

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

YANPING WANG,

Defendant.

Case No. 23-MAG-2007

**NOTICE OF MOTION FOR AN ORDER
DIRECTING DEFENDANT HAS
COMPLIED WITH THE TERMS OF HER
BAIL CONDITIONS**

PLEASE TAKE NOTICE that, pursuant to 18 U.S.C. § 3142, upon the accompanying Memorandum of Law, Defendant Yanping Wang, by and through her counsel, ChaudhryLaw PLLC and Lipman Law PLLC, respectfully moves this Court before the Honorable Robert W. Lehrburger, United States Magistrate Judge, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for an Order approving Defendant's proffered bond co-signers heretofore arbitrarily rejected by the government; or, alternatively, to amend Defendant's bail conditions to eliminate the requirement that she obtain two financially responsible persons to co-sign her bond.

Dated: New York, New York
March 24, 2023

ChaudhryLaw PLLC

By: /s/ Priya Chaudhry
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