

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	CRIMINAL NO. 06CR00538 JH
v.)	
)	
DANUEL QUAINANCE, et al.,)	
)	
Defendants.)	

**UNITED STATES' REQUEST FOR STAY OF ORDER AMENDING CONDITIONS
OF RELEASE AFTER HEARING ON JUNE 22, 2006.**

COMES NOW David C. Iglesias, United States Attorney for the District of New Mexico, and Amanda Gould, Special Assistant United States Attorney, and moves this Court for an Order Staying the Order on Defendant's Motion to Amend Conditions of Release, filed by defendant Danuel Quaintance, and joined by defendant Mary Quaintance in the above-captioned case. In support of this Motion, the government states as follows:

1. The Defendants are charged with violation of 21 U.S.C. § 846, Conspiracy, and 21 U.S.C. § 841(a)(1) and 21 U.S.C. § 841(b)(1)(C), Possession with Intent to Distribute 50 Kilograms and more of Marijuana, and 18 U.S.C. § 2, Aiding and Abetting, in a Superseding Indictment that was filed on May 17, 2006.
2. On June 22, 2006, United States Magistrate Judge Martinez set amended conditions of release in the above-captioned case pursuant to defendants' motion for amendment of such conditions.

3. The United States, contemporaneous to the filing of this request, is filing its Notice of Appeal of Magistrate Judge's Order Amending Conditions of Release After Hearing on June 22, 2006.

WHEREFORE, based upon the foregoing, the United States respectfully requests that the Court stay its order entered after the hearing on the defendant's Motion to Amend Conditions of Release Filed on May 1, 2006, in the above-captioned case until the government's appeal can be heard before the District Court.

Respectfully submitted,

DAVID C. IGLESIAS
United States Attorney

/s/

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I hereby certify that a true copy of the foregoing was mailed/delivered to the Federal Defender's Office, on this 23rd day of June , 2006.

/s/

AMANDA GOULD
Special Assistant United States Attorney