

TABLE OF CONTENTS

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

TABLE OF CONTENTS

COUNT II – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS	4:122
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
PRAYER FOR RELIEF	5:165
C Costs, disbursements, and reasonable attorney’s fees as allowed by law (see G.L. c. 231,	5:176
D Issuance of protective orders as described herein or as the Court deems appropriate (see G.L.	5:180
JURY DEMAND	6:185