

**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.	)	
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Case No. 1:20-cv-00393-LO-TCB

**PLAINTIFFS’ MOTION TO SEAL**

Pursuant to Local Civil Rule 5(C), Plaintiffs RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company respectfully move the Court for leave to file under seal and to file a redacted version of the following:

1. Plaintiffs’ Opposition to Defendants’ Motion for Leave To Serve Supplemental Expert Reports;
2. Exhibit A: excerpts from corrected amended supplemental expert report of Stacy Ehrlich;
3. Exhibit B: correspondence between counsel regarding deposition of David Clissold and supplemental report of Stacy Ehrlich;
4. Exhibit C: excerpts from amended and supplemental expert report of Paul K. Meyer;
5. Exhibit E: technical information regarding the Alto product;
6. Exhibit H: excerpts from Defendant PMP’s second supplemental response to Plaintiffs’ second set of interrogatories;
7. Exhibit I: March 12, 2021 letter from J. Michalik to J. Koh;

8. Exhibit J: excerpts from Defendant PMP's fifth supplemental response to Plaintiffs' second set of interrogatories;
9. Exhibit K: excerpts from March 12, 2021 supplemental report of John Abraham;
10. Exhibit L: correspondence between counsel regarding consent modification of the scheduling order;
11. Exhibit M: excerpts from March 31, 2021 supplemental responsive expert report of Kelly Kodama;
12. Exhibit N: October 27, 2020 letter from J. Michalik to J. Koh;
13. Exhibit O: November 19, 2020 letter from J. Michalik to J. Koh;
14. Exhibit P: excerpts from Plaintiffs' eighth supplemental response to Defendants' first set of interrogatories;
15. Exhibit R: excerpts from Defendants' October 10, 2020 30(b)(6) notice to Plaintiffs;
16. Exhibit S: excerpts from deposition of Reynolds's corporate witness;
17. Exhibit T: excerpts from RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company's Initial Disclosures;
18. Exhibit U: excerpts from report of Ryan Sullivan; and
19. Exhibit V: excerpts from the deposition of Defendants' corporate witness.

In support of this Motion, Plaintiffs submit contemporaneously herewith a proposed order and a non-confidential memorandum.

Dated: May 5, 2021

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Respectfully submitted,

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*Counsel for Plaintiffs RAI Strategic Holdings,  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of May, 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/ David M. Maiorana

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