

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 Albuquerque, New Mexico, to attend his trial scheduled for 18 August, 2008 at 9:00 a.m. Defendant is financially unable to pay costs of transportation and subsistence for his trial. Because the distance from Pima to Albuquerque is roughly eight hours, Mr. Quainance would prefer to travel on the day before the scheduled trial and stay in lodging in Albuquerque. This matter was originally slated for three to four days, however, the trial was aborted the first day, following a change of plea.

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 I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification to opposing counsel of record on this date.

/s/ electronically signed