

**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' NOTICE OF FILING A 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 provides notice that it is filing a renewed Motion to Seal ("Motion to Seal"). The Motion to Seal is being filed in relation to Philip Morris' Motion for a Permanent Injunction or, Alternatively, an Ongoing Royalty (Dkts. 1405, 1406, 1425, 1429).

Memoranda in support of or in opposition to the Motion to Seal may be submitted by parties and non-parties within seven (7) days after the filing of the Motion to Seal. All or part of any such memoranda may be designated as confidential. Any information designated as confidential in a supporting or opposing memorandum will be treated as sealed pending a determination by the Court on the Motion to Seal. Any person objecting to the Motion to Seal must file an objection with the Clerk within seven (7) days after the filing of the Motion to Seal. If no objection is filed in a timely manner, the Court may treat the motion as uncontested.

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.*