

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

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARY HELEN QUAINANCE, et. al,

No. CR-2006-538 JH

Defendant.

**UNDERSIGNED COUNSEL'S MOTION TO WITHDRAW AND INCORPORATED  
REQUEST FOR TELEPHONIC HEARING**

**COMES NOW**, undersigned counsel, Mario A. Esparza, and hereby moves this Court for an Order allowing him to withdraw as counsel of record for Defendant, Mary Helen Quaintance. **AS GROUNDS** in support of said motion, undersigned counsel would show the following facts:

1. Defendant, Mary Helen Quaintance, believes that undersigned counsel is not effectively representing her in this matter. She believes that undersigned counsel is not being loyal to her interests.
2. Defendant wishes to assert grounds and a defense at time of trial that this Court has previously barred. Being an officer of the court, undersigned counsel cannot ethically raise issues or a defense at time of trial that the Court has ruled inadmissible.
3. Because of this, and other outside influences, the attorney-client relationship has deteriorated and irreconcilable differences have risen between Defendant and undersigned counsel. Therefore, undersigned counsel is moving to withdraw as attorney of record herein for Defendant Mary Helen Quaintance.

