to this Request as overly broad and unduly burdensome, and to the extent it seeks  
3 information outside JLI's possession, custody, or control. JLI objects that this Request is overly broad  
4 and unduly burdensome to the extent contains no limitations as to time or subject matter, other than  
5 "ENDS generally or to JUUL specifically." JLI further objects to the phrase "data, opinions, or reports  
6 for internal use" as vague and undefined.

7 **REQUEST FOR PRODUCTION NO. 127:**

8 All draft and final Premarket Tobacco Product Applications relating to JUUL, whether or not  
9 actually submitted.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 127:**

11 JLI objects to this Request on the grounds that it seeks information prepared or compiled in  
12 connection with JLI's forthcoming PMTA. *See* 21 U.S.C. §387p(a)(2)(A). JLI further objects to this  
13 Request to the extent production of information would impair or interfere with the FDA's exclusive  
14 jurisdiction to consider JLI's forthcoming PMTA.