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JETTA GOUDAL VERSUS THE STUDIO SYSTEM: STAR LABOUR IN 1920S HOLLYWOOD

Agata Frymus

Jetta Goudal commenced her rise to Hollywood stardom in 1923. Like many other players hailing from the continent, her publicity was built upon the notion of temperamentality and represented Goudal as a volatile and irrational woman, prone to abrupt fits of rage. This perception soon started to work against her own professional interests. Her consecutive Hollywood contracts – first with Distinctive Pictures, then with Famous Players-Lasky – were both terminated prematurely, which resulted in Goudal suing them for a breach of contract. She promptly signed a new agreement with Cecil B. DeMille, but again ran into difficulties which found their way to the court room. In depicting her legal struggles, public commentators used the association between Goudal, Frenchness and problematic behaviour to explain her actions in terms of irrationality and impulsiveness rather than framing it within the context of wider power dynamic. This paper interrogates legal suits between Goudal and three of her former employers, discussing the ways in which a star image can function not only as a commodity, but also as an instrument of control. In constructing her in terms of an unruly persona, the public discourse denied Goudal her own stance in the matters relating to labour.

Jetta Goudal, now a lesser known star of the silent era, first appeared on the silver screen in a small role in the historical drama *The Bright Shawl*.¹ Her portrayal of a 'wicked half-caste' La Pilar immediately brought the actress to the attention of *Picture Play*, who called her 'a picturesque newcomer' and 'one of the most unusual and interesting screen debutantes'.² In March 1925, the executives of Famous-Players Lasky terminated Goudal's services, proclaiming her unprofessional and impossible to manage, which caused her to sue for a breach of contract. Cecil B.

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DeMille, her next employer, ended her next term of employment three years prematurely, which resulted in yet another lawsuit. This work interrogates the institutional politics that underpinned the way in which Goudal operated within the studio system; it places its focus on her legal battles with former employers. The producer/director countered that Goudal's irrational behaviour on set resulted in delays in shooting and cost the studio a great deal of money, but, having no records to support this claim, he has lost the case. Most press reports relied on statements made by DeMille, citing Goudal's demeanour as the reason why the matters were brought to a head.³ However, the outcome of the court battle was beneficial for Goudal, who was granted \$ 31,000 in damages.⁴

According to Sean P. Holmes, the extra-filmic narrative of Goudal's life identified her with mental instability and immature impulsivity which, in consequence, denied her the ability to express her own concerns relating to the control of labour.⁵ This study draws on Holmes' argument by interrogating the origin of Goudal's public image as a temperamental diva, and the subsequent impact it had on the perception of her legal issues with DeMille. I thus examine the contextual and cultural artefacts of stardom, especially the most popular film magazines of the 1920s, such as *Photoplay*, *Picture Play* and *Motion Picture Classic*. Yet, this study goes beyond all publicly available information pertaining to Goudal⁶; to supplement my understanding of principles governing the star system, I have also consulted various archival manuscripts, including court records. Many of the sources I draw upon in my study of Goudal's career, predominantly studio-generated documents, private correspondence and telegrams, came from the extensive collection of materials gathered in the 'Jetta Goudal papers', the extensive collection held at the Margaret Herrick Library in Los Angeles.

Famous Players-Lasky

Famous Players-Lasky – the studio which contracted Goudal's services as a performer in 1923 – was invested in promoting her as a star of both European finesse and oriental charm. The image of a highly strung, temperamental helped to strategically commodify Goudal's *femme fatale* persona.⁷ Fan magazines often reported on Goudal's problematic behaviour, which operated as means of authenticating her status as a French national. Irrationality constituted one of the *mélange* of clichés relating to female stars originating from the continent. Moreover, the idea of a woman having temperamental tantrums also relates to conservative constructions of femininity as intrinsically unstable in emotional terms.⁸ Within patriarchy, rational thinking and logic is constructed in opposition to emotion and irrationality, the set of disvalued attributes traditionally assigned to women. Jan-Christopher Horak notes that the stereotype of *émigrés* behaving badly was rooted in the fact that film actors in Hollywood had a dramatically different standing to that they enjoyed in Europe. In Berlin, for example, they belonged to the highest caste of intellectuals and artists. In America, they were incorporated into the meticulous workings of the studio system and no longer constituted members of the cultural elite.⁹

Stephen Gundle and Clino Castelli argue that the institutionalisation of American cinema differentiated it from other national cinemas.¹⁰ The star system did not develop in the same way in the European film industries, and movie players had a greater degree of control over their images than their American counterparts. In keeping with the popular discourse, European actresses were prone to cause trouble because they were not used to having the lower status that came with working in the American system, where they were simply highly paid labourers. In this new climate, individual performers had virtually no control over the roles offered to them, or over the ways in which their image would be constructed for consumption.

Studio executives embraced the connotations of bad behaviour to authenticate the European origin of their stars. One of the documents in the Jetta Goudal Collection at the Margaret Herrick Library provides a fascinating insight into the logic that governed the production of star images. The transcript of an undated meeting of 31 film people – studio executives and exhibitors – supports the assumption that those in charge of designing star images saw female temperament as an intricate part of being French. The vice-president in charge of exploitation and advertising (identified by the initials J.P.E) lead the discussion of Goudal's worth in the box office.

Where do these Hollywood writers get the stuff that stories about the stars' temperament hurt the stars? [*sic*] Goudal's publicity instead of hurting her has helped her. I agree that in the case of Garbo it may have done some harm because Garbo has never had any sympathetic publicity at all, whereas Goudal has and while we feel that Garbo is really 'a foreigner' the american [*sic*] public has always been strong for French actresses and temperament seems the rightful heritage and expression of the French star.¹¹

J.P.E acknowledged the benefits of Goudal's publicity; he also saw the potential dangers of that line of 'foreign' branding. Although undated, the document's mention of Garbo and DeMille allows it to be situated in late 1920s. I suggest, however, that the characteristic brand of temperament was conceived much earlier. The rumours regarding Goudal's diva-like behaviour were planted in the press soon after she entered the arena of stardom in 1923, with the release of *The Bright Shawl*.

