LIPMAN LAW PLLC

May 5, 2023

***Via* ECF**

Hon. Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: ***United States v. Yanping Wang*, S1 1:23-cr-00118-AT**

Dear Hon. Judge Torres:

Along with ChaudhryLaw PLLC, we represent Ms. Wang in the above-referenced matter. We write to inform the Court that we object to the detention order entered by Magistrate Judge Lehrburger on April 21, 2023, and intend to file a motion to revoke the detention order under 18 U.S.C. § 3145(b).

On April 21, 2023, Magistrate Judge Lehrburger ordered Ms. Wang detained pending trial because he found that no conditions could reasonably assure Ms. Wang's attendance at future proceedings. (ECF No. 56 at 23–24). His decision recited certain factual assertions the government made regarding Ms. Wang's interview with Pretrial Services upon her arrest. (*Id*. at 21).

Because we require additional information about Ms. Wang's interview with Pretrial Services to finalize our motion to revoke the detention order, on April 27, 2023, we filed a letter requesting the Court order the Pretrial Services Office for the Southern District of New York to provide us with certain information. (ECF No. 59). On May 4, 2023, the Court ordered the government to respond to our letter by May 11, 2023, stating whether it objects to our request for information. (ECF No. 64).

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We cannot adequately respond to the detention order until we receive and review this information. Therefore, we herein object to Magistrate Lehrburger's detention order, and respectfully request the Court permit us to file a motion to revoke the detention order under 18 U.S.C. § 3145(b) fourteen days after we receive the requested information from Pretrial Services.

Respectfully submitted,

Lipman Law PLLC

Alex Lipman

GRANTED.

SO ORDERED.

Dated: May 8, 2023
New York, New York

ANALISA TORRES
United States District Judge