

**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-DEFENDANT'S CLOSING ARGUMENT**

**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 Closing Argument filed herein on August 31, 2006 [doc. 160]. **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 contained in Co-Defendant Daneul Quaintance's Closing Argument directly relate to Defendant in that she was a founding member of the Church of Cognizance.
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 Closing Argument filed by her Co-Defendant.

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

Respectfully Submitted,

**Electronically Filed: 9-01-06**

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 1<sup>st</sup> day of September 2006.

/s/

\_\_\_\_\_  
Mario A. Esparza