

**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’ NOTICE OF A MOTION TO SEAL

Pursuant to Local Civil Rule 5(C), Plaintiffs RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company (“RJR,” and collectively, “Plaintiffs”) hereby provide notice that they are filing a Motion for Leave to File Under Seal un-redacted copies of Exhibits 1-2 and 4-5 to their Memorandum in Support of Motion For Relief From Stipulation on Deposition Dates in Light of New Injunction-Related Contentions from Philip Morris Products S.A. Plaintiffs’ Motion to Seal is being filed concurrently with Plaintiffs’ Memorandum.

Memoranda in support of or in opposition to the motion may be submitted by parties or non-parties within seven days of the motion’s filing. All or part of any such memoranda may be designated as confidential, and any information so designated will be treated as sealed pending the Court’s determination on the motion to seal. Any person objecting to the motion must file an objection with the Clerk within seven days of the motion’s filing. If no objection is timely filed, the Court may treat the motion as uncontested.

Dated: June 11, 2021

Respectfully submitted,

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

/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

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

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

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

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

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 11th 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*