

EXHIBIT 16
Filed Under Seal

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

JOSHUA GLASSCOCK, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

SIG SAUER, INC.,

Defendant.

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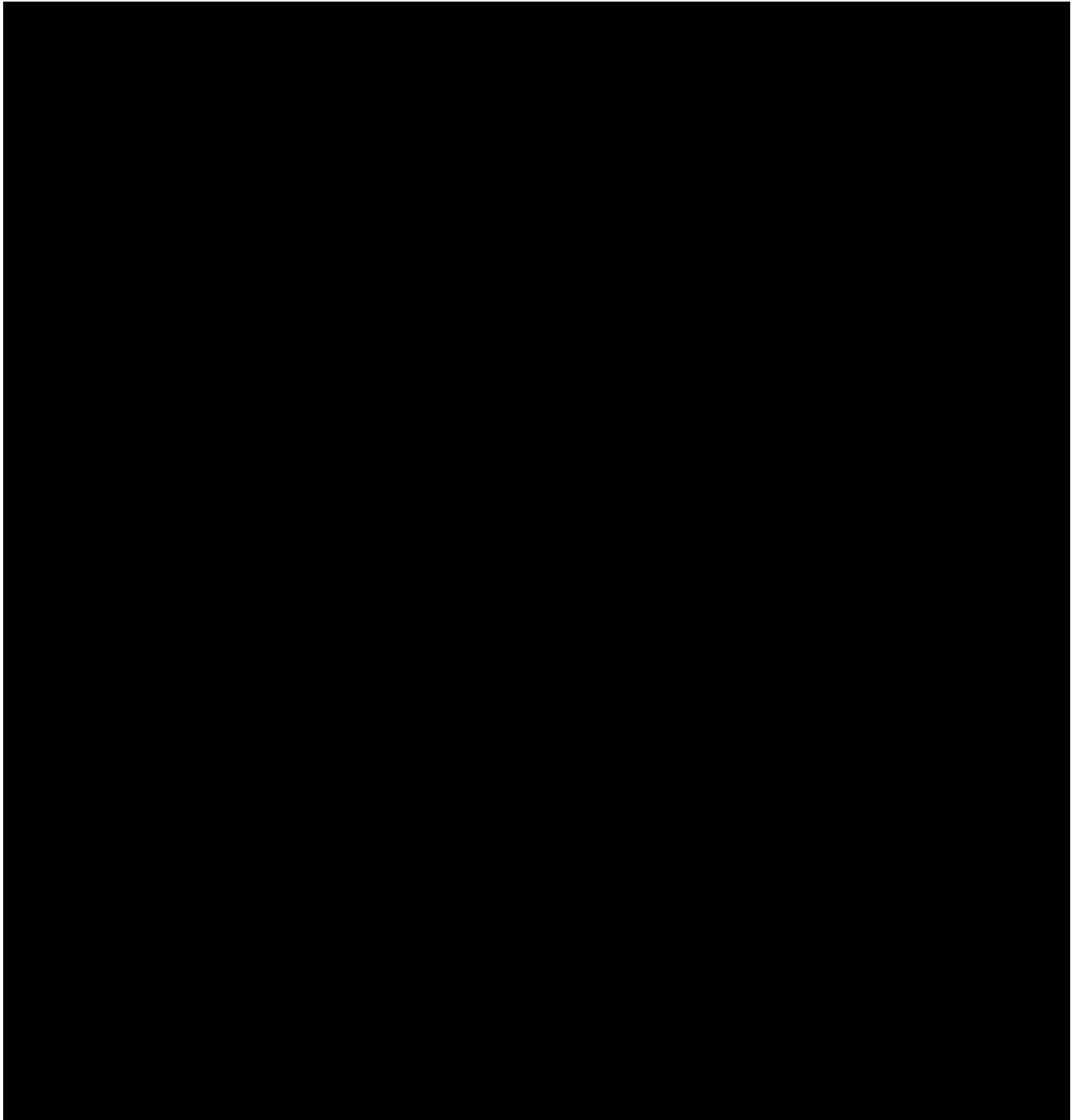
Case No.: 6:22-cv-3095-MDH

