

**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 Plaintiff Philip Morris Products S.A. ("PMP") hereby moves the Court for leave to file under seal the following documents:

1. An unredacted version of PMP's Opposition to their Motion for Relief from Stipulated Deposition Dates and Exhibits 2, 8, 9, and 10 thereto, as detailed in PMP's accompanying memorandum in support of this motion.

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

Dated: June 16, 2021

Respectfully submitted,

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*Plaintiff Philip Morris Products S.A.*

**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/ Maximilian A. Grant*  
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