



USDC SDNY
DOCUMENT
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DATE FILED: 6/28/2023

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

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

GRANTED.

SO ORDERED.

Dated: June 28, 2023
New York, New York



ANALISA TORRES
United States District Judge