UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

YANPING WANG,

Defendant.

Case No. 23-CR-118-AT

NOTICE OF MOTION FOR AN ORDER REVOKING THE MAGISTRATE JUDGE'S ORDER OF DETENTION AND AUTHORIZING PRETRIAL RELEASE

PLEASE TAKE NOTICE that, pursuant to 18 U.S.C. § 3142, upon the accompanying Declaration of Alex Lipman and the exhibits attached thereto, the Declaration of Robert Glenn and the exhibits attached thereto, and Memorandum of Law, Defendant Yanping Wang, by and through her counsel Lipman Law PLLC and ChaudhryLaw PLLC, respectfully moves this Court before the Honorable Analisa Torres, United States District Judge, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order revoking the Magistrate Judge's April 21, 2023, Order of Detention and Authorizing Pretrial Release.

Dated: New York, New York June 5, 2023

Lipman Law PLLC

By: <u>/s/ Alex Lipman</u>

Priya Chaudhry CHAUDHRYLAW PLLC Priya Chaudhry 147 W. 25th Street, 12th Floor New York, New York 10001 Tel: (212) 785-5550 Email: priya@chaudhrylaw.com

Alex Lipman LIPMAN LAW PLLC 147 W. 25th Street, 12th Floor New York, New York 10001 Tel: (212) 401-0070 Email: alexlipman@lipmanlawpllc.com

Attorneys for Defendant Yanping Wang