

**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 DANUEL QUAINANCE'S  
REPLY TO GOVERNMENT'S RESPONSE TO MOTION FOR RECONSIDERATION**

**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 Reply to Government's Response to Motion for Reconsideration [doc. 230], filed on May 7, 2007 by Defendant Danuel Quaintance. **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's response 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 Reply to Government's Response to Motion for Reconsideration [doc. 230], filed on May 7, 2007 by her Co-Defendant.

**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 8<sup>th</sup> day of May, 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, Attorney for co-Defendant Danuel Quaintance  
Bernadette Sedillo, Attorney for co-Defendant Butts

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/s/  
Mario A. Esparza