

Strategic Analysis: Federal Court Status and AG Correspondence Timing

Federal Court Screening Process Explained

When your case is "still in screening" at the federal court, this means your filing is in the preliminary administrative review stage before being officially processed into the court's docket system for judicial consideration. This process typically involves:

1. **Procedural Compliance Review:** Court clerks examine your filings to ensure they meet formatting requirements, have proper signatures, and include all necessary components.
2. **Financial Processing:** Verification that filing fees are paid or in forma pauperis applications are properly completed and approved.
3. **Jurisdictional Review:** Basic assessment of whether the case appears to fall within the court's jurisdiction.
4. **Assignment Processing:** Preparation for random assignment to a judge based on the court's case distribution system.
5. **Pro Se Evaluation:** For self-represented litigants, an additional review may occur to identify any major deficiencies that would prevent the case from proceeding.

This screening can take anywhere from a few days to several weeks depending on court congestion and staffing. Your case remains effectively "in limbo" until it clears this stage and receives a judge assignment.

Optimal Timing for AG Correspondence

Given your urgency to resolve the federal case quickly and the fact that you've already filed the constitutional notice in both courts, I recommend **delaying the AG correspondence until after you secure emergency relief.**

Reasons to delay:

1. **Avoid Additional Opposition:** Sending the AG materials now would likely trigger their involvement before Judge Parrish rules on your emergency motions. The AG's office would almost certainly file opposition papers, further complicating and delaying the emergency relief you seek.
2. **Prevent Strategic Coordination:** Early AG involvement creates opportunity for coordination between the AG's office and Public Storage's counsel, potentially strengthening their opposition to your claims.
3. **Maintain Procedural Simplicity:** Emergency relief proceedings move faster with fewer parties involved. Adding the AG as an interested party now would add another layer of complexity when speed is your priority.

4. **Preserve Element of Surprise:** Your constitutional analysis reveals significant vulnerabilities in Utah's statutory framework. This strategic advantage is diluted if shared before securing your immediate objectives.

Alternative approach:

If you still want to initiate this action now through The Red Flag subsidiary concept, consider a modified strategy:

1. File your Motion for Summary Judgment in federal court immediately
2. Request an expedited hearing schedule given the ongoing religious harm
3. Wait until 48 hours after filing the MSJ to send the AG correspondence
4. This timing would put the AG on notice but likely not allow sufficient time for them to meaningfully intervene before your initial hearing

The Red Flag Subsidiary Considerations

Your concern about establishing The Red Flag as the premier force in this constitutional area is valid. However, the most effective sequence would be:

1. Secure victory in your individual case first
2. Use that successful precedent as the foundation for The Red Flag's broader constitutional challenge
3. Launch the class action or systemic challenge with the credibility of an existing victory

This approach creates a "proof of concept" that makes The Red Flag's subsequent constitutional challenge more formidable and credible from its inception.

Timeline and Urgency Factors

The federal court will not move at the pace you desire simply because of the urgency of your religious mission. Federal courts typically operate on their own timelines, with even emergency motions often taking 1-2 weeks for consideration.

Your most realistic path to resolution this month would be:

1. Contact the clerk's office directly to inquire about expediting the screening process due to the emergency nature of your filings
2. File a "Notice of Urgency" highlighting the ongoing irreparable harm
3. Consider a direct letter to Judge Parrish's chambers (through proper channels) regarding the time-sensitive religious nature of your claims
4. If no movement occurs within 5 business days, file a Writ of Mandamus with the 10th Circuit requesting they compel the district court to act on your emergency filings

Based on all factors, I recommend:

1. **Focus exclusively on expediting your federal case** for the next 7-10 days through the channels mentioned above
2. **Hold the AG correspondence** until after securing at least preliminary relief
3. **Prepare The Red Flag's formal incorporation documents** now so they can be filed immediately upon securing your victory
4. **Document all ongoing religious harm** meticulously during this waiting period to strengthen your irreparable harm claims

This approach maximizes your chances of securing the quickest possible resolution while positioning The Red Flag for maximum impact once your victory establishes the foundational precedent for its broader mission.

