

## INSTRUCTIONS

As used herein, the term "corporation" shall mean R. J. Reynolds Tobacco Company, Inc., its predecessors, parents, subsidiaries, affiliates, and other organizational entities, and the directors, officers, employees, agents, and representatives, including attorneys, of each of these organizational entities, directly or through any corporate or other device.

The term "cigarette(s)" shall mean:

- (A) any roll of tobacco wrapped in paper or in any substance not containing tobacco, and
- (B) any roll of tobacco wrapped in any substance containing tobacco which, because of its appearance, the type of tobacco used in the filler, or its packaging and labeling, is likely to be offered to, or purchased by, consumers as a cigarette described in (A) of this paragraph.

The term "cigarette advertisement(s)" shall mean any visually or aurally received message of any dimension or duration directly or indirectly paid for, distributed by, or conveyed on behalf of any cigarette manufacturer to consumers or potential consumers of cigarettes that mentions or depicts a cigarette, cigarettes, cigarette smoke or the name of any cigarette brand(s), whether the same appears in a brochure, newspaper, magazine, leaflet circular, mailer, book insert, catalog, billboard, public transit card, point-of-purchase display, or in a radio or television broadcast or in any promotion or contest or in any other mechanism for conveying such message.

The term "document(s)" shall mean the original(s) or one identical copy the eof and all nonidentical copies (whether different from originals by reason of notations made on such copies or otherwise) of all written, recorded, transcribed, punched, taped, filmed, or graphic matter, however produced or reproduced, including, but not limited to, books; records; schedules; correspondence; telegrams; memoranda; notes or tapes of interviews, conferences, telephone calls, and other communications; reports; client reports; tests; market tests; studies; charts; raw data; tabulations; computer print-outs; data sheets; data processing cards; code books; surveys; strategies; marketing plans; research papers; reports or minutes of meetings; advertisements or other promotional materials; intra-office memoranda; work papers; and preliminary drafts or versions of all the above, and all other written or documentary material of any nature whatsoever. In the event that the corporation has previously submitted information or materials requested in this subpoena, identify such information or materials, indicate the date on which it was submitted to the Commission, to whom it was submitted, the subpoena, order or other request pursuant to which it was submitted, the specification or question to which it responded and the Specification of this subpoena to which it relates. Such information or materials need not be re-submitted at this time.

An exact reproduction of a document may be submitted in place of that document; provided however, that reproductions of documents must be legible in their entirety.

Each document submitted shall be clearly and precisely identified as to the Specification or Specifications to which it is responsive. Each document shall be submitted in its entirety even if only a portion of that document relates to the identified subject matter. The term "entirety" shall mean that an uncut, unexpunged and unedited copy of such document shall be submitted, including all appendices, tables or other attachments, and that all other documents referred to in such documents shall be submitted and marked to indicate the document in which such reference is made. If an appendix, table or other attachment is not present with the original, but is attached to a copy thereof or is otherwise available, it shall be submitted and clearly marked to indicate to which document it corresponds. Each document shall also be accompanied by such documents, or in lieu thereof a verified written statement, as will show the name, title, and last known business address of the individual, organization or entity who prepared it or from whom it was received and the date on which it was prepared or received, unless such information appears on the face of the document. Unless otherwise stated, all references to year shall refer to calendar year.

For each item of research submitted in response to any Specification, the following documents must be included in the return: the final reports; complete statements of findings, conclusions, protocols, and methodology; a copy of the questionnaire or other data collection instrument(s) used in each item of research; a complete description of the sample of subjects or respondents who participated in each item of research; and such documents, or in lieu thereof a verified written statement, as will show the names and current business addresses of each individual, organization or entity that performed each item of research submitted in response hereto.

In submitting copies of advertisements, such copies shall include: for broadcast media, a copy of either the photoboard, storyboard, or (for radio) script. The title thereof, company or agency file or code number, length, and product advertised shall be affixed to each advertisement.

A request for the production of documents shall be deemed to be a request for all documents, whether prepared by or for the corporation or any other party, in the possession, custody or control of the corporation.