

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

RAI STRATEGIC HOLDINGS, INC. and
R.J. REYNOLDS VAPOR COMPANY,

Plaintiffs and Counterclaim
Defendants,

v.

ALTRIA CLIENT SERVICES LLC; PHILIP
MORRIS USA INC.; and PHILIP MORRIS
PRODUCTS S.A.

Defendants and Counterclaim
Plaintiffs.

Civil Action No. 1:20-cv-393-LO-TCB

PMI/ALTRIA'S MOTION TO SEAL

Pursuant to Local Civil Rule 5(C), Altria Client Services, LLC, Philip Morris USA Inc., and Philip Morris Products S.A. (collectively, "PMI/Altria") hereby move the Court for leave to file under seal the following documents:

1. An unredacted version of Reply in Support of *Daubert* Motion to Exclude Design-Around Testimony of RJR's Expert, David Clissold, as detailed in PMI/Altria's accompanying memorandum in support of this motion.

In support of this Motion, PMI/Altria submit contemporaneously herewith a non-confidential Memorandum in Support of Motion to File Documents Under Seal, along with a proposed Order.

Dated: February 25, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of February, 2022, a true and correct copy of the foregoing was served using the Court's CM/ECF system, with electronic notification of such filing to all counsel of record:

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