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., Case No. 1:20-cv-00393-LO-TCB

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 ("Reynolds," and collectively, "Plaintiffs") hereby provide notice that they are filing a Motion for Leave to File Under Seal an un-redacted copy 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 and accompanying Exhibits P, Q, R, S, T, and U. 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: 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

DOCKE.

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 Case 1:20-cv-00393-LO-TCB Document 774 Filed 07/06/21 Page 3 of 3 PageID# 20857

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