

**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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**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. Reply in Support of Plaintiffs’ Partial Motion to Stay Further Proceedings on the Claim of Philip Morris Products S.A. Seeking Injunction Relief;
2. Exhibit C: May 24, 2021, correspondence between counsel; and
3. Exhibit D: April 16, 2021, deposition transcript excerpts of PMP’s corporate witness.

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

Dated: May 27, 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 27th 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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