In late 1923, *Picture Play's* Malcolm H. Oettinger described his meeting with Goudal as both mesmerising and very emotional. 'She is foreign in a highly theatrical way. Not for ze [*sic*] one moment she does she permit you to forget that she is an importation',¹² he observed, gently mocking her foreign accent. The ideological imperatives behind presenting Goudal's behaviour as challenging were aimed to enhance her alignment with Europeanness. As noted by *Photoplay*, the actress refused to stay in a hotel booked for her by Famous-Lasky's executives when she arrived in Hollywood, on the account of it being 'too much old lady'. She was promptly accommodated in another, more suitable establishment.¹³ Neither of these mentions uses the adjective that soon came to outline Goudal's entire persona – temperamental – but they did lay a foundation to the later claims of explosive moodiness. Hinting at her foreign, continental attitude served as a prelude to putting a label of temperament on La Goudal.

Several issues emerge from the marketing tactics established by Famous Players-Lasky in the subsequent promotion of Goudal's 'difficult' star persona. First of all, fan magazines were instructive in drawing a parallel between a propensity to misconduct and being foreign, thus, temperament reinforced Goudal's connection with Europe. Secondly, it engaged with an implicit discourse on silent stars that placed high currency upon the nineteenth century understanding of creativity and talent. Goudal's star image deployed the signs of an erratic disposition because, within the Romantic framework, extremely gifted artists were often assumed to suffer from social inadequacy, or be moody and generally difficult to deal with. The polemic popularised by Schopenhauer characterised geniuses as maladapted in the most mundane concerns.¹⁴ According to his ideas, which remained influential throughout the 1920s, the high development of one of their intellectual faculties resulted in the weakening of other emotional areas. The June 1928 issue of *Motion Picture Classic* featured an article that demonstrates this line of reasoning. The piece is concerned with Alan Crosland, a movie director renowned for working with many difficult stars.¹⁵ Crosland's 15 years in the industry made him realise that, although filming some problematic stars poses risks, the artistic results that can be obtained with them is worth the challenge. Admittedly, 'he prefers the temperamental ones to the good troupers, because they are almost always the artists – the ones who have something to give'.¹⁶ The account puts a sign of equation between superior skills and the demanding characters of the actors who possess them.

Speaking in retrospect, Goudal admitted that she met her fabricated off-screen identity with some reservations; however, her feelings on the subject were irrelevant to the studio, determined to stick to their stratagem.¹⁷ There is evidence to suggest the actress made attempts to single-handedly challenge the temperamental facet of the persona assigned to her by Famous Players-Lasky by personally contacting the media. An unpublished letter addressed to one of the writers of the *Picture Play* (known as 'The Bystander') illustrates the unease Goudal felt in regard to her own image. She wrote:

I read the reference to myself in your article in the last number [*sic*] of *Picture Play* with rather mixed feelings! I do not doubt that you had the best of intentions, but you really were not giving me the kind of publicity I am looking for nor the public true facts. When I buy seats myself, I have the intelligence to find out exactly where they are situated and that before accepting them. If I am invited I consider it due to good manners to suffer in silence when bad seats are our fate. (...) To prove you that I really do not have as bad a temper as some very sweet and kindly disposed person must have told you, let me tell you that I did not even lose it when I read your remarks, although it might have furnished a nice opportunity for it.¹⁸

The reference greeted by Goudal with such horror was relatively short and harmless in comparison to what was to come. The Bystander reported Goudal was often spotted in New York theatres where she never failed to display both her stunning looks and bad temper. 'If she doesn't like the seats she gets she complains so violently that the show can hardly go on. Usually, in desperation someone changes seats with her'.¹⁹ Goudal ended her letter by urging the writer to correct

his mistake in one of the following issues of the magazine. Her plea did not go unnoticed:

And that reminds me, I had a note from Jetta Goudal a few days ago. Do you remember my telling you that she was going or had gone to California to make pictures? Well, I was wrong. She wrote to correct me. And she took exception to me saying that she displayed a bad temper at the theater. Well, perhaps she didn't.²⁰

The actress succeeded in persuading the editors of *Picture Play* to rectify what she thought of as a denigration, but they did so with heavy dose of irony.²¹ This was, nonetheless, a small victory that had no bearing on her image at large. As an individual and a labourer, she had little (if any) chance of taking control of her representation in the press. In early 1931, Goudal recounted her reaction to being moulded into a marketable commodity: 'It was while I was at Paramount, and when I objected, horrified, they assured me that it was a swell stunt and it would be continued, no matter what my feelings on the subject might be'.²² In the context of the industry methods of the decade, the fabrication and manipulation of one's star persona by the studio was common practice. Goudal's approval, or lack of thereof, would not have any impact on the route Famous Players-Lasky decided to take.

One of the most crucial assertions made by Holmes in his discussion of Goudal's labour in Hollywood is that the star tried to seize control over the choice of her film costumes in order to manage her own image.²³ DeMille himself recollected that throughout her employment the actress made many valuable suggestions regarding not only her own wardrobe, but also other aspects of films she was cast in, such as set design and script.²⁴ Yet, *Motion Picture Classic*, *Photoplay* and their ilk effectively integrated this facet of Goudal's professional activity into the narrative of temperament, implying that her interest in fashion verged on the edge of obsession. For example, one commentator reported that Goudal tended to 'register her displeasure at any gown she happened to dislike – and there were few that she did not dislike – by violently tearing the offending garment from her body, and ripping it into shreds'.²⁵

According to the study by Charles. C. Benham, the first dispute between Goudal and Famous Players-Lasky executives took place on the set of *A Sainted Devil*,²⁶ a Rudolph Valentino star vehicle. Goudal allegedly disapproved of the costumes she was required to wear, and – despite the fact her studio contract gave her the right to select her wardrobe – she was dismissed from the production.²⁷ In the public domain, the event was reframed as a conflict between Natasha Rambova – Hollywood personality, costumer, set designer and, most importantly, Valentino's wife at the time of filming – and the eternally ill-tempered continental star. *Photoplay* alleged that the dissolution of Goudal's contract was caused, to an extent, by frequent feuds she had with Rambova, particularly on the issue of costumes.²⁸ One of Valentino's biographers suggests that although Rambova commented on the aesthetic value of the mis-en-scene, her artistic influence tends to be overstated. Goudal resented the intrusion Rambova made on every department 'with suggestions, criticisms, requests – and then demands for changes',²⁹ and expressed that resentment loud and clear. The constant bickering, writes Robert Oberfirst, cost

her a leading role.³⁰ Consequently, this form of representation was grounded in a rhetoric that saw fashion as an essentially feminine occupation, with the perception of fashion-savvy women as highbrow, but also self-indulgent and volatile. Professional and personal interest in couture operated as a recognisable component of Goudal's identity, and thus, it was often misconstrued by the editorials as yet another indication of her obsessive, flamboyant nature.

