

UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT

Shannon Golat v. Audrey K. Skwierawski, et al.

Golat · No. 25-3164 · Decided August 4, 2026

SUMMARY

The Seventh Circuit affirmed summary judgment for defendants in Shannon Golat’s action alleging a sex-based hostile work environment, retaliation, denial of reasonable accommodation, and equal-protection violations. The court held that the alleged sex-based comments and conduct were not sufficiently severe or pervasive to support the hostile-work-environment and Equal Protection claims, and it upheld the rulings concerning Golat’s disability-accommodation allegations. The opinion also held that Golat’s sworn EEOC charge could be treated as an affidavit for summary-judgment purposes.

CASE DETAILS

COURT	United States Court of Appeals for the Seventh Circuit
WRITING FOR THE COURT	Ripple; Easterbrook; Pryor
JURISDICTION	Federal
DECIDED	August 4, 2026
DOCKET	25-3164
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from an order granting the defendants' motions for summary judgment on claims alleging sex-based hostile work environment, retaliation, failure to accommodate a disability, and equal-protection violations.
STANDARD OF REVIEW	Summary judgment is reviewed de novo, with the evidence viewed in the light most favorable to the nonmoving party. Evidentiary decisions are reviewed for abuse of discretion.
PRECEDENTIAL VALUE	precedential
PARTIES	Shannon Golat v. Audrey K. Skwierawski, Christopher Channing, Caitlin Frederick, Melissa Bohse, Annette Barna, Steven Anderson, Randy R. Koschnick

TOPICS

hostile work environment

retaliation

reasonable accommodation

disability discrimination

appellate procedure

PRACTICE AREAS

employment law

civil rights

disability discrimination

appellate procedure

evidence

QUESTIONS PRESENTED

1. Whether the alleged sexist comments and conduct were sufficiently severe or pervasive to support a Title VII hostile-work-environment claim.
2. Whether the same conduct supported an equal-protection claim under 42 U.S.C. § 1983.
3. Whether requiring full-day sick leave for medical appointments, moving Golat's office, requiring transcription from a digital audio recording system, and denying assistance with transcripts violated the Rehabilitation Act.
4. Whether Golat's investigations, discipline, unpaid administrative leave, and nonrehiring decisions constituted retaliation for protected activity.
5. Whether Golat's contact with homicide-victim family members before filing an EEOC charge constituted protected participation under Title VII.

HOLDINGS

1. The alleged sexist and sexual comments, although unprofessional, rude, and offensive, were not objectively severe or pervasive enough to alter the conditions of Golat's employment and therefore did not establish a hostile work environment.
2. Because Golat could not establish a Title VII violation based on gender discrimination, summary judgment was also proper on her equal-protection claim under § 1983.
3. The defendants did not violate the Rehabilitation Act because the challenged measures either had no demonstrated connection to Golat's disability or constituted reasonable accommodations that allowed her to perform her essential job duties.
4. Golat's contact with the Rosolowskis to gather information for a potential EEOC charge was not protected participation under Title VII because no EEOC charge, proceeding, or investigation had begun when the contact occurred.
5. The travel-reimbursement investigation and written warning were not materially adverse employment actions, and the remaining adverse actions were not shown to be retaliatory because Golat could not establish pretext or but-for causation.
6. A sworn EEOC charge containing language substantially similar to a declaration under penalty of perjury may be treated as an affidavit for summary-judgment purposes.

KEY QUOTATIONS

“Given these similarities, we will treat the EEOC charge as an affidavit.” (12)

“However, some of the conduct (like the mug) was not directed exclusively at Ms. Golat, and the rest of the conduct cannot be characterized as more than the “occasional vulgar banter, tinged with sexual innuendo, of coarse or boorish workers,” which is not enough.” (15)

“Accordingly, Ms. Golat’s conversation with the Rosolowskis does not qualify as protected activity.” (23-24)

FACTUAL BACKGROUND

Golat worked as a court reporter for a Rusk County, Wisconsin, judge from 2007 until the judge retired in 2022. She alleged that the judge and court personnel made sexist comments, tolerated sexually derogatory conduct, failed to accommodate work restrictions resulting from an elbow injury, and retaliated against her through investigations, discipline, and decisions not to rehire her. The alleged adverse actions included a one-week suspension related to a missing vacuum and the refusal of successor judges to rehire her after the appointing judge retired.

PROCEDURAL HISTORY

Golat sued state-court-system officials and employees under Title VII, 42 U.S.C. § 1983, and the Rehabilitation Act. The Western District of Wisconsin granted summary judgment to the defendants on all counts. The Seventh Circuit reviewed the judgment and affirmed.

