

**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.)	
)	

Case No. 1:20-cv-00393-LO-TCB

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 exhibits to Plaintiff’s Brief in Support of Plaintiffs’ Motion to Dismiss:

- Exhibit A: Proposed Amended Answer to PMP’s Counterclaims;
- Exhibit B: Proposed Amended Response to Altria’s and PM USA’s counterclaims;
- Exhibit L: Redline of Proposed Amended Answer to PMP’s Counterclaims; and
- Exhibit M: Redline of Proposed Amended Response to Altria’s and PM USA’s Counterclaims.

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

Dated: June 16, 2021

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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 16th 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

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