

**IN THE 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 OPPOSITION
TO PM/ALTRIA'S DAUBERT MOTION TO EXCLUDE THE
DESIGN-AROUND TESTIMONY OF DAVID CLISSOLD**

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. Opposition to PM/Altria's Daubert Motion to Exclude the Design-Around Testimony of David Clissold; and
2. Exhibits 1-4 and 6.

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

Dated: February 11, 2022

Respectfully submitted,

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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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