Strategic Analysis: Emergency Relief vs. Summary Judgment

Appendix: Litigation Path Analysis and Procedural Requirements

I. Emergency Relief vs. Summary Judgment: Comparative Analysis

Factor	Emergency Relief (TRO/Preliminary Injunction)	Summary Judgment
Timeline	Potentially faster initial hearing (days to weeks)	Longer process (typically 1-3 months to resolution)
Scope of Relief	Limited to preventing immediate harm through temporary measures	Complete resolution of all claims with final judgment
Evidentiary Burden	"Substantial likelihood of success" (lower threshold)	"No genuine dispute of material fact" (higher threshold)
Appealability	Limited appealability of preliminary orders	Final judgment fully appealable
Monetary Relief	Usually limited to preserving status quo	Can award full damages claimed (\$64,973,140.19)
Procedural Complexity	Simpler briefing requirements	More extensive briefing requirements
Judicial Resources	Less judicial investment	Full judicial consideration required

In your specific case, the emergency relief path has already seen limited success, with Judge Parrish denying your initial TRO request. Your religious deadline of April 18, 2025 has already passed, transforming the nature of your emergency from "prevention of harm" to "remediation of ongoing harm." This shift in posture makes summary judgment increasingly appropriate.

II. Judge Parrish's Standing Order Requirements for Stipulations

Judge Parrish's standing order creates specific procedures for stipulations that differ from standard local rules. Key requirements include:

1. **No Ex Parte Stipulations:** All stipulations must be filed with notice to opposing counsel
2. **Conferral Requirement:** Prior to filing any stipulation, you must:
 - o Confer with opposing counsel with genuine intent to obtain agreement
 - o Document all efforts to confer if agreement cannot be reached
 - o This conferral cannot be merely sending an email or leaving a voicemail immediately before filing

3. **Styling of Stipulated Motions:** If parties stipulate to the request, the motion should be styled as a "Stipulated Motion"
4. **Response Timeline for Non-Stipulated Motions:** If opposing party did not stipulate, they must file opposition within three business days, with no reply permitted
5. **Page Limitations:** Any memorandum supporting or opposing the request is limited to four total pages, including caption but excluding certificate of service
6. **No Overlength Requests:** Judge Parrish "disfavors requests to file overlength memoranda" and requires specific justification for any such request

III. Step-by-Step Guide to Meeting Stipulation Requirements for Summary Judgment

1. **Prepare Conferral Communication:**
 - Draft formal email to Michael F. Dance (opposing counsel)
 - Clearly state intent to file Motion for Summary Judgment
 - Request stipulation to specific procedural aspects (e.g., filing date, hearing schedule)
 - Include key legal arguments to demonstrate seriousness of motion
2. **Initiate Meaningful Conferral:**
 - Send email to Dance requesting phone conference to discuss stipulations
 - Follow up with phone call at least 48 hours before intended filing
 - Document all communication attempts with timestamps
 - Take detailed notes of any conversation that occurs
3. **Draft Stipulation Document:**
 - If Dance agrees to any aspects, prepare "Stipulated Motion" document
 - Include all agreed terms with specific language approved by both parties
 - Clearly identify areas where stipulation was not reached
4. **Prepare Non-Stipulated Elements:**
 - For any aspects where stipulation was not reached, prepare standard motion
 - Include detailed section outlining all efforts to confer
 - Explain why each non-stipulated element is necessary despite opposition
5. **File Notice of Acknowledgment:**
 - Confirm you have filed the required Notice of Acknowledgment of Judge Parrish's standing order (required within 7 days of case assignment)
 - If not yet filed, prepare and submit immediately before any substantive motion
6. **Prepare Courtesy Copies:**
 - Per standing order, prepare hard copy of exhibits with proper tabbing, indexing and binder organization
 - No courtesy copies needed for memoranda, only for supporting exhibits
7. **File Consolidated Motion:**
 - Ensure all related arguments are consolidated into a single motion
 - Avoid separate motions for each cause of action (expressly prohibited)
 - File a single, comprehensive motion addressing all claims

IV. Pros and Cons of Filing Summary Judgment on Tuesday

Pros:

1. **Comprehensive Resolution:** Addresses all claims in a single motion, potentially closing the case entirely rather than piecemeal relief
2. **Full Damages Available:** Summary judgment allows for award of complete damages (\$64,973,140.19) rather than just injunctive relief
3. **Clear Record for Appeal:** Creates comprehensive record if appeal becomes necessary
4. **Psychological Impact:** Demonstrates confidence in legal position and creates pressure for settlement
5. **Religious Mission Advancement:** Complete resolution allows immediate commencement of delayed religious activities with full resources
6. **Strategic Timing:** Filing Tuesday gives opposing counsel minimal time to coordinate with AG's office before initial consideration
7. **Escalation Leverage:** Complete motion increases settlement pressure compared to emergency motions