In recasting it as a personal affair, the studio ensured that 'a struggle between a performer and the studio that employed [Goudal] over the terms of her commodification' never reached a wider audience.³¹ Alan Robert Ginsberg relies on the same discursive pattern, referring to the Goudal/ Rambova incident as 'a clash of divas', and adding that Rambova turned out to be 'one rival prima donna (...) capable of battling and beating Jetta'.³² Instead of entering the public domain as an issue regarding professionals, it morphed into an anecdote related to female misconduct. After completing two more features, *The Spaniard* and *Salome of the Tenebments*,³³ Famous Players-Lasky dissolved Goudal's contract. She saw the gesture as a violation of her contractual rights and insisted on seeking justice in court.

Recent research conducted by Grinberg reveals that a legal fight against Famous Players-Lasky was not the first instance in which Goudal has appeared as plaintiff, although it was the first case of such nature that attracted public attention. Goudal's initial multipicture contract was signed for an initial period of six months with Distinctive Pictures, granting the actress an attractive salary of five hundred dollars per week.³⁴ On 17th November 1923, less than a month after commencing employment, the star's agreement has been terminated by the studio. Goudal brought lawsuit for the sum of \$100,000, which included the remaining salary payments and a reimbursement for damages to her professional standing suffered as a consequence of sudden redundancy. The proposed sum exceeded unpaid wages by \$89,000 but, as argued by Goudal's attorney, the breach of contract significantly impaired the development of his client's career, casting a shadow of doubt on her professional ethics.³⁵ Whilst the exact outcome of the lawsuit remains unknown, Grinberg notes that the lack of court documentation suggests that a settlement has been reached.³⁶

Famous Players-Lasky capitalised on the 'temperamental' persona of their former star to protect its interest, and subsequently caused Goudal to fall victim to her constructed star image. In arguing that Goudal was fired due to her poor conduct, the November 1927 issue of *Motion Picture Classic* reflected general attitudes:

Jetta Goudal is perhaps better known than any other actress for her unaccountable whims and notions. She once lost a contract at Paramount (...). It is said that she invariably arrived late, keeping the entire company standing about, waiting for her; that she quarrelled incessantly with the wardrobe department about her clothes, that she had a hair-dresser ejected from her dressing-room, that she flew into hysterical rages, during which she sat, waving her arms and shrieking. And she would not obey her director's instructions. When she was in a fury she would sit down when told to stand and would stand up in a scene which required her to sit.³⁷

In 1924, *Motion Picture Classic* proclaimed Goudal 'the most temperamental actress that has ever been on the screen'.³⁸ In accordance with the gossip columns,

her blatant manifestations of temper were not welcomed by the film crew, who had to handle the star with extra care so she didn't choose to leave the set. Harry Carr reported that Goudal did not obey orders given by the directors: 'When she is told to do something she doesn't want to do, she gives the director a sidelong glance and a queer little twisted smile and says sweetly: *'Ah, no. Goudal wouldn't do that.* And a herd of cyclones can't make Goudal do it'.³⁹

In general, fan magazines did not dare to question Goudal's sulky, diva ways. Margaret Reid's account is one of the very few examples that employed a more sympathetic angle in describing Goudal's histrionics. To Reid, Goudal was just a cog in the machine. The journalist is astonished that 'cold-officials' could disregard the insights of someone as gifted and intelligent as Goudal. It is not strange that the star fights for her rights, but rather, that she has so little room to manoeuvre in her dealings with the studio that she is forced to fight for them. According to the article, the widely discussed reputation Goudal acquired was pure fabrication, and a harmful device, 'a poisoned thorn in her olive-tinted flesh'.⁴⁰ On one occasion, *Picture Play's* writer William H. McKegg presented Goudal in equally positive light explaining that she was labelled as volatile simply because she wanted her costumes designs to follow her explicit instructions. Unfortunately, the seamstresses could not match the greatness of Goudal's artistic vision, sparking conflict. 'They say she is temperamental when she merely points out their obvious mistakes. Not a quarter of a fault escapes Goudal's artistic eyes'.⁴¹

DeMille's studio

The star's exchange value kept on growing in 1925, so after her dismissal from Famous Players-Lasky she was offered positions at MGM and DeMille Picture Corporation, eventually opting for the latter. Neither the court case with Distinctive Pictures, nor the one with Famous Players-Lasky were settled at the time.⁴² Numerous articles were devoted to the discussion of Goudal's infamous tantrums and speculated whether someone as capricious as her had a chance of lasting in the DeMille fold. *Photoplay* admired the producer for taking a risk in hiring Goudal, calling him a 'lion tamer' and someone who 'evidently knows how to handle these people with temperament'.⁴³ The flighty image the star acquired whilst working for her previous studio was revalidated throughout her stay at DeMille's. In picturing Goudal as an irrational creature in need of training, her off-screen narrative followed the pattern of misconduct. The fact that she ceased to cause problems, as some features suggested, was explained by the careful way in which DeMille managed her. *Picture Play* praised the exceptional skill of the producer, known to have dealt with more difficult players than anyone else in the industry. 'He has tremendous tact, and he has mastered, somehow, the art of being impressive and inspiring respect in the most uncontrolled and emotional people'.⁴⁴

