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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

YANPING WANG,

Defendant.

No.: 23 Cr. 118-3 (AT)

DEFENDANT'S NOTICE OF PRE-TRIAL MOTIONS

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law,

Declaration of Brendan F. Quigley and exhibits thereto, Defendant Yanping Wang will move this

Court before the Honorable Analisa Torres, United States District Judge for the Southern District

of New York, at the United States Courthouse, 500 Pearl Street, New York, New York, 10007, on

a date and time to be determined, for orders (i) suppressing evidence, (ii) suppressing statements,

(iii) directing the government to provide a bill of particulars, (iv) severing her trial and (v) for

dismissing the counts against her in the S1 Indictment.

Dated: December 15, 2023 BAKER BOTTS L.L.P.

By: /s/ Brendan F. Quigley

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