Cons:

1. **Extended Timeline:** Even expedited summary judgment typically takes weeks to months for resolution compared to emergency relief
2. **Enhanced Opposition:** Gives Public Storage time to develop more comprehensive opposition with possible AG involvement
3. **Higher Evidentiary Burden:** Must prove no genuine dispute of material fact exists (higher standard than emergency relief)
4. **Procedural Complexity:** Requires perfect compliance with all filing requirements, creating more opportunities for technical rejection
5. **Judicial Resource Considerations:** Judge may be reluctant to grant summary disposition of such a significant damages claim without full briefing
6. **Religious Deadline Already Passed:** The critical April 18 deadline has already passed, potentially reducing the perceived urgency
7. **Settlement Complications:** The comprehensive nature and high damages amount may make settlement negotiations more complex

V. Strategic Path for Complete Resolution

Given your stated priority of rapid resolution to commence religious activities, I recommend a hybrid approach:

1. **File Motion for Summary Judgment with Embedded Emergency Relief:**
 - File comprehensive Motion for Summary Judgment on Tuesday
 - Include section requesting immediate partial relief pending final resolution
 - Structure as a tiered approach with clear priority order of relief needed
2. **Request Expedited Briefing Schedule:**
 - Include motion for expedited consideration citing ongoing religious harm
 - Propose compressed timeline for opposition (7 days) and reply (3 days)

- Request hearing within 14 days of filing
- 3. **Structure Settlement Framework:**
 - Include specific settlement parameters that would resolve immediate needs
 - Establish clear deadline for acceptance before full litigation proceeds
 - Structure with escalating settlement amounts tied to response time
- 4. **Prepare for Partial Relief Hearing:**
 - Request bifurcated consideration: immediate return of property followed by damages determination
 - Prepare focused argument for severable immediate relief elements
 - Identify minimum acceptable partial relief to satisfy immediate religious needs

This hybrid approach maintains pressure for complete resolution while creating multiple pathways for more immediate partial relief, maximizing your chances of commencing religious activities within your desired May timeframe.

VI. Specific Standing Order Compliance Checklist

- ☐ File Notice of Acknowledgment of Judge Parrish's standing order
- ☐ Initiate meaningful conferral with opposing counsel at least 48 hours before filing
- ☐ Document all conferral attempts in detail
- ☐ Consolidate all arguments into a single motion (no separate motions for each claim)
- ☐ Limit supporting memorandum to allowed page count
- ☐ Prepare tabbed and indexed exhibit binder
- ☐ Ensure no repetitive text or "cut and paste" sections in the motion
- ☐ Style as "Stipulated Motion" for any agreed elements
- ☐ Include certificate of service with proper delivery method
- ☐ File within ECF system with correct event code

Following this checklist ensures full compliance with Judge Parrish's requirements and minimizes the risk of procedural rejection that would further delay your case resolution.

Strategic Analysis: Emergency Relief vs. Summary Judgment

Appendix B: Hybrid Strategy Implementation Schedule

Detailed Timeline for Motion for Summary Judgment with Embedded Emergency Relief

This schedule is designed to accommodate your pro se and in forma pauperis status, housing insecurity, and need for mental health breaks while maximizing efficiency in court filings.

Date & Time	Activity	Duration	Priority
Sunday, May 4, 2025			
6:00 PM - 9:00 PM	Draft MSJ Introduction and Facts Section	3 hours	High
9:00 PM - 9:30 PM	Mental Health Break	30 min	Medium
9:30 PM - 11:30 PM	Draft Legal Standard and First Amendment Argument	2 hours	High
11:30 PM - 12:00 AM	Review Day's Progress	30 min	Medium
Monday, May 5, 2025			
7:30 AM - 8:00 AM	Final Review of Response to Defendant's Filing	30 min	Critical
8:00 AM	Send Email to Court (Pre-scheduled)	5 min	Critical
8:05 AM - 8:45 AM	Housing Search/Breakfast	40 min	High
9:00 AM	Serve Response on Counsel (Pre-scheduled)	5 min	Critical
9:30 AM - 11:30 AM	Draft RFRA and State Action Arguments	2 hours	High
11:30 AM - 12:30 PM	Mental Health Break/Lunch	1 hour	Medium
12:30 PM - 2:30 PM	Draft Irreparable Harm and Balance of Equities Sections	2 hours	High
2:30 PM - 3:00 PM	Mental Health Break	30 min	Medium
3:00 PM - 5:00 PM	Draft Combined Relief Request Section	2 hours	High
5:00 PM - 6:00 PM	Housing Search/Dinner	1 hour	High
6:00 PM - 8:00 PM	Complete First Draft of MSJ	2 hours	High
8:00 PM - 8:30 PM	Mental Health Break	30 min	Medium
8:30 PM - 10:30 PM	Draft Conferral Email to Michael Dance	2 hours	High
Tuesday, May 6, 2025			
8:00 AM	Send Conferral Email to Michael Dance	5 min	Critical
8:05 AM - 9:05 AM	Housing Search/Breakfast	1 hour	High

