

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

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DANUEL QUAINANCE, *et al*,

Defendant.

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Cause No. 06-CR-538 JH

UNOPPOSED MOTION TO WITHDRAW

Kari Converse hereby moves to withdraw as counsel of record for the witness Michael Senger. As grounds, his counsel states as follows:

1. Counsel was appointed by the district court to represent Mr. Senger on August 16, 2006.
2. Counsel has accepted employment with the federal public defender for the District of New Mexico, and cannot continue her private practice.
3. The Federal Public Defender, having represented Mr. Quaintance, has a conflict with this case and counsel cannot continue with her representation of Mr. Senger. NMRA 16-116(A)(1); 16-107(A); 16-111(C)(1).
4. Because this case is currently on appeal and new counsel was just appointed to represent the lead defendants, counsel's duties toward Mr. Senger cannot be completed before she begins employment with the federal public defender.
6. Defense and witness' counsel have consented to the relief requested in this

motion, and the government has not expressed a position.

WHEREFORE, counsel moves for leave to withdraw from this case, and requests that new CJA counsel be appointed to represent Mr. Senger.

Respectfully submitted,

KARI CONVERSE
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CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2007, I filed the foregoing 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: Jerry Daniel Herrera, jd@jdherreralaw.com, mcr@jdherreralaw.com, Luis A Martinez, luis.a.martinez@usdoj.gov, Erika.Rivera@usdoj.gov, USANM.ECFCriminalLCR@usdoj.gov, John F Robbenhaar, john@robbenhaarlaw.com, Jacquelyn Robins jrobins@nm.net, Leon Schydlower leon@schydlower.com, Cynthia@schydlower.com, Bernadette Sedillo, sedillobernadett@qwest.net, fembk_21@yahoo.com.

electronically filed
KARI CONVERSE