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## Divorce Goes to the Movies

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DIVORCE HAS BECOME a way of life, so much so that nearly everyone has heard the erroneous statistic that one of every two marriages now ends in divorce.<sup>1</sup> Almost every family has experienced it. So pervasive is divorce that it even has its own euphemism: "marital dissolution."<sup>2</sup> Divorce reform legislation stemmed from dissatisfaction from the electorate and those who have experienced divorce.<sup>3</sup> Image is everything.

The movies are way ahead of us. Throughout the 100 years of their history, motion pictures have dealt repeatedly with divorce. They have treated it humorously<sup>4</sup> and seriously.<sup>5</sup> They have focused on the pain of

[1209]

separation,<sup>6</sup> the tribulations of trial,<sup>7</sup> the dilemmas of custody,<sup>8</sup> and, of course, those terrible lawyers who are responsible for it all.<sup>9</sup>

Now life simply imitates art. As the movies show divorce and its ramifications, so has reality often become. If we now are reconsidering whether instant divorce needs adjustments to mitigate the havoc it seems to be wreaking on certain spouses, children, overwhelmed courts, and judicial processes, can we even begin a corrective process before filmmakers also agree it is time for a change?

If divorce has gone to the movies, who has been taking whom? If what we now face is a battle between myth and reality, who has the burden of proof? Indeed, who is even responsible for filing the opening brief?

### I. What Has Gone Before

In the beginning, silent films portrayed divorce as a tragedy.<sup>10</sup> It was a woman's problem. Her man had left, or was about to leave, or was despicable and should leave. There was the "other woman" to overcome or punish, or both.

By the time talkies took over, divorce had become part of American life. It was the 1920s - personal freedoms had increased; the great migration was from farm to cities; and fascination with the wealthy and their lifestyle was the rage. Little wonder that in 1930, Norma Shearer won an Academy Award for portraying a young, wealthy wife who put up with her husband's flirtations until, having enough of it, she decided to equal him.<sup>11</sup>

[1210]

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The primary plotline for divorce, however, continued to be that of a woman trapped in a wretched marriage,<sup>12</sup> married to a man who was unreliable,<sup>13</sup> or one who abandoned her.<sup>14</sup>

Often treated lightly, divorce was invariably shown as a lifestyle only of the wealthy. By limiting divorce to the rich, Hollywood made clear to the rest of us that it had no desire to upset the sanctity of the average happy home. Indeed, often even the wealthy were shown as opting to stay married. In 1932's *The Rich Are Always With Us*, Ruth Chatterton was undissuaded by a bitter divorce and new romance. She still professed undying love for her former husband.<sup>15</sup>

Indeed, so totally did Hollywood want to avoid being accused of promoting divorce that it even demanded a change in the title of Cole Porter's hit Broadway musical, *The Gay Divorce*. The Hays Office, the censorship branch of the Motion Picture Producers and Distributors of America,<sup>16</sup> refused to accept that title for the screen. Never anything if not inventive, Hollywood simply toyed with the end vowel and came up with *The Gay Divorcee*.<sup>17</sup> Apparently it was all right for the woman to be cheerful about divorce as long as the process was not so labelled.<sup>18</sup> In a movie featuring the dancing of Fred Astaire and Ginger Rogers, who cared about plot?

What the plot did show, however, was how jaded Hollywood already had become about the divorce process. Collusive perjury was accepted without comment. Thus to prove infidelity, which then was a required element for obtaining a divorce, Rogers' lawyer sent her to a resort where a professional correspondent would be "witnessed" having an affair with her. Never having met this hired perjurer, Rogers confuses him with Astaire, an innocent guest. After the obligatory plot twists, Rogers and Astaire discover true love with one another and dance off into the sunset.<sup>19</sup> It was

Hollywood's early pitch for no fault divorce.

[1211]

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All was not sweetness and light. In *One More River*,<sup>20</sup> adapted from John Galsworthy's novel, Diana Wynyard was accused by her mean-spirited husband, Colin Clive, of having an affair with a young man. The film was said to chronicle "a nasty divorce."

