

**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.)	
)	

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. Brief in Support of Plaintiffs’ Partial Motion for Summary Judgment;
2. Exhibit B: expert report discussing Plaintiffs’ confidential technical information;
3. Exhibit C: Plaintiffs’ confidential technical documents;
4. Exhibit E: expert report discussing third party confidential technical information;
5. Exhibit F: expert report discussing Defendants’ confidential technical information;
6. Exhibit G: expert report discussing Plaintiffs’ confidential technical information;
7. Exhibit H: expert report discussing Plaintiffs’ confidential technical information;
8. Exhibit K: deposition transcript discussing Plaintiffs’ confidential technical information;

9. Exhibit L: Plaintiffs' confidential technical document;
10. Exhibit M: expert report discussing Plaintiffs' confidential technical information;
11. Exhibit N: Plaintiffs' confidential technical document;
12. Exhibit O: interrogatory answers discussing Plaintiffs' confidential business and technical information;
13. Exhibit P: interrogatory answers discussing Plaintiffs' confidential business and technical information;
14. Exhibit Q: expert report discussing Plaintiffs' confidential technical information;
15. Exhibit S: interrogatory answers discussing Plaintiffs' confidential technical information.

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

Dated: June 2, 2021

Stephanie E. Parker
JONES DAY
1221 Peachtree Street, N.E.
Suite 400
Atlanta, Georgia 30361
Telephone: (404) 521-3939
Facsimile: (404) 581-8330
Email: searker@jonesday.com

Anthony M. Insogna
JONES DAY
4655 Executive Drive
Suite 1500
San Diego, CA 92121
Telephone: (858) 314-1200
Facsimile: (844) 345-3178
Email: aminsogna@jonesday.com

William E. Devitt
JONES DAY
77 West Wacker
Suite 3500
Chicago, IL 60601
Telephone: (312) 269-4240
Facsimile: (312) 782-8585
Email: wdevitt@jonesday.com

Sanjiv P. Laud
JONES DAY
90 South Seventh Street
Suite 4950
Minneapolis, Minnesota 55402
Telephone: (612) 217-8800
Facsimile: (844) 345-3178
Email: slaud@jonesday.com

Respectfully submitted,

/s/ David M. Maiorana
David M. Maiorana (VA Bar No. 42334)
Ryan B. McCrum
JONES DAY
901 Lakeside Ave.
Cleveland, OH 44114
Telephone: (216) 586-3939
Facsimile: (216) 579-0212
Email: dmaiorana@jonesday.com
Email: rhmccrum@jonesday.com

John J. Normile
JONES DAY
250 Vesey Street
New York, NY 10281
Telephone: (212) 326-3939
Facsimile: (212) 755-7306
Email: jjnormile@jonesday.com

Alexis A. Smith
JONES DAY
555 South Flower Street
Fiftieth Floor
Los Angeles, CA 90071
Telephone: (213) 243-2653
Facsimile: (213) 243-2539
Email: asmith@jonesday.com

Charles B. Molster, III Va. Bar No. 23613
THE LAW OFFICES OF
CHARLES B. MOLSTER, III PLLC
2141 Wisconsin Avenue, N.W. Suite M
Washington, DC 20007
Telephone: (703) 346-1505
Email: cmolster@molsterlaw.com

*Counsel for Plaintiffs RAI Strategic Holdings,
Inc. and R.J. Reynolds Vapor Company*

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of June, 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

David M. Maiorana (VA Bar No. 42334)

JONES DAY

901 Lakeside Ave.

Cleveland, OH 44114

Telephone: (216) 586-3939

Facsimile: (216) 579-0212

Email: dmaiorana@jonesday.com

*Counsel for Plaintiffs RAI Strategic Holdings,
Inc. and R.J. Reynolds Vapor Company*