**DECLARATION OF ED MURPHY IN SUPPORT OF SIG SAUER, INC.'S
OPPOSITION TO PLAINTIFF'S MOTION FOR CLASS CERTIFICATION**


I, Ed Murphy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of eighteen and competent to make this declaration.
2. I am a Vice President of Quality Assurance at Sig Sauer, Inc. ("Sig Sauer"). In this role, I oversee product quality and quality management for Sig Sauer's engineered and manufactured products for military and commercial markets. I have served in this role since October 2010.
3. I submit this declaration in support of Sig Sauer's suggestions in opposition to plaintiff Joshua Glasscock's motion for class certification ("Motion," ECF No. 121). The facts set forth below are based on my personal knowledge and my familiarity with, and access to, records maintained by Sig Sauer in the regular course of business. If called as a witness, I could competently testify to the matters set forth in this declaration.
4. In January 2017, the U.S. Army ("Army") selected the XM17 and XM18 (the "MHS Contract Pistols") to be their official standard-issue service pistol and entered into the Modular Handgun System ("MHS") Contract with Sig Sauer ("MHS Contract").

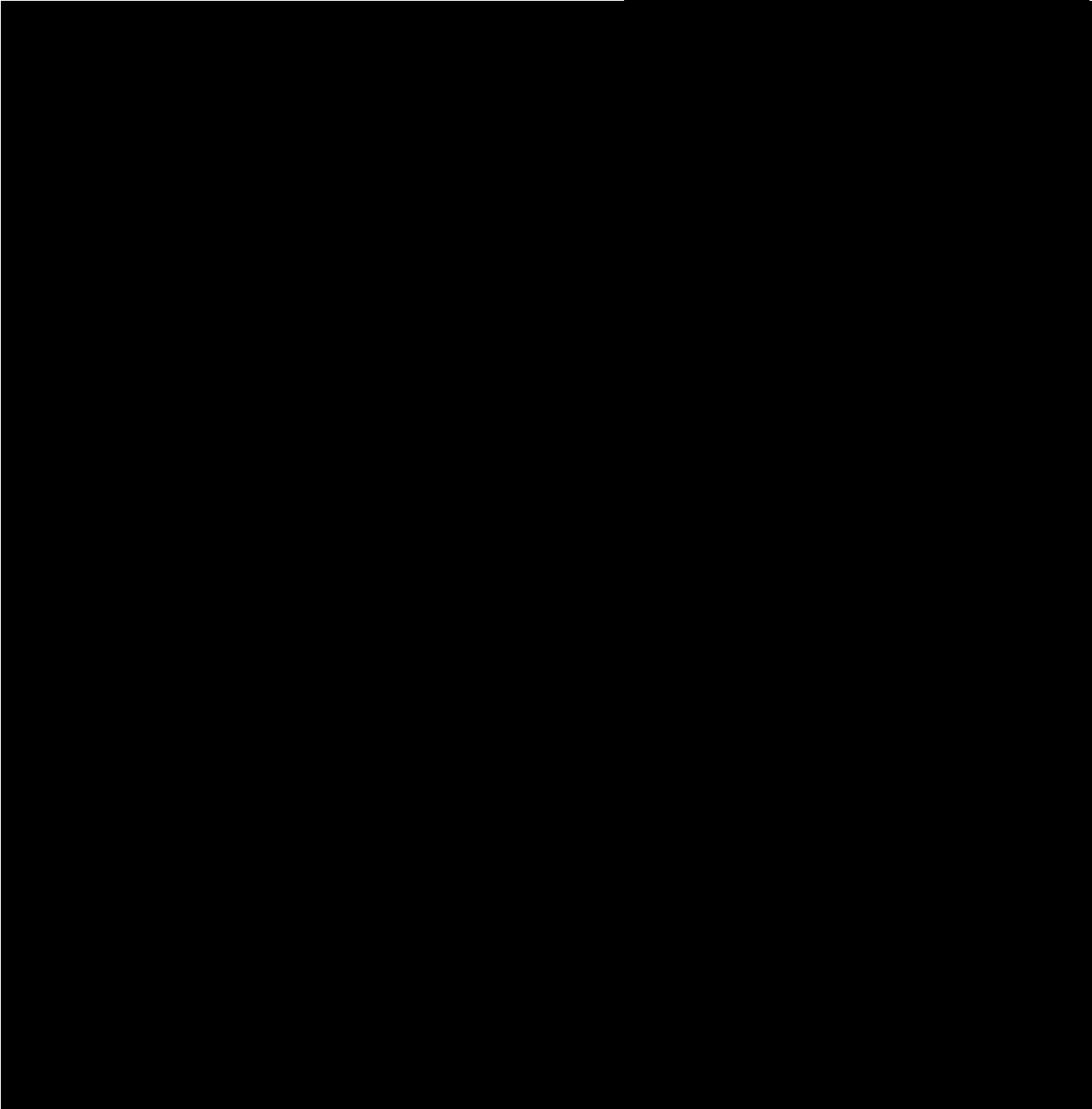
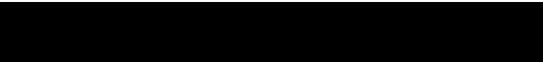
5. In February 2017, Sig Sauer performed a Failure Modes, Effects, and Criticality Assessment (“FMECA”) in response to the requirements of the MHS Contract.

