

**Case Assignment: A Comparison between Agreement-based versus Dependent Case  
Accounts**

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## Table of Contents

<b>Chapter 1: Introduction</b> .....	1
<b>Chapter 2: The Agreement-based Case Account</b> .....	4
2.1 Introduction.....	4
2.2 Formulation of Case theory in GB .....	4
2.3 Case and the Minimalist Program.....	10
2.3.1 Case and PRO .....	14
2.3.2 Case and the Feature Inheritance Model.....	17
2.4 Case as [uT] on D .....	20
2.5 Default Case .....	27
2.6 Summary .....	30
<b>Chapter 3: The Dependent Case Account</b> .....	31
3.1 Introduction.....	31
3.2 Case Tier Theory.....	31
3.3 Dependent Case Account – A Configurational Model .....	36
3.4 The Mixed Model .....	44
3.5 Summary .....	50
<b>Chapter 4: Critical Analysis of the Agreement-based Case Account and the Dependent Case Account</b> .....	51
4.1 Introduction.....	51

4.2 Against the Agreement-based Case Account.....	51
4.2.1 Case Occurs in the Absence of Phi-features .....	52
4.2.2 Phi-features do not Guarantee Case.....	61
4.2.3 Against Case as [uT] on D.....	63
4.3 Against the Dependent Case Account.....	65
4.3.1 Against the Mixed Model of Case Assignment .....	75
4.4 Summary .....	79
<b>Chapter 5: Conclusion.....</b>	<b>80</b>
<b>References .....</b>	<b>83</b>

# Chapter 1

## Introduction

This major research paper (MRP) aims to review the literature that has looked into Case theories from a generative grammar perspective from Government and Binding (Chomsky, 1981) onwards. Specifically, it offers a critical examination of the agreement-based Case account (Chomsky, 1981, 1995, 2000, 2001, etc.) and the dependent Case account (Marantz, 1991), and discusses their contribution to our current understanding of syntactic Case valuation on nominal arguments. Various counterevidence is also presented, which raises potential problems for both accounts.

In generative syntax, Case is divided into morphological case and abstract Case<sup>1</sup>. The former, as the name suggests, refers to morphological/lexicalized form and the latter, expresses a relationship between a nominal argument and its syntactic environment (Polinsky & Preminger, 2014). Morphological case is seen as a label that is used to capture the alternation in forms of a nominal constituent based on its function (Polinsky & Preminger, 2014). As shown in (1a) and (1b) in Latin, the forms of the nominal *ocul* ‘eyes’ surfaces differently based on the preposition it occurs with. When it appears with *ante* ‘before’, the nominal has the ACC(usative) while when it appears with *de* ‘from’, the nominal bears the ABL(ative).

- (1) a. ante    ocul-ōs                    *Latin*  
      before eye-ACC.PL  
      b. de     ocul-is  
      from eye-ABL.PL

(Polinsky & Preminger, 2014: ex.1, p.150)

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<sup>1</sup> Syntactic Case will be addressed as Case in this MRP.

Crucially, morphological case does not necessarily equal to abstract Case even though there is some overlap. For example, the one-to-one mapping relationship from case to function cannot capture the data accurately. As seen in (2), The ACC on *him* assigned by the preposition *for* shows that there is not a precise mapping relation between grammatical function and case marking since *him* is the subject of the infinitival clause, but it is not marked NOM(inative). Thus, the assignment of Case should not solely be based on the grammatical function of the nominal. but also on its the syntactic configuration.

(2) [For him/\*he to admit such a thing] is impossible.

(Polinsky & Preminger, 2014: ex.21, p.154)

Regarding Case assignment in generative grammar, there have been two opposing accounts that have dominated the field: (i) the Agreement-based versus (ii) the dependent Case account. In the agreement-based Case account, Chomsky (1995, 2000, 2001) posits that Case assignment is a result of an Agree relation. Whether a nominal would be valued NOM or ACC depends on whether the nominal enters an Agree relation with a feature of T or  $v^2$  respectively. The dependent Case account, put forth by Marantz (1991), assumes that NOM is assigned under structural conditions related to T but not related to Agree, ACC being assigned to the structurally lower of the two nominals, once the higher nominal bears NOM. If quirky case<sup>3</sup> is on the higher nominal, then NOM instead of ACC would be checked on the lower nominal. The two theoretical accounts have encouraged a number of studies that extended the discussion of Case

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<sup>2</sup>  $v$ : the highest head in the predicate domain, responsible for introducing Agent/Causer. It can only check Case when it assigns a theta role – Burzio’s Generalization (Burzio, 1986).

<sup>3</sup> Quirky Case: also called lexical/inherent Case. It is assigned simultaneously with the theta-role and is linked to certain selecting heads & theta-roles.

assignment. One of them is the theory of Pesetsky & Torrego (2001, 2004) which expands the agreement-based account and suggests that structural Case is an instance of [uT] (uninterpretable Tense feature) on D. Additionally, Baker (2015) proposes a dependent Case account by maintaining that the agreement-based account can be integrated into the configurational system embraced by Marantz (1991). To complicate matters, Preminger (2000) argues that the Chomskian account is a subset of what Marantz's theory covers and Baker's approach (2015) is in fact a vacuous one.

The debate is ongoing, which leads to the purpose of this research paper – an ultimate question to ask: how does syntactic Case assignment work? Case is a central concept in generative grammar (Chomsky, 1981, etc.), which is why continued empirical and theoretical examination of the theories and data is necessary.

This MRP consists of five chapters. Chapter 1 is the introduction; Chapter 2 focuses on the agreement-based Case account and its supporting data, with some theoretical accounts that are under the Agree umbrella; Chapter 3 looks into the dependent Case account and the evidence for it, also with some other developed approach based on it; Chapter 4 introduces some counterevidence of the agreement-based and the dependent-based accounts respectively, underlining the problematic aspects that have not been addressed by either or both of the theories; Chapter 5 summarizes the various discussions and provides some reflections on Case assignment and the nature of syntactic Case.

## Chapter 2

### The Agreement-based Case Account

#### 2.1 Introduction

The focus of this chapter is the agreement-based Case account in generative grammar. In section 2.2, the formulation of Case theory (Chomsky, 1980) and the Government and Binding (GB) approach to Case (Chomsky, 1986) are covered. In section 2.3, the Minimalist Program (MP) concerning Case in the early (Chomsky, 1995) and later stages (Chomsky, 2000, 2001, 2007, 2008) are introduced. Section 2.4 discusses Pesetsky and Torrego's (2001, 2004) approach to Case. In section 2.5, Schütze's (2001) approach to default Case is introduced. Section 2.6 summarizes this chapter.

#### 2.2 Formulation of Case theory in GB

In generative linguistics, Vergnaud's initial Case Filter states that all lexicalized DP arguments need Case (1977/2008). Following Vergnaud, Chomsky and Lasnik (1977) offer the following filter (1), which can account for the ungrammaticality of (2a-b) and capture the grammaticality of (2c-e). The rationale is provided shortly. Since the filter predicts the distribution of DPs, Case is seen as the licensing of DPs.

(1) Every lexicalized NP<sup>4</sup> must be assigned Case.

(2) a. \*[Mary to come] is surprising.

b. \*It is surprising [Mary to come].

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<sup>4</sup> For uniformity, all NPs shown in the previous literature are addressed as DPs in the MRP.

- c. For [Mary to come] is nice.
- d. It is nice for [Mary to come].
- e. I would like [Mary to come].

The notion of government is fundamental in understanding how Case assignment works in earlier generative grammar (i.e., Government and Binding). Chomsky (1980) defines it as in (3):

(3) “ $\alpha$  is *governed* by  $\beta$  if  $\alpha$  is c-commanded by  $\beta$  and no major category or major category boundary appears between  $\alpha$  and  $\beta$ ” (Chomsky, 1980, p.25).

There are several principles concerning Case assignment that make use of the structural relationship of government. Chomsky (1980, 1981) proposes 4(a-c), which can be summarized as: a syntactic head X can assign Case to a DP Y if and only if X governs Y.

- (4) a. “NP is oblique when governed by P and certain marked verbs;
- b. NP is objective when governed by V;
- c. NP is nominative when governed by Tense.” (Chomsky, 1980, p.25)

Together with the Case filter, the principles in (4) successfully capture the data in (2). In (2a) and (2b), the lexical DP *Mary* does not get Case in the infinitival clause since the clause is tenseless and cannot assign Case. Note that in (2b), the infinitival clause is the complement of the adjectival predicate *surprising* and adjectives are not Case assigners. In (2c-d), the DP *Mary* gets Case via (4a); in (2e), *Mary* receives Case via (4b). Within Minimalism, the rules in (4) are more accurately described as in (5) for NOM-ACC languages by Alboiu (2020a, p. 3).



(5) Structural Case Assigner in NOM-ACC Languages:

- a. Finite T assigns NOM;
- b. Transitive (& unergative) v assigns ACC (and has uD theta-role);
- c. Unaccusative v lacks ACC (and uD theta-role): some intransitives and passives;
- d. P assigns structural ACC (e.g., English).

Even though Case is first postulated as the licensing of DPs, the proposal of Case Filter theory has consequences beyond determining the distribution of DPs. One of the important ramifications is that Case is introduced in syntactic movement. For example, in passive (6a), raising (7a) and unaccusative (6b) constructions, Case is one of the motivation for the subject to raise from its base position (within the predicates) to Spec, TP since the trace position does not get Case from the predicate vP domain. In order to get Case, *Cindy* in (6a), *Kiki* in (7a) and *the tree* in (6b) move to Spec, TP and are valued NOM by the finite T. In (7b), the expletive *it* occupies Spec, TP, fulfilling the EPP - Extended Projection Principle<sup>5</sup> (Chomsky, 1981). *Kiki* in the embedded clause gets NOM, rendering no need to move for Case purpose. In this vein, EPP also accounts for (6) and (7). It is vital to understand that it is not Case but EPP that drives these movements. However, the need for Case on the DP allows the DP to move.

(6) a. *Cindy* was kissed *t*<sup>6</sup> (by Jake).

b. The tree fell.

(7) a. *Kiki* seems [*t* to like syntax].

---

<sup>5</sup> The requirement that each finite clause needs to project a nominal specifier.

<sup>6</sup> *t*: trace left behind by a moved constituent.

b. It seems [that Kiki likes syntax].

The Case assignment principle (5a) and data (2a-b) imply that nonfinite T cannot check NOM, which is similar to what is shown in the (5c) and data (7a). Thus, Case assignment on the embedded subject of a nonfinite clause triggers movement as well. (7a) shows an instance of DP movement from a nonfinite clause to Spec, TP of the matrix. This is known as subject raising and the DP gets NOM. The matrix predicate in this case is unaccusative. With transitive matrix predicate, the option is as in (8).

(8) a. I believed [that they are obsessed with magic].

b. I believed [them to be obsessed with magic].

c. I felt [that she was hostile].

d. I felt [her being hostile].

(8a, c) shows a finite complement clause and the embedded subject receive Case from the finite embedded T. When the embedded clause is infinitive (8b) or gerund (8d), the subject undergoes movement to the matrix predicate domain and receives ACC from the matrix v. This is termed Exceptional Case Marking (ECM).

In the early days of the Government and Binding theory, Case is treated as a PF (Phonetic Form) requirement on all lexicalized DPs (Chomsky, 1980; Lasnik, 2008; Sigurðsson, 2008). At this stage, control<sup>7</sup> as in (9) is explained by the claim that Case filter does not apply to PRO<sup>8</sup>. Since PRO is null, PRO does not get Case.

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<sup>7</sup> Control: DP subject or object in the main clause c-commands and is coindexed with the DP subject in embedded CP.

<sup>8</sup> PRO: a silent DP that is postulated in the subject position of a non-finite clause.

(9) Melissa<sub>i</sub><sup>9</sup> tries to [PRO<sub>i</sub> bake a cake].

However, the Case Filter is reformulated by Aoun (1980) as the Chain Condition: every argument chain must be headed by a Case position and must terminate in a theta-position.

Chomsky (1981) adopts this view into his claim that every DP argument needs Case whether it is pronounced or not. In (10),  $t_j$  is in an A-position (argument position) and it gets a theta-role from the infinitival predicate *send*. The A-function (argument function) chain  $\langle which, t_j \rangle$ , as Aoun (1980) maintains, indicates *which* is at a Case position and thus it bears Case.

(10) Mike<sub>i</sub> wrote a letter [which<sub>j</sub> he<sub>i</sub> wanted to [PRO<sub>i</sub> send  $t_j$  to Santa Claus]]].

Similarly, in (11), the trace of PRO is the DP argument of the infinitival predicate *introduce* occupies an A-position and receives a theta-role. PRO being the head of the chain, it obligatorily needs Case. Namely, PRO is in a Case position. Regarding PRO and what Case it bears, Chomsky (1986) proposes PRO has inherent Case, which later leads to the proposal of PRO bearing null Case that is licensed by nonfinite T (Chomsky & Lasnik, 1993). Discussion follows in section 2.3.

(11) It is time [PRO<sub>i</sub> to be introduced  $t_i$  to the visitors]. (Chomsky, 1986).

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<sup>9</sup>  $\langle i \rangle$ : identical indices indicate coreferentiality.

Moreover, the theta-role of the trace gets transferred to PRO, which means both of the trace and PRO are visible to LF. Thus, in the later days of the Government and Binding (Chomsky 1986), Case is perceived as an LF (Logical Form) requirement on nominal arguments so that they can be visible for theta-role assignment. Crucially, there is only one theta-position and one Case position in a chain (Chomsky, 1986). The marriage of theta-role and Case is further supported by Burzio's (1986) Generalization, which argues that being the highest head in the predicate domain, *v* is responsible for introducing Agent/Causer. Importantly, *v* only check Case when it assigns a theta role. Nonetheless, Baker (2013) comments on Burzio's (1986) Generalization: although it seems to provide a reasonable account of *v*, it leads to "no intrinsic relation between agreement and theta-marking for T: T never takes part in theta-marking, whether it agrees or not" (p. 686).

