

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

PHILIP MORRIS PRODUCTS S.A.,

Plaintiffs and Counterclaim  
Defendants,

v.

R.J. REYNOLDS VAPOR COMPANY,

Defendants and Counterclaim  
Plaintiffs.

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

**PHILIP MORRIS' MOTION TO SEAL**

Pursuant to Local Civil Rule 5(C), Plaintiff Philip Morris Products S.A. ("Philip Morris") hereby moves the Court for leave to file under seal ("Motion") the following documents:

1. An unredacted version of Philip Morris' Brief On Jury Instructions And The Verdict Form Pertaining To The Permissible Measure Of Damages ("Brief"); and
2. Exhibits 2-5, 7, and 9-10 to Philip Morris' Brief.

In support of this Motion, Philip Morris submits contemporaneously herewith a non-confidential Memorandum in Support of Motion to File Documents Under Seal, along with a proposed Order.

Dated: June 11, 2022

Respectfully submitted,

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*Counsel for Plaintiff Philip Morris Products  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 11th day of June, 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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