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., Civil 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 (collectively, "Plaintiffs") hereby provide notice that they are filing a

Motion for Leave to File Under Seal their Amended Answer sto Defendant Philip Morris

Products, S.A.'s Second Amended Counterclaims.

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: August 11, 2021

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of August 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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