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 NOTICE OF FILING A MOTION TO SEAL

Pursuant to Local Civil Rule 5(C), Defendant Philip Morris Products S.A. ("PMP") hereby provides notice that it is filing a Motion to Seal. The Motion to Seal is being filed concurrently with, and in relation to, PMP's Reply in Support of Motion for Leave to Amend Counterclaims to Include Injunctive Relief ("Reply"), and Exhibits 1, 11, and 12 to the Reply.

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 Case 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: March 11, 2021

Respectfully submitted,

/s/ Maximilian A. Grant

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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

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