

**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 REYNOLDS'S OPPOSITION TO PMI/ALTRIA'S  
OMNIBUS MOTION *IN LIMINE* AND ACCOMPANYING EXHIBITS 1, 2, 7-14, 16, 17,  
19, AND 20**

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

1. Reynolds's Opposition to PMI/Altria's Omnibus Motion *in Limine*; and
2. Accompanying Exhibits 2, 7, 8, 9, 10, 11, 12, 13 and 17.

Reynolds further moves to file wholly under seal the following exhibits accompanying the Opposition:

1. Exhibits 1, 14, 16, 19, and 20.

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

**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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