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 ("Reynolds," and collectively, "Plaintiffs") hereby provide notice that they are filing a Motion for Leave to File Under Seal un-redacted copies of Exhibits L, M, P, Q, S, T, U, and W that accompany Plaintiffs' Brief in Opposition to Counterclaim Plaintiffs' Motion for Summary Judgment. Plaintiffs' Motion to Seal is being filed concurrently with Plaintiffs' Brief.

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 16, 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: separker@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 Avenue Cleveland, OH 44114 Telephone: (216) 586-3939 Facsimile: (216) 579-0212

Email: dmaiorana@jonesday.com Email: rbmccrum@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 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.

<u>/s/ David M. Maiorana</u>

David M. Maiorana (VA Bar No. 42334) JONES DAY 901 Lakeside Avenue Cleveland, OH 44114 Talanhana (216) 586, 2020

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