It has also been traditionally argued by George and Kornfilt (1981) and Chomsky (1981) that structural Case is correlated with agreement. Under Government and Binding framework, Case assignment and finite agreement has an overlapping relation since they both operate under government and occur under Spec, I/TP (Chomsky, 1986; Stowell, 1981 among others). The relationship between Case and agreement is mostly demonstrated by the NOM subject of a finite clause. In the example (12) below, the subject *she* bears NOM (which is checked by the finite T) and obligatorily determines 3<sup>rd</sup> person singular agreement on the finite verb *asks*. Only NOM argument triggers agreement whilst other arguments trigger a default 3<sup>rd</sup> person singular form (Alboiu, 2020a). As shown in (13), *methinks* demonstrates that when the DP argument *me* bears DAT, the finite verb *thinks* exhibits the default 3<sup>rd</sup> singular agreement. At this juncture, the coupling of NOM Case and agreement is seen as coincidental but not causal.

(12) a. She asks three questions.

b. \* She ask three questions.

(13) “The lady doth protest too much, methinks.” (Hamlet, Shakespeare, as cited in Alboiu, 2020a: ex. 4b, p. 3)

### 2.3 Case and the Minimalist Program

In the Minimalist Program, the notion of formal features is introduced by Chomsky (1995), denoting the morphosyntactic properties of lexical items. A distinction is drawn between the interpretable [iF] features and uninterpretable [uF] features. Regarding nominals, the former encompasses phi/ $\phi$  features: person ( $\pi$ ), number (#), gender (g)/noun-class while the latter refers to features that are intolerable at the interfaces and must be checked off in order to yield grammaticality. The significance of the feature checking mechanism is manifested in the Principle of Full Interpretation (PFI): a representation must contain elements that contribute to its interpretation at the relevant level (Chomsky, 1986). Thus, Chomsky (1995) initially states that uninterpretable features such as [uCase] feature has to delete and become invisible for the later LF interface once checked or else the derivation crashes. For DPs, their [uCase] features need to be valued by functional heads which bear the matching [uCase] features, particularly T for NOM and v for ACC.

Based on Chomsky (1995), valuation is a process of a phi-feature bearing Goal<sup>10</sup> being found by a head (Probe<sup>11</sup>) that has a need for phi-features and also c-commands<sup>12</sup> this Goal. Note that the probing is a downward process since it requires c-command, and the Probe must agree

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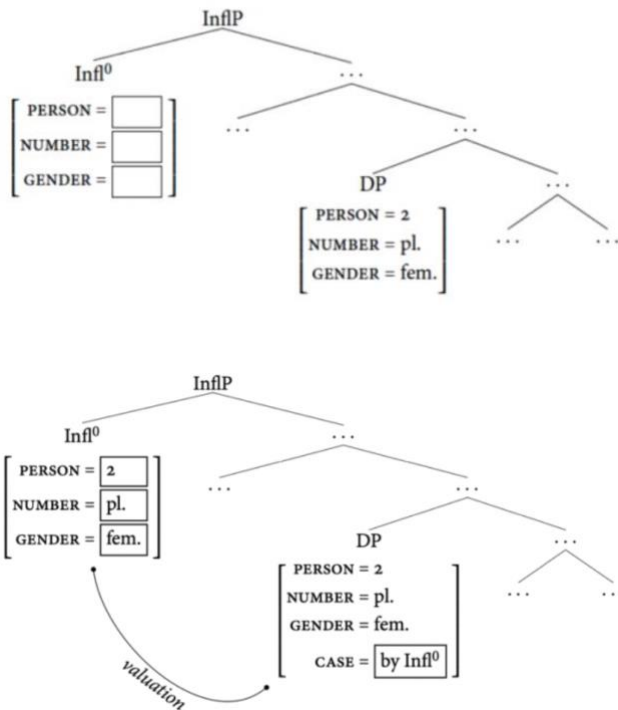
<sup>10</sup> Goal: A DP that has valued phi-features.

<sup>11</sup> Probe: A functional head that is the locus of the unvalued phi-features.

<sup>12</sup> A node A c-commands a node B iff: (i) Neither A nor B dominates the other, and (ii) every branching node dominating A also dominates B.

with the closest Goal that has the relevant features as per the Locality of Matching: “Agree holds between a feature F on X and a matching feature F on Y only if there is no intervening Z[F]” (Alboiu, 2020a, p. 2). Returning to valuation, Preminger (2015) offers a similar but more general definition: it can be viewed as the transmission of features from where they belong semantically, to a locus where they are semantically inert. As observed in (13), on the one hand, Infl<sup>0</sup> (or T<sup>0</sup>) acts as the placeholder and is later filled in by the features probed on the target DP. On the other hand, the [uCase] feature on the DP is checked by Infl<sup>0</sup> (or T<sup>0</sup>).

(13)



(Preminger, 2015)

In the early Minimalist stage, what is vital is that the lexical items enter the syntactic variation fully specified for their Case features, which are later checked against those that are on the Probes. However, in later Minimalism (Chomsky, 2000 and beyond), Goals enter the

derivation without a Case value, and they receive Case through an Agree relation with a Probe that must be phi-complete. Specifically, the unvalued Case feature of the Goal depends on the Probe: NOM if the Probe is finite T; ACC if the Probe is v and null if the Probe is a control infinitival. In scenarios where the Probe lacks the full component of the phi-features, it is deemed defective and loses the Case assigning capacity. In this case, the Goal deletes the existing uninterpretable feature(s) of the Probe, without having checked its Case feature. The Goal then remains active and is accessible for higher Probes. What is described here is called the activity condition (AC) by Chomsky (2000, 2001). In order for a DP to be eligible for agreement, it needs to have unvalued Case feature (i.e., to be active). Thus, a I/T head cannot agree with a DP that has already received Case from other Probes. For instance, in (14a), the Icelandic example illustrates that when the predicate *illt* ‘bad’ requires the subject to bear DAT and simultaneously assigns the theta-role Experiencer to the subject, T cannot agree with the subject and the agreement shown is the default 3<sup>rd</sup> person singular. In contrast with (14a), the subject in (14b) is active and engages with T, bearing NOM and agreeing with T as shown by the 3<sup>rd</sup> person plural agreement marking.

(14)

- a. *stelpunum hafði verið illt* (Sigurðsson 2002:707-708)  
 girls.the.DAT had(3.SG) been bad.NOM.N.SG  
 ‘the girls had been feeling bad’
- b. *stelpurnar höfðu verið illar*  
 girls.the.NOM had(3.PL) been bad.NOM.F.PL  
 ‘the girls had been angry’

Chomsky (2001) introduces the Phase Impenetrability Condition (PIC), which suggests that only the edge of a phase (Spec and the Head) is visible for operations outside of the phase.

Namely, the complement of the phase Head is not accessible to operations at the next-higher phase (Chomsky, 2001) as it is assumed to have been transferred to the interfaces (cyclicality). Moreover, CP, DP and vP<sup>13</sup> are considered strong phases (Chomsky, 2008), which are legitimate Case-assigning domains, compared to weak phases such as TP and vP (in passives and unaccusatives), which lack Case checking capacity. The ungrammaticality in (15a) results from the violation of PIC. Since CP is a strong phase, the ACC marking on the embedded subject *her* by the main predicate *believe* via ECM is deemed impossible because the subject *she* is valued NOM by the embedded finite T. Consequently, it is inactive and already spelled out when *believe* merges with the finite complement. In (15b), the embedded subject *her* is contained in a weak phase (infinitival TP), the interaction between the embedded subject and the matrix v is both possible and required. Thus, ECM operates smoothly.

(15) a. I believe [that she/\*her is a witch].

b. I believed [her to be a witch].

Example (16) gives a clearer picture of the effect of PIC on Agree. Since the embedded subject *two doctors* is the closest DP to the matrix T in (16a-c), the matrix T theoretically can probe it. However, due to the fact that CP is a phase, the subject of the CP (16b) is invisible to Agree initiated by the matrix T, resulting in the ungrammaticality (the agreement on *appear*). In (16a), however, the embedded subject *two doctors* and the matrix T are in the same phase, rendering Agree. Example (16c) is different from (16b) in that the Spec, TP in the matrix is occupied by the expletive *it* instead of *there*. Though both expletives denote no semantic

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<sup>13</sup> A transitive vP, which c-selects an external argument.



interpretation, *it* has phi-features [3<sup>rd</sup> person singular masculine/feminine]. Therefore, *it* can agree with the matrix T.

- (16) a. There appear to be two doctors in the room.  
b. \* There appear [<sub>CP</sub> that two doctors are in the room].  
c. It appears [<sub>CP</sub> that two doctors are in the room].

In total, there are four conditions on the operation of Agree summarized by Baker (2013, p. 618) as shown in (17).

- (17) F on the X agrees with a matching feature F on Y only if:
- a. X c-commands Y. (The c-command condition)
  - b. There is no ZP such that ZP[F] comes between XP and YP. (The intervention condition)
  - c. XP and YP are contained in all the same phases. (The phase condition)
  - d. YP has an unvalued case feature. (The activity condition)

Next, I discuss several aspects concerning the changes of Case perspective from GB to MP. First, the treatment of PRO. Second, the shift from lexical head assigners to function head assigners, especially the postulation of *v*.

### **2.3.1 Case and PRO**

In terms of the treatment of PRO, the initial GB approach assumes PRO does not have Case since it is null, even though Chomsky (1986) revises the claim, arguing that PRO has inherent Case due to the Chain Condition (Aoun, 1980). In the Minimalist Program, Chomsky

and Lasnik (1993) posit that PRO is Case-marked, and bears Null Case that is licensed by nonfinite T. The implication drawn here is that PRO can only occur in non-finite contexts. There has been debate on the Null Case proposal, one of the arguments against it is that “non-finite may license NOM, regardless of whether C is overt or not” (Alboiu, 2020b, p.1). From various crosslinguistic data from (18) – (20), it can be observed that in Romanian, Spanish and Hungarian, the nonfinite T licenses the NOM subject in gerund clause, infinitive clause and participle clause respectively<sup>14</sup>. Crucially, all the examples show a CP domain whether C is pronounced or not. It is argued that it is the fully saturated C that empowers the nonfinite T the NOM assigning capacity (Alboiu, 2006). Thus, the claim that nonfinite T assigns Null Case is not strongly supported.

(18)

[<sub>CP</sub> Fiind noi gata cu toții], am pornit la drum.  
 [being.GER we.NOM ready with all] 1PL started on way  
 ‘Given that we were all ready, we started on our way.’ (Romanian)

(19)

Lo supimos [<sub>CP</sub> después de llegar él].  
 we found out [<sub>CP</sub> after of arrive.INF he.NOM]  
 ‘We found out after he had arrived.’ (Spanish, Ledgeway 1998: 5)

(20)

[<sub>CP</sub> A gyermek felébredvén], az anya ebédet készített.  
 [<sub>CP</sub> the child.NOM wake.PRTC ] the mother lunch.ACC made.3SG  
 ‘The child having woken up, the mother prepared lunch.’ (Hungarian, Liptak, p.c.)

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<sup>14</sup> Examples (18)-(20) are taken from Alboiu (2020b: ex. 1a, 1d and, 1h, p. 2).

Furthermore, there seems to be other problems with regard to Null Case on PRO. The Icelandic example in (21a) illustrates the predicate ‘bored’ assigns the lexical Case DAT to the argument ‘the boys’. Also, the quantifier ‘all’ is also marked with DAT since it agrees in Case with the DP it modifies. In (21b), when the quantifier ‘all’ modifies PRO in the infinitival clause, it surfaces with DAT marking, which suggests that PRO bears DAT.

(21) (Sigurðsson, 1991, as cited in Alboiu, 2020b: ex. 3, p. 3)

- 1a. *Strákunum<sub>i</sub> leiddist öllum<sub>i</sub> í skóla.*  
 boys-DAT bored all-DAT in school  
 ‘The boys were all bored in school.’
- b. *Strákarnir<sub>i</sub> vonast [PP til [CP að PRO<sub>i</sub> leiðast ekki öllum<sub>i</sub> í skóla]].*  
 boys-NOM hope for to PRO bore not all-DAT in school  
 ‘The boys hope not to be all bored in school.’

Cecchetto and Oniga (2004), however, argue that the consistency of Case agreement between PRO and its controller in languages such as Latin poses a challenge to Null Case Theory. In the Latin data, the subject DP and the adjectival predicate agree in phi-features and Case as in (22a). In the subject control example (22b) and the object control example (22c), the adjectival predicate in the infinitival clause agrees in Case with PRO. The different Case markings on the adjectival predicates indicate that PRO bears the Case of its controller. Since PRO is a DP, it cannot simultaneously bear two Cases (Cecchetto & Oniga, 2004), and it cannot possibly bear Null Case. Nevertheless, this account does not seem to account for the Icelandic data in (21) for the Case of PRO fails to agree with its antecedent.

(22) a. Ego sum bonus.

I.NOM am good.NOM.

‘I am good.’

b. Ego<sub>i</sub> volo [PRO<sub>i</sub> esse bonus].

I.NOM want to-be good.NOM

‘I want to be good.’

c. Ego iubeo te [PRO esse bonum].

I.NOM order you.ACC to-be good.ACC

‘I order you to be good.’

(Cecchetto & Oniga, 2004)

### 2.3.2 Case and the Feature Inheritance Model

The need to check the uninterpretable features on function heads further invites the theory to update. In the Feature Inheritance Model, Chomsky (2007, 2008) redefines the relationship between C and T. Being the complement of C, T inherits features from C and operates as a Probe. As Alboiu (2020c) argues, structural Case assignment is licensed in the probing domain with Probe bearing specific [uD] and/or [u $\phi$ / $\pi$ ] feature, as shown in (23), which is contrary to the idea that T and v intrinsically have NOM and ACC features, respectively.

(23) a. NOM, if and only if the Probe is specified for [uD, u $\phi$ / $\pi$ ]

b. ACC, if and only if the Probe is specified for [uD]

The postulation of *v* is one important line of investigation on the Case checking mechanism under Minimalist Program. Following X-bar theory<sup>15</sup> (Chomsky, 1970; Jackendoff, 1977), Chomsky (1991) among others postulate that VP-external functional projection is responsible for the Case on objects. *v* is first proposed by Chomsky (1995) as the Head to host an external argument of a predicate. As discussed, when the predicate is transitive<sup>16</sup>, the function of *v* is captured in Burzio’s Generalization (1986).

Furthermore, *v* has been argued to encode information concerning Inner Aspect (Travis, 2010). Inner Aspect refers to how a predicate (verb + relevant argument) describes an event – its domain is the (sub)event structure of the predicate (MacDonald, 2008, as cited in Alboiu, 2021a). As exemplified in (24a), the object *a bottle of beer* implies that there is an endpoint of the subevent while the object *beer* in (24b) implies otherwise. In other words, (28a) carries a telic reading and (24b) derives an atelic reading.

