

**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.

Case No. 1:20-cv-00393-LO-TCB

REYNOLDS'S MOTION TO SEAL

Pursuant to Local Civil Rule 5(C), RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company respectfully move the Court for leave to file under seal and to file redacted versions of the following:

1. Reynolds's Opposition to PMI/Altria's Motion to Show Cause Why Sanctions Should Not Be Imposed; and

Reynolds further moves to file wholly under seal the following exhibits accompanying Reynolds's Opposition to PMI/Altria's Motion to Show Cause Why Sanctions Should Not Be Imposed:

1. Exhibits B, H, and I.

In support of this Motion, Reynolds submit contemporaneously herewith a proposed order and a non-confidential memorandum.

Dated: March 30, 2022

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Respectfully submitted,

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*Counsel for RAI Strategic Holdings, Inc. and
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CERTIFICATE OF SERVICE

I hereby certify that on this 30th 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.

/s/ David M. Maiorana

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