## 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,

Civil Action No. 1:20-cv-393-LO-TCB

v.

ALTRIA CLIENT SERVICES LLC; PHILIP MORRIS USA INC.; and PHILIP MORRIS PRODUCTS S.A.

Defendants and Counterclaim Plaintiffs.

## **COUNTERCLAIM PLAINTIFFS' 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 move the Court for leave to file under seal the following documents:

- Memorandum in Support of PMP/Altria's Motion for Leave to File Supplemental Materials in Support of Their Opposition to Reynolds' Motion for Partial Summary Judgment.
- Exhibits A-C to Memorandum in Support of PMP/Altria's Motion for Leave to
  File Supplemental Materials in Support of Their Opposition to Reynolds'
  Motion for Partial Summary Judgment.



In support of this Motion, PMP/Altria submits contemporaneously herewith a non-confidential Memorandum in Support of their Motion to File Documents Under Seal, along with a proposed Order.

Dated: July 15, 2021

Respectfully submitted,

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Counsel for Defendants and Counterclaim Plaintiffs Altria Client Services LLC, Philip Morris USA Inc., and Philip Morris



Products S.A.



## **CERTIFICATE OF SERVICE**

I hereby certify that on this 15th 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/ Maximilian A. Grant

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