

**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.)
_____)

Case No. 1:20-cv-00393-LO-TCB

PLAINTIFFS' MOTION TO SEAL

Pursuant to Local Civil Rule 5(C), Plaintiffs RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company respectfully move the Court for leave to file under seal and to file a redacted version of the following:

1. Plaintiffs' Memorandum in Support of their Second Motion to Compel Responsive Documents Related to Defendants' '374 Patent Infringement Counterclaim.
2. Plaintiff's accompanying exhibits B–E, G–J, and L–O to Plaintiffs' Memorandum in Support of their Second Motion to Compel Responsive Documents Related to Defendants' '374 Patent Infringement Counterclaim.

In support of this Motion, Plaintiffs submit contemporaneously herewith a proposed order and a non-confidential memorandum.

Dated: March 12, 2021

Respectfully submitted,

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*Counsel for Plaintiffs RAI Strategic Holdings,
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CERTIFICATE OF SERVICE

I hereby certify that on this 12th 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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