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 Reply In Support Of PMI/Altria's Motion To Show Cause Why Sanctions Should Not be Imposed ("Reply"), as detailed in PMI/Altria's accompanying memorandum in support of this motion; and
- 2. Exhibits 1-3 to PMI/Altria's Reply.

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: March 31, 2022

Respectfully submitted,

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Counsel for Plaintiffs Altria Client Services LLC, Philip Morris USA Inc., and Philip Morris Products S.A.



CERTIFICATE OF SERVICE

I hereby certify that on this 31st 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/ Maximilian A. Grant

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