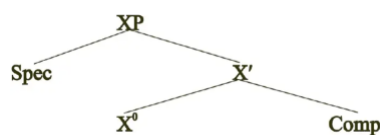
(24) a. Marcus drank a bottle of beer last night.

b. Marcus drank beer last night. (Alboiu, 2021a: ex. 10a, 10b, p. 4)

Inner Aspect is manifested via shift in Case as well. In Finnish, when the Inner Aspect is atelic as in (25a), the direct object bears PART(itive); when the Inner Aspect is telic as in (25b), the direct object bears ACC.

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<sup>15</sup> In X’ theory, every phrase of every category in every language has the following structure. X<sup>0</sup> is the HEAD of the phrase, Spec is the SPECIFIER, and Comp is the COMPLEMENT.



<sup>16</sup> Or even in some unergative verbs following Hale & Keyser (1993).

(25)

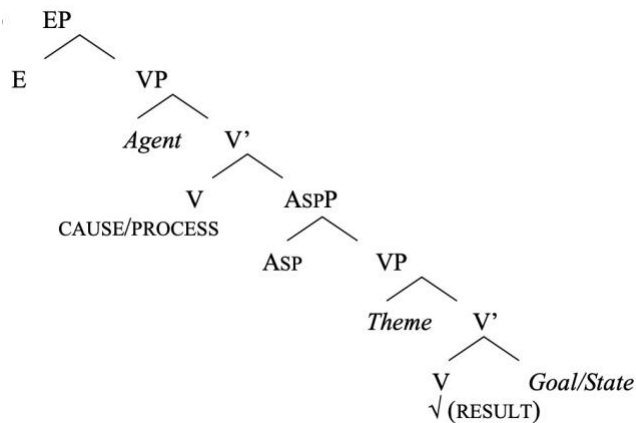
Finnish: ACC vs. PARTITIVE Case distinctions (Kiparsky 1998:267)

a. *Ammu-i-n karhu-a*  
shoot-PST-1SG bear-PART  
'I shot at the/a bear.'

b. *Ammu-i-n karhu-n*  
shoot-PST-1SG bear-ACC  
'I shot the/a bear.'

Travis (2010) argues that the shift of Inner Aspect is due to the change of the structure. A slightly modified (Alboiu, 2021b) phrase structure to represent events is shown in (26).

(26)



(Travis, 2010, as cited in Alboiu, 2021b)

The traditional vP location is occupied by the Asp(ectual)P. Travis (2010) proposes that only Themes in Spec, AspP can measure the event (triggers telic reading). Thus, the Finnish data in (25) can be analyzed as: *karhua* 'bear' in (25a) remains in its base position in the structure and

receives PART; *karhun* ‘bear’ in (25b) moves to Spec, AspP and receives ACC. Consequently, it reveals the validity of an Asp Head since Case is related to Inner Aspect.

## 2.4 Case as [uT] on D

The theoretical account of Case valuation as an uninterpretable feature checking mechanism has been refined in the recent literature. In the spirit of Chomsky (1995, 2000, 2001), Pesetsky and Torrego (2001, 2004) propose that structural Case (NOM/ACC) is in fact an instance of [uT] (uninterpretable Tense feature) on D and is marked for deletion once it enters in Agree relation with a Head probing a Goal which bears [uT]. The rationale is as followed<sup>17</sup>. Initially, Pesetsky and Torrego (2004) present the T-to-C movements and the T-to-C asymmetry in matrix questions as in (27). It is shown that non-subject *wh*-items can have optional T-to-C movement as in (27a-b), while the subject *wh*-item does not have T-to-C movement as in (27c-d). If C bears [uT, +EPP]<sup>18</sup>, then (27a) and (27c) are not expected since there is no T-to-C movement observed (note that (27a) is not interrogative but exclamative, hence no T-to-C movement). Supposing that NOM is a T feature, *Mary* in (27a) moves to Spec, CP and T (*did*) itself in (27b) moves to Spec, CP, both fulfilling the [uT, +EPP] on C. In (27c), *who* has both [wh-] and T feature. Thus, only one movement is observed.

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<sup>17</sup> Data provided in this section are from Pesetsky & Torrego (2004,) unless otherwise stated.

<sup>18</sup> I interpret [+EPP] as [uD] as EPP requires each finite clause to project a nominal specifier.

(27)

**T-to-C asymmetry in matrix questions (Koopman 1983)**

[non-subject *wh* → "optional" T-to-C]

- a. What a nice book Mary read \_\_!
- b. What did Mary read \_\_?

[subject *wh* → no T-to-C]

- c. Who \_\_ read the book?
- d. \*Who did \_\_ read the book?/\*What a nice person did read the book!

By observing the analogous *that/for*-trace effect and *that/for*- omission asymmetry, the realis infinitive asymmetry, Pesetsky and Torrego (2004) attribute these similar syntactic phenomena to the claim that they are also T-to-C movements/asymmetries. First, in terms of overt subjects in finite context, *that*-trace effect exhibits similar pattern in that non-subject *wh*-item can have optional *that* as in (28a-b) while subject *wh*-item cannot not have *that* as in (28c-d). *That*-omission asymmetry, likewise, shows non-subject CP can have optional *that* as in (29a-b) while subject CP obligatorily requires *that* as in (29c-d).

(28)

**"That-trace effect" (Perlmutter 1971)**

[non-subject *wh* → optional *that* ]

- a. What do you think [Mary read \_\_]?
- b. What do you think [that Mary read \_\_]?

[subject *wh* → no *that*]

- c. Who do you think [\_\_ read the book]?
- d. \*Who do you think [that \_\_ read the book]?



(29)

**"That-omission" asymmetry**

[non-subject CP → optional *that*]

- a. Mary thinks [that Sue left].
- b. Mary thinks [Sue left].

[subject CP → obligatory *that*]

- c. [That Sue left] is obvious.
- d. \*[Sue left] is obvious.

Second, concerning overt subjects in nonfinite contexts, *for*-trace effect illustrates that subject *wh*-item does not have *for* as in (30).

(30)

**The *for*-trace effect**

\*Who would you prefer [for \_\_\_ to buy the book]?

The *for*-omission asymmetry in (31) also points out that non-subject CP can have optional *for* whilst subject CP obligatorily needs *for*.

(31)

**"*for*-omission" asymmetry**

[non-subject CP → optional *for*]

- a. Mary would prefer [for Sue to leave].
- b. Mary would prefer [Sue to leave].

[subject CP → obligatory *for*]

- c. [For Sue to leave] would be desirable.
- d. \*[Sue to leave] would be desirable.

These patterns of the similar syntactic phenomena are argued to be due to T-to-C movements, justifying *that/for* is an instance of T moving to C (Pesetsky & Torrego, 2004). It also serves as evidence to maintain that structural Case is an instance of [uT] on D since T-to-C movement satisfy the [uT] on C and the NOM is checked via an Agree relation between the [uT] on C and the [uT] deletion on D. At this point, it can be safely concluded that *that/for* is not C, but a particular realization of T moved to C (Pesetsky & Torrego, 2004).

The authors also manage to include the phenomenon of covert subject in nonfinite context – PRO. Since PRO is silent, the asymmetry is best represented in the level of difference in readings. The realis infinitive asymmetry nicely captures that non-subject CP has irrealis or realis reading as in (32a-b) while subject CP only has irrealis/generic reading (T-to-C movement) as in (32c-d). The realis infinitive asymmetry not only mirrors the other types of T-to-C asymmetries mentioned above, but it also shows that T-to-C movement does not necessarily appear in an overt syntactic manner.

- (32) a. Mary<sub>i</sub> hated [PRO<sub>i</sub> to learn the election results].      [realis: factive]  
       b. Mary<sub>i</sub> wanted [PRO<sub>i</sub> to learn the election results.]      [irrealis]  
       c. [PRO to learn the election results] would shock me.      [irrealis]  
       d. ?? [PRO to learn the election results] shocked me<sup>19</sup>.      [realis: factive]

Pesetsky and Torrego's approach (2004) to tackle the NOM subject matter seems comprehensive as they discuss NOM subjects in both finite and nonfinite contexts and null subject (PRO) where the antecedent bears NOM. PRO being often overlooked, it is dearly

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<sup>19</sup> ?? here denotes semantic awkwardness.

appreciated that Pesetsky and Torrego (2004) engage it as part of the NOM subjects. Even though it is not mentioned in their article, these realis infinitive examples also echo the notion of “Strong Case” and “Weak Case”. Based on De Hoop (1996), structural Case can be divided into Strong Case and Weak Case. The former is the one assigned at S-structure and as a result of movement while the latter is assigned at D-structure and remain within VP. In (36a), the infinitive clause can be viewed as the Weak Case here since there is no T-to-C movement and the reading is weak. In (32c), the T-to-C movement triggers a strong semantic interpretation (generic), which can account for why (32d) seems semantically inappropriate. Even though De Hoop’s (1996) account aims for DPs, I feel the symmetry is worth to be noted in here.

Additionally, Pesetsky and Torrego (2004) propose an updated interpretation of Case Filter – Argument-Tense Condition, which states that an argument must bear T (uT or iT). Assuming the theoretical account holds, there must be a T in the transitive clause that licenses ACC. By discussing the similarities and differences among the complementation that Noun, Adjective and Verb takes, Pesetsky and Torrego (2004) postulate a  $T_o$  Head which is closer to the complement of the verbal predicate than the Tense head in the main clause –  $T_s$ , as illustrated in (33).

(33) Subject  $T_s$  [<sub>VP</sub> v  $T_o$  [<sub>VP</sub> Object]]

Crucially, when the predicate is verbal, the Goal of  $u\phi$  must bear [uT], as Pesetsky and Torrego term it the special property of [verbal] T (2004). Nonetheless, this property is not without questions. It raises questions of VPs containing no DP complements and VPs containing a selected PP.

In the first case, when the VP does not contain a DP complement, the argument is that the DP complements are phonologically null. (34a-c) are unaccusatives, in which the  $T_0$  is defective (Chomsky, 2000) and unable to delete [uT] on its Goal. Thus, the DP complement enters an Agree relation with  $T_s$  to get its [uT] deleted. In (34d-f), the predicates are unergatives, cognate objects are the phonologically null objects. For example, “*the dog barked a (high-pitched) bark*”; “*they worked their (dangerous) work hard*”; “*the victim screamed a (loud) scream.*”

(34)

**VPs without any overt DP complement**

- a. Mary arrived.
- b. The boat sank.
- c. A bell sounded.
  
- d. The dog barked.
- e. They worked hard.
- f. The victim screamed.

In the second case, when the VP contains a selected PP as a second object as in (35), structurally the PP *with water* is lower than the first object *the town* and cannot not be the Goal for  $T_0$ .

(35) The government provided the town with water.

When the VP selects a PP as the second object of an unaccusative verb as in (36), the PP *to Sue* is still structurally the lower than the first object *the issue*, even though *the issue* raises to Spec, TP to get its [uT] deleted.

(36) The issue matters to Sue.

Lastly, when the VP selects a PP complement of non-accusative verb as in (37), the verb *barked* is treated as unergative predicate so that the PP complement *at the mailman* is still viewed as the second object. According to Pesetsky and Torrego (2004), if the PP is genuine first object, then the selectional requirement of a predicate needs to take priority over the satisfaction of the special property of [verbal] T.

(37) The dogs barked at the mailman.

In Pesetsky and Torrego's (2004) account, the  $T_O$  in nominals differs from the  $T_O$  in verbal structures in that it seeks a Goal that bears [iT] rather than [uT]. This claim is supported by the realis infinitive complement of Adjective (Possible) and Noun (Impossible) shown below.

(38) clearly shows that the complementation of A and N are distinct.

As discussed earlier, the irrealis infinitives are similar to the finite *that*-clauses in undergoing movement of T to C. Consequently, an irrealis infinitive is interpreted by Pesetsky and Torrego (2004) as an instance of iT in C. As seen in (38a-b), Noun cannot take realis infinitival complement since the realis infinitival complement lacks T-to-C movement. It implies that such CP do not host an instance of iT in C. On top of that, in (38d), it is revealed that because a bare DP only contains [uT] but not [iT] on D, it cannot be the complement of the Noun. But an irrealis DP complement as in (38d) can since it contains [iT] on D.

(38) a. Tom was depressed to hear that he had been passed over for promotion.

- b. \* Tom's depression to hear that he had been passed over for promotion.
- c. Harry's need to be accepted
- d. \* Harry's brother to check the facts

The data in (38) provide empirical evidence of nominal predication having a T<sub>O</sub> Head to probe [iT] on D.

## 2.5 Default Case

Assuming a Minimalist syntax (Chomsky, 1995) and the Distributed Morphology<sup>20</sup> (Halle & Marantz, 1993), Schütze (2001) posits that each language has a form of morphological case – default Case, which is spelled out when DPs enter the derivation bearing no uninterpretable (i.e., \*[uCase]) Case feature. Under this approach, DP arguments cannot get default Case since they must receive Case in the surface position based on Case Filter (Schütze, 2001). Namely, if there were default Case features in the syntax, then it would render the Case Filter vacuous (Schütze, 2001). Thus, default Case is invisible to syntax and obligatorily applies postsyntactically.

To support such a claim, Schütze (2001) investigates the contexts in which the English ACC pronouns occur, with no sources of any abstract Case<sup>21</sup>. In (39a), the left dislocated pronoun bears ACC the verb or inflection shows ACC marking. As Schütze (2001) points out, the ACC pronoun has the grammatical function of subject in the elliptical answer as in (39b). Moreover, in the verb gapping example (39c), the subject pronoun once again surfaces as ACC. The next instance is a bit more controversial since the ACC conjoined DPs in (39d) seem to

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<sup>20</sup> It postulates all vocabulary items are inserted at the postsyntactic spell-out stage.

<sup>21</sup> Data provided in this section are from Schütze, 2001, unless otherwise stated

break the prescriptive rules in English. Schütze (2001) argues that in crosslinguistic data, coordinated DPs in subject position is considered to be a default Case environment<sup>22</sup>. The last context that Schütze (2001) engages with is the ACC modified pronoun in subject position as shown in (39e). One might argue that (39f) is a legitimate sentence in which both ACC and NOM pronouns are acceptable. In response to this, Schütze (2001) presents (39g) as evidence since ACC pronoun can be accepted in both pre- and postmodification while NOM pronoun can only be accepted in postmodification.

