

**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.

**AMENDED¹ 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. Quaintance 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 Quaintance filed a similar motion [doc. 212] which was granted

¹ Document amended to include the position of pretrial services.

by this Court on March 14, 2007 [doc. 213].

5. The position of opposing counsel was sought, via Mr. Luis Martinez A.U.S.A., and he is unopposed to this motion being granted.

6. The position of pretrial services was sought, via Mr. David Banegas, and he is unopposed to this motion being granted.

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

Electronically Filed,

/s/ Mario A. Esparza, Attorney at Law
Mario A. Esparza, ESQ.
Counsel for Defendant
P.O. Box 2468
Las Cruces, NM 88004
(505) 524-8312

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 27th day of March, 2007, I filed the foregoing motion electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Luis Martinez, Assistant United States Attorney
Marc Robert, Counsel for co-defendant
Bernadette Sedillo, Counsel for co-defendant

/s/
Mario A. Esparza