

EXHIBIT 6

Claimant's Motion to Produce Critical Discovery Documents dated April 2, 2025

MOTION TO PRODUCE CRITICAL DISCOVERY DOCUMENTS

FINRA Case No. 24-02286

April 2nd, 2025

INTRODUCTION

Claimant respectfully submits this Motion to Compel Discovery due to Respondent Oppenheimer's continued failure to produce critical discovery documents despite repeated requests and prior acknowledgments that such documents exist.

FACTUAL BACKGROUND

1. The ongoing withholding of key financial records in Excel Spreadsheet format, which Respondent stated they sent, then agreed during the prehearing conference to send when Claimant's pro se attorney stated they didn't receive, then instead sent log files not financial statements. In addition, they stated they now refuse to comply by sending the financials in Excel Spreadsheet format.
2. Additionally, Respondent has failed to produce the signed letter stating Mr. Weiner gave Mr. Hymen a "bonus," despite this letter having been discussed with regional manager Mr. Mygatt.
3. Mr. McGuire's amended statement of claim incorrectly states the rate increase occurred in January 2022, contradicting the documentary evidence.
4. Most of the files sent continue to be in files larger than 30MBs, which this issue was clearly addressed and agreed upon by Mr. McGuire.

REQUEST FOR RELIEF

WHEREFORE, Claimant respectfully requests that the Arbitrator:

1. Draw an adverse inference that the withheld records would support Claimant's allegations regarding unauthorized fee increases and exploitation of a cognitively impaired elderly client;
2. Order Respondent to immediately produce all missing documentation, including:
 - Complete Excel spreadsheets showing all fees and commissions
 - The signed letter regarding Mr. Hymen's "bonus"
 - Making sure all files are 30MB or smaller. No exceptions.

Respectfully submitted,

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