

**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 REBUTTAL 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 Rebuttal Argument filed herein on September 6, 2006 [doc. 166]. **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 Rebuttal 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 Rebuttal Argument filed by her Co-Defendant.

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

Respectfully Submitted,

**Electronically Filed: 9-12-06**

MARIO A. ESPARZA

Attorney for Defendant Quaintance

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**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 12<sup>th</sup> day of September 2006.

/s/

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Mario A. Esparza