

**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' NOTICE OF FILING A MOTION TO SEAL**

Pursuant to Local Civil Rule 5(C), Counterclaim Plaintiffs Altria Client Services LLC ("ACS"), Philip Morris USA Inc. ("PM USA"), and Philip Morris Products S.A. ("PMP") (collectively, "PMP/Altria") hereby provide notice that they are filing a Motion to Seal. The Motion to Seal is being filed concurrently with, and in relation to, PMP/Altria's Opposition to RJR's Motion to Dismiss Inequitable Conduct Counterclaim and Affirmative Defenses and Memorandum in Support of their Cross-Motion for Attorneys' Fees and Costs.

Memoranda in support of or in opposition to the Motion to Seal may be submitted by parties and non-parties within seven (7) days after the filing of the Motion to Seal. All or part of any such memoranda may be designated as confidential. Any information designated as confidential in a supporting or opposing memorandum will be treated as sealed pending a Case determination by the Court on the Motion to Seal. Any person objecting to the Motion to Seal must file an objection with the Clerk within seven (7) days after the filing of the Motion to Seal. If no objection is filed

in a timely manner, the Court may treat the motion as uncontested.

Dated: June 30, 2021

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 30th 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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