(39) a. Me/\*I, I like beans.

b. Q: Who wants to try this game?

A: Me/\*I.

c. We can't eat caviar and him/\*he (eat) beans. (Siegel, 1987, as cited in Schütze, 2001)

d. Us and them/\*We and they are gonna rumble tonight.

e. Lucky us/\*we!

f. We/Us linguists are a crazy bunch.

g. Lucky us/\*we linguistics have to explain our profession to everyone.

Crosslinguistic support is also provided by Schütze (2001) to strengthen the argument that default Case is made available by the Universal Grammar. The example of left dislocation in German, as in (40), shows that NOM is the default Case in the language given that there is no Case assigner for the left-dislocated DP *Vanja* 'John'. Crucially, without the default Case theory, a new account that assigns NOM to left dislocation in German but ACC to left dislocation in

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<sup>22</sup> As shown in the next paragraph, data (45).

English needs to be proposed (Schütze, 2001). Moreover, the aforementioned coordination in (39d) can be better argued to be default Case if crosslinguistic data is included.

(40)

Vanja/?Vanju, ego ja ne ljublju.  
John-NOM/?ACC him-ACC I don't like  
'John, I don't like him.'

In some dialects of Norwegian, both conjuncts of a coordinated DP can surface as ACC (Johannessen, 1998, as cited in Schütze, 2001). This is illustrated in (41).

(41)

- a. Bare meg og deg ska' sitte på kjelken hans.  
only me-ACC and you-ACC shall sit on sledge his  
'Only you and me shall sit on his sledge.' [Bergen dialect]
- b. Meg og deg hjalp no godt te', då.  
me-ACC and you-ACC helped now well too then  
'But then me and you did help a lot, too.'
- (Johannessen 1998, citing Larsen & Stoltz 1912)

Based on Schütze (2001), it is significant to realize that the presence of unexpected Case marking serves as the strongest evidence for default Case. In Spanish, a pronoun occurring after a preposition needs to be checked ACC as the preposition is the ACC assigner (42c-d). However, when coordinated pronouns occur after a preposition, their surface forms have to be NOM instead of ACC as shown in (42a-b). Such unexpected Case marking presents that coordination, among other discussed contexts, is a default Case environment.



(42)

- a. para tú            y    yo  
   for you-NOM and I-NOM
- b. \*para ti            y    mí  
   for you-ACC and me-ACC
- c. para ti/\*tú  
   for you-ACC/\*NOM
- d. para mí/\*yo  
   for me-ACC/\*NOM            (Johannessen 1998, citing Goodall 1987)

## 2.6 Summary

This chapter focuses on the relationship between Case and agreement from the Government and Binding (Chomsky, 1980) era onwards. Case is first considered to be requirement for nominal argument licensing at the PF level (Chomsky & Lasnik, 1977; Vergnaud, 1977) but is later reinterpreted as an LF requirement (Chomsky, 1986). In the Minimalist Program, the Case checking mechanism emerges as a consequence of a functional head that bears the uninterpretable features (i.e., [ $\text{u}\phi$ ]) probing for a Goal bearing the relevant features (i.e., [ $\text{i}\phi$ ,  $\text{uCase}$ ]) (Chomsky, 2000). Thus, the establishment of an Agree relation between the Goal and the active Probe leads to successful Case assignment. The agreement-based Case approach is further extended by Pesetsky and Torrego's (2001, 2004) account of Case being an uninterpretable Tense feature on D. Lastly, the default Case proposed by Schütze (2001) illuminates that for a DP that enters the derivation without any [ $\text{uCase}$ ] feature, each language has a form of morphological case that is spelled out at the PF level.

# Chapter 3

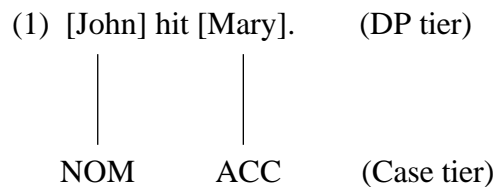
## The Dependent Case Account

### 3.1 Introduction

In this chapter, I introduce the dependent Case account, which is an alternative theory to the Chomskian approach to Case. Section 3.2 lays the theoretical background of the dependent Case account, focusing on the Case tier theory (Yip, Maling & Jackendoff, 1987). In section 3.3, the Marantzian (1991) version of dependent Case account is introduced. Section 3.4 presents the mixed model, a revised version of the dependent Case theory and Minimalist insights (Baker, 2015; Baker & Vinokurova, 2010). Section 3.5 provides a summary of this chapter.

### 3.2 Case Tier Theory

Yip, Maling and Jackendoff (1987) propose the Case tier theory, which argues that grammatical Cases are assigned based on the hierarchy of grammatical functions (where subject is higher than object). Under this account, DPs constitute an DP tier and grammatical Cases form a separate Case tier as illustrated in (1).



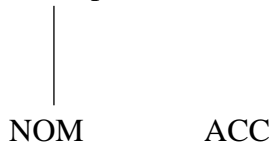
(Yip et. al. 1987, as cited in Ahmed, 2016: ex.1, p.103)

Based on Yip et al. (1987), in NOM-ACC languages, the unmarked association is from left to right; in ERG-ABS languages, the unmarked association takes an opposite direction.

Crucially, the association lines must not cross.

In a clause as in (2) where there is no object, NOM associates with the subject DP *John* while ACC has no DP to associated with. Thus, the ACC is not realized.

(2) John paused.



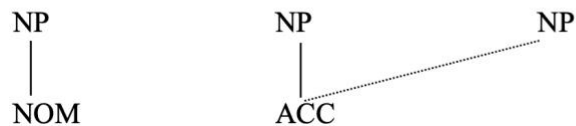
(Yip et. al. 1987, as cited in Ahmed, 2016: ex.2, p.104)

As for scenarios where more than one object is involved, Yip et al. (1987) maintain that some languages exhibit a Case spreading rule. As shown in the Swedish example in (3), the ACC on the Goal *honom* ‘him’ spreads to the Theme *henne* ‘her’. Moreover, Yip et al. (1987) reinforce the validity of the Case spreading rule by showing that the ungrammaticality of the second object *\*hon* bearing NOM is due to failure to apply default Case (NOM in Swedish).

(3)

Kunggen      gav      honom(\*hon)      henne(\*hon)      (till maka).

the.king      gave      him(\*he)      her(\*she)      (as wife)



‘The king gave her to him as a wife.’ (Yip et. al. 1987, as cited in Ahmed, 2016: ex.3, p.104)

The most convincing evidence of the Case tier hypothesis is shown in the Icelandic data where lexical Case “disturbs” the association. In the Icelandic data (4a), *barninu* ‘the child’ – the direct object of the predicate *gaf* ‘give’ – bears DAT and the Recipient theta-role, which takes priority over the grammatical Case assignment as illustrated in (4c). Therefore, the observation that the second object ‘the book’ is associated with ACC in (4a) (*bókina*) and with NOM in (4b) (*bókin*) is well accounted for by the Case tier theory.

(4)

**a. *Jón gaf barninu bókina***

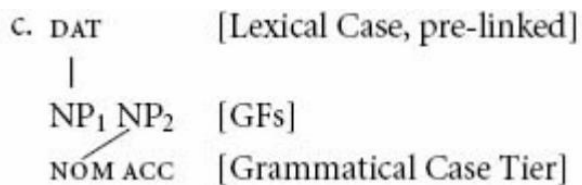
Jon.NOM gave the.child.DAT the.book.ACC

‘Jon gave the child the book’

**b. *Barninu var gefin bókin***

the.child.DAT was given the.book.NOM

‘the child was given the book’



(Maling, 2008: ex.2, p. 3)

Regarding treatment for control and raising, Yip et al. (1987) specify that Case assignment holds for items in same domain. The definition under Case tier theory is presented in (5). As shown, the notion of domain relies highly on the syntactic relationship between the two DPs.

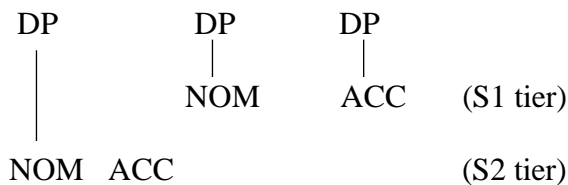
(5) a. “A node Y is IN THE CASE DOMAIN of a node X iff Y is dominated by X, and X supplies a case tier C.”

b. A node Y is IN THE CASE DOMAIN of a node X iff Y is in the case domain of X, and there is no node Z such that X dominate Z and Y is in the case domain of Z.”

(Yip et. Al. 1987, p. 239)

In data where PRO is involved, as in (6), the embedded clause is treated as one tier (S1) and the main clause is treated as a separate tier (S2). In each tier, syntactic Case assignment occurs in a left-to-right fashion. Since there is only one DP in S2 tier, ACC remains unassociated.

(6) Bill<sub>i</sub> tried to [PRO<sub>i</sub> help me].



(Yip et. al. 1987, as cited in Ahmed, 2016: ex.9,

p.111)

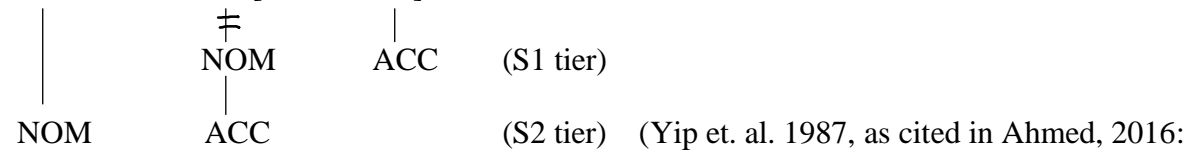
In terms of raising constructions, Yip et al. (1987) offer two possible analyses. First, as illustrated in (7b), the ECM construction under GB is considered as having two tiers since there exist two domains. (7a) shows that the embedded subject *she* is associated with NOM. It is important to realize that the embedded clause is finite, which constitutes a fully saturated domain. However, in (7b), the embedded subject *her* undergoes movement, raising to the matrix domain. Based on Yip et al. (1987), the ACC on *her* results from the overlay from the S2 tier.

Note that contrast to (7a), the embedded clause in (7b) is not a saturated domain, which makes the analysis not persuasive since the motivation of movement is not well explained.

(7) a. Bill believed [she/\*her likes me].



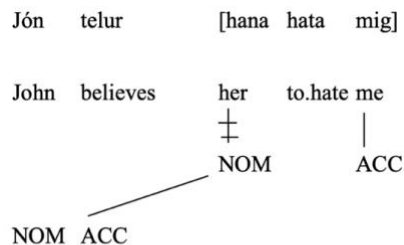
b. Bill believed her<sub>i</sub> [<sub>t<sub>i</sub></sub> to like me].



ex.11, p.113)

The second analysis supposes that embedded subjects do not raise to the matrix clause. In (8), Yip et al. (1987) argue the embedded subject remains in the embedded clause and is associated with NOM. The matrix tier does not associate ACC with *hana* ‘her’ per se. But it yields a result “that the complement subject comes to lie in the domain for syntactic Case assignment in the matrix clause” (p. 242), possibly due to S’ deletion as Yip et al. (1987) claim. Thus, the embedded subject receives the overlaid ACC from the matrix tier.

(8)



‘John believes her to hate me.’

(Yip et. al. 1987, as cited in Ahmed, 2016: ex.12, p.113)

### 3.3 Dependent Case Account – A Configurational Model

Following Yip, Maling and Jackendoff's (1987) Case tier theory, Marantz (1991) proposes a configurational model, which argues against Case assignment via functional heads (Chomsky, 2000, 2001) and stresses instead that Case is an outcome of the structural relationship between two DPs (McFadden, 2004; Baker, 2015; Baker & Vinokurova, 2010).

Before diving into the details of the configurational account of Case assignment (Marantz, 1991), it is essential to acknowledge that there are some aspects of Case theory that are rebutted under the Marantzian approach<sup>23</sup>. According to Marantz (1991), nominal licensing does not equate to Case because of the following rationale. Firstly, Burzio's Generalization (1986) is argued to be not about Case (Marantz, 1991). Let's review the concept of Burzio's Generalization (1986), which states that *v* can only check Case when it projects an external argument that bears a theta-role. In (9), the DP argument *the man* has the Theme theta-role and should have been licensed. However, since the predicate *arrived* is unaccusative and does not project a subject bearing a theta-role, ACC cannot be valued to the DP *the man*. Note that the subject position is occupied by the expletive *it* (which does not bear any theta-role) to satisfy EPP.

(9) \*It arrived the man.

However, it seems that Burzio's generalization (1986) cannot account for some data where the object DP is licensed by Case even when there is no thematic subject. As shown in

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<sup>23</sup> Data provided in this section are from Marantz (1991), unless otherwise stated.

(10a-b), Marantz (1991) argues that the objects of *struck* (*me* and *her* respectively) bears ACC marking but both sentences do not have a thematic subject.

(10) a. There struck me as being too many examples in his paper.

b. Elmer<sub>i</sub> struck her as [<sub>i</sub> being too stubborn for the job].

To my understating, the sentences in (10) do have a logical subject that carry thematic relation with the object. In (10a), what *struck me* is *too many examples in his paper*, which is the logical subject that also is the Stimulus. In (10b), similarly, *Elmer being too stubborn for the job* is the logical subject that also acts as the Stimulus. In both cases, the logical subject is a clause and does not surface as the grammatical subject at Spec, TP. Thus, Marantz's analysis could have been more transparent and caused less confusion should he specify that it is the projected grammatical subject in Spec, TP that does not seem to carry the theta-role, which poses challenge to Burzio's Generalization (1986). What's more, a major difference between (9) and (10a) that is not mentioned by Marantz is the different expletives. Expletive *there* is distinct from expletive *it* in that the former is Caseless while the latter one is Case-marked. In (9), *it* has 3<sup>rd</sup> person singular phi-features albeit being an expletive. Therefore, that NOM in (9) is checked on *it* is impossible due to Burzio's generalization (1986). In (10a), however, *there* is not marked NOM, even though the ACC on *me* still violates Burzio's generalization (1986). In essence, why (9) is ill-formed and (10) grammatical cannot be accounted for by Burzio's Generalization (1986).

