

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

FILED
U.S. DISTRICT COURT
DISTRICT OF NEW MEXICO
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UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARY QUAINANCE,

Defendant.

Ob. 3655m
No. 05-9391-M

**DEFENDANT'S MOTION TO
RECONSIDER CONDITIONS OF RELEASE**

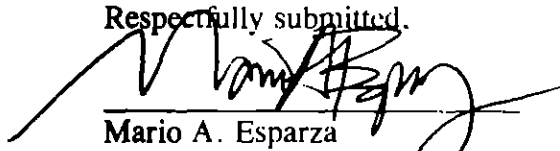
COMES NOW, the Defendant, **MARY QUAINANCE**, by and through her attorney of record, **MARIO A. ESPARZA**, and moves the Court for an Order Reconsidering Conditions of Release. **AS GROUNDS** in support of said Motion, the Defendant would state the following:

1. A Detention hearing was held on February 28, 2006, in front of the Honorable Lourdes Martinez. At that time, Pretrial had not been provided with any suitable third party surety information.
2. Since then, Pretrial Services has interviewed and approved Mr. Laythol W. Quaintance to assist as third party custodian. Mr. Quaintance understands the responsibility that is involved.
3. The Defendant is proposing a \$ 5,000.00 dollar corporate surety bond to ensure her appearance at all future Court proceedings.
4. The Defendant does not have a criminal record nor does she present a flight risk.
5. The position of the U.S. Attorney's Office was sought via Mr. Luis Martinez and he is not opposed to the granting of this Motion.

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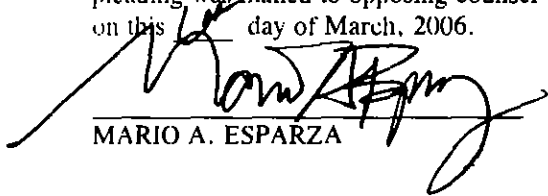
6. Further, during the pendency of this matter, the Defendant will be reporting to her Pre-trial officer on a weekly basis.

Respectfully submitted,



Mario A. Esparza
Attorney For Defendant-Quaintance
P.O. Box 2468
Las Cruces, NM 88004
(505) 524-8312

I certify that a true and correct copy of the foregoing pleading was mailed to opposing counsel on this 14 day of March, 2006.



MARIO A. ESPARZA