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), Plaintiffs 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 ("Motion") the following documents:

- An unredacted version of PMI/Altria's Motion to Show Cause Why Sanctions Should Not be Imposed ("Motion to Show Cause"), as detailed in PMI/Altria's accompanying memorandum in support of this motion; and
- 2. Exhibits 2-5, 10, and 17 to PMI/Altria's Motion to Show Cause.

In support of this Motion, PMI/Altria submit contemporaneously herewith a nonconfidential Memorandum in Support of Motion to File Documents Under Seal, along with a proposed Order. Dated: March 25, 2022

 Respectfully submitted,

/s/ Maximilian A. Grant

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Counsel for Plaintiffs Altria Client Services LLC, Philip Morris USA Inc., and Philip Morris Products S.A. Case 1:20-cv-00393-LO-TCB Document 1161 Filed 03/25/22 Page 3 of 3 PageID# 30775

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of March, 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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