

**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.)	
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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 redacted versions of the following:

1. Memorandum in Support of Plaintiffs’ Partial Motion to Stay Further Proceedings on the Claim of Philip Morris Products S.A. Seeking Injunction Relief;
2. Exhibit A: May 14, 2021, Initial Determination in ITC Inv. No. 337-TA-1199; and
3. Exhibit B: Phillip Morris Products S.A.’s Objections and Responses to Plaintiffs’ Sixth Set of Interrogatories (No. 23-24).

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

Dated: May 21, 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 21st 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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