

**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 SECOND UNOPPOSED
MOTION TO MODIFY CONDITIONS OF RELEASE**

COMES NOW, the Defendant, **MARY HELEN QUAINANCE**, by and through her attorney of record, Mario A. Esparza, and hereby moves this Court for an Order modifying her conditions of release. **AS GROUNDS** in support of said motion, Defendant would show the following facts:

1. Defendant is currently being charged with possession of more than 50 kilograms of marijuana with intent to distribute. Trial is currently scheduled for May 21, 2007. At present, Defendant is free on conditions of release [doc. 21].

2. Travel restrictions were included in Defendant's conditions of release. Ms. Quainance is moving the Court to modify those travel restrictions to permit her travel within the state of Arizona, and to the state of New Mexico for meetings with counsel and attendance at court proceedings, and other travel within the United States at the discretion of Pretrial Services.

3. Defendant has complied with all conditions of release put upon her by Order of this Court.

4. Co-Defendant Danuel Quainance filed a similar motion [doc. 212] which was granted by this Court on March 14, 2007 [doc. 213].