The message was clear. The 1936 film version of Sinclair Lewis' *Dodsworth*,<sup>21</sup> already a best seller and a Broadway hit, starred Walter Huston in the title role. *Dodsworth* showed that even in an unhappy marriage, virtue would produce an eventual reward.<sup>22</sup>

By the mid 1930s, Hollywood had found a favorite theme in showing the divorced couple who almost find new mates but, just in time, discover that true love was what they had with each other all along. The message was still clear: stay put! A classic of this genre was *The Awful Truth*, starring Irene Dunne and Cary Grant, and produced in 1937.<sup>23</sup>

The movies' view of divorce as comedy also seemed endless. Every conceivable comedic twist got inserted around divorce.<sup>24</sup>

[1212]

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The movies also discovered divorce as soap opera.<sup>25</sup>

About this time, Reno became established as the divorce capital of the world.<sup>26</sup> The Truckee River, once the site of silver mines, became the repository for discarded wedding rings thrown over the shoulder on leaving the Washoe County Courthouse. On the other end, husbands schemed to get their former spouses remarried to end alimony.<sup>27</sup>

Then came the World War II. Even divorce finally met its match. Between 1940 and 1945, motion pictures had little time for anything but the war effort. Breakdown in the American family was the last subject Hollywood wanted to discuss.

By 1948, however the War was over, peace and prosperity were everywhere, Levittown was bringing housing to the masses, the G.I. Bill was doing the same for higher education, and the movies were beginning to find reality brought bigger audiences than fantasy. In *The Decision of Christopher Blake*, director Peter Godfrey showed that a child can suffer deeply when her parents divorce.<sup>28</sup> It was a movie before its time. One critic called it "insipid." Yet the effect of divorce on children was to entice serious

filmmakers, and Family Law, for the next fifty years.<sup>29</sup>

[1213]

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In 1951, in *Payment on Demand*,<sup>30</sup> Curtis Bernhardt directed Bette Davis and Barry Sullivan in an attempt to highlight events leading to the breakdown of a marriage.<sup>31</sup> By 1957, divorce already had become so commonplace that the movies began moving to examine its effects. In *Man on Fire*,<sup>32</sup> Bing Crosby as a divorced father refuses, in an ironic twist on reality, to grant his remarried ex-wife any custody of their son.

In 1962, *Divorce - Italian Style* won an Academy Award for its sophisticated story and screenplay with Marcello Mastroianni as a man who could no longer tolerate his wife, so he manipulated people and events to wed another.<sup>33</sup>

Five years later, *Divorce American Style*<sup>34</sup> approached the subject slightly differently. Starring Dick Van Dyke and Debbie Reynolds, another casting irony, *American Style* said that there were more problems in divorce than the parties expected. The message continued: it still may be better just to stay married.

That also was more or less the theme of *McLintock!* In a Westernized version of the *Taming of the Shrew*, Maureen O'Hara plays the feisty wife of the title character, a cattle baron, played of course by John Wayne. O'Hara seeks a divorce from Wayne only to be surprised by the couple's college-age daughter telling mommy a few things about staying married.<sup>35</sup>

By the 1970's, however, Woody Allen had not only accepted divorce as the norm, but was psychoanalyzing the recovery process in such films as *Play It Again, Sam*, where the hero was intent on finding another girl after

[1214]

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being divorced by his wife;<sup>36</sup> and *Manhattan*, where at the beginning of the film Allen already has been twice divorced.<sup>37</sup>

Other views by the movies of marriage in the 70s included *Blume in Love*, where George Segal is a lawyer refusing to accept the fact that his wife left him,<sup>38</sup> and *Divorce His - Divorce Hers*, where Elizabeth Taylor and Richard Burton, of all persons, offer their respective views of marriage through the disparate eyes of husband and wife.<sup>39</sup>

By 1982, television, by now in full force, was bringing

together into a single presentation the combined elements of movies, divorce and reality. In a made-for-TV docudrama, *Little Gloria ... Happy at Last*, Bette Davis led a high-powered cast depicting the 1934 custody trial of Gloria Vanderbilt, then age 10.<sup>40</sup>

By the 80s, movies were seriously focusing not only on how, but also on why, marriages were breaking up. In *Divorce Wars: A Love Story*,<sup>41</sup> Tom Selleck plays a divorce lawyer who gets the ultimate comeuppance by finding that his own marriage has gone awry.