Secondly, Marantz (1991) advocates the separation between Case and case. Namely, the syntactic licensing and the case morphology should be kept distinct. By presenting the Icelandic



examples, Marantz (1991) posits that DPs are licensed through EPP instead of case morphology. In (11a), it can be observed that some DPs bear quirky Case by virtue of being selected by certain predicate such as *Ólaf* ‘Olaf’ – the indirect object of the predicate *óskaði* ‘wish’ bears DAT and *alls* ‘everything’ – the direct object of the predicate *óskaði* ‘wish’ bears GEN. Marantz (1991) argues that these objects do not get licensing simply because they receive (quirky) Cases. In (11b), when the sentence is passivized, the direct object *þess* ‘this’ is promoted to the grammatical subject position and still bears GEN. As Marantz (1991) puts forth, even though the direct object ‘this’ bears GEN (thanks to *óskað* ‘wish’), GEN does not license the DP in the object position. Hence, quirky Case is not syntactic Case. The reason why the direct object *þess* ‘this’ raises to Spec, TP is due to EPP instead of Case reason. The same applies to (11c) where the indirect object *henni* ‘her’ moves to Spec, TP to satisfy EPP and bears DAT at the same time. To conclude, the Icelandic fact suggests that a DP can get morphological case without being licensed, which indicates that DP licensing works via projection (Marantz, 1991).

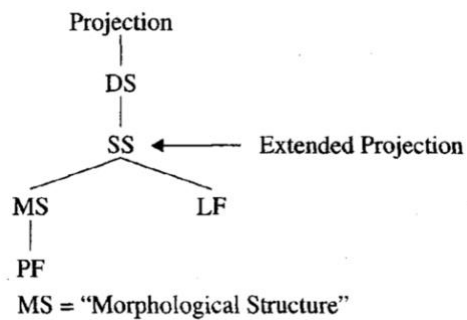
(11)

- a. *María óskaði (Ólaf) alls goðs.*  
Mary-NOM wished Olaf-DAT everything-GEN good-GEN
- b. *Þess var óskað.*  
this-GEN was wished
- c. *Henni var óskað þess.*  
her-DAT was wished this-GEN

Pointing out the above two problematic aspects of Case theory, Marantz (1991) offers some insight of the structure of grammar as illustrated in (12), where DS refers to deep

structure<sup>24</sup> and SS refers to surface structure<sup>25</sup>. Based on this model, Marantz (1991) assumes Case and agreement only occur at the MS level, which is part of the PF component. The takeaway is that when the SS is well-formed, MS interprets it by inserting the appropriate Case and agreement morphology.

(12)



(Marantz, 1991, p. 19)

Marantz (1991), as does Schütze in (2001), utilizes default Case theory to strengthen the claim in (13).

(13) “Nominal arguments are licensed by (extended) projection, not by Case or by morphological properties.” (Marantz, 1991, p. 20)

However, (13) is not problem-free since it cannot account for the distribution of PRO.

Marantz (1991) presents data such as (14) to showcase this issue.

(14) a. \*Elmer bought PRO.

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<sup>24</sup> Deep Structure: syntactic representation of semantic interpretation.

<sup>25</sup> Surface Structure: syntactic representation of phonetic input.

b. Elmer preferred [PRO<sub>i</sub> to be given *t<sub>i</sub>* the bigger porcupine].

In (14a), PRO cannot be licensed via projection and stay in the object position. Some might argue that it is because PRO can only be projected at Spec, TP in the infinitival clause. Nonetheless, (14b) serves as a piece of evidence that PRO is first projected as the object of the embedded predicate ‘given’ (see the trace). The raising of PRO to Spec, TP in the embedded clause is to meet the requirement of EPP, which reveals that PRO can be projected in a position with or without being licensed.

Furthermore, (13) seems to be inadequate as it cannot explain why lexical DPs cannot be licensed as the subject of an infinitival clause<sup>26</sup> as illustrated in (15).

(15) \*Hortense tried [Elmer<sub>i</sub> to be given *t<sub>i</sub>* a porcupine].

Thus, Marantz (1991) concludes that it is some residue of the Case theory (16) but not the extended projection that determines the complementary distribution of PRO and lexical DPs.

(16) RES(idue) of Case theory:

“An NP argument is PRO iff not governed at S-structure by a lexical item or [+tense] INFL.”

(Sigurðsson, 1991, as cited in Marantz, 1991, p. 21)

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<sup>26</sup> Marantz (1991) supplements that lexical DPs can be realized as the subject in infinitival clauses. In English, the preposition *for* can be added or the infinitival clause can be placed as the complement of an ECM verb.

Following the diagram in (12), Marantz (1991) posits that Case realization follows a disjunctive hierarchy, in which it distinguishes the following kinds of Cases as captured in (17).

(17) Lexically governed Case (Dative) > Dependent Case (Accusative and Ergative) >  
Unmarked Case (Nominative and Absolutive) > Default Case

According to the disjunctive hierarchy, a 4-step process of Case assignment is adopted under this approach. First, if a predicate obligatorily gives the DP object a theta-role and requires it to bear DAT, then this DP has the highest ranking than other Case-marked DPs. Second, when lexical Case is not available, a DP gets dependent Case if certain syntactic environment is present (i.e., discussed in section 3.3). Third, if dependent Case cannot be applied, unmarked Case is checked on the DP. Fourth, if no other Case realization is possible, default Case comes into effect. Last but not least, it should be recognized that under Marantz's (1991) account, unmarked Case and default Case need to be differentiated since the former is domain-sensitive whilst the latter is domain-insensitive.

Among these Cases, dependent Case is the pivotal one in Marantz's (1991) discussion. Marantz (1991) asserts that in a NOM-ACC language, ACC is the dependent Case assigned to the structurally lower DP (object) when the higher DP (subject) is governed by V+I with some syntactic properties; in an ERG-ABS language, ERG is the dependent Case assigned to the structurally higher DP (subject) when the lower DP (object) is governed by V+I with some syntactic properties. The syntactic properties mentioned above are illustrated in (18).

(18) Dependent case is assigned by V+I to a position governed by V+I when a distinct position governed by V+I is:

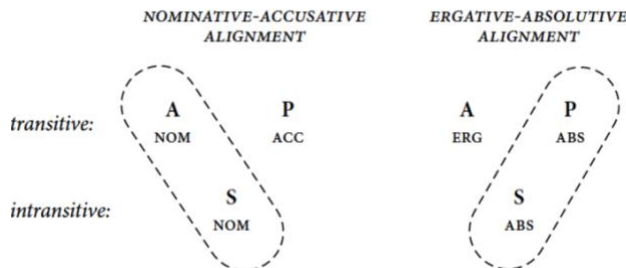
- a. not "marked" (not part of a chain governed by a lexical Case determiner)
- b. distinct from the chain being assigned dependent Case

Dependent Case assigned up to subject: Ergative

Dependent Case assigned down to object: Accusative (Marantz, 1991, p. 25)

Essentially, for pairs of DPs in the same spell-out domain, dependent Case is assigned to the {higher, lower}<sub>PARAM</sub><sup>27</sup> of two distinct DP chains, chains being depicted in (19), which is perfectly aligned with the observed NOM-ACC and ERG-ABS patterns.

(19)



(Preminger, 2015, p. 93)

Furthermore, Marantz's (1991) account manages to salvage Burzio's generalization (1986). That Burzio's generalization fails to explain the grammaticality in (10), repeated as in (20), can be accounted for by the dependent Case account. Marantz (1991) explains that when there is no thematic subject, a DP governed by V+I raising to Spec, TP, which indicates both the

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<sup>27</sup> Parameters.

subject and object are filled by item of the same chain. Even though (20) violates Burzio’s generalization (1986), the derived subjects (*there* and *Elmer*, respectively) and objects (*me* and *her*, respectively) are in distinct chains, which allows for ACC dependent Case assignment.

- (20) a. There struck me as being too many examples in his paper.  
 b. Elmer<sub>i</sub> struck her as [<sub>i</sub> being too stubborn for the job].

The application of the dependent Case account smoothly accounts for the “supposed ECM” Icelandic data below. In (21), it is shown that the subject of the embedded clause *henni* ‘her’ bears quicky Case DAT while the object of the embedded clause *Ólafur* ‘Olaf’ bears NOM. The dependent-based account justifies the NOM marking on *Ólafur* ‘Olaf’ since in the embedded clause, the embedded subject is supposed to have ACC marking due to ECM, but it is overridden by the DAT due to the embedded predicate *þótt* ‘thought’. Thus, the unmarked NOM is checked on embedded object because *Ólafur* ‘Olaf’ is the only DP left in this domain.

(21)

Ég	tel	<b>henna</b>	hafa	alltaf	þótt	<b>ólafur</b>	leiðinlegur.
I	believe	her-DAT	to-have	always	thought	Olaf-NOM	boring-NOM

‘I believe her to have always thought of Olaf as boring.’

The English translated sentence (22), however, shows ACC marking on the embedded object. Marantz’s theory still holds since the rationale of ACC on him is that in the embedded clause, the subject *her* gets ACC via ECM. *Her* being higher in the structure than *him*, it renders the marking of ACC on *him*. Marking *him* NOM violates the configurational Case-assignment as

the ungrammaticality indicates. The ECM examples in Icelandic and English have different Case realization on the embedded object, which is well-explained by the dependent Case account.

(22) I believe [her to have always thought Olaf/him/\*he boring].

It is also worthwhile to point out the difference between Case tier theory and dependent Case account. In a NOM-ACC language, Case tier theory proposes a left-to-right association, which implies that NOM is realized before ACC. Such precedence is non-existent or sometimes reversed in the dependent Case account (Marantz, 1991). In the English ECM example (22), the subject and object in the embedded clause both receive ACC, suggesting that the dependent Case assignment does not rely on the prior assignment of NOM.

### 3.4 The Mixed Model

Baker (2015) proposes a mixed model of Case assignment, which relies on the dependent Case account of Marantz (1991) and incorporates the phase theory of Chomsky (2008). Following Chomsky (2008), Baker (2015) assumes C and v are phase heads and their complements (IP, VP) are spell-out domains, which are essential to Case assignment. Specifically, the author argues that vP can be a soft or hard phase, indicating if its complement VP can be visible or not to the later operation. In Finnish imperatives, as seen in (23) and (24), when the object is definite, it bears NOM but not ACC; when the object is indefinite, it bears PART(itive). Baker (2015) attributes the Case asymmetry to the VP being a soft phase in (10) and a hard phase in (11), *karhu* ‘bear’ getting NOM (unmarked Case in the IP domain) and *karhuja* ‘bears’ getting PART (unmarked Case in the VP domain).

(23)

Tuo	karhu!	(*karhu-n)
bring.IMPER	bear.NOM	bear-ACC

‘Bring the (a) bear!’ (Kiparsky 2001, as cited in Baker 2015, ex. 46: 141).

(24)

Tuo	karhu-j-a!
bring.IMPER	bear-PL-PART

‘Bring bears!’ (Kiparsky 2001, as cited in Baker 2015, ex. 47: 141).

In the same vein, Baker and Vinokurova (2010) adopt the hybrid view of Case assignment in their analysis of the Sakha (i.e., Yakut) data, suggesting that NOM and GEN are assigned in the Chomskian conception while ACC and DAT are assigned by the Marantzian configurational rules.

In the simple active sentences, (25a-c) show that the subjects of the three predicates are marked NOM. In (25b), the object on the two-place predicate *kördö* ‘saw’ is marked ACC; in (25c), the direct object of the three-place predicate *bierde* ‘give’ is marked ACC while the indirect object is marked DAT. These data can be explained by the Marantz’s account (if we consider DAT in the Sakha example is unmarked Case), but it does not necessarily rule out the Chomskian approach.



(25)

a. Min kel-li-m.

I.NOM come-PAST-1sS

'I came.'

b. Masha aqa-ta yt-y kör-dö.

Masha(GEN) father-3sP(NOM) dog-ACC see-PAST.3sS

'Masha's father saw the dog.'

c. Masha Misha-qa at-y bier-de.

Masha(NOM) Misha-DAT horse-ACC give-PAST.3sS

'Masha gave Misha a horse.'

(Baker & Vinokurova, 2010: ex.3, p.4)

The argument appears stronger when a more complex sentence as in (26) is examined, where the DP *kimi* 'nobody/who' raises out of the embedded clause and is checked ACC even when the matrix predicate is a passive one (suggesting *v* does not have any Case assigning capacity). In this case, the dependent Case theory can explain the data since the subject of the embedded clause moves to the higher clause and thus enters the same domain of the derived subject of the matrix clause. *Sargy* c-commanding *who*, it renders the ACC on the lower DP *who*.

(26)

Sargy kim-i daqany tönn-üm-üö dien erenner-ilin-ne.

Sargy who-ACC PRT return-NEG-FUT.3sS that promise-PASS-PAST.3sS

'Sargy was promised that nobody would return.'

(Baker & Vinokurova, 2010: ex.40, p.34)

In relation to the DAT assignment, (27a) and (27b) demonstrate that when the subject of the complement clause raises, it gets ACC, but the other internal argument must be checked

DAT. The predicate in (27) is a three-place predicate *erennerde* ‘promise’, which has two arguments: *Keskil* and the complement clause. *Keskil* c-commands the complement clause including the embedded subject. With *who* raising to the edge of the complement clause, Baker and Vinokurova (2010) argue that *who* becomes visible to the matrix VP. Hence, the Marantz’s approach applies, the lower DP *who* receiving ACC and *Keskil* DAT.

(27)

a.

Sargy Keskil-i [kim daqany kel-im-ie dien] erenner-de.  
 Sargy Keskil-ACC who PRT come-NEG-FUT that promise-PAST.3sS  
 ‘Sargy promised Keskil that nobody will come.’

b.

Sargy Keskil-ge/\*i kim-i daqany [- kel-im-ie dien]] erenner-de.  
 Sargy Keskil-DAT/\*ACC who-ACC PRT come-NEG-FUT that promise-PAST  
 ‘Sargy promised Keskil that nobody will come.’

(Baker & Vinokurova, 2010: ex.43-44, p.37)

With regards to NOM, Baker and Vinokurova (2010) suggest it is not the default Case in Sakha since it does not freely occur in environments where there is only one DP in that phase. For example, the DP *dijetin* ‘house’ in a PP *Masha dijetin tula* ‘around Masha’s house’ bears GEN instead of NOM as in (28). Note that in Sakha, NOM and GEN are morphologically null, but they show distinct forms under one circumstance: GEN is realized as /n/ after a 3rd person possessive suffix (Krueger, 1962, as cited in Baker & Vinokurova, 2010).

