

**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

**REYNOLDS'S MOTION TO SEAL**

Pursuant to Local Civil Rule 5(C), RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company (collectively, "Reynolds") respectfully move the Court for leave to file under seal and to file a redacted version of the following:

1. Reynolds's Memorandum in Support of Motion *in Limine* No. 10.

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

Dated: January 21, 2022

Respectfully submitted,

Stephanie E. Parker  
JONES DAY  
1420 Peachtree Street, N.E.  
Suite 800  
Atlanta, GA 30309  
Telephone: (404) 521-3939  
Facsimile: (404) 581-8330  
Email: [searker@jonesday.com](mailto:searker@jonesday.com)

/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](mailto:dmaiorana@jonesday.com)  
Email: [rhmccrum@jonesday.com](mailto:rhmccrum@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](mailto:aminsogna@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](mailto:jjnormile@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](mailto:wdevitt@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](mailto:asmith@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](mailto:slaud@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](mailto:cmolster@molsterlaw.com)

*Counsel for RAI Strategic Holdings, Inc. and  
R.J. Reynolds Vapor Company*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21st day of January, 2022, 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 RAI Strategic Holdings, Inc. and  
R.J. Reynolds Vapor Company*