Still, the movies found time to mix divorce with comedy.

In *I Take These Men*, Susan St. James celebrates her anniversary by asking for a divorce and fantasizing about marrying others.<sup>42</sup> In *Micki & Maude*, Dudley Moore shows such sincere desire not to hurt either of the two women, each of whom wind up about to give birth to his child, that we all overlook that his solution is bigamy.<sup>43</sup>

In *Irreconcilable Differences*, a child, Drew Barrymore of *E.T.*<sup>44</sup> fame, faced with mean and selfish parents, asks for a divorce<sup>45</sup> One or the other

[1215]

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of her parents always seems to be more concerned with anything other than paying attention to Drew. So Drew asks to be awarded to the maid.<sup>46</sup>

## II. Myth Becomes Reality: *The War of the Roses*

If the multitude of divorce films produced during the past century has shown Hollywood to be ahead of reality, the quintessential divorce movie may be *The War of the Roses*.<sup>47</sup> It shows not only the current state of the divorce process, but the illogic of continuing without meaningful change.

From its brilliant title, which can be interpreted to mean various things,<sup>48</sup> to its black satire on Yuppie materialism and its devastating climax in the chandelier scene, *Roses* seems to sum up the present bleak state of the divorce process. If war is hell, *Roses* says, then divorce is worse!

Not without small irony, Danny De Vito, one of Hollywood's most talented and versatile character actors, elects here not only to serve as the film's director, but as the divorce attorney as well. As director, he presumably has put his imprint on the production. As the divorce attorney cum narrator, he tells us in effect that the process was totally outside his control.

It did not have to be that way. Instead of just shrugging away at various times in the plot when his increasingly

hysterical client, Oliver Rose, requested legal acts or advice, De Vito could have tried to return moderation to the matter. The movie does not even try to suggest such a possibility. De Vito is a hired gun. Perhaps a wiser, more sensitive and perceptive gun than the usual stereotypic divorce lawyer, but a total mercenary nevertheless.

For those who may have forgotten, *Roses* is a story about the sheer horror of an uncontrolled divorce. As Oliver and Barbara Rose, Michael Douglas and Kathleen Turner show how wonderful it was to be young and beautiful and falling in love in the 60s. The days were filled with sunshine and promise; the lovers were filled with one another. Life was dreams and romance and soft strings of background music so well integrated to the whole that you only hear it when you listen closely. This was how boy-girl movies used to end.

In *Roses*, however, it is just the beginning. Marriage, the movie tells us, is just the overture to a tragedy.

With time but seemingly little effort, Oliver becomes a successful lawyer. Barbara becomes an extraordinary housekeeper. At this point, it is

[1216]

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*Stepford Wives* revisited.<sup>49</sup> The couple has two children, who grow normally and healthful and eventually move away to school or adulthood. It has been a "marriage of long duration."<sup>50</sup>

Barbara now "awakens." Selling some of her "wonderful" liver pate to a neighbor, she realizes that true independence lies in self employment as a caterer. Somehow, because there is a lot more plot yet to cover in only a short remaining time, this discovery leads Barbara to tell Oliver that she wants a divorce,<sup>51</sup> as well as the house and furnishings that she says she created during the marriage. Oliver presumably can keep his law practice.<sup>52</sup>

As in reality, however, it does not end that simply. What follows is a series of escalating interactions between Oliver and Barbara so vicious and mean-spirited that it has made *Roses* a classic of what is wrong with the divorce process.

When the "war" is over, with the Roses swinging like pre-Darwinian apes from their prized chandelier, scorched earth as a policy of battle is made to seem a term of endearment.

The movie often is billed as black comedy. It has been critiqued as a satire on materialism. According to De Vito, no marriage ever is happy for long.