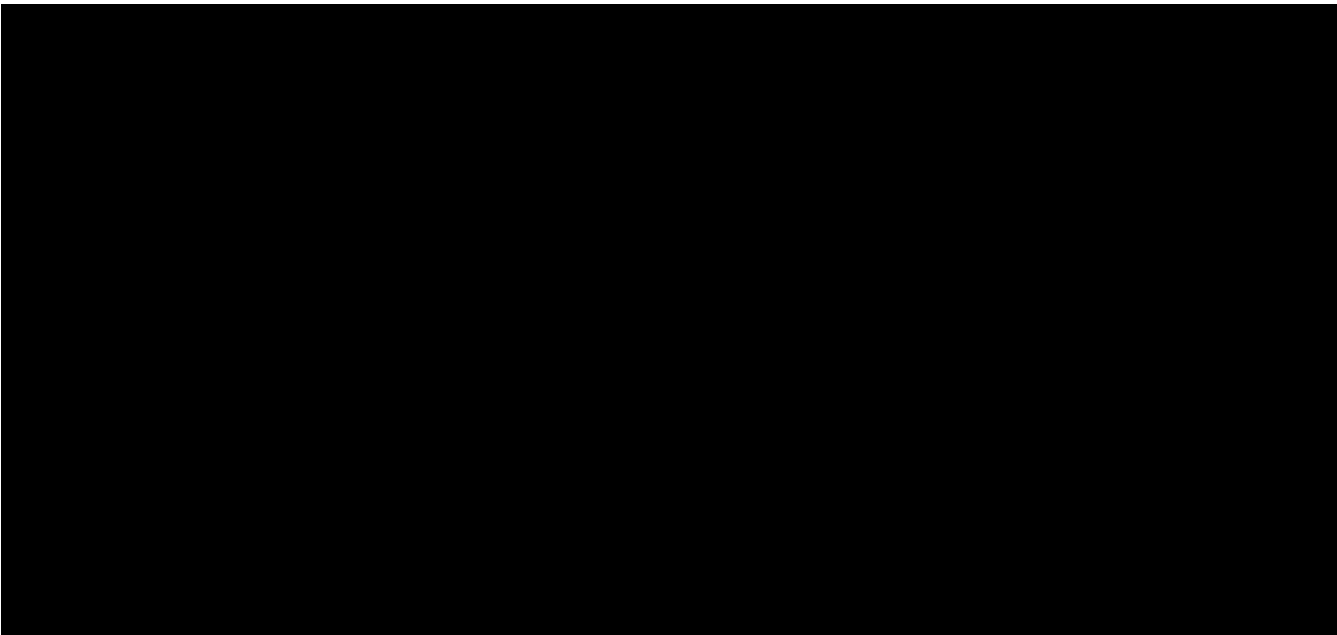


¹ For example, the MHS Contract required the MHS Contract Pistols to be equipped with an external manual safety among other things. *See* Plaintiff’s Ex. 15 to the Motion (Purchase Description, Modular Handgun) at section 3.4.4(d).