(28)

Masha djie-tin tula itii. (\*djie-te)  
Masha house-3sP.GEN around hot house-3sP.NOM

‘It is hot around Masha’s house.’

(Baker & Vinokurova, 2010: ex.53a, p.46)

By showing constructions with nouns like ‘rumor’ as in (29)<sup>28</sup>, Baker and Vinokurova (2010) observe that *surax* ‘rumor’ can occur with a finite CP (29a); or with a participial clause that has optional possessive agreement as in (29b-c). (29b) and (29c) imply that the head of the clause and the head noun do not obligatorily bear agreement.

(29)

a. Misha kel-ieq-e dien surax  
Misha come-FUT-3sS that rumor  
‘a rumor that Misha will come’

b. En kel-bit-ij suraq-a  
you come-PTPL-2sP rumor-3sP  
‘a rumor that you came’

c. En kel-bit suraq-yŋ  
you come-PTPL rumor-2sP  
‘a rumor that you came’

(Baker & Vinokurova, 2010: ex.68, p.57)

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<sup>28</sup> Typo in the original data in (29b): 3sP should be 2sP.

Moreover, when agreement disappears on both the head noun and the head of the clause, and the subject of clause is an overt argument that cannot incorporate into the predicate, it yields ungrammaticality as seen in (30). Baker and Vinokurova (2010) see this as support of the claim that NOM is assigned by a T-like head that agrees with it. Similarly, they extend this to the GEN assignment. As shown in (31c), GEN is assigned only in a nominal that has an agreeing D, which is realized as possessive agreement on the head noun at PF (Baker & Vinokurova, 2010). In (31a), it clearly illustrates that there is no need to have a possessive suffix to attach on the nominal if there is no possessor. But when there is a possessor, then an agreement-bearing D head is required on the noun. Hence, the agreeing with the possessor is manifested by checking the GEN on DP.

(30)

\*En kel-bit surax  
 you come-PTPL rumor  
 ‘a rumor that you came’

(Baker & Vinokurova, 2010: ex.70, p.58)

(31)

- a. aqa ‘father’
- b. \*Aisen aqa (Aisen father) ‘Aisen’s father’
- c. Aisen aqa-ta (Aisen father-3sP) ‘Aisen’s father’

(Baker & Vinokurova, 2010: ex.71, p.58)

With the Sakha facts examined, Baker and Vinokurova (2010) conclude that the Case assignment in Sakha demonstrates that NOM and GEN are assigned by agreement with a nearby functional head while ACC and DAT are assigned by the dependent Case rules. It pleasantly

aligns with the proposal that the agreement-based Case account and dependent Case account can coexist in the grammar of a single language (Baker & Vinokurova, 2010).

### **3.5 Summary**

This chapter discusses dependent Case theory (Marantz, 1991) by first introducing the Case tier theory (Yip, Maling & Jackendoff, 1987) as the theoretical prerequisite. The Case tier theory stresses that grammatical Case assignment is according to the hierarchy of grammatical functions. Under this account, lexical Case is prioritized when the association between Case and the grammatical function occurs. Following Yip et al. (1987), Marantz (1991) develops the dependent Case account, in which Case is assigned follows through a set of rules. First, lexically governed Case is assigned by any particular lexical item. Second, for pairs of remaining DPs in the same spell-out domain, dependent Case is assigned to the {higher, lower}<sub>PARAM</sub> of two distinct DP chains (Preminger, 2015), higher when in an ERG-ABS language, lower when in a NOM-ACC language. Third, unmarked Case is checked on any remaining nominal phrases that have not received Cases. Fourth, default Case is assigned to any free-standing DPs. Following Marantz (1991), a mixed model regarding Case assignment is maintained to be in favour (Baker, 2015; Baker & Vinokurova, 2010), suggesting that the agreement-based Case account and dependent Case account can coexist in the Universal Grammar of a single language. Specifically, Baker and Vinokurova (2010) utilize the mixed model, successfully accounting for the Sakha data where ACC and DAT are argued to be assigned via configuration rules whilst NOM and GEN are posited to be assigned via Agree with their corresponding functional heads.

## Chapter 4

### Critical Analysis of the Agreement-based Case Account and the Dependent Case Account

#### 4.1 Introduction

This chapter offers a critical analysis of both the agreement-based Case account and/or the dependent Case account, presenting various counterevidence discussed in the literature. Section 4.2 focuses on the rebuttal of the agreement-based Case account (Chomsky, 2000 and beyond), with evidence mainly drawing from Alboiu (2006, 2009, 2020c) and McFadden & Sundaresan (2011). In section 4.3, the challenge to the Marantz's (1991) dependent Case account is majorly shown by B ar any and Sheehan's (2021) data analysis with scrutinization of the mixed model of Case assignment (Baker, 2015; Baker & Vinokurova, 2010) provided by Preminger (2020). Section 4.4 sums up this chapter.

#### 4.2 Against the Agreement-based Case Account

Despite various updates to the agreement-based Case account - Chomsky (2008) puts forth the notion of phases and Pesetsky and Torrego (2001, 2004) argues that Case is [uT] on D - there has been criticism of the agreement-based Case approach, mainly presenting two problems stemming from the fact that phi-features are neither a necessary nor a sufficient condition for Case: (i) on the one hand, Case (including NOM) may occur in the absence of phi-features, and (ii) on the other hand, phi-features does not guarantee Case. For the former, this MRP discusses McFadden & Sundaresan (2011) and Alboiu (2020) where evidence for syntactic Case on subjects is presented in non-finite clauses. For the latter, the MRP discusses Alboiu (2006).

Additionally, Alboiu (2009) provides some insight on the limitedness of Pesetsky and Torrego's (2001, 2004) account on Case.

#### 4.2.1 Case Occurs in the Absence of Phi-features

Alboiu (2020c) recognizes that the agreement-based Case account is problematic conceptually and empirically and puts forth the following issues. First, if all A-related features are uninterpretable, then how can they have presupposed NOM or ACC values? Second, T is in fact phi-incomplete in the Indo-European languages since Carlsen (2001, p. 148, as cited in Alboiu, 2020c) argues that "Gender is systematically excluded from the features of subject agreement". Third, *v* does not appear to have [*u*phi], so how does ACC get assigned?

In order to address the unanswered questions above, Alboiu (2020c) proposes an account against agreement (defined specifically as [*u*phi] following Chomsky) as a Case requisite by presenting evidence from non-finite CPs. The Romanian example in (1) shows that the subject *noi* 'we' in the embedded gerund clause is checked NOM.

(1)

[<sub>CP</sub> Fiind noi gata cu toții], am pornit la drum.  
[being.GER we.NOM ready with all] 1PL started on way  
'Given that we were all ready, we started on our way.' (Romanian)

(Alboiu, 2020c: ex. 8b, p.11)

Alboiu (2020c) also cites Haegeman (1985) who discusses West Flemish as shown in (2), where the subject *ik* 'I' is also marked NOM in the infinitival adjunct clause.

(2)

[<sub>CP</sub> Mee ik da te zeggen], hee-se dat hus gekocht.  
[<sub>CP</sub> with I.NOM that to say] has-she that house bought  
'Because of my saying that she has bought that house.'  
(West Flemish, Haegeman 1985:125)

Furthermore, Alboiu (2020c) mentions that there are also instances of nonfinite subjects bearing ACC that can be observed in English and Latin, as in (3) and (4) respectively.

(3) [<sub>CP</sub> For him to listen to the talk] was awkward. (Alboiu, 2020c: ex. 9a, p.12)

(4)

Me interest [<sub>CP</sub> te studere].  
me.ABL it is good [you.ACC study]  
'It is to my advantage that you study.'  
(Latin, Wyngaerd 1994: 124)

Alboiu (2020c) also illustrate examples where the Case valuation in the nonfinite contexts seems to be determined by linear order, as in (5a-b). In (5a), the nonfinite subject *io* 'I' is marked NOM. Nonetheless, in (5b), the nonfinite subject *lui* 'him' is marked ACC but not NOM. Note that the former occurs postverbally while the latter occurs preverbally, which implies that Case valuation is related to linearization.

(5)

- a. Tu non ti rallegri [<sub>CP</sub> aver io incontrata una morte]  
you not CL delight [to-have I found a death]  
'You are not glad that I have found death.'  
(Old Italian, D'Azeglio, ch. 18, p222, cf. Schwehendener 1923:72)
- b. Negar non voglio esser possibile, [<sub>CP</sub> lui essere beato ..  
to-deny not (I) want to-be possible **him** to-be blessed  
'I do not want to deny that it is possible that he is blessed.'  
(Old Italian, Boccaccio, Dec., I, 1; cf. Schwehendener 1923:82)



Data (1) – (5) reveal that structural Case assignment in nonfinite context is crosslinguistically observed. In the nonfinite context, T is deficient, which according to the agreement-based Case account, should exclude any Case assigning capacity. Crucially, however, the examples of the lexicalized subjects in nonfinite clauses are all in phasal domains (CPs), which are legitimate Case domains (Chomsky, 2008). Lastly, (5) shows that linearization can have an effect on Case valuation.

To further tease apart the distinction between NOM and ACC, Alboiu (2020c) posits that phi-probes are crucial for NOM but not for ACC. In (6a), when the subject-verb agreement presents on the verb *ricu-ni* ‘see-1SG’, NOM on the subject is observed. In (6b), when the DES (desiderative) predicate shows no agreement, the subject bears ACC.

(6)

- |    |  |                   |  |
|----|--|-------------------|--|
| a. | Ñuca-Ø<br>I-NOM<br>‘I see you.’                | can-da<br>you-ACC | ricu-ni/*-ngui.<br>see-1SG/-2SG                  |
| b. | Ñuca-ta<br>I-ACC<br>‘I would like to see you.’ | can-da<br>you-ACC | ricu-naya-n/*-ni/*-ngui<br>see-DES-IMP/-1SG/-2SG |

(Cole & Jake, 1978, p.74, as cited in Alboiu, 2020c: ex. 15, p.15)

Thus, Alboiu (2020) claims that structural Case assignment is as stated in (7). When  $[\text{u}\pi^{29}]$  is contained in the phi-probe, then NOM is in effect, which implies that phi-completeness

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<sup>29</sup>  $\pi$ : Person feature.

is not a requirement on syntactic Case valuation. This serves as strong evidence against the idea that T and v intrinsically have NOM and ACC features, respectively.

(7) Structural Case licensing:

- a. NOM, *if and only if* the Probe is specified for [uD, u $\phi$ / $\pi$ ]
- b. ACC, *if and only if* the Probe is specified as [uD]

(Alboiu, 2020c: ex. 16, p.15)

Similarly, McFadden and Sundaresan (2011) argue that NOM is not assigned by finite T or agreement. As shown in the Italian sentences (8a) and (8b), the embedded subject DPs *lui* ‘he’ and *io* ‘I’ are marked with NOM. Both embedded clauses in (8) are infinitival clauses as the embedded predicates *lavorare* ‘work’ and *cantare* ‘sing’ are in infinitive forms. Clearly, the agreement-base account of Case is not able to capture the data since the infinitival T is considered deficient and not equipped with Case checking capacity. However, the issue in (8a) here is that some could argue *anche lui* is actually part of the matrix, since *ogni ragazzo* can be coreferential with *anche lui*. In (8b), it should also be noted that the sentence can be analyzed as subject raising with null expletive *pro*<sup>30</sup>. In this case, the NOM on *io* again can be argued it is from the matrix by association with the finite T.

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<sup>30</sup> *pro* is seen as null expletive which has [D,u $\phi$ i] features. (Alboiu, 2009).

(8)

- a. Ogni ragazzo vuole [lavorare sodo **anche lui**]  
every boy wants work.INF hard also he.NOM  
'Every boys wants it to be the case that he too works hard.'
- b. Non sembra [cantare **solo io** su questo nastro].  
not seem.1SG sing.INF only I.NOM on this tape  
'It doesn't seem to be the case that only I am singing on this tape.'

(McFadden & Sundaresan, 2011: ex. 4, p. 3)

In the Tamil data (9), it is observed that the embedded subjects *Vasu* and *Naan* bear NOM in the infinitival clauses, which cannot be accounted for by the Chomskian perspective. The matrix subject in (9b), 'Raman' has the 3rd person singular phi- features that are distinct from that of 'naan' (1st person singular). According to Szabolcsi (2009, as cited in McFadden & Sundaresan, 2011), the NOM on the embedded subjects is due to the agreement to the matrix verbs. However, the cyclic Agree does not work under this circumstance since in (9a), though both *Vasu* and *Raman* are 3rd person singular, they cannot be coreferential with each other since R-expressions must be free<sup>31</sup>. Thus, NOM assignment via multi-agreement is infeasible.

(9)

- a. [**vasu** poori porikk-a] raman maavu vaangi-n-aan  
vasu.NOM poori.ACC fry-INF raman.NOM flour.ACC buy-PST-M.3SG  
'Raman bought flour for Vasu to fry pooris'
- b. [**naan** poori porikk-a] raman maavu vaangi-n-aan  
I.NOM poori.ACC fry-INF raman.NOM flour.ACC buy-PST-M.3SG  
'Raman bought flour for me to fry pooris'

(McFadden & Sundaresan, 2011: ex. 7, p. 5)

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<sup>31</sup> Principle C in Binding theory: R-expressions cannot be bound.

Both the Italian and Tamil instances show that NOM seems to be independent of finiteness. In order to account for why NOM subjects occur in situations where phi-features are incomplete, McFadden and Sundaresan (2011) resort to the dependent Case account (Marantz, 1991) and Schütze's default Case (2001), arguing that NOM is the default Case. Data in (9b) can be analyzed as follows: the bracket clause is an adjunct clause, and the embedded predicate is *porikka* 'fry'. The embedded subject *Vasu* is checked as default NOM because there is no higher DP in this domain.<sup>32</sup>

To further validate the default Case status of NOM, McFadden and Sundaresan (2011) make use of data from left dislocation. As seen in (10), (10a) and (10b) respectively demonstrate that in Russian and in Arabic, the lexicalized object DPs *Vanja* 'John' and *alkitaabu* 'the book' occur at the left periphery. Note that they are both checked NOM and they are not the subjects of the clauses. Also, both of *Vanja* 'John' and *alkitaabu* 'the book' are coreferential with their corresponding pronominalized object DPs (resumptive pronouns). In sentences like these, I consider the left dislocation of the lexicalized DPs acting as (contrastive) focus or topic. Crucially, when the DPs appear in the left periphery, they are outside of the TP domain where NOM cannot be assigned by finite T. One significant distinction between default Case and unmarked Case is that the former is domain-insensitive, and the latter is domain sensitive. Since left periphery and the finite TP are two distinct domains, it is impossible to argue that the NOM markings on the DPs (*Vanja* and *alkitaabu*) to be unmarked Case.

