

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

CR 06-538 JH

MARY HELEN QUAINANCE,

Defendant.

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

COMES NOW the Defendant Mary Quaintance, by and through her attorney John F. Robbenhaar, and pursuant to 18 U.S.C. § 4285, respectfully moves the Court to direct the United States Marshall to furnish the Defendant with adequate funds for travel and subsistence from her home in Pima, Arizona to Las Cruces, New Mexico, to attend a hearing at the United States District Court scheduled for April 9, 2008 at 9:30 a.m. Defendant is financially unable to pay costs of transportation and subsistence for this hearing. Because the distance from Pima to Las Cruces is roughly five hours, Ms. Quaintance will need to travel on the day before the scheduled hearing, and therefore will be required to stay in lodging in Las Cruces, New Mexico.

Respectfully submitted:

*Filed Electronically*

JOHN F. ROBBENHAAR  
Attorney for Mary Helen Quaintance  
1011 Lomas NW  
Albuquerque, NM 87102  
(505) 242-1950

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 30, 2008 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:

LUIS MARTINEZ  
Assistant U.S. Attorney  
555 S. Telshor  
Suite 300  
Las Cruces, New Mexico 88001

*Filed Electronically*  
JOHN F. ROBBENHAAR