

**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.

No. 1:20-cv-393-LMB-TCB

PHILIP MORRIS' RENEWED MOTION TO SEAL

Pursuant to Local Civil Rule 5(C), and the Court's Orders dated March 22, 2023 (Dkt. 1454) and March 30, 2023 (Dkt. 1456), 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 the Memorandum Opinion, entered March 30, 2023 (Dkt. 1455);
2. An unredacted version of Brief in Support of Philip Morris' Motion For a Permanent Injunction or, Alternatively, an Ongoing Royalty ("Opening Brief");
3. Exhibits 5, 18, 23-24, 27, 38, 41, 43-44, 47-48, and 56 to Philip Morris' Opening Brief;
4. An unredacted version of Reply in Support of Philip Morris' Motion For a Permanent Injunction or, Alternatively, an Ongoing Royalty ("Reply Brief"); and
5. Exhibits 65-66, 76, and 78 to Philip Morris' Reply Brief.

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

Dated: April 5, 2023

Respectfully submitted,

/s/ Maximilian A. Grant

Maximilian A. Grant (VSB No. 91792)

max.grant@lw.com

Matthew J. Moore (*pro hac vice*)

matthew.moore@lw.com

Jamie Underwood

jamie.underwood@lw.com (*pro hac vice*)

LATHAM & WATKINS LLP

555 Eleventh Street, N.W., Ste. 1000

Washington, DC 20004

Tel: (202) 637-2200; Fax: (202) 637-2201

Clement J. Naples (*pro hac vice*)

clement.naples@lw.com

LATHAM & WATKINS LLP

885 Third Avenue

New York, NY 10022-4834

Tel: (212) 906-1200; Fax: (212) 751-4864

Gregory K. Sobolski (*pro hac vice*)

Greg.sobolski@lw.com

LATHAM & WATKINS LLP

505 Montgomery Street, Suite 2000

San Francisco, CA 94111

Tel: (415) 391-0600; Fax: (415) 395-8095

*Counsel for Plaintiff Philip Morris Products
S.A.*

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of April, 2023, 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 _____
Maximilian A. Grant (VSB No. 91792)
LATHAM & WATKINS LLP
555 Eleventh Street, N.W., Suite 1000
Washington, DC 20004
Telephone: (202) 637-2200
Facsimile: (202) 637-2201
Email: max.grant@lw.com

*Counsel for Plaintiff Philip Morris Products
S.A.*