

Harassment by a member of the same sex is also actionable. In a case from Philadelphia, a female life skills counselor working for a social service organization was subjected to frequent sexual advances by a new female supervisor. When she complained to Human Resources, she was removed from the harasser's supervision, but that person continued to monitor her work and treat her with hostility. Suffering from acute depression and anxiety, the life skills counselor requested leave under the Family and Medical Leave Act, attaching a doctor's certification that her condition was the result of sexual harassment. Her leave request was denied and she was told to have her doctor delete any references to harassment so she could get paid. She refused and ultimately was removed from her job. The case was settled for \$90,000, an injunction against sexual harassment and retaliation, and extensive revision of company's sexual harassment and antiretaliation policies. *EEOC v. Resources for Human Development, Inc.* (E.D. Pa. March 24, 2004).