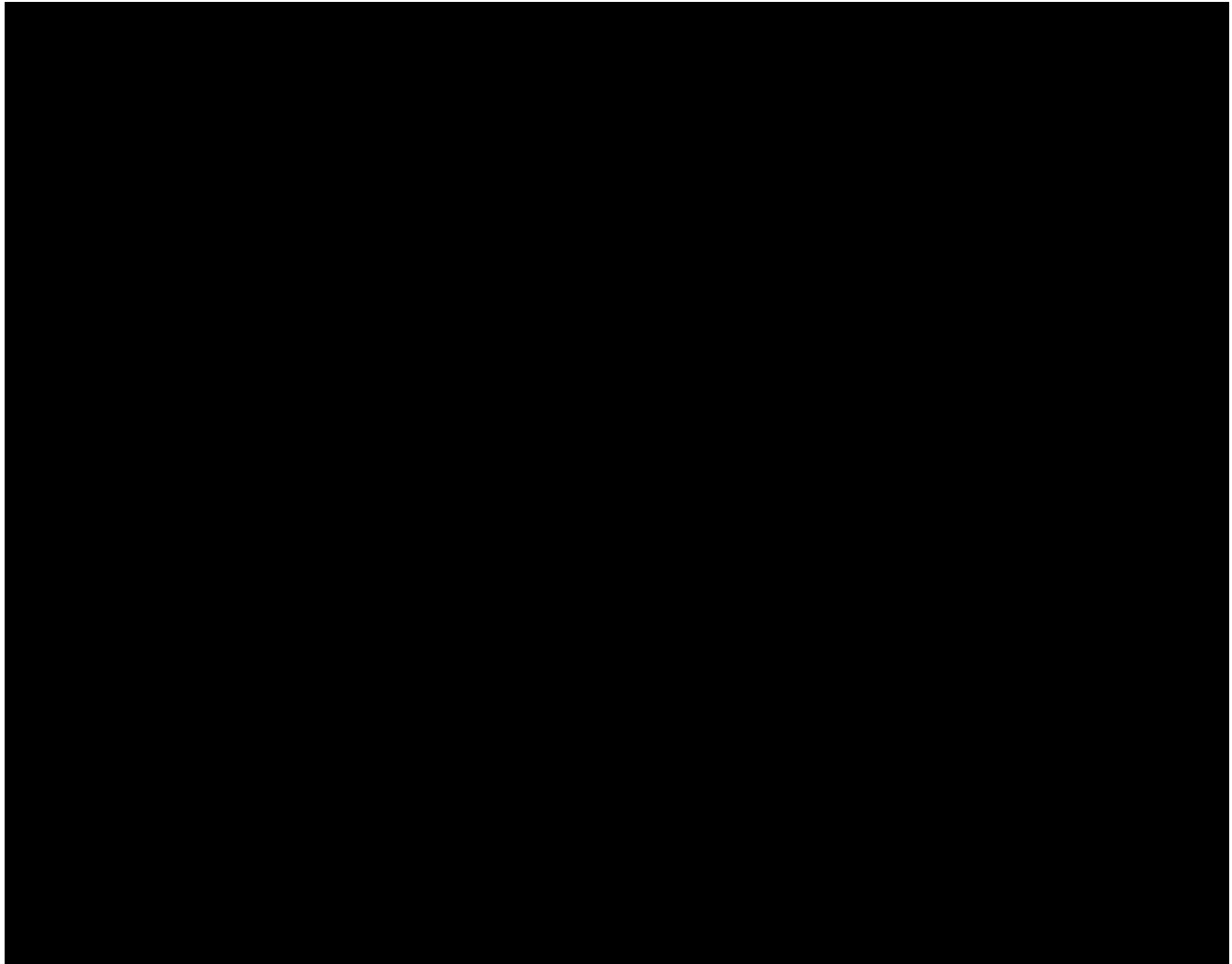


Any pistol can experience an accidental or unintended discharge regardless of the pistol's trigger pull or whether it is fitted with a manual safety feature.





While certain aspects of a given pistol can help decrease the risk of an inadvertent discharge, such a risk cannot be eliminated entirely in any pistol.



I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 10, 2025
Portsmouth, New Hampshire

Signed by:
Ed Murphy
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Ed Murphy