Other sections of the fan magazine discourse painted Goudal as a victim of gossip, and a professional who fully recognised the potentially damaging repercussions her reputation could have on her career. Writing for *Picture Play*, William McKegg also defended her name by noting that Goudal, unlike many other film people, was

pleasant to him during their meeting. The picture of the temperamental diva, so eagerly painted on the canvas of the press, has nothing to do with the real Goudal, he concludes, suggesting that 'studio customers' were to blame for Goudal's unjustly earned reputation.⁴⁵ In 1927, she looked back at her post-Famous Players-Lasky period as full of doubts and lost opportunities. According to the editorial, 'the dreadful stories of her temperament' became a burden that kept the actress from getting any good parts:

It was unfortunate, too, because I had no other way of earning my living. I really, seriously speaking, had to have some sort of work. At that time, Cecil DeMille was starting his own company and he sent for me. He asked me if I would work for him and named the salary. I accepted it immediately, no haggling about money. Then he asked me about these rumours of temperament. I couldn't answer him at first: I just began to cry. Finally, I promised him that I never would say or do anything that a lady wouldn't do.⁴⁶

DeMille emerges from the pages of the contemporary press as a humble man who hasn't let the gossip influence his decision in hiring Goudal. In 'taking a chance with the dynamite'⁴⁷ he put himself at risk by giving the star an opportunity she deserved. The sweeping financial success of *Three Faces East*, a spy drama that capitalised on Goudal's mysterious appeal, proved that his decision paid off.⁴⁸ Under her new management, the performer was ordained a major star. A year into the contract, fan magazines reported that Goudal not only managed to coexist with DeMille in perfect harmony, but had also started to refer to him affectionately as 'Papa DeMille'.⁴⁹ Her old, mercurial ways appeared to have gone.

Goudal's personal correspondence reveals that she was extremely conscious of her public persona and the challenges it posed. Indeed, on the 11 February 1927 she asked DeMille for permission to hire her own publicity representative. DeMille agreed to the scheme, stating:

My dear Jetta: – Relative to the publicity matter regarding which you spoke to me on Friday – it will be agreeable to us for you to employ a special representative if you think it will be of any benefit to you. Whoever you employ must, of course, work in cooperation with our department in order to avoid confusion, and if the matter does not work out beneficially, in my opinion, we reserve the right to cancel this permission (...).⁵⁰

In March 1927, Sig Schlager agreed to represent the actress in matters of 'exploitation, publicity [and] counsel' and to take care of the further promotion of her career, for which he received a payment of 1500 dollars for two months of his services.⁵¹

In September 1927, *Los Angeles Times* broke the news of the end of the DeMille–Goudal working partnership. Over a year after *Picture Play* concluded that Goudal's behaviour was to blame for the court battle; 'tantrums on the set have won her realms of publicity, but they finally lost her a good contract'.⁵² DeWitt Bodeen quotes a salary dispute as responsible for the split. In accordance with his account, the contract signed by Goudal was divided into six-month intervals, which necessitated a rise of 1000 dollars in the star's weekly wages. After the second year of their cooperation DeMille violated the terms and conditions by refusing to

pay the increase. Goudal pressed charges demanding over 85,000 dollars of financial compensation.⁵³

By the time the trial commenced in late January 1929, Cecil B. DeMille Pictures Corporation was operating as part of Pathé Exchange, due to DeMille's decision to sell the company a year before. DeMille's initial line of defence was to assert that Goudal was fired on the grounds of disobedience. His company had to incur additional production costs because its chief player repeatedly failed to show to work on time, causing delays in shooting; on a more personal level, the producer has simply lost the patience to deal with Goudal's 'spitfire temper'.⁵⁴ The attorney who represented the actress suggested that the sudden termination of her services was motivated by financial difficulties faced by the studio at the time. In a desperate attempt to reduce spending, he explained, DeMille had to break an expensive star contract, even without a legitimate reason to do so. Working on the behalf of the defendant, Neil McCarthy responded: 'it does not make any difference what the motivation was. The only whether grounds exist for the discharge of this girl'.⁵⁵ McCarthy's use of the term 'girl' in reference to a woman of 38 years of age is notable, given its connotations of adolescence and, therefore, of misbehaviour characteristic of this period of development. In the light of tangible evidence provided by financial records of eight moving pictures Goudal filmed at the studio, the accusations of insubordination were found to be baseless. The judge ruled the plaintiff performed her duties dutifully. What additionally made such attacks disputable, was the fact that the company exercised its right to extend Goudal's contract for a one-year term just four months before making her redundant. 'If Goudal's behaviour had truly been unacceptable, why did the company keep renewing her contract?' asks Grinberg, rather poignantly.⁵⁶

Bodeen reports that in fighting her erstwhile employer Goudal saw an opportunity to seize control over the image she acquired in the media.⁵⁷ However, correspondence between the two parties suggests that Goudal was ready to discuss the conditions of proposed contract release, without resorting to legal action. Her previous experience has taught her of the harm another dismissal would cause to her future employability. The existing letters also tend to strike a highly emotional note, suggesting that the star established a close relationship with her producer, whom she addressed as 'Papa DeMille'. 'Don't you know that I have been sick and heartbroken over the whole matter [?] Don't you realize that I have been refusing to believe for nearly five months that you were aware of the unbusinesslike manipulating of your representatives [?]',⁵⁸ she lamented. At the same time, Goudal thought of her studio contract as a partnership; 'a pact between equals, not an indenture binding a servant to a master',⁵⁹ and, fully aware of the economic value she represented as a commodity, she sought to mitigate this professional setback through adequate compensation. Despite Goudal's victory in the court of law, the incident failed to cast off her problematic persona. In fact, it achieved an opposite effect, as popular press revelled in criticising her for her bold actions. Facing a deluge of unfavourable comments and with her professional standing on the line, the indemnity of \$ 31,000 must have seemed like scant consolation.⁶⁰

This turn of events conformed to the narrative of temperament constructed in the initial years of Goudal's career; through that paradigm, her relatively 'quiet',

peaceful time at DeMille's studio was re-framed as inauthentic, a mere performance. Her victory over the studio was greeted with a degree of suspicion, as most fan magazines acted in unison in criticising the Los Angeles judge for his ruling. *Photoplay* smirked at the decision by saying that it sanctioned disobedience and gave Goudal 'the right to be temperamental'.⁶¹ *Picture Play* saw it as a threat to the workings of the film industry, where erratic women, from now on, would dictate their fancies.⁶² Comments of this nature echoed larger social reality where seeking to undermine existing structures of power, both within the star system and, on a wider scale, within patriarchy, was frowned upon.

