

**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 DOCUMENTS IN SUPPORT OF
MOTION TO EXCLUDE THE TESTIMONY OF PAUL K. MEYER**

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 redacted versions of the following:

1. Memorandum in Support of Reynolds's Motion to Exclude the Testimony of Paul K. Meyer; and
2. Exhibits 1 and 2.

Reynolds further moves to file wholly under seal the following exhibits accompanying the Memorandum in Support of Reynolds's Motion to Exclude the Testimony of Paul K. Meyer:

1. Exhibits 3-6, 8-10, and 13.

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

Dated: January 21, 2022

Respectfully submitted,

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*Counsel for RAI Strategic Holdings, Inc. and
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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

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