

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

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. CR 06-538 JH

DANUEL QUAINANCE,

Defendant.

**MOTION FOR TRANSPORTATION AND SUBSISTENCE FUNDS
PURSUANT TO 18 U.S.C. § 4285**

COMES NOW Defendant, Danuel Quaintance, by and through his counsel, Jerry Daniel Herrera, and pursuant to 18 U.S.C. § 4285, respectfully moves this Court to direct the United States Marshal to furnish the defendant with funds for travel and subsistence from his home in Pima, Arizona to Las Cruces, New Mexico, to attend his hearing scheduled for April 9, 2008 at 9:40 a.m. Defendant is financially unable to pay costs of transportation and subsistence for his hearing. Because distance from Las Cruces is roughly five hours. Mr. Quainance would prefer to travel on the day before the scheduled hearing and stay in lodging in Las Cruces.

Respectfully submitted

/s/ electronically signed

JERRY DANIEL HERRERA
Attorney for Danuel Quaintance
509 13th Street SW
Albuquerque, New Mexico 87102
Telephone: 505.262.1003

I hereby certify that a true and correct copy
of the foregoing was faxed to the Assistant
U.S. Attorney on this 28th day of March, 2008.

/s/ electronically signed