

Michael F. Dance: Background and Analysis

April 30, 2025

Based on the information available from case documents and filings, here's an analysis of opposing counsel Michael F. Dance (Utah Bar #19248):

Professional Background

Michael F. Dance appears to be representing Public Storage in your current litigation. Based on the motion practice evident in the case documents, he likely specializes in commercial litigation with emphasis on property disputes and lien enforcement. His bar number (#19248) suggests he was admitted to the Utah Bar relatively recently compared to more senior attorneys.

Dance has demonstrated a pattern of procedural rather than substantive opposition in your case, focusing on technical challenges regarding corporate representation rather than engaging with the core religious liberty arguments you've presented.

Litigation Strategy Observed

From your case filings, Dance's approach shows several consistent patterns:

1. **Technical Dismissal Emphasis:** His Motion to Dismiss filed on March 27, 2025 attacked the religious-corporate unity doctrine by challenging your ability to represent Brandon Michael Jeanpierre Corporation pro se, rather than addressing substantive First Amendment claims.
2. **Delay Tactics:** Despite receiving multiple notices about the religious nature of the property and approaching religious deadlines, he has consistently rejected settlement offers and pursued procedural delays.
3. **Minimizing Religious Claims:** He appears to systematically dismiss the religious significance of The Black Flag's corporate structure and governance documents, despite their formal recognition by Delaware and the IRS.

Factors That May Impact Your Interaction

1. **Commercial Law Focus:** Dance likely has limited experience with religious liberty jurisprudence, particularly regarding unconventional religious practices, creating a strategic weakness you can exploit.
2. **Corporate Client Influence:** As counsel for a multi-billion dollar corporation, his litigation strategy is likely dictated by Public Storage's corporate policies rather than independent legal judgment.

3. **Local Cultural Context:** Given Utah's dominant religious culture, he may be particularly uncomfortable with or dismissive of non-traditional religious expressions like The Black Flag's punk-inspired doctrine.

Strategic Considerations

When dealing with Dance, consider these approaches:

1. **Overwhelm with Legal Authority:** Your citations to Supreme Court precedent (particularly *Lugar v. Edmondson Oil Co.*) regarding state action appear to exceed his familiarity with this area of law. Continue pressing these points with specific page citations.
2. **Highlight Corporate Resources Disparity:** In court appearances, subtly emphasize the power imbalance between a multi-billion dollar corporation and a religious nonprofit, which may resonate with Judge Parrish.
3. **Force Engagement with Religious Substance:** Your Motion for Summary Judgment should repeatedly challenge him to address the religious substance rather than procedural technicalities, making his evasion obvious to the court.
4. **Use Settlement History Against Him:** The fact that he rejected your offer to pay 75% of the disputed debt while receiving return of religious property demonstrates bad faith that can be leveraged in arguments about balance of harms.
5. **Speak His Language on State Actor Status:** Frame the state action argument in commercial terms he'll understand—Public Storage can't simultaneously benefit from statutory lien powers while claiming immunity from constitutional constraints.

Dance's continued rejection of reasonable settlements despite escalating damages (now at \$64,973,140.19) suggests either significant overconfidence or instructions from his client to maintain a hardline position regardless of legal risk.