

**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.)	Case No. 1:20-cv-00393-LO-TCB
)	
ALTRIA CLIENT SERVICES LLC; PHILIP)	
MORRIS USA, INC.; and PHILIP MORRIS)	
PRODUCTS S.A.,)	
)	
Defendants and Counterclaim Plaintiffs.)	
)	

PLAINTIFFS’ NOTICE OF A MOTION TO SEAL

Pursuant to Local Civil Rule 5(C), Plaintiffs RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company (“RJR,” and collectively, “Plaintiffs”) hereby provide notice that they are filing a Motion for Leave to File Under Seal un-redacted copies of the Memorandum in Support of R.J. Reynolds Vapor Company’s Motion to Compel Defendant Philip Morris Products S.A. to Designate Rule 30(b)(6) Witnesses Relating to Philip Morris Products S.A.’s Claim for a Permanent Injunction and accompanying Exhibits 3-13. Plaintiffs’ Motion to Seal is being filed concurrently with Plaintiffs’ Memorandum.

Memoranda in support of or in opposition to the motion may be submitted by parties or non-parties within seven days of the motion’s filing. All or part of any such memoranda may be designated as confidential, and any information so designated will be treated as sealed pending the Court’s determination on the motion to seal. Any person objecting to the motion must file an objection with the Clerk within seven days of the motion’s filing. If no objection is timely filed, the Court may treat the motion as uncontested.

Dated: May 14, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 14th 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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