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30 ROCKEFELLER PLAZA NEW YORK, NEW YORK 10112-4498

TEL +1 212.408.2500 FAX +1 212.408.2501 BakerBotts.com AUSTIN BRUSSELS DALLAS DUBAI HOUSTON LONDON NEW YORK PALO ALTO RIYADH SAN FRANCISCO SINGAPORE WASHINGTON

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## VIA ECF

Brendan F. Quigley TEL: 2124082520 FAX: 2122592520 brendan.quigley@bakerbotts.com

The Honorable Analisa Torres United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

## Re: United States v. Ho Wan Kwok, et al., 23 Cr. 118 (AT)

Dear Judge Torres:

We represent Yanping Wang in this matter. We write to follow-up on the Court's November 14, 2023 memo endorsement, ECF No. 169, which held in abeyance the previously scheduled November 15 defense motion deadline.

After conferring with the government and counsel for defendant Ho Wan Kwok, we write to request the following (an approximately one-month extension of the deadline):

- Defense motions due December 15
- Government opposition due January 18
- Defense reply, if any, due February 1

The government does not object to the defendants' proposed motion schedule

All other deadlines and dates in the case would remain the same. The defendants specifically request that the Court maintain the April 8, 2024 trial date. The government requests that, to the extent that the extension of deadlines necessitates—in conjunction with other motion practice—an adjournment of the trial date by the Court, that any adjournment be proportionate to the extension of the pretrial motions briefing schedule (i.e., approximately four to six weeks).

Respectfully submitted,

<u>/s/ Brendan F. Quigley</u> Brendan F. Quigley