

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Sara L. Shriqui v. Belinda Btesh

Shriqui v. Btesh · No. 25-1042 (MAS) (TJB) · Decided February 17, 2026

SUMMARY

The United States District Court for the District of New Jersey grants Sara L. Shriqui’s application to proceed in forma pauperis and screens her complaint under 28 U.S.C. § 1915(e)(2)(B). The court dismisses without prejudice her intentional infliction of emotional distress claim for failure to state a claim, finding that the alleged Facebook posts did not sufficiently constitute extreme and outrageous conduct under New Jersey law. The court permits her defamation claim to proceed.

CASE DETAILS

COURT	United States District Court for the District of New Jersey
WRITING FOR THE COURT	Michael A. Shipp
JURISDICTION	United States District Court for the District of New Jersey
DECIDED	February 17, 2026
DOCKET	25-1042 (MAS) (TJB)
DISPOSITION	other
PROCEDURAL POSTURE	The district court screened a pro se civil complaint after granting the plaintiff's application to proceed in forma pauperis.
STANDARD OF REVIEW	The court applied the same failure-to-state-a-claim standard used under Federal Rule of Civil Procedure 12(b)(6), accepting well-pleaded factual allegations as true and drawing reasonable inferences in the plaintiff's favor, while disregarding legal conclusions couched as factual allegations.
PRECEDENTIAL VALUE	unpublished and nonprecedential

TOPICS

- motions to dismiss
- intentional infliction of emotional distress
- defamation
- civil procedure
- torts

PRACTICE AREAS

- Civil procedure
- Torts
- Defamation
- Intentional infliction of emotional distress

QUESTIONS PRESENTED

1. Whether the complaint's intentional-infliction-of-emotional-distress claim stated a plausible claim under New Jersey law.
2. Whether the complaint's defamation claim should be dismissed at the screening stage under 28 U.S.C. § 1915(e)(2)(B).

HOLDINGS

1. The complaint failed to state an intentional-infliction-of-emotional-distress claim because it did not adequately allege that defendant's Facebook statements were sufficiently extreme and outrageous to go beyond all possible bounds of decency.
2. The defamation claim was sufficiently pleaded to proceed and was not dismissed under 28 U.S.C. § 1915(e)(2)(B).

KEY QUOTATIONS

“For the reasons set forth below, Plaintiff’s first cause of action shall be dismissed without prejudice for failure to state a claim upon which relief may be granted. Plaintiff’s second cause of action, however, shall proceed.”

“In order to make out an IIED claim pursuant to New Jersey law, a plaintiff must adequately allege that: (1) the defendant acted intentionally; (2) the defendant’s conduct was “so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, and to be regarded as atrocious, and utterly intolerable in a civilized community”; (3) the defendant’s actions proximately caused the plaintiff emotional distress; and (4) that distress was “so severe that no reasonable [person] could be expected to endure it.””

FACTUAL BACKGROUND

Defendant allegedly made a Facebook post and Facebook Live video about plaintiff on January 14, 2025, and February 2, 2025. The statements accused plaintiff of bringing drug-addicted individuals into defendant's home to steal valuables, being a drug addict, stealing and cashing checks, and participating in a fraudulent check-stealing scheme; the video also alleged that plaintiff was a danger to her children and that they should be taken away. Plaintiff alleged that the publications led to unsolicited communications, harassment of her family, and continuing unwelcome communications.

PROCEDURAL HISTORY

Plaintiff filed a complaint alleging intentional infliction of emotional distress and defamation based on statements published by defendant on Facebook. The court granted in forma pauperis status, screened the complaint under 28 U.S.C. § 1915(e)(2)(B), dismissed the intentional-infliction-of-emotional-distress claim without prejudice for failure to state a claim, and allowed the defamation claim to proceed.

DISPOSITION

other

CASES CITED

- Schreane v. Seana, 506 F. App'x 120, 122 (3d Cir. 2012)
- Allah v. Seiverling, 229 F.3d 220, 223 (3d Cir. 2000)
- Phillips v. County of Allegheny, 515 F.3d 224, 228 (3d Cir. 2008)
- Papasan v. Allain, 478 U.S. 265, 286 (1986)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555, 557, 556, 570 (2007)
- Mala v. Crown Bay Marina, Inc., 704 F.3d 239, 245 (3d Cir. 2013)
- Soliman v. Kushner Co., 77 A.3d 1214, 1229 (N.J. Super. Ct. App. Div. 2013)
- Segal v. Lynch, 933 A.2d 1229, 1241-42 (N.J. Super. Ct. App. Div. 2007)
- L.C. v. Middlesex Cnty. Prosecutor's Off., No. A-3654-18, 2021 WL 1327169, at *19 (N.J. Super. Ct. App. Div. Apr. 9, 2021)
- Buckley v. Trenton Sav. Fund Soc., 544 A.2d 857, 863 (N.J. 1988)
- Botts v. N.Y. Times Co., No. 03-1582, 2003 WL 23162315, at *9 (D.N.J. Aug. 29, 2003), aff'd sub nom. Botts v. N.Y. Times Co., 106 F. App'x 109 (3d Cir. 2004)
- Ramirez v. United States, 998 F. Supp. 425, 434 (D.N.J. 1998)
- Zamboni v. Stamler, 847 F.2d 73, 80 (3d Cir. 1988)
- United States ex rel. Magid v. Wilderman, No. 96-4346, 2005 WL 469590, at *5 (E.D. Pa. Feb. 28, 2005)