

EXHIBIT 15-C

Oppenheimer's Response to Claimant's Motion to Produce Discovery dated April
10, 2025

BEFORE THE
FINANCIAL INDUSTRY REGULATORY AUTHORITY
("FINRA")

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TERRI P. TEPPER

FINRA Case No. 24-02286

Claimant,

-against -

OPPENHEIMER & CO., INC.

Respondent.

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RESPONDENT OPPENHEIMER & CO., INC.'S RESPONSE
TO CLAIMANT'S MOTION TO PRODUCE DISCOVERY

Respondent Oppenheimer & Co., Inc., ("Oppenheimer" or "Respondent") by its undersigned counsel hereby makes this response to Claimant Terri Tepper's ("Claimant") recent filing on the FINRA Portal pertaining to discovery.

On April 3, 2025, Claimant filed an additional discovery motion, in which Claimant asserts that Respondent is "withholding key financial records in Excel Spreadsheet format" and more. Respondent is perplexed to what Claimant is referring to. As reflected in Mr. Ordower's Order dated March 14, 2025, Oppenheimer was mandated to produce the "Client Activity Report" in Excel spreadsheet, which Oppenheimer did produce to Claimant. Oppenheimer is not and never was in possession of any other financial records pertaining to the accounts in question in any other format other than what has already been produced to Claimant in smaller file sizes as requested. Respondent does not even keep these records in excel; Oppenheimer never agreed to produce such documents in excel. To reiterate, Oppenheimer to date has produced everything that was not previously objected to in Oppenheimer's responses to Claimant's request for discovery, with the exception of specific email communications and an internal memo that Oppenheimer submitted

on the FINRA Portal (that Claimant has access to) for confidentiality review by Mr. Ordower.

Furthermore, Claimant states that some of the files are still greater than 30MB. Oppenheimer worked to break up the files sizes as best as possible, the largest file size being 60MB at 60 pages long. However, due to the contents of many of the files, (graphs, charts, etc., all of which accounts for the file size) some of them are unable to be broken up to be under 30MB. To break these files up even more could jeopardize the contents of the documents. Respondent has asked Claimant to identify which specific files they are having issues with accessing, and Claimant has refused to inform Respondent. Oppenheimer has now produced these files twice. Respondent would also like to acknowledge the fact that in Claimant's most recent filing on April 10, 2025, documents from Oppenheimer's production – which are part of the production that Claimant states they cannot open – are used as attachments.

Wherefore, for the foregoing reasons, Respondent respectfully requests that Mr. Ordower deny Claimant's Motion to produce discovery on the grounds that Oppenheimer has already produced everything in its possession (with the exception of the specific email documents and internal memo submitted on the FINRA Portal for confidentiality review).

Dated: April 10, 2025
New York, NY

/s/ John T. McGuire
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