

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	CRIMINAL NO. 06-538 JH
)	
DANUEL DEAN QUINTANCE, et al.,)	
)	
Defendants.)	

MOTION FOR CONTINUANCE

COMES NOW the United States of America, by and through David C. Iglesias, United States Attorney for the District of New Mexico, and Luis A. Martinez, Assistant United States Attorney for said District, and respectfully moves this Court for a continuance of the trial now scheduled for March 19, 2007, in the above-styled and numbered criminal case for the following reasons:

1. The government has been informed by counsel for defendant Danuel Dean Quaintance that additional defense motions will be filed including a motion to reconsider the court's denial of defendant's motion to dismiss indictment.
2. The government is hopeful that additional time may allow the apties to enter into plea agreements.
3. At least one important government witness is unavailable March 19-23, 2007.
4. Defense counsel, Mario A. Esparza, Marc H. Robert and Bernadette Sedillo, do not object to a continuance in this matter and agree that the ends of justice

served by the granting of such continuance outweigh the best interest of the public and the defendants in a speedy trial.

WHEREFORE, the government respectfully requests that trial in this case be vacated and requests a trial setting in April, 2007, excluding the week of April 16-20, 2007 as counsel for Danuel Dean Quaintance will be unavailable.

Respectfully submitted,

DAVID C. IGLESIAS
United States Attorney

Electronically filed 2/15/07

LUIS A. MARTINEZ
Assistant U.S. Attorney
555 S. Telshor Blvd., #300
Las Cruces, New Mexico 88011
(505) 522-2304

I HEREBY CERTIFY that a true copy of the foregoing pleading was served upon to opposing counsel, Mario A. Esparza, H. Robert and Bernadette Sedillo, on this 15th day of February 2007.

Electronically filed 2/15/07

LUIS A. MARTINEZ
Assistant United States Attorney