

**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' MOTION TO SEAL

Pursuant to Local Civil Rule 5(C), Defendants Altria Client Services, LLC (“ACS”), Philip Morris USA Inc. (“PM USA”), and Philip Morris Products S.A. (“PMP”) (collectively, “Counterclaim Plaintiffs”) hereby move the Court for leave to file under seal the following documents:

1. An un-redacted version of Counterclaim Plaintiffs’ Reply in Support of their Motion to Compel Reynolds’ 30(b)(b) Deposition on Topics 28, 54, and 78, and exhibits 25, 26, 29, 30, and 32 thereto, as detailed in Counterclaim Plaintiffs’ accompanying memorandum in support of this motion.

In support of this Motion, Counterclaim Plaintiffs submit contemporaneously herewith a non-confidential Reply in Support of Motion to File Documents Under Seal, along with a proposed Order.

Dated: April 15, 2021

Respectfully submitted,

By: /s/ Lawrence J. Gotts

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*Counsel for Defendants-Counterclaim Plaintiffs
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Inc., and Philip Morris Products S.A.*

CERTIFICATE OF SERVICE

I hereby certify that on this 15th 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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