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<sup>32</sup> McFadden and Sundaresan (2011) mention that it doesn't much matter how to define the minimal domain for (2b), as the embedded clause is an adjunct, and thus they do not expect it to interact with the DPs in the matrix clause.

(10)

a.

Vanja/?Vanju, ego ja ne ljublj.  
John:N/?A him:A I don't like  
'John, I don't like him.' (Russian)

b.

al-kitaab-u qara?t-u-hu.  
the-book-N read-1SG-it  
'The book, I read it.' (Arabic)

(McFadden & Sundaresan, 2011: ex. 12, p. 9)

Additionally, that the overtness of NOM subject tends to concur with finiteness is argued to stem from the following factors (McFadden & Sundaresan, 2011). The rationale is two-fold: first, nonfinite clause is usually smaller than finite clause in terms of size. As McFadden and Sundaresan (2011) analyze, in the German data in (11), the embedded subject in (11a) *der Zug* 'the train' is marked NOM while the embedded subject *den Zug* 'the train' in (11b) is marked ACC (marking is shown on the determiners *der* and *den* respectively). At first glance, it seems that this is the counterevidence of what McFadden and Sundaresan (2011) argue against since in (11a), NOM occurs in a finite embedded clause and in (11b), the absence of NOM occurs in an infinitival clause. However, McFadden and Sundaresan (2011) posit that the size of the embedded clause in (11a) is larger than that in (11b), which determines if they constitute the minimal domain for Case assignment. Thus, assuming the dependent Case account and NOM as the default Case, both sentences can be correctly captured: in (11a), *der Zug* is the only DP argument in the finite embedded clause (a distinct domain from the matrix one) so the embedded subject is checked as default NOM; in (11b), the ACC on the embedded subject *den Zug* can be

checked only under ECM since the embedded infinitival clause does not constitute a minimal domain for Case assignment.

(11)

- a. Ich höre, [dass der Zug ankommt].  
I.NOM hear that the.NOM train arrive.3SG  
'I hear that the train is arriving.'
- b. Ich höre [den Zug ankommen].  
I.NOM hear the.ACC train arrive.INF  
'I hear the train arrive.'

(McFadden & Sundaresan, 2011: ex. 18, p. 15)

The second aspect of why NOM subjects are not prototypical in nonfinite contexts is related to PRO. In the Icelandic example (12), the adjective *allir* 'all' in the embedded clause shows NOM plural agreement. Since the matrix subject DP *strákana* 'the boys' is checked ACC (because the main predicate *langaði* 'wanted' requires its subject to bear quirky ACC), the adjective 'all' cannot agree with 'the boys'. Thus, the only candidate that 'all' can agree with is PRO, which must bear NOM. In this case, even when the subject of the embedded clause (PRO) bears NOM, due to its silent nature, it is not obvious to detect NOM-subjects in nonfinite contexts.

(12)

Strákana langaði til að PRO komast allir í veisluna.  
boys-the:A wanted for to PRO get all:N.PL to party-the  
'The boys wanted to all get to the party.'

(Sigurðsson, 1991, as cited in McFadden & Sundaresan, 2011: ex. 19, p. 15)

Nonetheless, McFadden and Sundaresan's analysis (2011) reveal some potential problems. Other than the two issues mentioned in data (8), the discussion of McFadden and Sundaresan (2011) seems to lead to one misconception that finite T equals to agreement. This is an Anglocentric perspective since in Standard Modern English, there is almost always overt agreement in finite clauses (exception would be discussed later). Alboiu (2006) specifies that Case valuation relies on a tensed T which can only occur when there is a CP phrasal domain, regardless of phi-probes. This is crucial for the discussion since McFadden and Sundaresan (2011) only include examples that the embedded clause has NOM subject along with no overt agreement.

Us readers might assume that when there is no agreement, there is no finiteness and vice versa, which is contrary to facts. On the one hand, agreement does not always surface morphologically in finite clauses. For example, in a sentence like (13), the embedded subjunctive clause *that he be polite* is finite since it has a complementizer "that" albeit there appears no overt agreement on the embedded adjectival predicate *polite*. Importantly, the embedded subject is realized as NOM but not ACC. Surely, based on McFadden and Sundaresan, they could still explain the NOM marking by the default Case account. It could have been more ideal should they make it clearer to the readers that the absence of agreement does not necessarily lead to the absence of finiteness.

(13) I requested [that he/\*him be polite]. (Cai, 2022)

#### 4.2.2 Phi-features do not Guarantee Case

Alboiu (2006) discusses Romanian subjunctive examples where the embedded clause shows agreement morphology, but the clause itself is not finite. First, the *să* subjunctive clauses are incomplete (i.e., lack CP phasal status). In example (14), it can be seen that in the obligatory control constructions, subjunctive clauses are required to bear anaphoric tenses dependent on the matrix ones.

(14)

- a. *Am reușit să plec (\*mîine).*<sup>18</sup>  
 AUX.1SG managed SBJ leave.1SG tomorrow  
 ‘I managed to leave (\*tomorrow).’
- b. *Încep să citesc / \*fi citit.*  
 begin.1SG SBJ read.1SG / PAST read  
 ‘I’m beginning to (\*have) read.’

(Alboiu, 2006: ex. 6, p.10)

The above subjunctives contrast with those present in constructions with non-obligatory control, where a distinct tense is allowed for as in (15).

(15)

- a. *Am vrut să plece Mihai*  
 AUX.1SG wanted SBJ leave.3SG Mihai.NOM  
*(mîine).*  
 (tomorrow)  
 ‘I wanted for Mihai to leave (tomorrow).’
- b. *Am vrut să plec (mîine).*  
 AUX.1SG wanted SBJ leave.1SG (tomorrow)  
 ‘I wanted to leave (tomorrow).’

(Alboiu, 2006: ex. 7, p. 11)



Therefore, Alboiu (2006) summarizes that non-obligatory control subjunctives are CPs while obligatory subjunctives are TPs. At this juncture, it is also reasonable to argue that the element *să* to be a T item (Alboiu, 2006).

As illustrated in (16), the embedded subject is realized as NOM in the obligatory control subjunctive clause.

(16)

<i>(Victor)</i>	<i>încearcă</i>	<i>(Victor)</i>	[ <i>să</i>	<i>cînte</i>	<i>(Victor)</i>
(Victor.NOM)	try.3SG	(Victor.NOM)	[SBJ	sing.3SG	(Victor. NOM)
<i>la trombon</i>	<i>(Victor)</i> ].				
at trombone	(Victor.NOM)]				

‘Victor is trying to play the trombone.’

(Alboiu, 2006: ex. 16, p. 17)

That there are multiple possible sites for uttering the subject *Victor* indicates a raising account (NOM is checked in the matrix T since the embedded T is not a saturated phrasal domain to assign Case) (Alboiu, 2006). The key point is that they all obligatorily bear NOM. Specifically, if we look at the last two possible positions that are inside the subjunctive clause, it is apparent that clause is not finite (since the main verb is Obligatory Control predicate) even when there is overt agreement (3<sup>rd</sup> person singular) on the embedded predicate *cînte* ‘sing’. It needs to be explained why NOM is checked here even when non-finiteness is present. Also, it demonstrates the significance to tease apart finiteness and agreement morphology, which often coincide with NOM.

(17)

[<sub>CP</sub> \*(*Pentru*) *a*      *avea* *tu*      *liniște*],      *plecă.* (RO)  
[<sub>CP</sub> \*( For)    INF      have 2.SG.NOM      quiet]      leave.PST.3SG  
“S/he left so that you can have peace of mind.”

(Alboiu, 2009: ex. 11a, p. 11)

As illustrated in (17), there is Tense mismatch between the adjunct and the matrix, indicating both domains have [iT]. Importantly, in the infinitive clause, the subject *tu* ‘you’ still bears NOM even when there lacks a phi-probe. Note that, it is ungrammatical if the complementizer *pentru* ‘for’ is absent, which reveals the significance for the CP status of the infinitive clause.

#### 4.2.3 Against Case as [uT] on D

The rebuttal is illustrated below. Alboiu (2020c) maintains that T(ense) is a phasal property, which is in accordance with Chomsky (2008). There have been earlier supportive claims in the literature that echo this argument, starting with Stowell (1982). Later, Landau (2004, as cited in Alboiu, 2020c) argues that non-anaphoric T is selected by C whilst anaphoric T is never selected by C. In this vein, Alboiu (2020c) considers temporal deixis as [iT]. Following Pesetsky and Torrego (2001, 2004), Case is construed as [uT] on D. Thus, the saturated domain (CP) licenses both [iT] and [uT]. Nonetheless, Pesetsky and Torrego’s account (2001, 2004) seems to be problematic because NOM occur in the absence of Tense.

In Hungarian, Kenesei (1986, as cited in Alboiu, 2020c) states that NOM appears in possessive constructions as in (18). As in (18a), the Person and Number features (2<sup>nd</sup> Person singular) of the NOM-marked DP *te* ‘you’ agree with the agreement suffix on the head noun. In

(18b), even though the agreement suffix can be either 3<sup>rd</sup> Person singular or 3<sup>rd</sup> Person plural, it still indicates the relevance to the NOM-marked DP *fiúk* ‘boys’ which is 3<sup>rd</sup> Person plural. It is crucial to realize that the NOM valuation in the Hungarian possessives is in no way involved with T. Instead, the NOM assignment suggests the presence of a [uphi] Probe. Moreover, I consider the possessives discussed in (19) as DPs, which are, according to Chomsky (2008), strong phases that are legitimate Case-assigning domains.

(18)

- a.     a       te               ház-ad  
        the    you.NOM       house-2SG  
        ‘your house’       (Kenesei 1986: 115)
- b.     a       fiú-k           kapu-ja  
        the    boy-PL-NOM   gate-3SG/PL  
        ‘the boys’ gate’   (Kenesei 1986: 112)

Alboiu (2009) also refutes Case as [uT] is unpractical by presenting data from Romanian gerunds. In (19), the NOM-marked embedded subject *tu* ‘you’ can optionally appear preverbally or postverbally. Regardless, the NOM in the gerund clause without Tense suggests the invalidity of Pesetsky and Torrego’s (2001, 2004) perspective. Alboiu (2009) argues that gerunds in Romanian are CPs, which provides solid support that NOM can occur without agreement but obligatorily within CP domains.

(19)

- [<sub>CP</sub> (*tu*)       *fiind*           (*tu*)       *gata*], *am*       *și pornit*.  
 [<sub>CP</sub> 2.SG.NOM *be*-GER       2.SG.NOM       *ready*] AUX.1PL   also started  
 “Once you were ready, we started on our way.”

(Alboiu, 2009: ex. 11c, p. 11)

In conclusion, the Hungarian and Romanian examples illustrate that NOM valuation happens without the presence of T. What is crucial is that the saturated phasal status (i.e., DP, CP) is a necessary condition for Case licensing (Alboiu, 2020c).

### **4.3 Against the Dependent Case Account**

The dependent Case account (Marantz, 1991) no doubt sheds light on the Case assignment in languages (e.g., Icelandic) when the agreement-based Case account (Chomsky, 2000 and beyond) is not adequately explanatory. Nonetheless, counterarguments of the configurational Case assignment have been shown in the literature. Among, Barany and Sheehan (2021) claim that the dependent Case account is insufficient, highlighting the essentiality of Cyclic Agree in capturing Case valuation in some languages exhibiting Global Case splits (discussed later).

A recap of the disjunctive Case hierarchy of the dependent Case account is as in (20).

(20) Lexically governed Case (Dative) > Dependent Case (Accusative and Ergative) >

Unmarked Case (Nominative and Absolutive) > Default Case

(Marantz, 1991)

What is crucial regarding the dependent Case assignment is the structural relationship of the two DPs in the same spell-out domain. Adopting Chomsky's (2008) notion of phases, we can interpret the legitimate domains mentioned in the dependent Case account to be CPs. Baker

(2015) offers a proposal as in (21), claiming that only DPs can be Case competitors.

Furthermore, Baker (2015) argues that true CPs (CPs introduced by a complementizer) should not participate in Case assignment. In essence, the argument is that only phrases with nominal properties can be Case competitors.

(21) Dependent Case by C-command (Baker, 2015: 48-49)

- a. If there are two distinct NPs in the same spell out domain such that NP1 c-commands NP2, then value the case feature of NP2 as accusative unless NP1 has already been marked for case.
- b. If there are two distinct NPs in the same spell out domain such that NP1 c-commands NP2, then value the case feature of NP1 as ergative unless NP2 has already been marked for case.

However, Bárány and Sheehan (2021) point out the CPs and PPs can also function as Case competitors in Romance causatives. The French data in (22) shows that *faire-infinitif* predicate requires the causee to bear DAT when *manger* ‘eat’ – the embedded predicate is transitive as in (22a); ACC when *partir* ‘leave’ – the embedded predicate is intransitive. Note that the Case marking is realized on the clitic in (22) but it can also be shown with the presence or absence of *à* preceding a full DP. Clearly, the DPs (clitics) are sensitive to the transitivity in terms of their Case valuation.

(22)

- a. *Elle lui / \*l'=a fait [ manger les épinards ]*  
3SG.F 3SG.DAT 3SG.ACC=has made eat.INF the.PL spinach.PL  
‘She made him/her eat the spinach.’
- b. *Il l' / \*lui=a fait [ partir ]*.  
3SG.M 3SG.ACC 3SG.DAT=has made leave.INF  
‘He made him/her leave.’

(Bárány & Sheehan, 2021: ex. 5, p. 5)

Kayne (1975), as cited in Bárány and Sheehan (2021), also noticed that finite CP can trigger dative causee as shown in (23).

