

**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 REDACT PORTIONS OF THE
MARCH 19, 2021 HEARING TRANSCRIPT**

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”) move to designate as “Confidential” pursuant to the Stipulated Protective Order (Dkt. 103) and to redact certain portions of the transcript of the hearing held before the Court on March 19, 2021 (Dkt. 531), on the grounds that they reflect confidential business information under the protective order. The portions of the transcripts that Counterclaim Plaintiffs seek to redact and the grounds for seeking such redaction are set forth in the accompanying memorandum in support.

Dated: April 26, 2021

Respectfully submitted,

By: /s/ Maximilian A. Grant

Maximilian A. Grant (VSB No. 91792)

max.grant@lw.com

Lawrence J. Gotts (VSB No. 25337)

lawrence.gotts@lw.com

Matthew J. Moore (*pro hac vice*)

matthew.moore@lw.com

LATHAM & WATKINS LLP

555 Eleventh Street, N.W., Suite 1000

Washington, DC 20004

Telephone: (202) 637-2200

Facsimile: (202) 637-2201

Clement J. Naples (*pro hac vice*)

clement.naples@lw.com

LATHAM & WATKINS LLP

885 Third Avenue

New York, NY 10022-4834

Tel: (212) 906-1200; Fax: (212) 751-4864

Gregory J. Sobolski (*pro hac vice*)

greg.sobolski@lw.com

LATHAM & WATKINS LLP

505 Montgomery Street, Suite 2000

San Francisco, CA 94111

Telephone: (415) 391-0600

Facsimile: (415) 395-8095

Brenda L. Danek (*pro hac vice*)

brenda.danek@lw.com

LATHAM & WATKINS LLP

330 North Wabash Avenue, Suite 2800

Chicago, IL 60611

Tel: (312) 876-7700; Fax: (312) 993-9767

*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 26th 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/ Maximilian A. Grant
Maximilian A. Grant (VSB No. 91792)
LATHAM & WATKINS LLP
555 Eleventh Street, N.W., Suite 1000
Washington, DC 20004
Telephone: (202) 637-2200
Facsimile: (202) 637-2201
Email: max.grant@lw.com

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