

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
LAS VEGAS DIVISION

JOSE DECASTRO,  
Plaintiff,

v.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT,  
STATE OF NEVADA,  
BRANDEN BOURQUE,  
JASON TORREY,  
C. DINGLE,  
B. SORENSON,  
JESSE SANDOVAL,  
C. DOOLITTLE,  
and DOES 1 to 50,  
Defendants.

Case No. 2:23-cv-00580-APG-EJY

Honorable Judge Andrew Patrick Gordon  
Presiding

**JURY TRIAL DEMANDED BY RIGHT AND  
PRIVILEGE**

**JENSEN’S PARTIALLY SUPPORTED AND  
PARTIALLY OPPOSED RULE 24 MOTION  
TO INTERVENE**

COMESNOW, Intervenor Applicant, Jason A Jensen (“JENSEN”), under FRCP 24 (A), or alternatively, FRCP 24 (B), in application to intervene in the above captioned matter, submits the following:

1. JENSEN received Mr. DeCastro's positive consent on the filing of this Motion to Intervene on June 12<sup>th</sup>, 2023 at 10:44 AM CST.
2. JENSEN received Defendant's refusal of consent to file this Motion to Intervene on June 12<sup>th</sup>, 2023 at 11:01 AM CST. The defendants do not believe that the driver and traffic stop detainee has any Miranda Rights and/or that those Miranda Rights, are implicated by the policy exhibited by isolation of the traffic stop detained driver.
3. JENSEN is a licensed Motor Vehicle Operator in the United States.
4. JENSEN has prerogative in the State of Nevada and other Southern warm States as a "Snow Bird" with a Motor-home to enjoy varied climates.
5. JENSEN lives in and utilizes his mobile living arrangement to offset discrimination of the Mentally Ill; This allows JENSEN to relocate when prejudice and conflict arises when neurotypical persons identify JENSEN's mental health disorders.
6. Mr. Jose DeCastro cannot, as the "other party" to a traffic stop to the scenario presented in this case, protect and enforce the Miranda Law, as prescribed in the Supreme Court of the United States of America, *Berkemer v. McCarty*, 468 U.S. 420 (1984).
7. The Defendant's "Motion to Dismiss" violates FRCP 8 as an Affirmative Defense, such as Qualified Immunity, is a responsive pleading and not a Motion.
8. JENSEN incorporates all elements and arguments in the attached Proposed Intervenor Complaint as if it were Memorandum in Support of this Motion.

WHEREFORE:

JENSEN prays this Court to allow JENSEN to file the Proposed Intervenor Complaint.

JENSEN prays for all relief just and proper.

Sincerely and Respectfully Submitted,

//s/JasonAJensen

Jason A Jensen

CERTIFICATE OF SERVICE

I, Jason A Jensen, did cause all defendants currently present and in appearance of this Court to be served electronically by the ECF/CM of the Federal Court, on this day the 12<sup>th</sup> of June 2023, as soon as the Clerk of Court files this paperwork as submitted to lv\_public\_docketing@nvd.uscourts.gov.

//s/JasonAJensen