

**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 PLAINTIFFS' 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 Reynolds' Partial Motion to Stay Injunctive Relief Discovery.

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 26, 2021

Respectfully submitted,

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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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