

**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' MOTION TO SEAL

Pursuant to Local Civil Rule 5(C), Counterclaim Plaintiffs Altria Client Services, LLC (“ACS”), Philip Morris USA Inc. (“PM USA”), and Philip Morris Products S.A. (“PMP”) (collectively, “PMP/Altria”) hereby move the Court for leave to file under seal the following documents:

1. An unredacted version of PMP/Altria’s Memorandum in Support of Their Motion for Summary Judgment, and Exhibits 5-11, 18, and 21 thereto, as detailed in PMP/Altria’s accompanying memorandum in support of this motion.

In support of this Motion, PMP/Altria submits contemporaneously herewith a non-confidential Memorandum in Support of Motion to File Documents Under Seal, along with a proposed Order.

Dated: June 2, 2021

Respectfully submitted,

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Morris USA Inc., and Philip Morris
Products S.A.*

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:

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