

**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.)
_____)

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 redacted versions of the following:

1. Reynolds's Opposition to Defendants' Motion to Compel Deposition Date; and
2. Exhibits A-M: correspondence between counsel regarding Rule 30(b)(6) depositions.

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

Dated: May 19, 2021

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 19th 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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