UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

R.J. REYNOLDS VAPOR COMPANY, Plaintiffs and Counterclaim Defendants, v. Case No. 1:20-cv-00393-LO-TCE ALTRIA CLIENT SERVICES LLC; PHILIP MORRIS USA, INC.; and PHILIP MORRIS PRODUCTS S.A., Defendants and Counterclaim Plaintiffs.	RAI STRATEGIC HOLDINGS, INC. and)	
v. Case No. 1:20-cv-00393-LO-TCE ALTRIA CLIENT SERVICES LLC; PHILIP MORRIS USA, INC.; and PHILIP MORRIS PRODUCTS S.A.,	R.J. REYNOLDS VAPOR COMPANY,)	
v. Case No. 1:20-cv-00393-LO-TCE ALTRIA CLIENT SERVICES LLC; PHILIP MORRIS USA, INC.; and PHILIP MORRIS PRODUCTS S.A.,)	
ALTRIA CLIENT SERVICES LLC; PHILIP MORRIS USA, INC.; and PHILIP MORRIS PRODUCTS S.A.,)	Plaintiffs and Counterclaim Defendants,)	
ALTRIA CLIENT SERVICES LLC; PHILIP MORRIS USA, INC.; and PHILIP MORRIS PRODUCTS S.A.,))	Case No. 1:20-cy-00393-LO-TCB
MORRIS USA, INC.; and PHILIP MORRIS) PRODUCTS S.A.,)	V.)	0.0000000000000000000000000000000000000
MORRIS USA, INC.; and PHILIP MORRIS) PRODUCTS S.A.,)	ALTERIA GLIENTE GERNIGEG LL G. RIVILIR)	
PRODUCTS S.A.,	ALTRIA CLIENT SERVICES LLC; PHILIP)	
)	MORRIS USA, INC.; and PHILIP MORRIS)	
Defendants and Counterclaim Plaintiffs.	PRODUCTS S.A.,)	
Defendants and Counterclaim Plaintiffs.)	
	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 ("RJRV," and collectively, "Plaintiffs") hereby provide notice that they are filing a Motion for Leave to File Under Seal un-redacted copies of their 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 and accompanying Exhibits 6-8. 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 17, 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

Sanjiv P. Laud

Telephone: (312) 269-4240 Facsimile: (312) 782-8585 Email: wdevitt@jonesday.com

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 Ave. 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 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.

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

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

