

**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 PLAINTIFF PHILIP MORRIS  
PRODUCTS S.A.'S MOTION TO SEAL**

Pursuant to Local Civil Rule 5(C), Counterclaim Plaintiff Philip Morris Products S.A. (“PMP”) hereby moves the Court for leave to file PMP’s Opposition to Counterclaim Defendant’s (“Reynolds”) Motion to Compel Rule 30(b)(6) Witnesses Relating to Injunctive Relief and Exhibit 1 thereto under seal, as detailed in PMP’s accompanying memorandum in support of this motion.

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

Dated: May 19, 2021

Respectfully submitted,

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*Plaintiff Philip Morris Products S.A.*

**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:

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