Another piece suggested Goudal's behaviour in court was a perfectly staged ploy. Bystander reported that Goudal cried crocodile tears on the stand and generally behaved so slyly that one had to admire how tremendously well-performed her act was.⁶³ The article advocated that Goudal's fashion choices were aimed to elicit sympathetic responses from those following her trial with DeMille. The plaintiff used performative qualities of clothing to masquerade as someone she was not:

I glanced toward the door just in time to see Jetta Goudal make an entrance. Everyone was staring at her, and why not. She was wearing the outfit in which she had appeared in court for several days. It was probably the ugliest dress that any woman ever wore of her own free will. It was a muddy gray – covert cloth, or cravenette, or some such harsh, sensible material. Can you imagine a judge taking seriously the charge that La Goudal is temperamental, when she appears in a dress like that? No one with any temperament would wear it. That gives a fair illustration of how clever Jetta Goudal really is.⁶⁴

Inherent in these comments is the notion that, as a female actress, Goudal was bound to be dubious and manipulative. Virginia Wexman Wright theorises actresses as women who occupy a privileged position, in a sense that they inevitably come to symbolise 'the role-playing that all women must inevitably perform within a patriarchal system.'⁶⁵ With specified cultural attributes, femininity is in itself a performative state; an identity that requires continuous production and support.⁶⁶ Additionally, the role played by fashion in this fabrication further demonstrates the significance of Goudal's sartorial choices and their relevance in writing of her star text. Drawing on dominant regimes of representation, interest in fashion is a feminine attribute which further enhances the connection between womanhood and practicing deceit.⁶⁷ Again, this worked on the assumption that the 'real' star behind the façade is an incarnation of a European diva. *Picture Play* went on to describe Goudal's star image as an authentic representation of her true self, thus framing any inconsistency in it – represented here by an old-fashioned outfit – as suspicious. After all, Goudal's penchant for extravagant gowns both on and off silver screen was well documented; her failure to conform to the image of a fashion enthusiast in court was read as a sign of ingenuity. The editorial connects her choice of simple attire to deception. This crafted trick, it reasoned, showed how 'very shrewd'⁶⁸ the plaintiff was.

The scrutiny that surrounded the actress' involvement in the trial stood in strong juxtaposition to the manner in which the star system treated her former employer. Cecil B. De Mille had a reputation for requiring a great deal of physical

sacrifice from his leading cast, yet his autocratic behaviour never had a derogatory impact on his image. An article in *New York Times* from 1925 calls him an 'imperious producer' and 'a man with an iron hand', speaking approvingly of DeMille's strict directorial methods: 'The other day I lunched with him in his delightful private studio suite, and I came out filled with admiration for Mr. DeMille's discipline, which is emulated by his subordinates'.⁶⁹ DeMille's position as a producer meant that his behaviour needed no excuses and that he had every right to challenge his employees; in fact, his disciplinarian filming methods were often venerated. Goudal's status as a mere worker and a woman meant that she was marked as problematic rather than admirable for ostensibly exhibiting the same manner of behaviour. These social attitudes find their reflection in the 'diva' term Goudal has been labelled with. According to the vaunting, collective hubris perfectionism in men is to be praised; women who strive for perfection, however, are thought of as unprofessional at best, and downright unmanageable at worst.

In the context of this paternal relationship Goudal lost her significance as a labourer; diminished to a disobedient child, ungrateful for the chance her 'Papa' had given her. The language used in the discussion of the court action often depicts Goudal in a patronising manner; in infantilising her it further weakened her agency. *Picture Play* described the reason behind the court case as follows: 'The company contends that she broke her contract by not being a good girl and obediently taking orders from her directors'.⁷⁰ The Goudal that emerges from this discourse is not an actress, or even a grown-up woman; she is a 'bad girl' who behaves inappropriately in failing to respect her elders. The way fan magazines represented the Goudal/ DeMille battle was hardly ever sympathetic towards the plaintiff, and the financial implications of the split failed to make a lasting impact in the public consciousness.

Nonetheless, some parts of the debate regarding Goudal and her legal case started to change in the following years. Film magazines were not consistent in their treatment of gossip regarding film performers, and their stances on specific issues could change overtime. In May 1928, for example, *Picture Play* disapproved of Goudal taking legal action against DeMille, noting that her contract had been cancelled due to her 'mannerisms', i.e. misconduct. A report published in the following year, however, assumed a different tone, seeing the producer's defeat as a welcome shift in the monolithic model of power relations in Hollywood, a victory of workers over the studio system. 'The judge, in rendering the decision, indicated that artists have more rights intellectually than is ordinarily presumed, and that they can't be treated as menials and ordered about at pleasure', it reasoned, before concluding that the ruling 'might be constructed as a blow to the so-called czarist methods that occasionally are advocated in the management of players'.⁷¹

As noted above, Goudal's star image also partly enclosed her within the framework of Romantic genius, hence, some of the voices that sympathised with her made use of the perceived notion of artistry to justify her actions. McKegg, who became an outspoken supporter of Goudal's fight, called attention to the fact that the judge presiding over the case against DeMille understood the implications of talent.⁷² The greatness of artistic stature raised an individual above the ordinary, offering, in some instances, a form of immunity against the strict requirements of the studio system. In McKegg's words 'a real artist could not be expected to do

the things expected of an ordinary person. That judge knew something. But he might have said ‘genius’ – for such is Jetta Goudal in more ways than one’.⁷³ According to this line of reasoning, Goudal’s behaviour sanctioned her steely resolve. She had to object to some of the ideas promoted by the directors to retain her integrity as an artist; not to do so would degrade her to a position of a mere puppet. To betray one’s vision was to commit one of the greatest transgressions any artist could commit. In another piece, McKegg spoke equally highly of Goudal’s professional competences, arguing that most of the disputes she became involved in arose as a consequence of her astute critical skills; she excelled in pointing out ‘mistakes and incongruities to the director, suggesting a far more logical or dramatic episode’.⁷⁴ Despite the poignancy of Goudal’s remarks, this form of professional involvement was not welcomed by the studio officials, presumably because of the existing gender alignment informed by patriarchy. No man feels comfortable in being corrected by a woman, especially in the workplace; concluded the article. Overall though, voices congruent with McKegg’s in identifying the problematic nature of Goudal’s professional status were vastly outnumbered by those that castigated her strong stance in the matters relating to actors and ownership of labour.

