

Ethics & Professionalism

American Bar Association Litigation Section

Michigan Court Orders Lawyer to Ditch Cartoon Dragon Watermark

[Pamela S. Menaker](#)

Jun 02, 2025

In a peculiar but instructive case that underscores the tension between branding and courtroom decorum, in [Jane Doe No. 2 v. Clinton County, et.al.](#), case number 1:25-cv-00368 (2025) a U.S. district court magistrate judge in the Western District of Michigan struck the complaint filed by Dragon Lawyers PC and ordered the firm to cease using the large, purple cartoon dragon watermark that was embedded across every page of its pleading. The watermark, depicting a suit-clad dragon in a power pose, became the firm's trademark, appearing in various court filings.

However, U.S. Magistrate Judge Ray Kent found the imagery inappropriate for official legal documents and wrote: *"Use of its dragon cartoon logo is not only distracting, it is juvenile and impertinent. The Court is not a cartoon."* [Order Striking Complaint, April 28, 2025.](#)

This aligns with [ABA Model Rule 3.5\(d\)](#), which mandates that lawyers uphold the decorum of the tribunal and avoid conduct intended to disrupt proceedings. [Comment 4 to Rule 3.5](#) notes: "A lawyer's function is to present evidence and argument so that the cause may be decided according to law. Refraining from abusive or obstreperous conduct is a corollary of the advocate's right to speak on behalf of litigants."

The lawyer in the matter, Jacob Perrone of East Lansing, Michigan, subsequently filed an amended complaint without the use of the trademark across each page. The case is a section 1983 civil-rights matter dealing with deliberate indifference that is still in litigation.

When I spoke with Perrone, he said that initially he decided "to go big or go home," purchasing the dragon image online for \$20 and then licensing it, but after this judge's ruling, the plaintiff's lawyer said he would be toning it down and placing his new logo in the lower left-hand corner of future pleadings, and leaving it off of pleadings in this particular case. "Going forward, I think that's the prudent thing to do for the time being," Perrone said.

While creativity can be an asset in law, particularly in crafting compelling arguments or engaging narratives and becoming recognizable to the public, it should not come at the

Ethics & Professionalism

American Bar Association Litigation Section

expense of professionalism. Branding and recognition in competitive legal fields may be an essential part of distinguishing oneself to the public, but these efforts should not be so outrageous or inappropriate as to undermine the credibility or the integrity of a lawyer's work. According to [ABA Formal Opinion 10-457](#), which addresses attorney websites, while branding is permissible, it must not interfere with the lawyer's duty to maintain the integrity and seriousness of legal communications.

Judge Kent relied on [Fed. R. Civ. P. 12\(f\)\(1\)](#) that allows a court “*to strike from a pleading an insufficient defense or any redundant, immaterial, impertinent, or scandalous matter.*”

Commentators agreeing with the judge observed that including such whimsical imagery eroded the solemnity of judicial proceedings and could be seen as a deliberate affront to the formality of the court. There is also the question of the purpose served by the branding: Did it serve the client's interests or add substance to the documents being filed in some way? It seems evident that it did not, and that a marketing or firm logo or slogan has no place in court filings.

This decision highlights an ongoing debate in the legal community about the balance between professionalism, innovation, and advertising. While many firms have embraced modern branding techniques, especially in digital spaces, this case serves as a reminder that courts remain bastions of tradition and formality. There is a time and place for creativity in law, but courtroom documents—intended to advance our clients' goals and persuade within a rigid procedural framework—demand sobriety, respect, and substance.

The ruling serves as a cautionary tale for attorneys seeking to blur the line between their personal or firm brand and the professional decorum required in court. While a purple dragon in a business suit may charm clients, it has no place in the solemn halls of justice—at least not in Michigan—where decorum within the judicial system is expected. While creativity and branding can play a role in a firm's identity, it is the work of the firm that must align with the public's expectations of the judicial system. As the legal landscape continues to evolve, particularly in this digital world, it will be essential for attorneys to find ways to express their individuality without compromising the seriousness and decorum that the law demands.