

June 27, 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 Request to Seal Inadvertently Filed Exhibit and to File Correct Exhibit

Dear Hon. Judge Torres:

Along with Lipman Law PLLC, we represent Defendant Yanping Wang in the above-referenced matter.

On June 5, 2021, Ms. Wang filed a Motion for an Order Revoking the Magistrate Judge's Order of Detention and Authorizing Pretrial Release. (ECF No. 81). Attached to the motion was **attachment # 16**, entitled, "Exhibit N - Priya Chaudhry's Pretrial Service Interview Handwritten Notes dated March 15, 2023 (Redacted)."

We recently realized that the exhibit in its entirety—not merely the redacted portions—contains confidential information. Our filing of the underlying document as Exhibit N (attachment # 16) was inadvertent and in no way expresses an intention to waive any applicable privilege. Per the Office of the Clerk of the Court, we have alerted the Attorney Services Help Desk to temporarily seal the exhibit pending the Court's decision on our application.

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Accordingly, we respectfully request the Court permanently seal attachment # 16 to ECF No. 81 and allow us to file the correct exhibit. The government has no objection to our request.

Respectfully submitted,

/s/

Priya Chaudhry

SO ORDERED.

HON. ANALISA TORRES, U.S.D.J.

Cc: AUSA Juliana N. Murray AUSA Micah Fergenson AUSA Ryan Finkel