

**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

COUNTERCLAIM PLAINTIFFS' NOTICE OF A MOTION TO SEAL

Pursuant to Local Civil Rule 5(C), Counterclaim Plaintiffs Altria Client Services, LLC (“ACS”), Philip Morris USA Inc. (“PM USA”), and Philip Morris Products S.A. (“PMP”) (collectively, “Counterclaim Plaintiffs”) hereby provide notice that they are filing a Motion to Seal. The Motion to Seal is being filed concurrently with, and in relation to, Counterclaim Plaintiffs’ Memorandum in Support of Their Motion to Compel Reynolds’ 30(b)(b) Deposition on Topics 28, 54, and 78, and exhibits 1-23 thereto.

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: April 9, 2021

Respectfully submitted,

By: /s/ Maximilian A. Grant

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Inc., and Philip Morris Products S.A.*

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of April, 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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