

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARY HELEN QUAINANCE,

No. CR-2006-538 JH

Defendant.

**DEFENDANT'S MOTION TO JOIN CO-DEFENDANTS NOTICE OF INTENT TO
CALL EXPERT WITNESS TO TESTIFY AT MOTION HEARING**

COMES NOW, the Defendant, **MARY HELEN QUAINANCE**, by and through her attorney of record, Mario A. Esparza, and respectfully moves the Court for an Order allowing Defendant to join in the Notice of Intent to Call Expert Witness to Testify at Motion Hearing filed herein on July 18, 2006 [doc. 135]. **AS GROUNDS** in support of said motion the Defendant would state the following:

1. Defendant and Co-Defendant Danuel Quaintance are being charged with the same crimes arising out of the same incident that occurred on February 22, 2006.
2. The facts in which the expert witness will be testifying to directly relate to Defendant in that she was a founding member of the Church of Cognizant.
3. Joinder in this matter is not prejudicial to any party, and said joinder would promote judicial economy. Therefore, Defendant is respectfully requesting that she be joined in the Notice of Intent to Call Expert Witness to Testify at Motion Hearing filed by her Co-Defendant.

Wherefore, for the foregoing reasons, Defendant prays for the above requested relief.

Respectfully Submitted,

Electronically Filed: 7-19-06

MARIO A. ESPARZA

Attorney for Defendant Quaintance

P.O. Box 2468

Las Cruces, NM 88004

(505) 524-8312

CERTIFICAT OF MAILING

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion was mailed to opposing counsel of record on this 26th day of May 2006.

/s/

Mario A. Esparza