The aftermath

On the surface, Hollywood offered women a position of power incredibly hard to match in any other industry at the time. The machinery of the studio system elevated women to the spheres of recognition mainly as actresses, but also occasionally as screenwriters and filmmakers, and firmly placed them in the popular imagination. Paradoxically, the same industry closely controlled the images of the female celebrities it produced; the treatment they received in the press is a telling illustration of the constraints placed on stars by the studio system. Jeanine Basinger discussed how the attempts of stars to exert power over their own images were inherently doomed to fail.⁷⁵ She understands star power to be a saleable illusion that worked in the realm of popular culture, but not within the film industry: ‘It was ironic that behind the scenes, seemingly powerful movie stars were not in a position to make any decision about how they were cast or used. (...) A star’s only power lay outside the system, in the minds of the public and in the fans’ response to their images’.⁷⁶

In accordance with the discourse promulgated by fan magazines, stars had more power over their personae than they could ever hold in reality. Hortense Powdermaker also framed the studio system as a totalitarian structure that imposes its choices on stars, its chief commodities: ‘Its basis is economic rather than political but its philosophy is similar to that of the totalitarian state. (...) The basic freedom of being able to choose between alternatives is absent’.⁷⁷ American production strategies were stronger than any individual and Goudal laid herself on the line by challenging the status quo. Even though studios were in competition with each other, they often joined forces against performers who didn’t want to adhere to their ruling. Goudal’s actions thus put her at risk of being permanently blacklisted by film producers.⁷⁸ After the DeMille court case, she made a further

two films before retiring. Her prosperous career was brought to a standstill in the 1930s, partly because of the growing popularity of sound film, and partly because of her tenacity in fighting for her rights as a labourer. According to the press, her consecutive struggle to find work was self-inflicted. *Motion Picture Magazine* predicted that motion picture stars who, like Goudal, 'have let their ego run away with them, and who are in the habit of displaying that peculiar streak or personality known as temperament, will have to take off the high hat or join the great army of the unemployed'.⁷⁹

Goudal's most serious affront to common sensibilities was her refusal to conform to the pre-existing patriarchal power structures of the studio system. As a consequence, her private star persona came to be compatible with the images of independent women she projected upon the silver screen. Personal antagonisms prevented Goudal from flourishing, even though she had talent and all the predispositions needed to attain a niche at the top of her profession. During the period of 'studio bickering and feuds' Goudal was kept away from the camera for months, which effectively hampered her career. 'Would you say that her behaviour is, as she describes, intelligent?', asked *Picture Play* rhetorically.⁸⁰ To the public consciousness, the star relinquished stardom on her own accord. 'Directors no longer look upon temperament as a necessity and find that it is something they can do without', proclaimed *Photoplay*.⁸¹ In September 1931, Goudal had a brief stint working on stage in a production of *The French Doll* in Portland. Local newspapers hailed her talent, and were generally more understanding towards her peculiar position within the national film industry. One account explained Goudal's absence from the screen as a consequence of 'a boycott, the result of a salary trouble with Cecil B. deMille [sic], which was decided in her favour, but which put her *in bad* with motion picture people, a situation just ended'.⁸² Nonetheless, the vehemence of criticism aimed at Goudal overrode rare voices of sympathy and understanding.

Conclusion

The issues that need to be foregrounded in the context of Goudal's image relate to her position as a European actress who lacks the work ethic of the American-trained actor; paradoxically, the apparent lack of professionalism was also constructed as part of her acting talent and a unique, God-given artistry. The infamous temperament of La Goudal was a marketable commodity imposed on her by Famous Players-Lasky as a way of linking the star with the particular vision of Europeaness. In 1925, and in the court battle against DeMille that followed in 1928, Goudal's star persona was used at her cost. Her image was utilised first by Zukor's studio, and then by Cecil B. DeMille as a tool to dismiss her efforts in refusing to subjugate herself to the workings of an exploitative industry. Instead of acquiring the status of an individual who rightfully challenged the system, Goudal became a stereotyped caricature of the highly emotional woman who does not know how to behave and who effectively has to be punished for her bad conduct. The strict reliance on her Famous Players-Lasky persona effectively moved Goudal's court case from the professional sphere to the realm of the personal, where her act of defiance lost its political meaning as a power struggle, depriving her of

the opportunity to voice her concerns about the inner dynamics of the studio system. By framing Goudal's behaviour as either insincere or child-like, the producers took control of the public account, ultimately relegating Goudal to the sidelines of the movie industry.

In many respects, the issues inherent to the publicity of foreign-born stars in the 1920s find uncomfortable echoes in modern day Hollywood. There is no doubt that the American film industry should shed its rigid notions of Frenchness and Europeaness, especially because its products reach over 2.5 billion people worldwide every year, contributing to the further promulgation of stereotypes across the globe. Furthermore, there are some broad parallels between the trials and tribulations of Goudal and the treatment of women in the twenty-first century, as film industry continues to marginalise their voices.

