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<b>MIDDLESEX COUNTY SUPERIOR COURT</b>	<b>1:4</b>
<b>BO SHANG,</b>	<b>1:9</b>
<b>1. GEJING DENG</b>	<b>1:17</b>
<b>2. FU SHANG</b>	<b>1:21</b>
<b>INTRODUCTION</b>	<b>1:26</b>
<b>1 This is a civil action brought by Plaintiff, Bo Shang (“Plaintiff”), against Defendants,</b>	<b>1:28</b>
<b>PARTIES</b>	<b>2:37</b>
<b>2 Plaintiff, Bo Shang, is an individual residing at 10 McCafferty Way, Burlington,</b>	<b>2:39</b>
<b>3 Upon information and belief, Defendant, Gejing Deng, is an individual who resides in</b>	<b>2:42</b>
<b>4 Upon information and belief, Defendant, Fu Shang, is an individual who resides in</b>	<b>2:45</b>
<b>JURISDICTION AND VENUE</b>	<b>2:48</b>
<b>5 This Court has subject matter jurisdiction over this action because the amount in</b>	<b>2:50</b>
<b>controversy</b>	
<b>6 Venue is proper in Middlesex County pursuant to G.L. c. 223 because the events at issue</b>	<b>2:54</b>
<b>STATEMENT OF FACTS</b>	<b>2:59</b>
<b>7 Plaintiff was previously under certain pretrial release conditions and was no longer</b>	<b>2:61</b>
<b>required to</b>	
<b>8 On or about February 8, 2025, Defendants called the Burlington Police Department and</b>	<b>2:67</b>
<b>falsely</b>	
<b>9 Defendants knew or should have known that Plaintiff’s pretrial release conditions did not</b>	<b>2:72</b>
<b>10 Defendants’ false statements to law enforcement were malicious and intended to harm</b>	<b>3:80</b>
<b>11 As a direct and proximate result of Defendants’ actions, Plaintiff has suffered damages</b>	<b>3:87</b>
<b>COUNT I – DEFAMATION</b>	<b>3:94</b>
<b>12 Plaintiff realleges and incorporates by reference all preceding paragraphs as if fully set</b>	<b>3:96</b>
<b>forth</b>	
<b>13 Defendants published false statements regarding Plaintiff’s compliance with his pretrial</b>	<b>3:99</b>
<b>14 These statements were false and defamatory, as they portrayed Plaintiff as violating</b>	<b>3:104</b>
<b>legal</b>	
<b>15 Defendants acted negligently, recklessly, or with actual malice in making such</b>	<b>4:109</b>
<b>statements.</b>	
<b>16 As a direct and proximate result of these defamatory statements, Plaintiff suffered harm</b>	<b>4:116</b>

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<b>COUNT II – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS</b>	<b>4:122</b>
17 Plaintiff realleges and incorporates by reference all preceding paragraphs as if fully set forth	4:124
18 Defendants’ conduct, including falsely reporting Plaintiff to law enforcement for a violation of	4:127
19 Defendants intended to cause emotional distress or knew, or should have known, that such	4:133
20 As a direct and proximate result of Defendants’ conduct, Plaintiff has experienced severe	4:138
21 Plaintiff realleges and incorporates by reference all preceding paragraphs as if fully set forth	5:146
22 Defendants used the legal or law enforcement process (calling the police under false pretenses)	5:149
23 The use of such process was not justified by any legitimate cause or reason (see Kelley v.	5:156
24 As a direct and proximate result, Plaintiff has incurred damages including emotional distress,	5:160
<b>PRAYER FOR RELIEF</b>	<b>5:165</b>
<b>C</b> Costs, disbursements, and reasonable attorney’s fees as allowed by law (see G.L. c. 231,	5:176
<b>D</b> Issuance of protective orders as described herein or as the Court deems appropriate (see G.L.	5:180
<b>JURY DEMAND</b>	<b>6:185</b>