

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

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARY QUAINANCE,

Defendant.

No. CR-2006-0538 RB

DEFENDANT'S UNOPPOSED MOTION TO ALLOW TRAVEL

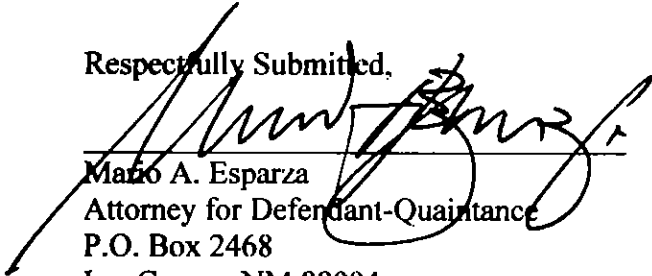
COMES NOW, the Defendant, **MARY QUAINANCE**, by and through her attorney of record, Mario A. Esparza, and hereby moves the Court for an Order allowing the Defendant to travel from her home in Pima, Arizona to Tucson, Arizona on July 20, 2006. **AS GROUNDS** in support of said Motion, the Defendant would state the following:

1. Defendant's granddaughter has been experiencing problems with her tonsils, and, as a result, her doctor believes that a tonsillectomy is required. Defendant's granddaughter is scheduled to undergo this procedure on July 20, 2006.
2. In light thereof, Defendant is requesting that she be allowed to travel to the Pima, Arizona Medical Center to accompany her granddaughter to her surgery on July 20, 2006. Defendant is further requesting that she be allowed to stay the night and return the next day.
3. The position of the Assistant United States Attorney was sought, via Ms. Amanda Gould, and she is unopposed to this motion being granted.

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

Respectfully Submitted,



Mario A. Esparza
Attorney for Defendant-Quaintance
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing motion was delivered to opposing counsel this 24th day of July 2005.



Mario A. Esparza