

EXHIBIT 16

Oppenheimer's Motion in Opposition to Claimants' Motion to Accept Expert
Letter dated February 21, 2025

BEFORE THE
FINANCIAL INDUSTRY REGULATORY AUTHORITY
("FINRA")

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JORDAN TEPPER WEINER
and TERRI P. TEPPER

FINRA Case No. 24-02286

Claimants,

-against -

OPPENHEIMER & CO., INC.

Respondent.

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**RESPONDENT OPPENHEIMER & CO., INC.'S MOTION IN OPPOSITION TO CLAIMANTS' MOTION
TO ACCEPT EXPERT LETTER**

Respondent Oppenheimer & Co. Inc. ("Oppenheimer" or "Respondent") by its undersigned counsel hereby makes this motion in opposition to Claimants Jordan Teppper Weiner's and Terri P. Teppper's (collectively "The Claimants") Motion to Accept Expert Witness Letter. While Claimants submission of this letter may seek to streamline proceedings, the acceptance of this letter would be insufficient. Respondent believes it is crucial for the arbitrator to be able to observe the witness's live testimony in order for the arbitrator to fully evaluate the expert's credibility/expertise (or lack thereof), qualifications, and potential biases, all of which cannot be adequately assessed through written materials alone. As such, Respondent requests that the Arbitrator deny Claimants' Motion, and preclude the Expert Witness Letter from any consideration in this arbitration.

The purpose of arbitration is not only to evaluate the evidence presented but also to assess the demeanor and reliability of the witnesses who provide that evidence. The arbitrator must have the opportunity to observe and directly ask questions regarding the witness's consistency and response under direct questioning, potential biases, and qualifications in real time, all of which could

manifest in ways that cannot be captured in written testimony. Written testimony, by its nature, lacks the dynamic interaction between witnesses, counsel, and the arbitrator that would allow for a deeper understanding of the witness's reliability – the true foundation of all evidence. While written testimony may contain an expert's opinions, it fails to allow the arbitrator to gauge whether the witness truly possesses the depth of knowledge and experience necessary to support their opinions. For these reasons, witnesses need to testify so the arbitrator can observe their demeanor, evident bias, lack of credibility and/or lack of expertise.

Wherefore, for the reasons stated above, Respondent respectfully requests that Claimants' Motion to Allow Expert Letter be denied and that the arbitrator enforces the standard of live testimony for this witness to ensure a fair and complete assessment of the evidence presented in this matter.

Dated: February 21, 2025

New York, NY

/s/ John T. McGuire

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