

**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 NOTICE OF MOTION TO SEAL REYNOLDS'S MEMORANDUM IN  
OPPOSITION TO PM/ALTRIA'S MOTION TO EXCLUDE OPINIONS OF RJR'S  
EXPERTS BASED ON REJECTED CLAIM CONSTRUCTIONS AND  
ACCOMPANYING EXHIBITS 2-9**

Pursuant to Local Civil Rule 5(C), RAI Strategic Holdings, Inc. and R.J. Reynolds Vapor Company (collectively, "Reynolds") hereby provide notice that they are filing a Motion for Leave to File Under Seal un-redacted versions of Reynolds's Memorandum in Opposition to PM/Altria's Motion to Exclude Opinions of RJR's Experts Based on Rejected Claim Constructions and accompanying Exhibits 2-9. Reynolds's Motion to Seal is being filed concurrently with Reynolds's 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: February 11, 2022

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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 11th day of February, 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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