**PDFSage Inc. | MA Superior Court Middlsex County  
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| **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 controversy** | 2:50 |
| **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 required to** | 2:61 |
| **8 On or about February 8, 2025, Defendants called the Burlington Police Department and falsely** | 2:67 |
| **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 forth** | 3:96 |
| **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 legal** | 3:104 |
| **15 Defendants acted negligently, recklessly, or with actual malice in making such statements.** | 4:109 |
| **16 As a direct and proximate result of these defamatory statements, Plaintiff suffered harm** | 4:116 |
| **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 |