

**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
NOTICE OF A MOTION TO SEAL**

Pursuant to Local Civil Rule 5(C), Counterclaim Plaintiff Philip Morris Products S.A. (“PMP”) hereby provides notice that it is filing a Motion to Seal. The Motion to Seal is being filed concurrently with, and in relation to, PMP’s Opposition to Counterclaim Defendant’s (“Reynolds”) Motion to Compel Rule 30(b)(6) Witnesses Relating to Injunctive Relief.

Memoranda in support of or in opposition to the Motion to Seal may be submitted by parties and non-parties within seven (7) days after the filing of the Motion to Seal. All or part of any such memoranda may be designated as confidential. Any information designated as confidential in a supporting or opposing memorandum will be treated as sealed pending a Case determination by the Court on the Motion to Seal. Any person objecting to the Motion to Seal must file an objection with the Clerk within seven (7) days after the filing of the Motion to Seal. If no objection is filed in a timely manner, the Court may treat the motion as uncontested.

Dated: May 19, 2020

Respectfully submitted,

/s/ Maximilian A. Grant

Maximilian A. Grant (VSB No. 91792)

max.grant@lw.com

Lawrence J. Gotts (VSB No. 25337)

lawrence.gotts@lw.com

Matthew J. Moore (*pro hac vice*)

matthew.moore@lw.com

Jamie Underwood

jamie.underwood@lw.com (*pro hac vice*)

LATHAM & WATKINS LLP

555 Eleventh Street, N.W., Ste. 1000

Washington, DC 20004

Tel: (202) 637-2200; Fax: (202) 637-2201

Clement J. Naples (*pro hac vice*)

clement.naples@lw.com

LATHAM & WATKINS LLP

885 Third Avenue

New York, NY 10022-4834

Tel: (212) 906-1200; Fax: (212) 751-4864

Gregory K. Sobolski (*pro hac vice*)

Greg.sobolski@lw.com

LATHAM & WATKINS LLP

505 Montgomery Street, Suite 2000

San Francisco, CA 94111

Tel: (415) 391-0600; Fax: (415) 395-8095

Brenda L. Danek (*pro hac vice*)

brenda.danek@lw.com

LATHAM & WATKINS LLP

330 North Wabash Avenue, Suite 2800

Chicago, IL 60611

Tel: (312) 876-7700; Fax: (312) 993-9767

Counsel for Defendant and Counterclaim

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:

/s/ Maximilian A. Grant

Maximilian A. Grant (VSB No. 91792)
LATHAM & WATKINS LLP
555 Eleventh Street, N.W., Suite 1000
Washington, DC 20004
Telephone: (202) 637-2200
Facsimile: (202) 637-2201
Email: max.grant@lw.com

*Counsel for Defendant and Counterclaim
Plaintiff Philip Morris Products S.A.*