

**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’ 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.

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 15, 2021

Respectfully submitted,

By: /s/ Lawrence J. Gotts

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*Counsel for Defendants-Counterclaim Plaintiffs  
Altria Client Services LLC, Philip Morris USA  
Inc., and Philip Morris Products S.A.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15<sup>th</sup> 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:

*/s/ Lawrence J. Gotts*  
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