

**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 Reply in Support of Motion for Leave to Amend Counterclaims to Add Injunctive Relief (“Reply”)
2. An unredacted version of Reynolds’ Response to Defendants’ Interrogatory No. 8 (Exhibit 1);
3. An unredacted version of a February 19, 2021 email from J. Michalik (Exhibit 11);  
and
4. An unredacted version of the expert report of S. Ehrlich (Exhibit 12).

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 11, 2021

Respectfully submitted,

/s/ Maximilian A. Grant

Maximilian A. Grant (VSB No. 91792)

max.grant@lw.com

Lawrence J. Gotts (VSB No. 25337)

(lawrence.gotts@lw.com)

Matthew J. Moore (*pro hac vice*)

matthew.moore@lw.com

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

Brenda L. Danek (*pro hac vice*)

brenda.danek@lw.com

LATHAM & WATKINS LLP

330 North Wabash Avenue, Suite 2800

Chicago, IL 60611

Tel: (312) 876-7700; Fax: (312) 993-9767

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

**CERTIFICATE OF SERVICE**

I hereby certify that on this 11th 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:

*/s/ Maximilian A. Grant*

Maximilian A. Grant (VSB No. 91792)

max.grant@lw.com

LATHAM & WATKINS LLP

555 Eleventh Street, N.W., Suite 1000

Washington, DC 20004

Telephone: (202) 637-2200

Facsimile: (202) 637-2201

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