

**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'S MOTION FOR LEAVE
TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Local Civil Rule 5(C), Counterclaim Plaintiff Philip Morris Products S.A. ("PMP") hereby moves the Court for leave to file under seal its Memorandum in Support of PMP's Opposition to Reynolds' Partial Motion to Stay Injunctive Relief Discovery and Exhibits 2-7, under seal.

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 26, 2021

Respectfully submitted,

By: /s/ Maximilian A. Grant

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Philip Morris Products S.A.

CERTIFICATE OF SERVICE

I hereby certify that on this 26th 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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