

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

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARY HELEN QUAINANCE,

No. CR-2006-538 JH

Defendant.

**DEFENDANT'S MOTION TO JOIN CO-DEFENDANT DANUEL QUAINANCE'
MOTION AND MEMORANDUM FOR SUPPRESSION OF EVIDENCE**

COMES NOW, the Defendant, **MARY HELEN QUAINANCE**, by and through her attorney of record, Mario A. Esparza, and respectfully moves the Court for an Order allowing Defendant to join in the Motion to Suppress filed by co-defendant Danuel Quaintance on April 18, 2006. **AS GROUNDS** in support of said motion the Defendant would state the following:

1. Defendant and Co-Defendant Danuel Quaintance are being charged with the same crimes arising out of the same incident that occurred on February 22, 2006.
2. The facts contained in Co-Defendant's motion directly relate to Defendant in that she and the co-Defendant occupied the same vehicle.
3. Joinder in this matter is not prejudicial to any party, and said joinder would promote judicial economy. Therefore Defendant is respectfully requesting that she be joined in the Motion to Suppress filed by her Co-Defendant.

Wherefore, for the foregoing reasons, Defendant prays for the above requested relief.

Respectfully Submitted,

Electronically Filed: 5-02-06

MARIO A. ESPARZA

Attorney for Defendant Quaintance

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CERTIFICATE OF MAILING

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion was mailed to opposing counsel of record on this 2nd day of May 2006.

/s/

Mario A. Esparza