There may be a larger, and more constructive, message as well. Viewing the horror for the absurdity it is may teach that divorce is survivable if each spouse is willing to compromise.

Barbara states that she just wants the house because it represents her adult achievement. She remodeled it and picked the furniture. Oliver says the house should be his because he earned the money that permitted its purchase and development. *Roses* says that both are right and neither is: if spouses cannot share, neither will get anything.

The moral is both accurate and Draconian. It is accurate because it portrays what all too often is the result of modern divorce. It is Draconian because it discounts as worthless to mitigate human nature, both the role of the intelligent divorce lawyer and the entire legal process.

[1217]

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For example, what if Barbara was correct? What if she should have received the house and furnishings? What if Oliver was being unreasonable in seeking to deny them to her? Was the message of *Roses* that there is no recourse when one spouse is being unreasonable?

Perhaps that is why *Roses* has become so classic an example of the genre. Perhaps we face now an era (hopefully temporary!) when most persons have lost faith in any process mitigating the horrors of their personal lives and emotions. De Vito as the seemingly helpless divorce lawyer can do no more than stand by at the beginning and end to tell us the story, smoking a big, comforting cigar. Has a fascination with greed and self-absorption so clouded thinking that even the myth makers of Hollywood cannot break through?

After one hundred years of examining the issue, is the ultimate message the movies now have for us on the subject of divorce that clients will fiddle while lawyers' cigars burn? We moviegoers may have a right to expect much more from our beloved silver screen.

### **Conclusion**

Throughout the history of filmmaking over the past century, divorce has hovered over plot lines of movies, as it has our lives, like the morning mist. Here is one of the greatest ironies to be found in films about divorce. On the one hand, because Hollywood stories have to present a problem in order to tell a story, the divorce must always be shown in simplistic terms: good vs. evil; right vs. wrong; unhappy divorce vs. happy marriage, or vice versa. On the other hand, there is possibly no more complex and sophisticated issue that has emerged on the American scene during these past one hundred years than the emergence of divorce as an accepted element of average life. It has profoundly affected virtually every aspect of our culture and

society. It reaches into some of the deepest and most intimate areas of our psyche as a people and the security of our social order.

The movies have responded in ways equally complex. From pairing Fred Astaire with Ginger Rogers, from matching Bob Hope with Jane Wyman, from focusing on John Wayne and Lupe Velez, the movies have now embraced Woody Allen, *Kramer vs. Kramer*, and Danny De Vito narrating the Roses swinging from their chandelier.

What is to be made of it all? For the confused and disenchanted in the audience, for the multitudes whose real life relationships are uncomfortable but not that uncomfortable, the message often has seemed to be inspiring in a perverse way - unhappiness in marriage may be a staple of modern life, the films said, but divorce is worse. You think you have it bad, look at how easily it could be truly horrible.

[1218]

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That may sell popcorn. It does not always make for a better society. The challenge to our brilliant filmmakers is to meld the two. Divorce has gone to the movies; it now may be time for the movies to go to divorce.

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#### ENDNOTES

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Myth vs. Reality, planned for presentation at the ABA Family Law Section's Annual Spring Meeting, April 17-20, 1997, in Los Angeles, Cal.

1. See, e.g., MICHAEL MEDVED, *HOLLYWOOD VS. AMERICA* 132-35 (1992) (exposing the myth of the fifty-percent divorce rate).

2. See, e.g., Cal. Fam. Code 2000-2406 (West 1994 & Supp. 1996).

3. See Report of 1969 Divorce Reform Legislation, 4 CAL. ASSEMBLY J. 8054 (Aug. 8, 1969).

4. See, e.g., *FOREVER DARLING* (Metro-Goldwyn-Mayer/Zanra 1956) (starring Lucille Ball and Desi Arnaz, directed by Alexander Hall).

5. See, e.g., *SMASH PALACE* (Aardvark Films 1981) (produced and directed in New Zealand by Roger Donaldson; the life of a man is tracked from idyllic happiness to sheer hell through domestic dysfunction).

6. See, e.g., *MORGAN!* (British Lion/Quintra 1966) (directed by Karel Reisz in the United Kingdom); see also *Breaking Up* (ABC television broadcast, Jan. 2, 1978) (directed by Delbert Mann).

