

**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 MOTION TO REDACT PORTIONS OF THE NOVEMBER 4, 2022,
HEARING TRANSCRIPT**

Pursuant to Local Civil Rule 5(C), Defendant R.J. Reynolds Vapor Company (“RJR”) hereby moves the Court to designate as “Confidential” pursuant to the Stipulated Protective Order (Dkt. 103) and to redact certain portions of the transcript of the hearing held before the Court on November 4, 2022 (Dkt. 1436), on the grounds that they reflect confidential business information under the protective order. The portions of the transcripts that RJR seeks to redact and the grounds for seeking such redaction are set forth in the accompanying memorandum in support.

Specifically, RJR seeks to redact the following from the November 4, 2022, transcript:

- Page 22:18 (redact the two words after “retain”);
- Page 22:20 (redact the two words after “retain”);
- Page 23:16 (redact the four words before “it is very unique”);
- Page 23:21 (redact the two words after “retain”);
- Page 27:15 (redact the fraction before “for the ’265 patent”);
- Page 29:16-17 (redact the rest of the sentence after “Solo G2”);
- Page 30:4 (redact the three words before “has changed”);
- Page 30:5 (redact the entire line);
- Page 30:7 (redact the end of the sentence following “G2”);
- Page 30:15 (redact the end of the sentence following “data was that it”);
- Page 33:4 (redact the two words before “split of the profit”);

- Page 33:18 (redact the two words after “was worth”);
- Page 33:20 (redact the two words after “percentage, took”);
- Page 34:12 (redact the two words after “only taking”);
- Page 34:17 (redact the two words after “Just saying”);
- Page 39:11 (redact the two words after “It’s worth”);
- Page 41:21 (redact the two words after “that’s their profits”);
- Page 43:23 (redact the two words before “of the profits”); and
- Page 44:4 (redact the two words after “operating profit of”).

In support of this Motion, RJRV submits contemporaneously herewith a non-confidential Memorandum in Support of Motion to Redact Portions of the November 4, 2022, Hearing Transcript, along with a proposed Order.

Dated: November 15, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of November, 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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