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**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 Lipman Law PLLC, we represent Ms. Yanping Wang in the above-referenced matter. On June 5, 2023, Ms. Wang filed her bail application (ECF No. 81) and on June 6, 2023, the Court set a briefing schedule for the government’s opposition to Ms. Wang’s bail application (which was due and filed on June 20, 2023, ECF No. 89) and Ms. Wang’s reply to the government’s application, which is currently due on June 28, 2023. We respectfully request a three-day extension to file Ms. Wang’s reply, which would change the filing date to June 30, 2023.

The reasons for our request are: 1) the government’s opposition contains entirely new factual allegations (including obstruction of justice) against Ms. Wang, 2) because Ms. Wang is in custody and counsels’ schedule, today was the first day we were able to meet with her to discuss these new allegations, and 3) we need additional time to investigate these new allegations so we can effectively respond to them. This is our first request for an extension to file Ms. Wang’s reply. The government does not object to this request. The requested adjournment will not affect any other scheduled date in this matter.


We thank Your Honor in advance for Your courtesy.

Respectfully submitted,

GRANTED.

SO ORDERED.

Dated: June 26, 2023  
New York, New York

  
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ANALISA TORRES  
United States District Judge