7. See, e.g., *Little Gloria ... Happy at Last* (NBC television broadcast, Oct. 24-25, 1982) (directed by Waris Hussein). This movie is an adaptation of the best seller about the 1934 custody trial of Gloria Vanderbilt.

8. See, e.g., *KRAMER VS. KRAMER* (Columbia 1979) (directed by Robert Benton); *RICH KIDS* (Altman/Lion's Gate/United Artists 1979) (directed by Robert M. Young); *A QUESTION OF LOVE* (Blinn/Thorpe Productions in association with Viacom 1978) (directed by Jerry Thorpe, starring Gena Rowlands, Ned Beatty, and Bonnie Bedelia); *PEPPERMINT SODA* (Films de L'Alma/Alexandre Films 1977) (directed by Diane Kurys).

9. There does not appear to be a single motion picture in which the divorce attorney is the hero.

10. Nevertheless, portray it they did. By the authors' estimate from an American Film Institute list, at least 170 movies dealt with divorce during just the years between 1911 and 1920. *AMERICAN FILM INSTITUTE'S CATALOG, FEATURE FILMS, 1911-1920* (1988).

11. THE DIVORCEE (Metro-Goldwyn-Mayer 1930) (directed by Robert Z. Leonard, 1930). The film also featured Conrad Nagel and a young actor named Robert Montgomery.

12. See, e.g., TRAVELLING HUSBANDS (RKO 1931).

13. See, e.g., CIMARRON (RKO 1931).

14. See, e.g., THE POWER AND THE GLORY (Twentieth Century Fox 1933).

15. THE RICH ARE ALWAYS WITH US (Warner Brothers 1932) (directed by Alfred E. Green and featuring a newly introduced actress named Bette Davis).

16. RICHARD S. RANDALL, CENSORSHIP OF THE MOVIES: THE SOCIAL AND POLITICAL CONTROL OF A MASS MEDIUM 16 (1970).

17. THE GAY DIVORCEE (RKO 1934) (directed by Mark Sandrich, featuring Betty Grable and Edward Everett Horton as the lawyer). As for the charades that used to surround obtaining a divorce, also see THE TWO JAKES (Blue Dolphin/Paramount 1990) (directed by and starring Jack Nicholson in a sequel to Chinatown (Paramount/Long Road 1985)).

18. Semantics change, as does culture. In the 1930s, "gay" meant cheerful.

19. They must have done something right. *The Gay Divorcee* was nominated for four Academy Awards, including Best Picture, and won for Best Song.

20. ONE MORE RIVER (Universal 1934) (directed by James Whale and featuring the film debut of Jane Wyatt).

21. DODSWORTH (Samuel Goldwyn 1936) (directed by William Wyler, also featured Paul Lukas, David Niven and Mary Astor). The film was nominated for five Academy Awards, including Best Picture, and won for Art Direction. Much the same theme was addressed almost fifty years later in TWICE IN A LIFETIME (Yorkin Company 1985) (starring Gene Hackman and directed by Bud Yorkin).

22. Dodsworth, a sensitive and kindly manufacturer who wants only peace and quiet, silently suffers an intolerable wife. Self-indulgent, she constantly demands new excitements. Ultimately, at her behest, Dodsworth sells his business and begins travelling around the world with his

wife. She then says that she still finds him dull and that she wants a divorce in order to marry into European aristocracy. Innocently, Dodsworth falls in love with an attractive and understanding widow but breaks off the relationship because it is not morally correct. Only then does he realize how much a true relationship means to him. At the end, he and the widow are together again.

23. *THE AWFUL TRUTH* (Columbia 1937) (directed by Leo McCarey). Mr. McCarey won the Best Director Academy Award for this movie in 1937. This story was so successful that it actually was filmed four times. Originally produced as a silent film in 1925 with Agnes Ayres and Warner Baxter, the 1937 version was considered so successful that it spawned two later movies with Grant and Dunne. Proof that one should stop when one is ahead is found in the rejection that the fourth remake suffered in 1953, despite featuring Jane Wyman and Ray Milland. Retitled *Let's Do It Again* (Columbia 1953), mercifully, it was quickly forgotten.

