

**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' Corrected Brief in Support of Submission of the Willful Infringement Issue to the Jury ("Corrected Brief"), as detailed in Philip Morris' accompanying memorandum in support of this motion.

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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