

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

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. CR 06-538 JH

MARY QUAINANCE,

Defendant.

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

COMES NOW Defendant, Mary Quaintance, by and through her counsel, John F. Robbenhaar, 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 her home in Pima, Arizona to Albuquerque, New Mexico, to attend her sentencing hearing scheduled for January 8, 2009 at 9:30 a.m. Defendant is financially unable to pay costs of transportation and subsistence for her sentencing. Because the distance from Pima to Albuquerque is roughly eight hours, Ms. Quainance would prefer to travel on the day before the scheduled trial and stay in lodging in Albuquerque.

Respectfully submitted,

FEDERAL PUBLIC DEFENDER
111 Lomas NW, Suite 501
Albuquerque, NM 87102
(505) 346-2489

filed electronically
JOHN F. ROBBENHAAR, AFPD
Attorney for Defendant

I HEREBY CERTIFY THAT on December 24, 2008, I filed the foregoing electronically through the CM/ECF system, which caused AUSA Luis Martinez and Jerry Daniel Herrera to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

filed electronically
JOHN F. ROBBENHAAR