24. In *THE DIVORCE OF LADY X* (London Films 1938) (directed by Tim Whelen), Laurence Olivier is a lawyer forced to share his hotel room with a mischievous Merle Oberon. Olivier becomes convinced that he is the cause of Oberon's pending divorce, even though she is not married. In *I WANT A DIVORCE* (Paramount 1940) (directed by Ralph Murphy), Joan Blondell and Dick Powell begin to wonder about divorce almost immediately after getting married. At the time, both Blondell and Powell also were married in reality. Also in 1940, director W.S. Van Dyke brought out *I LOVE YOU AGAIN* (Metro-Goldwyn-Mayer/Cosmopolitan 1940) (starring William Powell and Myrna Loy), centering on mix-ups and confusions over divorce and prior lives of an amnesiac Powell. *OUR WIFE* (Columbia 1941) (directed by John M. Stahl), starred Melvyn Douglas as a musician seeking a divorce so he could marry again. Shortly thereafter, even Andy Hardy got into the act; in *THE COURTSHIP OF ANDY HARDY* (Metro-Goldwyn-Mayer 1942) (directed by George B. Seltz), Andy romanced a divorcing couple's withdrawn daughter while Judge Hardy handled the divorce. In 1946, Lucille Ball starred in *LOVER COME BACK* (Universal 1946) (directed by William A. Seiter), in which Lucy sued costar George Brent for divorce after she met his companion. By 1976, in *HOW TO BREAK UP A HAPPY DIVORCE* (NBC television broadcast, Oct. 6, 1976), the movies were down to using sight gags to spruce up the plot of trying to win back a former spouse through attempts to make him jealous.

25. In *IN NAME ONLY* (RKO 1939) (directed by John

Cromwell), Cary Grant falls in love with widowed Carol Lombard but is stymied by an unpleasant Kay Francis who would not give Grant his freedom. See also *AFFAIR WITH A STRANGER* (RKO 1953) (directed by Roy Rowland; during the adoption of a child, "the stranger" prompts a couple to reconsider their divorce); *THE MARRYING KIND* (Columbia 1952) (directed by George Cukor; Judy Holliday and Aldo Ray play a young couple recalling their life together on the eve of their divorce).

26. See, e.g., *MEXICAN SPITFIRE OUT WEST* (RKO 1940) (a lively farce directed by Leslie Goodwins and featuring Lupe Velez as a wife who goes to Reno for a divorce because she feels her husband is not paying sufficient attention to her); see also *REUNION IN RENO* (Universal 1951) (directed by Kurt Neumann, featuring Gigi Perreau as a little girl deciding to divorce her parents so she will not be in their way). Forty-five years later, this time with a woman director, Reno still was shown as the divorce capital in *DESERT HEARTS* (Desert Heart Productions 1985) (directed by Donna Deitch).

27. See, e.g., *HE MARRIED HIS WIFE* (Twentieth Century Fox 1940) (directed by Roy Del Ruth).

28. *THE DECISION OF CHRISTOPHER BLAKE* (Warner Brothers 1948).

29. In that same vein was *NO PLACE FOR JENNIFER* (ABPC 1949), made in the United Kingdom in 1951 under the direction of Henry Cass. See also *THE GOOD MOTHER* (Warner Brothers/Touchstone/Silver Screen Partners IV 1988) (directed by Leonard Nimoy), where a divorced mother loses custody of her young daughter because she adopts a bohemian existence.

30. *PAYMENT ON DEMAND* (RKO 1951).

31. That ambitious theme was tried again thirty years later in *SHOOT THE MOON* (Metro-Goldwyn-Mayer 1982), an extraordinary movie of raw emotional power directed by Alan Parker, and starring Albert Finney and Diane Keaton. That film was criticized, however, for lacking logic and credibility despite its recognized insights into the subject. See, e.g., *CINEMANIA '95 CD-ROM* (1995) (film reviewed by Leonard Maltin). In essence, the plot is that Finney wants to end his marriage without losing his family and possessions. It presents the classic dilemma of a modern divorce. See also *SCENES FROM A MARRIAGE* (Cinema 5 1973) (directed by Ingmar Bergman).

