

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss.

SUPERIOR COURT
C.A. No. 2481CV03028

BO SHANG,

Plaintiff,

v.

COLLEEN MADIGAN,

Defendant.

**DEFENDANT COLLEEN MADIGAN'S MOTION TO DISMISS PLAINTIFF'S
COMPLAINT**

Defendant, Colleen Madigan, hereby moves to dismiss Plaintiff Bo Shang's Complaint pursuant to Mass. R. Civ. P. 12(b)(6) for the reasons stated in the accompanying Memorandum.

WHEREFORE, Defendant Colleen Madigan respectfully requests that this Motion be ALLOWED and that Plaintiff's claims against her in the above-captioned action be dismissed.

Defendant,

COLLEEN MADIGAN,

By her Attorneys,

ANDREA JOY CAMPBELL
ATTORNEY GENERAL

/s/ Mathias Fressilli
Mathias Fressilli, BBO #709176
Assistant Attorney General
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Date: December 27, 2024

CERTIFICATE OF SERVICE

I, Mathias F. Fressilli, Assistant Attorney General, hereby certify that I have this day, December 27, 2024, served the foregoing Notice of Appearance upon Plaintiff *pro se*, by mail and email.

Bo Shang
10 McCafferty Way
Burlington, MA 01803
bo@shang.software
Plaintiff pro se

/s/ Mathias Fressilli
Mathias Fressilli
Assistant Attorney General