

**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  
TESTIMONY OF RYAN SULLIVAN**

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 Testimony of Ryan Sullivan; and
2. Exhibits 1 and 4.

Reynolds further moves to file wholly under seal the following exhibits accompanying the Opposition to PM/Altria's Daubert Motion to Exclude the Testimony of Ryan Sullivan:

1. Exhibits 2-3, 5, and 7.

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

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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