32. MAN ON FIRE (Metro-Goldwyn-Mayer 1957) (directed by Ranald MacDougall, also featuring Inger Stevens and E.G. Marshall).
33. DIVORCE - ITALIAN STYLE (Lux/Vides/Galatea 1962) (directed by Pietro Germi). See also Germi's followup film, SEDUCED AND ABANDONED (Lux Film 1964) (lampooning traditional sexual mores by focusing on the fate of a Don Juan who manages to make pregnant his fiancée's kid sister).
34. DIVORCE AMERICAN STYLE (Columbia/Tandem 1967) (directed by Bud Yorkin; featuring Jason Robards, Van Johnson, Shelley Berman, Lee Grant, and Tom Bosley).
35. MCLINTOCK! (United Artists 1963) (directed by Andrew McLaglen, featuring Patrick Wayne, and produced by Michael Wayne); see also HOW TO COMMIT MARRIAGE (Cinerama 1969) (directed by Norman Panama). In this Bob Hope movie with Jane Wyman and Jackie Gleason, Hope and Wyman are about to divorce when their daughter states that she is about to marry Gleason's son.
36. PLAY IT AGAIN, SAM (Paramount/APJAC/Rollins-Jaffe 1972) (directed by Herbert Ross).
37. MANHATTAN (United Artists 1979) (directed by Woody Allen).
38. BLUME IN LOVE (Warner Brothers 1973) (directed by Paul Mazursky).
39. *Divorce His - Divorce Hers* (ABC television broadcast, Feb. 6-7, 1973) (directed by Waris Hussein); see also *Breaking Up is Hard to Do* (ABC television broadcast, Sept. 5 & 7, 1979) (directed by Lou Antonio).
40. See *Little Gloria ... Happy at Last*, *supra* note 7; see also *Roxanne: The Prize Pulitzer* (NBC television broadcast, Oct. 16, 1989) (directed by Richard A. Colla).
41. *Divorce Wars: A Love Story* (ABC television broadcast, Mar. 1, 1982) (written and directed by Donald Wrye).
42. *I Take These Men* (CBS television broadcast, Jan. 5, 1983) (directed by Larry Peerce); see also *Who Gets the Friends* (CBS television broadcast, May 10, 1988) (directed by Lila Garrett, where a supposedly happily married couple get divorced and must divide up their friends).
43. MICKI & MAUDE (Columbia/Delphi III/B.E.E. 1984)

(directed by Blake Edwards).

44. E.T. THE EXTRA-TERRESTRIAL (Universal 1982).

45. IRRECONCILABLE DIFFERENCES (Lantana/Warner Brothers 1984) (directed by Charles Shyer).

46. Life does indeed imitate art; a few years later, a minor child brought a similar action against biological parents to remain with foster parents.

47. THE WAR OF THE ROSES (Fox/Gracie Films 1989) (directed by Danny De Vito).

48. For example, the brutality of the British monarchy's War of the Roses; the thorns of a rose bush; and the "war" of Oliver and Barbara Rose in the movie.

49. STEPFORD WIVES (Fadsin/Palomar 1974) (directed by Brian Forbes).

50. Cal. Fam. Code 4336 (West 1994) (defining a marriage of ten years or longer in California as a marriage of "long duration" and requiring that a court not summarily abandon jurisdiction to award support to the spouse in need).

51. See the recent plot twist of the *Blondie* comic strip, created by Chic Young. With his son as coproducer, Young's strip, one of the oldest of the genre, now has evolved Blondie into a thriving catering business with Dagwood and the two teenage children happily assisting. If Blondie is a modern superwife, both independent and dutiful at the same time, Dagwood is a post-modern less-than-super husband, both egocentric and compliant at the same time. Dean Young & Stan Drake, *Blondie*.

52. It is the axiom of the divorce lawyers: the house for the business.