

**PORZIO, BROMBERG & NEWMAN**

A PROFESSIONAL CORPORATION  
163 MADISON AVENUE  
MORRISTOWN, N. J. 07960  
(201) 538-4006  
ATTORNEYS FOR

plaintiffs

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ROSE D. CIPOLLONE and : UNITED STATES DISTRICT COURT  
ANTONIO CIPOLLONE, her : FOR THE DISTRICT OF NEW JERSEY  
husband, : HONORABLE H. LEE SAROKIN

Plaintiffs, : Civil Action No. 83-2864 SA

vs. :

REQUEST TO PRODUCE

LIGGETT GROUP, INC., A :  
Delaware Corporation, PHILIP :  
MORRIS, INCORPORATED, A : Returnable: April 23, 1984  
Virginia Corporation and :  
LOEWS CORPORATION, a Delaware :  
Corporation, and LOEW'S :  
THEATRES, INC., a New York :  
Corporation, :

Defendants. :

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TO: Raymond F. Drozdowski, Esq.  
Brown, Connery, Culp, Wille,  
Purnell & Greene  
518 Market Street  
Post Office Box 1449  
Camden, New Jersey 08101  
Attorneys for Defendant Philip Morris, Inc.

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SIRS:

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 34, we hereby request that defendant Philip Morris, Inc. produce at the offices of Porzio, Bromberg & Newman, P.C., 163 Madison Avenue, Morristown, New Jersey, on Monday, April 23, 1984 at 10:00 a.m. and permit the party making this request to inspect and copy the following designated documents and things:

AND TAKE FURTHER NOTICE that defendant must respond in writing within 30 days to each of the following Requests to Produce:

1. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Brand Perception or Preference Research performed, formulated or generated by or for you, regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

2. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Perceptual Mapping Research performed, formulated or generated by or for you, regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

3. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Market Segmentation Research performed, formulated or generated by or for you, regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

4. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Usage Rate Segmentation Research performed, formulated or generated by or for you, regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

5. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Advertising Copy Tests performed, formulated or generated by or for you, regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

6. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Test Market Studies performed, formulated or generated by or for you, regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

7. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Market Plans performed, formulated or generated by or for you, regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

8. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Media Plans performed, formulated or generated by or for you, regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

9. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Concept Testing performed, formulated or generated by or for you, regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

10. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Copy Platforms performed, formulated or generated by or for you, regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

11. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Brand Naming Research performed, formulated or generated by or for you regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

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12. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Packaging Research performed, formulated or generated by or for you regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

13. Any and all writing, memoranda reports, studies, correspondence, and any other document relating to Concept Development Plan performed, formulated or generated by or for you regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

14. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Product-Market Development Plan performed, formulated or generated by or for you regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

15. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Advertising Copy Research performed, formulated or generated by or for you regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

16. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Brand/Product Positioning Studies performed, formulated or generated by or for you regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

17. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Motivation Research performed, formulated or generated by or for you regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

18. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Main Selling Propositions performed, formulated or generated by or for you regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

19. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Advertising Themes performed, formulated or generated by or for you regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

20. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Media Plan and Justification in terms of Consumer Market Segments performed, formulated or generated by or for you regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

21. Any and all writing, memoranda, reports, studies, correspondence, and any other document relating to Tracking Studies performed, formulated or generated by or for you regarding Virginia Slims cigarettes and Parliament cigarettes sold during the years 1966 through 1972 and 1970 through 1974, respectively.

PORZIO, BROMBERG & NEWMAN, P.C.  
Attorneys for plaintiffs, Rose D.  
Cipollone and Antonio Cipollone

By: \_\_\_\_\_

*Marc Z. Edell*  
Marc Z. Edell

DATED: *3/16/84*

cc: Alan M. Darnell, Esquire  
WILENTZ, GOLDMAN & SPITZER  
Of Counsel

David J. Novack, Esquire  
BUDD, LARNER, KENT, GROSS,  
PICILLO & ROSENBAUM  
Of Counsel

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