

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

RAI STRATEGIC HOLDINGS, INC. and
R.J. REYNOLDS VAPOR COMPANY,

Plaintiffs and Counterclaim
Defendants,

v.

ALTRIA CLIENT SERVICES LLC; PHILIP
MORRIS USA INC.; and PHILIP MORRIS
PRODUCTS S.A.

Defendants and Counterclaim
Plaintiffs.

Civil Action No. 1:20-cv-393-LO-TCB

PHILIP MORRIS PRODUCTS S.A.'S MOTION TO SEAL

Pursuant to Local Civil Rule 5(C), Defendant Philip Morris Products S.A. ("PMP") hereby moves the Court for leave to file under seal the following documents:

1. An unredacted version of PMP's proposed Second Amended Counterclaims (Exhibit A); and
2. An unredacted version of a redline version of PMP's proposed Second Amended Counterclaims (Exhibit B).

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

Dated: March 1, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of March, 2021, 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:

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