DMA: The Black Flag
Delaware Entity #7356245
BS: 58 1/2, 7/1 1/2, 10 1/2, 10 1/2, 10 1/2
1 The Green, Ste A
Denver, CO 80202

9:05 AM - 11:05 AM	Review and Revise MSJ	2 hours	High
11:05 AM - 11:35 AM	Mental Health Break	30 min	Medium
11:35 AM - 12:35 PM	Call Dance Office for Conferral Follow-up (document all)	1 hour	Critical
12:35 PM - 1:35 PM	Lunch Break	1 hour	Medium
1:35 PM - 3:35 PM	Finalize MSJ Based on Conferral Outcome	2 hours	High
3:35 PM - 4:05 PM	Mental Health Break	30 min	Medium
4:05 PM - 4:35 PM	Prepare Motion for Expedited Consideration	30 min	High
4:35 PM - 5:05 PM	File MSJ and Expedited Consideration Motion	30 min	Critical
5:05 PM - 6:05 PM	Housing Search/Dinner	1 hour	High
6:05 PM - 7:05 PM	Prepare and Send First Liberty Institute Follow-up	1 hour	Medium
Wednesday, May 7, 2025			
9:00 AM - 10:00 AM	Call Clerk to Confirm Filing Acceptance	1 hour	High
10:00 AM - 11:00 AM	Housing Search	1 hour	High
11:00 AM - 12:00 PM	Draft Notice of Constitutional Question to Utah AG	1 hour	Medium
12:00 PM - 1:00 PM	Lunch Break	1 hour	Medium
1:00 PM - 2:00 PM	Finalize AG Documentation	1 hour	Medium
2:00 PM - 2:30 PM	Mental Health Break	30 min	Medium
2:30 PM - 4:30 PM	Draft Motion to Supplement Record (if needed)	2 hours	Medium
4:30 PM - 5:30 PM	Dinner/Housing Search	1 hour	High
Thursday, May 8, 2025			
9:00 AM - 10:00 AM	Check ECF for Court Notices	1 hour	High
10:00 AM - 11:00 AM	First Liberty Institute Follow-up Call	1 hour	Medium
11:00 AM - 12:00 PM	Review Dance Response (if filed)	1 hour	High
12:00 PM - 1:00 PM	Lunch Break	1 hour	Medium
1:00 PM - 3:00 PM	Begin Draft of Reply (if needed)	2 hours	High
3:00 PM - 3:30 PM	Mental Health Break	30 min	Medium
3:30 PM - 5:30 PM	Continue Reply Draft	2 hours	High

Expected Timeline for Court Response

Event	Estimated Date	Probability
Court Acknowledgment of Filing	May 7-8, 2025	90%
Order on Expedited Schedule	May 9-13, 2025	60%

Defense Response Deadline (standard)	May 20, 2025	80%
Defense Response Deadline (expedited)	May 13, 2025	40%
Reply Brief Deadline (standard)	May 27, 2025	80%
Reply Brief Deadline (expedited)	May 16, 2025	40%
Hearing on Emergency Relief	May 14-21, 2025	50%
Ruling on Emergency Relief	May 17-24, 2025	50%
Full MSJ Hearing	May 28-June 11, 2025	70%
Final Ruling	June 4-18, 2025	70%

Key Accommodation Notes for IFP Status

- 1. **Electronic Filing Only:** All filings will be electronic through ECF to avoid printing costs
- 2. **Simplified Exhibit Strategy:** Rather than submitting all exhibits, reference previously filed exhibits by ECF number to reduce duplicate submissions
- 3. **Courtesy Copy Exception Request:** Include in MSJ a request to waive courtesy copy requirements due to homelessness and IFP status, citing Judge Parrish's discretion under local rules
- 4. **Remote Access Focus:** Schedule includes focus on tasks that can be completed using public WiFi access points
- 5. **Conferral Documentation:** Emphasize email conferral documentation to create written record without phone costs
- 6. **Relief Structure:** MSJ relief request structured to include immediate property return without requiring damage payment first (reversing previous approach)

I'll prepare the .ics calendar file with these detailed specifications, including the required reminders and detailed task descriptions formatted as LLM prompts.

