

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

PHILIP MORRIS PRODUCTS S.A.,

Plaintiff,

v.

R.J. REYNOLDS VAPOR COMPANY,

Defendant.

Case No. 1:20-cv-00393-LMB-WEF

DEFENDANT’S NOTICE OF A MOTION TO SEAL

Pursuant to Local Civil Rule 5(C), Defendant R.J. Reynolds Vapor Company (“RJR”) hereby provides notice that it is filing a Motion to Seal. The Motion to Seal is being filed concurrently with, and in relation to Defendant’s Memorandum in Opposition to Plaintiff’s Motion for a Permanent Injunction or, Alternatively, an Ongoing Royalty.

Memoranda in support of or in opposition to the motion may be submitted by parties or non-parties within seven days of the motion’s filing. All or part of any such memoranda may be designated as confidential, and any information so designated will be treated as sealed pending the Court’s determination on the motion to seal. Any person objecting to the motion must file an objection with the Clerk within seven days of the motion’s filing. If no objection is timely filed, the Court may treat the motion as uncontested.

Dated: September 2, 2022

Respectfully submitted,

Stephanie E. Parker
JONES DAY
1221 Peachtree Street, N.E.
Suite 400
Atlanta, GA 30361
Telephone: (404) 521-3939
Facsimile: (404) 581-8330
Email: separker@jonesday.com

Anthony M. Insogna
JONES DAY
4655 Executive Drive
Suite 1500
San Diego, CA 92121
Telephone: (858) 314-1200
Facsimile: (844) 345-3178
Email: aminsogna@jonesday.com

William E. Devitt
JONES DAY
110 North Wacker
Suite 4800
Chicago, IL 60606
Telephone: (312) 269-4240
Facsimile: (312) 782-8585
Email: wdevitt@jonesday.com

/s/ David M. Maiorana
David M. Maiorana (VA Bar No. 42334)
Ryan B. McCrum
JONES DAY
901 Lakeside Ave.
Cleveland, OH 44114
Telephone: (216) 586-3939
Facsimile: (216) 579-0212
Email: dmaiorana@jonesday.com
Email: rbmccrum@jonesday.com

John J. Normile
JONES DAY
250 Vesey Street
New York, NY 10281
Telephone: (212) 326-3939
Facsimile: (212) 755-7306
Email: jjnormile@jonesday.com

Alexis A. Smith
JONES DAY
555 South Flower Street
Fiftieth Floor
Los Angeles, CA 90071
Telephone: (213) 243-2653
Facsimile: (213) 243-2539
Email: asmith@jonesday.com

Charles B. Molster, III Va. Bar No. 23613
THE LAW OFFICES OF
CHARLES B. MOLSTER, III PLLC
2141 Wisconsin Avenue, N.W. Suite M
Washington, DC 20007
Telephone: (703) 346-1505
Email: cmolster@molsterlaw.com

*Counsel for RAI Strategic Holdings, Inc. and
R.J. Reynolds Vapor Company*

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of September, 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

David M. Maiorana (VA Bar No. 42334)

JONES DAY

901 Lakeside Ave.

Cleveland, OH 44114

Telephone: (216) 586-3939

Facsimile: (216) 579-0212

Email: dmaiorana@jonesday.com

*Counsel for Plaintiffs RAI Strategic Holdings,
Inc. and R.J. Reynolds Vapor Company*