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Notes

1. *The Bright Shawl* (Richard Barthelmess, Associated First National Pictures; US, 1923).
2. See 'A Picturesque Newcomer', *Picture Play*, July 1923, 80. The term 'wicked half caste' was used by *Picture Play*. See Malcolm H. Oettinger, 'A Gesture from Jetta', *Picture Play*, October 1927, 34.
3. The animosity between Goudal and DeMille was short-lived. The two managed to remain friends after the lawsuit. See Rachel A. Schildgen, *More Than a Dream: Rediscovering The Life and Films of Vilma Bánky* (Hollywood, CA: 1921 PVG Publishing, 2010), 91.
4. The sum is cited by 'Hollywood Highlights', *Picture Play*, June 1929, 59; it would be equivalent to approximately \$425,682 in 2017.
5. Sean P. Holmes, 'No Room For Manoeuvre: Star Images and The Regulation of Actors' Labor in Silent Era Hollywood', in *Working in the Global Film and Television Industries: Creativity, Systems, Space, Patronage*, ed. Andrew Dawson and Sean P. Holmes (London: Bloomsbury Academic, 2012), 87.
6. In his seminal study of stardom, Richard Dyer argues that star phenomena are constructed across a variety of texts that go well beyond one actor's oeuvre, and encompass all publicly available information on the given performer. See Richard Dyer, *Stars*, 2nd edition (London: British Film Institute, 1998), 20.
7. Holmes, 'No Room For Manoeuvre...', 77.

8. In reality, Goudal was of Jewish ancestry, and born in Amsterdam as Henriette Goudekot. Nevertheless, she was promoted as French and/ or oriental throughout her career in Hollywood. See Matthew Issac Cohen, 'Representing Java and Bali in Popular Film, 1919–1954. Sites of Performance, Extra-daily Bodies, Enduring Stories', in *Sites, Bodies and Stories. Imagining Indonesia History*, ed. Susan Légene, Bambang Purwato and Henk Schulte Nordholt (Singapore: National University of Singapore Press, 2015), 135.
9. Jan-Christopher Horak, 'Sauerkraut & Sausages with a Little Goulash: Germans in Hollywood, 1927', *Film History: An International Journal*, Volume 17, Number 2/ 3 (Bloomington: Indiana University Press, 2005), 244.
10. Stephen Gundle and Clino Castelli, *The Glamour System* (London: Palgrave Macmillan, 2006), 65.
11. Transcript of a meeting in St. Louis, undated, Jetta Goudal papers, Miscellaneous 1924–1971, 11-f.133, Margaret Herrick Library, Los Angeles.
12. Malcolm H. Oettinger, 'Sapristi! – How Foreign!', *Picture Play*, November 1923, 22–3.
13. Cal York, 'Studio News and Gossip', *Photoplay*, August 1924, 92.
14. 'But there is always a limit to human capacity; and no one can be a great genius without having some decidedly weak side, it may even be, some intellectual narrowness. In other words, there will foe some faculty in which he is now and then inferior to men of moderate endowments.' See Arthur Schopenhauer, 'On Genius' in *The Art of Literature*, trans. T. Bailey Sanders, <https://ebooks.adeelaide.edu.au/s/schopenhauer/arthur/lit/chapter9.html>
15. Crosland is described as a director who 'is always given the most difficult stars to handle'. The article lists Conrad Veidt, Dolores Costello and John and Lionel Barrymore as some of the picture players he worked with. See Calhoun, 'The Tamer of the Temperamental', 33.
16. Calhoun, 'The Tamer of the Temperamental', 80.
17. 'Long Arm of Coincidence Replaces Goudal on High', unsourced clipping, 21 June 1931, in Goudal, Jetta, microfilmed clippings file, Margaret Herrick Library, Los Angeles. Cited in Holmes, 'No Room For Manoeuvre...', 77.
18. Jetta Goudal, letter to the Bystander, 10th January 1924, Jetta Goudal papers, Miscellaneous 1924–1967, 19-f.192, Margaret Herrick Library, Los Angeles.
19. The Bystander, 'Over the Teacups', *Picture Play*, February 1924, 47.
20. The Bystander, 'Over the Teacups', *Picture Play*, April 1924, 59.
21. How little could Goudal know that the very same *Picture Play* will soon lead the way in criticizing her for suing DeMille's studio in 1927.
22. 'Long Arm of Coincidence Replaces Goudal on High', unsourced clipping. Cited in Holmes, 'No Room For Manoeuvre...', 77.
23. Holmes, 'No Room For Manoeuvre', 78.
24. Reporter's Transcript, *Jetta Goudal v. Cecil B. DeMille Pictures Corporation*, 73. Cited in Alan Robert Ginsberg, *The Salome Ensemble. Rose Pastor Stokes*, eds. Anzia Niezierska, Sonya Levien, and Jetta Goudal (New York: Syracuse University Press, 2016), 194.
25. Edward Hayward, 'Keeping Tabs on Temperament', *Motion Picture Classic*, July 1927, 33, 72.
26. A Sainted Devil (Joseph Henabery, Famous Players-Lasky; US, 1924).

27. Charles C. Benham, 'Jetta Goudal: The Exotic', at *Classic Images*, September 1999, available at <http://www.classicimages.com/1999/september99/goudal.htm>. Cited in Holmes, 'No Room For Manoeuvre', 78. See also Hester Robinson, 'The Secrets of the Stars. Interview with Ferdinand Joseph Graf', *The New Movie Magazine*, July 1932, 18.
28. 'Dagmar Wins a Cast with Valentino', *Photoplay*, October 1924, 36.
29. Robert Oberfirst, *Rudolph Valentino. The Man Behind the Myth* (New York: Citadel Press, 1962), 240.
30. *Ibid.*, 240.
31. Holmes, 'No Room For Manoeuvre', 80.
32. Ginsberg, *The Salome Ensemble...*, 178.
33. *Salome of the Tenements* (Sidney Olcott. Famous Players-Lasky; US, 1925).
34. Ginsberg, *The Salome Ensemble...*, 168.
35. *Ibid.*, 171.
36. *Ibid.*, 171.
37. Helen Louise Walker, 'Spanking the Stars. High and Mighty TEMPERAMENTAL Geniuses Told Where to Get Off', *Motion Picture Magazine*, November 1927, 210–21.
38. Carr, 'Jetta and Her Temperament', 21.
39. Harry Carr, 'On The Camera Coast', *Motion Picture Magazine*, June 1925, 75.
40. Reid, 'A Persecuted Lady', 74.
41. William H. McKegg, 'Sure, They Have Brains!', *Picture Play*, May 1928, 20.
42. Ginsberg, *The Salome Ensemble...*, 173.
43. Cal York, 'Studio News and Gossip – East and West', *Photoplay*, May 1926, 88.
44. Helen Louise Walker, 'Spanking the Stars. High and Mighty TEMPERAMENTAL Geniuses Told Where to Get Off', *Motion Picture Magazine*, November 1927, 210–21.
45. What the author meant by 'studio customers' remains unclear. See William McKegg, 'Don't Believe All You Hear', *Picture Play*, September 1926, 45.
46. Francis Clark, 'Jetta Lives Down her Past', *Photoplay*, August 1927, 35.
47. *Ibid.*, 34.
48. *Three Faces East*. Directed by Rupert Julian. Hollywood, CA: Cinema Corporation of America, 1926. According to Ultimate Movie Rankings, the film grossed \$1.14 million in the domestic box office, selling 3.9 million tickets. See 'Movie Box Office Grosses: 1925 through 1931', available at <http://www.ultimatemovierankings.com/box-office-grosses-1925-through-1931/>
49. The correspondence between Goudal and DeMille shows that she indeed referred to him as 'Papa De Mille.' See Jetta Goudal, letter to Cecil B. DeMille, undated, Jetta Goudal papers, Miscellaneous 1924–1971, 11-f.133, Margaret Herrick Library, Los Angeles and 'We hear no more these days of 'Goudal temperament'...', *Picture Play*, July 1927, 38 and Margaret Reid, 'A Persecuted Lady', *Picture Play*, May 1926, 112.
50. Cecil B. DeMille, letter to Jetta Goudal, 14th February 1927, Jetta Goudal papers, Miscellaneous 1924–1971, 11-f.133, Margaret Herrick Library, Los Angeles.
51. Sig Schlager, letter to Jetta Goudal, 2nd of March 1927, Jetta Goudal papers, Miscellaneous 1924–1971, 11-f.133, Margaret Herrick Library, Los Angeles.