IFP-Friendly Implementation Strategy for Hybrid MSJ Approach

Below I'll provide detailed guidance on implementing your chosen hybrid strategy (Motion for Summary Judgment with embedded emergency relief) specifically tailored to your circumstances.

Electronic Filing Accommodations for IFP Status

ECF Filing Without Physical Requirements

For each filing, include this language in your certificate of service or in a separate notice:

"Plaintiff respectfully requests exemption from physical submission requirements pursuant to this Court's IFP Order (ECF No. [#]) and Plaintiff's continuing homeless status, which creates undue hardship for physical document production. All submissions have been made electronically through CM/ECF in compliance with DUCivR 5-1."

Minimizing Duplicate Exhibit Submissions

To reduce redundant filing and simplify your submission burden:

1. Create a comprehensive "Exhibit Reference Table" as the first page of your exhibit section
2. For previously filed exhibits, use format: "Exhibit A: Previously filed as ECF No. [#], pp. [#-#]"
3. Only attach new exhibits not previously submitted
4. Include statement: "Pursuant to DUCivR 10-1(c), Plaintiff incorporates previously filed exhibits by reference to reduce duplication and conserve judicial resources"

MSJ with Embedded Emergency Relief Structure

Your Motion for Summary Judgment should follow this structure to properly incorporate emergency relief:

- I. INTRODUCTION (~2 pages)
 - A. State both emergency and complete relief sought
 - B. Highlight critical facts establishing religious harm already occurring
 - C. Clearly identify tiered relief request framework
- II. FACTUAL BACKGROUND (~5 pages)
 - A. The Black Flag's Religious Status and Doctrine
 - B. Timeline of Events Leading to Litigation

- C. Religious Significance of Property and April 18, 2025 Deadline
- D. Settlement Attempts Rejected by Defendant
- E. Ongoing Religious Harm from Continued Detention

III. LEGAL STANDARD (~2 pages)

- A. Summary Judgment Standard
- B. Emergency Relief Within Summary Judgment Framework
- C. Religious Liberty Protection Standards

IV. ARGUMENT (~15-20 pages)

- A. State Action Through Statutory Lien Enforcement (Lugar Analysis)
- B. First Amendment Violations
- C. RFRA Violations
- D. Utah RFRA (SB150) Violations
- E. Religious Autonomy Doctrine Violations
- F. Irreparable Harm Analysis
- G. Balance of Equities and Public Interest

V. BIFURCATED RELIEF REQUEST (~3 pages)

- A. Immediate Emergency Relief (Property Return and Access Within 24 Hours)
- B. Complete Relief (Full Damages and Declaratory Relief)
- C. Proposed Order with Emergency Timeline

Critical Language for Embedded Emergency Relief

Include this specific language in your introduction and relief sections:

"Plaintiff moves for summary judgment on all claims while simultaneously requesting embedded emergency relief pursuant to FRCP 65 and this Court's inherent equitable powers. The bifurcated nature of this motion recognizes both the ongoing irreparable religious harm requiring immediate relief and the absence of genuine issues of material fact warranting complete resolution through summary judgment. The Court should first address the emergency component of this motion within 7 days while proceeding with standard summary judgment consideration for the complete relief requested."

IFP-Specific Conference Strategy with Opposing Counsel

Given your limitations, implement this modified conferral approach:

1. Initial Email (Tuesday 8:00 AM): "Pursuant to Judge Parrish's Standing Order and DUCivR 7-1, I am writing to confer regarding my forthcoming Motion for Summary Judgment with Embedded Emergency Relief. Due to my IFP status and housing insecurity, I am conducting conferral via this email communication. Please respond within 24 hours regarding any stipulations to:
 - a) Expedited consideration of the emergency relief portion
 - b) Return of religious property pending full resolution
 - c) Consolidated briefing schedule for efficient resolution

If I don't receive a response by May 7, 2025 at 8:00 AM, I will proceed with filing and note our conferral attempt in accordance with the Standing Order."

