

**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.	)	
	)	

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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:

- Reply in Support of Motion For Relief From Stipulation on Deposition Dates in Light of New Injunction-Related Contentions From Philip Morris Products S.A.
- Exhibit 6: Reynolds’s Response to PMP’s Eighth Set of Requests for Admission;
- Exhibit 7: PMP’s Response to Plaintiffs’ Tenth Set of Requests for Production;
- Exhibit 8: PMP’s Response to Plaintiffs’ First Set of Interrogatories.

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

Dated: June 17, 2021

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 17th 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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