52. Helen Louise Walker, 'The Little Poses of the Stars', *Picture Play*, May 1928, 18.
53. *Picture Play* reported that 'she is suing Pathe for one hundred and one thousand dollars back salary.' See Bystander, 'Over the Teacups', *Picture Play*, May 1929, 30.
54. The phrase was used in Cal York, 'Studio News and Gossip. East and West', *Photoplay*, March 1926, 92.
55. Ginsberg, *The Salome Ensemble...*, 178.
56. *Ibid.*, 193.
57. DeWitt Bodeen and Gene Ringgold, *Films of Cecil B. DeMille* (New York: Citadel Press, 1974), 458–9.
58. Goudal, letter to Cecil B. DeMille, 11-f.133, Margaret Herrick Library, Los Angeles.
59. Ginsberg, *The Salome Ensemble...*, 178.
60. According to the letter written by Goudal's publicity man Sig Schlager, the star sued DeMille for 90,000 dollars of financial compensation. Schlager claims that she was paid 2,750 dollars weekly at DeMille's studio before she was made redundant. See Sig Schlager, letter to W.I Gilbert, 12th February 1928, Jetta Goudal papers, Miscellaneous 1924–1971, 11-f.133, Margaret Herrick Library, Los Angeles.
61. Leonard Hall, 'Reeling Around with Leonard Hall', *Photoplay*, June 1929, 70.
62. Aileen St. John-Brenon, 'Weighed in the Balance', *Picture Play*, August 1929, 112.
63. The Bystander, 'Over the Teacups', *Picture Play*, May 1929, 30.
64. *Ibid.*, 30.
65. Virginia Wexman Wright, *Creating the Couple: Love, Marriage, and Hollywood Performance* (Princeton: Princeton University Press, 1993), 45.
66. Diane Negra, 'Immigrant Stardom in Imperial America: Pola Negri and the Problem of Typology', in *A Feminist Reader in Early Cinema*, ed. Jennifer Bean and Diane Negra (Durham: Duke University Press, 2002), 392.
67. Rosie White, *Violent Femmes: Women as Spies in Popular Culture* (London: Routledge, 2007), 2.
68. The Bystander, 'Over the Teacups', 30.
69. Mordaunt Hall, 'De Mille as Director is Disciplinarian', *The New York Times*, 19th of July 1925, 140.
70. The Bystander, 'Over the Teacups', 30.
71. 'Hollywood Highlights', *Picture Play*, June 1929, 59.
72. William H. McKegg, 'Their Actions Speak Louder than Words', *Picture Play*, November 1929, 18–9.
73. 'Were I to force myself to do something that went against every fiber of my artistic senses, I would be false to myself – no longer an artist but a puppet.' See William H. McKegg, 'Their Actions Speak Louder than Words', *Picture Play*, November 1929, 18–9.
74. William H. McKegg, 'Sure, They Have Brains!', *Picture Play*, May 1928, 20.
75. Although Basinger's discussion of Hollywood's power dynamic starts in 1930s, I find her argument to be useful in application to the previous decade. See Jeanine Basinger, *The Star Machine* (New York: Alfred A. Knopf, 2007), 141.
76. Basinger, *The Star Machine*, 141.

77. In 1951, Hortense Powdermaker published her pioneering effort to explain American film industry through the lens of anthropology. Although not bereft of shortcomings, *Hollywood: The Dream Factory* can be understood as a predecessor to the field of star studies. See Hortense Powdermaker, *Hollywood: The Dream Factory. An Anthropologist Looks at The Movie-Makers* (London: Secker & Warburg, 1951), 327.
78. Holmes notes that Goudal's fluency in French was the only reason why she was not blacklisted by Hollywood producers. At the dawn of the talking pictures studios started shooting foreign-language versions of their top grossing releases to bolster their market share in Europe. See Holmes, 'No Room For Manoeuvre...', 87.
79. Alan Hynd and Dorothy Calhoun, 'News of the Camera Coast', *Motion Picture Magazine*, December 1927, 46.
80. Aileen St. John- Brenon, 'Weighed in the Balance', *Picture Play*, August 1929, 112.
81. Cal York, 'Studio News and Gossip. East and West', *Photoplay*, March 1926, 92.
82. Harold Hunt, 'Actress is Busy with Rehearsals', unsourced clipping, 29th September 1931, page unknown. From Jetta Goudal papers, Clippings 1923–1980, 19-f.191, Margaret Herrick Library, Los Angeles.

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