

**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

SIG SAUER’S UNOPPOSED MOTION TO UNSEAL DOCUMENTS

Defendant Sig Sauer, Inc. (“Sig Sauer”) respectfully moves this Court for an order unsealing Plaintiff’s moving and reply briefing in support of his Class Certification Motion (“Cert. Motion”) that were previously filed under seal. Sig Sauer requests to unseal this briefing as the Court previously sealed documents or references to the Failure Modes, Effects, and Criticality Analysis (“FMECA”) performed by Sig Sauer at the request of the United States Army (“Army”). The FMECA consists of a memorandum (ECF No. 128-14 (“FMECA Memorandum”)) and an attached spreadsheet (ECF No. 128-13 (“FMECA Spreadsheet”)) (collectively the “FMECA” or “FMECA Documents”). Specifically, Sig Sauer requests that the Court issue an order to unseal in full the following documents filed by Plaintiff:

- **ECF No. 128** (Plaintiff’s Suggestions in Support of his Cert. Motion);
- **ECF No. 128-4** (Plaintiff’s Ex. 4 to his Cert. Motion, Report of Beau A. Biller);
- **ECF No. 128-5** (Plaintiff’s Ex. 5 to his Cert. Motion, Declaration of Benjamin D. Gatrost);
- **ECF No. 128-13** (Plaintiff’s Ex. 13 to his Cert. Motion, FMECA Spreadsheet);
- **ECF No. 128-14** (Plaintiff’s Ex. 14 to his Cert. Motion, FMECA Memorandum); and
- **ECF No. 169** (Plaintiff’s Reply in Support of his Cert. Motion).

On September 10, 2024, Sig Sauer produced the two FMECA Documents, marking them “Highly Confidential” pursuant to the Stipulated Protective Order dated October 11, 2022. *See* ECF No. 38. Sig Sauer previously believed that the FMECA Documents were “Highly Confidential” pursuant to the Protective Order. *See id.* Plaintiff attached the FMECA Documents as exhibits to his Cert. Motion, ECF Nos. 128-13, 128-14, and both parties utilized exhibits that discussed the FMECA. *See, e.g.,* ECF Nos. 128, 128-4, 128-5, 169, 188-1, 188-9. The FMECA Documents and references thereto from the parties’ class certification briefing have been sealed to date. *See* Orders Granting Mots. Seal, ECF Nos. 127, 157, 168.

After Trace Media, Inc. (“Trace”) filed a Motion to Intervene for purposes of unsealing the record on class certification (ECF No. 181), Sig Sauer undertook efforts to narrow the dispute and engaged in ongoing communications with the Army regarding the basis of confidentiality of the FMECA Documents and the Army’s desire to prevent public release of the documents. *See generally* ECF No. 189. On August 29, 2025, the Army informed Sig Sauer that it does not intend to seek protection of the FMECA Documents. Based on this new guidance from the Army, Sig Sauer respectfully submits that the FMECA Documents—and any documents that reference the FMECA—should no longer be designated as “Highly Confidential” and instead should be unsealed. Sig Sauer has already publicly filed new versions of its opposition to the Cert. Motion (“Opposition”) and exhibits thereto that referenced the FMECA Documents.¹ ECF No. 191. On August 29, 2025, Sig Sauer informed Plaintiff that the entirety of his briefing for his Cert. Motion could be unsealed.

On September 4, 2025, counsel for Sig Sauer asked counsel for Plaintiff whether they

¹ However, sealing should remain in place for the non-public names of individuals involved in inadvertent discharge incidents, which were referenced only in Sig Sauer’s Opposition briefing and remain under seal. None of Plaintiff’s documents implicate this issue.

would agree to the relief sought in the present motion, and Plaintiff's counsel represented that they did not oppose this motion.

WHEREFORE, Sig Sauer respectfully moves the Court for an order unsealing the entirety of Plaintiff's Cert. Motion briefing, including the specified documents outlined above, so that they can be made available on the public docket.

Dated: September 4, 2025

Respectfully submitted,

/s/ Colleen Carey Gulliver

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CERTIFICATE OF SERVICE

I hereby certify that on September 4, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record registered on the CM/ECF system.

/s/ Colleen Carey Gulliver

Colleen Carey Gulliver