

**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.	)
_____	)

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. Reynolds’s Reply in support of Motion to Dismiss Counterclaim and Affirmative Defenses and Opposition to Counterclaim Plaintiffs’ Cross-Motion for Attorneys’ Fees and Costs;
2. Exhibit P, letter from Nicole Smith to Jennifer Koh, March 3, 2021;
3. Exhibit Q, excerpts of the deposition transcript of Robert L. Ripley (March 15, 2021);
4. Exhibit R, excerpt of the deposition transcript of Grier S. Fleischhauer (March 11, 2021);

5. Exhibit S, email correspondence from Jennifer Koh to Nicole Smith, March 10, 2021;
6. Exhibit T, email correspondence from Nicole Smith to Jennifer Koh, March 18, 2021;
7. Exhibit U, pages 13 and 14 of the Expert Report of Dr. Travis Blalock.

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

Dated: July 6, 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 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 6th day of July, 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

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*