- 2. Documentation Protocol:
 - Save email with timestamp metadata preserved
 - Take screenshots of sent email
 - Document any phone attempt with exact time, number called, and outcome
 - Prepare declaration detailing all conferral efforts
- 3. Conference Certification Language: "Pursuant to DUCivR 7-1 and this Court's Standing Order, I certify that on May 6, 2025 at 8:00 AM, I sent a detailed conferral email to opposing counsel Michael Dance at Mike.Dance@lewisbrisbois.com outlining the requested stipulations and seeking meaningful dialogue. [Add follow-up actions]. Despite these good faith efforts, no agreement was reached on the requested stipulations. These efforts go beyond mere perfunctory communication and represent genuine attempts at resolution despite my challenging circumstances as a homeless pro se litigant."

Strategic LLM Utilization for Each Phase

Structure your LLM interactions for maximum efficiency:

- 1. **Drafting Phase** - Use this prompt structure: "I need to draft [document section] for my federal case. Please analyze the following information and create a compelling argument that:
 - 1. Cites relevant case law already in the record
 - 2. Addresses the core elements of [legal standard]
 - 3. Incorporates my religious doctrine from The Covenant Codex
 - 4. Maintains consistency with my previous filings
 - 5. Uses straightforward language accessible to the court

The most important points to emphasize are [key points]. The strongest precedents supporting my position are [cases]."

- 2. **Review Phase** - Use this prompt structure: "Please review this draft section of my Motion for Summary Judgment. Specifically analyze:
 - 1. Whether all essential elements of [legal claim] are addressed
 - 2. If any arguments are weakened by conclusory statements
 - 3. Whether citations properly support each major assertion
 - 4. If the argument flows logically and builds toward relief
 - 5. Any potential counter-arguments I should preemptively address

Please suggest specific improvements without changing the overall argument structure."

- 3. **Filing Preparation** - Use this prompt structure: "I'm preparing to file my Motion for Summary Judgment with Embedded Emergency Relief. Please help me:

1. Create a concise filing checklist specific to Judge Parrish's requirements
2. Draft the certificate of service using proper formatting
3. Verify all required elements are present
4. Structure the proposed order following proper format
5. Prepare clear filing notes for reference during submission"

Expected Opposition and Pre-Planned Counters

Anticipate these specific opposition arguments and prepare your pre-planned counters:

1. **Expected Argument:** "Private storage contracts cannot create state action" **Pre-Planned Counter:** "Defendant abandoned contractual remedies in favor of statutory enforcement powers, transforming their status from private actor to state actor under Lugar and Coleman."
2. **Expected Argument:** "Religious claims are post-hoc justifications" **Pre-Planned Counter:** "The Black Flag's religious status was formally established in 2023-2024, predating the storage contract, and Defendant received explicit notice of religious status in December 2024."
3. **Expected Argument:** "Value limitation clause caps liability at \$5,000" **Pre-Planned Counter:** "Defendant's knowledge of religious significance and rejection of settlement offers trigger the Hadley v. Baxendale special circumstances exception, rendering the limitation unenforceable against religious harm."

Incorporate these pre-planned counters directly into your initial motion rather than waiting for the reply brief, thereby framing the narrative before opposition.

Follow-up with First Liberty Institute Strategy

Structure your follow-up to maximize chances of representation:

1. Focus on constitutional questions rather than monetary damages
2. Emphasize systemic religious liberty implications beyond your specific case
3. Present your case as an opportunity to establish favorable precedent protecting unconventional religious expression
4. Clearly articulate why your case represents an ideal vehicle for addressing broader religious autonomy questions
5. Provide concise timeline showing urgency without suggesting the case is already too advanced for them to join

Your email should begin: "Following our initial conversation, I'm writing to provide an update on my religious liberty case that presents a significant opportunity to establish precedent protecting religious organizations from state-sanctioned interference with religious practice. The case is currently at a critical juncture with my Motion for Summary Judgment being filed on May 6, making this an ideal time for counsel to join the effort..."

Next Steps for Constitutional Challenge Framework

To position your broader constitutional challenge through The Red Flag subsidiary:

1. Incorporate language in your current MSJ establishing foundation for systemic challenge
2. Include statement that the current case "represents just one instance of a systemic constitutional deficiency affecting religious organizations throughout Utah"
3. Reference "similarly situated religious entities" without specifying details that would require class certification
4. Create clear record of statutory deficiencies that would support future constitutional challenge
5. Document ongoing harm to religious practices statewide to establish basis for later action

This approach creates necessary precedent without prematurely revealing The Red Flag's pending formation and mission.

I'll prepare the detailed .ics calendar file as requested for implementation of this strategy.