

**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.	)	
	)	

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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:

1. Reply in Support of Plaintiffs’ Partial Motion for Summary Judgment;
2. Exhibit T: deposition transcript discussing third party confidential technical information;
3. Exhibit U: declaration discussing confidential technical information.

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

Dated: June 22, 2021

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*Counsel for Plaintiffs RAI Strategic Holdings,  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd 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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