DISPOSITION

affirmed

CASES CITED

- *Fabick, Inc. v. JFTCO, Inc.*, 944 F.3d 649, 658 (7th Cir. 2019)
- *Roby v. CWI, Inc.*, 579 F.3d 779, 784 (7th Cir. 2009)
- *Oncale v. Sundowner Offshore Services, Inc.*, 523 U.S. 75, 80 (1998)
- *Scruggs v. Garst Seed Co.*, 587 F.3d 832, 840-41 (7th Cir. 2009)
- *EEOC v. Costco Wholesale Corp.*, 903 F.3d 618, 624-27 (7th Cir. 2018)
- *Baskerville v. Culligan International Co.*, 50 F.3d 428, 430 (7th Cir. 1995)
- *Adusumilli v. City of Chicago*, 164 F.3d 353, 361 (7th Cir. 1998)
- *Smith v. Northeastern Illinois University*, 388 F.3d 559, 567 (7th Cir. 2004)
- *Russell v. Board of Trustees of the University of Illinois at Chicago*, 243 F.3d 336, 343 (7th Cir. 2001)
- *Yuknis v. First Student, Inc.*, 481 F.3d 552, 554 (7th Cir. 2007)
- *Gates v. Board of Education of the City of Chicago*, 916 F.3d 631, 638 (7th Cir. 2019)
- *EEOC v. Village at Hamilton Pointe LLC*, 102 F.4th 387, 402 (7th Cir. 2024)
- *Turner v. Saloon, Ltd.*, 595 F.3d 679, 686-87 (7th Cir. 2010)
- *Ammons-Lewis v. Metropolitan Water Reclamation District of Greater Chicago*, 488 F.3d 739, 746-47 (7th Cir. 2007)
- *Johnson v. West*, 218 F.3d 725, 729-30 (7th Cir. 2000)

- Hostetler v. Quality Dining, Inc., 218 F.3d 798, 807-09 (7th Cir. 2000)
- Orton-Bell v. Indiana, 759 F.3d 768, 775 (7th Cir. 2014)
- Bohen v. City of East Chicago, 799 F.2d 1180, 1186 (7th Cir. 1986)
- Patt v. Family Health Systems, Inc., 280 F.3d 749, 754 (7th Cir. 2002)
- Gratzl v. Office of the Chief Judges of the 12th, 18th, 19th & 22nd Judicial Circuits, 601 F.3d 674, 678 (7th Cir. 2010)
- Peters v. City of Mauston, 311 F.3d 835, 845-46 (7th Cir. 2002)
- Bourke v. Collins, 142 F.4th 918, 921 (7th Cir. 2025)
- Jay v. Internet Wagner Inc., 233 F.3d 1014, 1017 (7th Cir. 2000)
- Conners v. Wilkie, 984 F.3d 1255, 1262 (7th Cir. 2021)
- Smithson v. Austin, 86 F.4th 815, 822 (7th Cir. 2023)
- Yochim v. Carson, 935 F.3d 586, 591 (7th Cir. 2019)
- Vande Zande v. State of Wisconsin Department of Administration, 44 F.3d 538, 544-45 (7th Cir. 1995)
- James v. Hyatt Regency Chicago, 707 F.3d 775, 783 (7th Cir. 2013)
- Ammons v. Aramark Uniform Services, Inc., 368 F.3d 809, 819 (7th Cir. 2004)
- Kinsella v. Baker Hughes Oilfield Operations, LLC, 66 F.4th 1099, 1105 (7th Cir. 2023)
- Sansone v. Brennan, 917 F.3d 975, 980 (7th Cir. 2019)
- Estate of Harris v. City of Milwaukee, 141 F.4th 858, 869 (7th Cir. 2025)
- Fuller v. McDonough, 84 F.4th 686, 690 (7th Cir. 2023)
- Hatmaker v. Memorial Medical Center, 619 F.3d 741, 745, 747 (7th Cir. 2010)
- Benes v. A.B. Data, Ltd., 724 F.3d 752, 753-54 (7th Cir. 2013)
- Grube v. Lau Industries, Inc., 257 F.3d 723, 729 (7th Cir. 2001)
- Benuzzi v. Board of Education of City of Chicago, 647 F.3d 652, 665 (7th Cir. 2011)
- Lesiv v. Illinois Central Railroad Co., 39 F.4th 903, 918 (7th Cir. 2022)
- Rozumalski v. W.F. Baird & Associates, Ltd., 937 F.3d 919, 924 (7th Cir. 2019)
- Greengrass v. International Monetary Systems Ltd., 776 F.3d 481, 486 (7th Cir. 2015)
- Coleman v. Donahoe, 667 F.3d 835, 852, 861 (7th Cir. 2012)
- McClendon v. Indiana Sugars, Inc., 108 F.3d 789, 799 (7th Cir. 1997)
- Daugherty v. Wabash Center, Inc., 577 F.3d 747, 751 (7th Cir. 2009) (per curiam)
- Vesey v. Envoy Air, Inc., 999 F.3d 456, 461-62 (7th Cir. 2021)
- Sinha v. Bradley University, 995 F.3d 568, 574 (7th Cir. 2021)
- James v. Hale, 959 F.3d 307, 314 (7th Cir. 2020)
- EEOC v. LHC Group, Inc., 773 F.3d 688, 701 (5th Cir. 2014)
- Zayas v. Rockford Memorial Hospital, 740 F.3d 1154, 1158-59 (7th Cir. 2014)

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