## 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,

Civil Action No. 1:20-cv-393-LO-TCB

v.

ALTRIA CLIENT SERVICES LLC; PHILIP MORRIS USA INC.; and PHILIP MORRIS PRODUCTS S.A.

Defendants and Counterclaim Plaintiffs.

## COUNTERCLAIM PLAINTIFFS' MOTION FOR LEAVE TO FILE DOCUMENTS UNDER 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, "PMP/Altria") hereby move the Court for leave to file under seal their Memorandum in Support of their Motion for Leave to Serve Supplemental Expert Reports, and Exhibits 2-21 thereto, under seal.

In support of this Motion, PMP/Altria submit contemporaneously herewith a non-confidential Memorandum in Support of Motion to File Documents Under Seal, along with a Proposed Order.



Dated: April 30, 2021 Respectfully submitted,

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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 30th 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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