(23)

French (Kayne 1975: 210)

*Elle a fait admettre à Jean [ qu'il avait tort ].*  
3SG.F has made admit.INF DAT Jean that=3SG.M had wrong  
'She made Jean admit that he was wrong.'

The CP clause *qu'il avait tort* 'that he was wrong' is the complement of the main predicate *admettre* 'admit'. The causee *à Jean* 'Jean' is marked DAT. It is important to see that 'Jean' is the subject of the complement clause because of the 3<sup>rd</sup> person masculine agreement marker on *qu'il* 'that'. This piece of data shows clear contradiction to the dependent Case account predicts. Bárány and Sheehan (2021) propose that the CP complement in this case appears to be Case competitor, triggering DAT on the causee.

One could argue that French CPs have nominal properties and thus be seen as DPs when Case assignment takes place. However, this view is refuted since the distribution of CPs and DPs does not overlap in French (Zaring, 1992, as cited in Bárány and Sheehan, 2021) as shown in (24). When the complement of a reflexive verb *s'habituer* 'to get used' is a DP, it must be introduced by the preposition *à* 'to'. When the complement is a CP, *ce* 'that' is obligatory since it explicitly nominalizes the CP. Hence, French CPs cannot be considered as DPs.

(24)

French (Zaring 1992: 72)

*Je m'habitue à \*(ce) qu'elle fasse la vaisselle à la main.*  
I 1SG=accustom to that=she does the dishes to the hand  
'I'm getting used to her doing the dishes by hand.'

The account favored by Bárány and Sheehan (2021) to account for data such as (23) is Cyclic Agree<sup>33</sup>. As Pineda and Sheehan (2020, as cited in Bárány and Sheehan, 2021) assert, Cyclic Agree takes place in Romance *faire-infinitif*. When the DP object of the complement is 1<sup>st</sup> or 2<sup>nd</sup> person, the causee cannot bear DAT or it triggers ungrammaticality as in (25) (Postal, 1989, as cited in Bárány and Sheehan, 2021).

(25)

French (Postal 1989: 2)

*Marcel l' / \*vous a fait épouser au médecin.*  
Marcel 3SG.ACC you.ACC has made marry.INF to.the doctor  
'Marcel had the doctor marry her / \*you.'

In (25), when the object of the embedded predicate *épouser* 'marry' is 2<sup>nd</sup> person *vous* 'you', the causee (clitic: *l'*) is marked ACC even though the embedded predicate is transitive. The rationale is that DAT only occurs as a side effect of secondary Agree. Based on the Cyclic Agree approach (Pineda & Sheehan, 2020), after VP-fronting, the causee and any complements enter the matrix predicate domain and are accessible to the higher Probe. When the object of the matrix predicate is not a DP (e.g., CP), it lacks phi-features and specifically lacks Person

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<sup>33</sup> A single Probe agrees with multiple goals (Bárány & Sheehan, 2021).

features, which has been argued to be the main ingredient needed for syntactic Case assignment (Alboiu, 2020). Thus, the Probe enters into a second round of Agree, giving rise to DAT. The person features triggering distinct Case marking in (25) also indicates Person hierarchy effects, which is discussed further shortly.

While the Romance *faire-infinitif* poses challenges for the dependent Case account, there are also emerging data which shows that the differential Cases cannot be reduced to the analysis of two DPs existing in the same phase. Exploring global Case splits, Bárány and Sheehan (2021) observe that in Kashmiri imperfective, the Case marking on the pronominal object exhibits a pattern that is closely related to the Person hierarchy (Wali & Koul, 1997), as in (26).

(26)

Person hierarchy in Kashmiri

1 > 2 > 3

Specifically, when the subject's Person feature is higher than the object's Person feature, the object DP bears NOM, otherwise DAT as stated in (27).

(27)

Global case split in Kashmiri

In the imperfective aspect, a pronominal direct object is DAT if its person is on the same level as or higher on (15a) than that of the subject.

(Wali & Koul, 1997, as cited in Bárány & Sheehan, 2021: ex. 15, p.12)

As demonstrated in the data (28), the boxed item is the direct object. (28a) shows the Person feature (1) of the subject 'I' is higher than the Person feature (2) of the object 'you', and



the object is realized in NOM marking. In (28b), when the Person feature (2) of the subject ‘you’ is higher than the Person feature (1) of the object ‘me’, the object appears in DAT.

(28)

Kashmiri (Wali & Koul 1997: 155)

a. 1st person SBJ, 2nd person OBJ → NOM OBJ

*bi* *chu-s-ath* tsi *parina:va:n*  
 I.NOM be.M.SG-1SG.SBJ-2SG.OBJ **you.NOM** teach.PTCP.PRS  
 ‘I am teaching you.’

b. 2nd person SBJ, 1st person OBJ → DAT OBJ

*tsi* *chu-kh* me *parina:va:n*  
 you.NOM be.M.SG-2SG.SBJ **I.DAT** teach.PTCP.PRS  
 ‘You are teaching me.’

As seen in (29a), when the subject ‘you’ has 2<sup>nd</sup> Person feature and the object ‘he’ has 3<sup>rd</sup> Person feature, the Case marking realized on the object is NOM; in (29b), when the subject ‘he’ has 3<sup>rd</sup> Person feature and the subject ‘you’ has 2<sup>nd</sup> Person feature, the Case marking surfaced on the object is DAT.

(29)

Kashmiri (Wali & Koul 1997: 156)

a. 2nd person SBJ, 3rd person OBJ → NOM OBJ

*tsi* *chi-h-an* su *parina:va:n*  
 you.NOM be-2SG.SBJ-3SG.OBJ **he.NOM** teach.PTCP.PRS  
 ‘You are teaching him.’

b. 3rd person SBJ, 2nd person OBJ → DAT OBJ

*su* *chu-y* tse *parina:va:n*  
 he.NOM be.M.SG-2SG.OBJ **you.DAT** teach.PTCP.PRS  
 ‘He is teaching you.’

When both the subject and the object share 3<sup>rd</sup> Person feature, the object bears DAT as in (30).

(30)

Kashmiri (Wali & Koul 1997: 156)  
3rd person SBJ, 3rd person OBJ → OBJ.DAT

*su vuch-i* *təmis*.  
he see-3SG **he.DAT**  
'He will see him.'

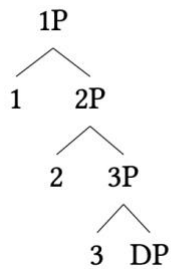
In order to investigate how the dependent Case account can explain global Case splits, Bárány and Sheehan (2021) bring forth two possible analyses. The first one is movement-based, suggesting that a DP moves into the relevant domain for the dependent Case to be applicable. Based on this approach, the above Kashmiri data can be analyzed as an object moving out of VP and entering a domain where the dependent Case is assignable. This type of movement is argued to be due to the local properties. Nonetheless, Bárány and Sheehan (2021) note that global Case splits cannot be derived by locally-triggered movement since the Case on the object depends on the Person feature of the subject. Thus, the trigger of the movement needs to incorporate properties of the two arguments (e.g., Person features of the subject and the object). For the object DP to be valued DAT, the object needs to be in the same domain as the subject. One movement scenario is that the subject is structurally higher than the object, the object raises to the subject's domain to get DAT whenever the subject's Person feature is higher than that of the object. The other movement scenario is that both the subject and the object originate in the lower domain. When the subject's Person feature is higher than that of the object, subject raises but still

remains in the same domain as the object in order for DAT to be checked on the object. It seems complicated to account for the global Case splits using the movement-based analysis.

The second analysis pertains to c-command, arguing that rules in (21) cannot account for global Case splits. McFadden (p.c., as cited in Barany & Sheehan, 2021) proposes that the Person feature projects a layer as shown in (31).

(31)

First person DP



Based on (31), Barany and Sheehan (2021) formulate a dependent Case rule in Kashmiri as in (32).

(32)

Dependent case rule for Kashmiri imperfective

If person feature *N* on DP<sub>1</sub> c-commands person feature *N* on DP<sub>2</sub>, assign DAT to DP<sub>2</sub>.

(Barany & Sheehan, 2021: ex. 28, p.21)

However, (32) fails to account for all cases regarding to global Case splits. In Wampis, when the subject is 1<sup>st</sup> Person plural as in (33c) or 2<sup>nd</sup> Person as in (33b), the object is marked

NOM; under other circumstances such as in (33a), the object is marked ACC. This specific example of global Case splits does not simply rely on the Person hierarchy. Thus, (32) is not explanatorily adequate for the Wampis fact.

(33)

Wampis (Peña 2015: 718)

a. **1SG SBJ, 3rd person object → ACC OBJ**

*iauãa=na* *mã-á-ma-ha-i*  
 jaguar=ACC kill-HIAF-REC.PST-1SG.SBJ-DECL  
 “I killed a jaguar.”

b. **2SG SBJ, 3rd person object → NOM OBJ**

*ami iauãa* *mã-á-ma-mi*  
 2SG jaguar kill-HIAF-REC.PST-2SG.SBJ-DECL  
 “You killed a jaguar.”

c. **1PL SBJ, 3rd person object → NOM OBJ**

*iauãa* *mã-á-ma-hi*  
 jaguar kill-HIAF-REC.PST-1PL.SBJ-DECL  
 “We killed a jaguar.”

Even though a stipulation such as (34) can manage to describe the Wampis patterns, Bárány and Sheehan (2021) state that (34) is not as general as (32) as the former focuses more on the features of two DPs instead of the structural relationships between the two.

(34)

Dependent Case rule for Wampis

Unless a 1PL or 2<sup>nd</sup> person DP<sub>1</sub> c-commands a 3<sup>rd</sup> person DP<sub>2</sub>, assign DP<sub>2</sub> ACC.

As mentioned earlier, a revised version of the agreement-based approach seems able to derive systems with global Case splits. Bárány and Sheehan (2021) assume that in the global Case splits, phi-valuation occurs before Case valuation. In other words, phi-valuation feeds Case assignment. In (28a), repeated as (35a), when the direct object is 2<sup>nd</sup> Person and the subject is 1<sup>st</sup> Person, *v* probes the object first and then the subject, rendering NOM on both arguments. In (28b), repeated as (35b), however, when the direct object is 1<sup>st</sup> Person and the subject is 2<sup>nd</sup> Person, *v* probes (only once) the object since the object's Person feature is a superset of the subject's. Therefore, in Kashmiri, *v* assigns DAT to the direct object DP unless it had agreed with more than one argument, in which case it assigns NOM.

(35)

Kashmiri (Wali & Koul 1997: 155)

a. **1st person SBJ, 2nd person OBJ → NOM OBJ**

*bɪ*    *chu-s-ath*                      tsi    *parina:va:n*  
 I.NOM be.M.SG-1SG.SBJ-2SG.OBJ **YOU.NOM** teach.PTCP.PRS  
 'I am teaching you.'

b. **2nd person SBJ, 1st person OBJ → DAT OBJ**

*tsi*    *chu-kh*                      me    *parina:va:n*  
 YOU.NOM be.M.SG-2SG.SBJ **I.DAT** teach.PTCP.PRS  
 'You are teaching me.'

Similarly, in Wampis, when the subject is 1<sup>st</sup> Person plural or 2<sup>nd</sup> Person, *v* probes the object first and then the subject; while the subject carries features that are not as previously states, *v* probes once and interacts with the closest DP – the object, checking ACC.

Crucially, the Kashmiri and Wampis examples exhibit agreement in phi-features on the verb, further supporting the Agree relations between *v* and the arguments. Even though the

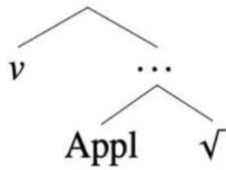
dependent Case account is able to account for the data, it overall presents a more complex analysis.

#### **4.3.1 Against the Mixed Model of Case Assignment**

Preminger (2020) offers a general reflection upon the dependent Case theory, specifically arguing that Baker's (2015) mixed model of Case assignment is in fact a vacuous theory. Before showing the evidence of this claim, Preminger (2020) highlights the distinction the taxonomies and ontologies of Case: the former denotes the labels of Cases (NOM, ACC, ERG, ABS, etc.) and the latter refers to the ways in which Cases may depend on the syntactic context. I think this is of great necessity in the discussion since the conflation between the taxonomies and ontologies of Case tends to lead to the overgeneralization such as the amalgamation of NOM with default Case; ACC with dependent Case; DAT with lexical Case. As the previously mentioned Wampis and Kashmiri data reveal, ACC is the dependent Case in Wampis and DAT is the dependent Case in Kashmiri. Labels changing when crosslinguistic data is examined, the key is to pay attention to the syntactic environment that it occurs in.

The overall reflection on the Marantzian (1991) approach is two-fold. First of all, Preminger (2020) proposes that the lexically-governed Case should be revised to be Case assigned under local c-command by a designated head. Essentially, based on the syntactic theory that verbs are considered as merging to a category-neutral root with a verbalizing head (Marantz, 1997, as cited in Preminger, 2020), as shown in (40), Preminger (2020) maintains that the difference between a quirky-subject predicate and a normal transitive predicate should be encoded on the functional heads rather than the root itself.

(40)



(Preminger, 2020: ex. 5b, p. 5)

Secondly, in order to demonstrate the mixed model of Case valuation is vacuous, Preminger (2020) compares three models altogether as in (41) to examine data (42) and (43).

(41)

- a. m1:= Case-assignment under  $\phi$ -agreement (Chomsky, 2000, 2001)
- b. m2:= Configurational Case-assignment (cf. Marantz, 1991, with the revision discussed above)
- c. m3:= m2 + m1 (cf. Baker, 2015)

(Preminger, 2020: ex. 14, p. 8-9)

In (42a), it can be observed that NOM forms of subject DP in English seem to be related to subject phi-agreement on the verb. In (42b), when the embedded subject is realized as in ACC, the agreement on the embedded verb is no longer present.

(42)

- a. She/\*her arrive\*(s) on time.
- b. It is impossible for her/\*she to arrive(\*s) on time.

(Preminger, 2020: ex. 15, p. 10)

In (43b), compared to (43a), it shows the prescriptive rule that if one of the conjuncts is 1st person pronoun, it must occur last.

(43)

a. Me and Kim are coming over.

b. \*! I and Kim are coming over.

(Preminger, 2020: ex. 16, p. 10)

Preminger (2020) analyzes the data using the following “recipe”: Assuming NOM is assigned by finite T under c-command,  $T^0$  enters the derivation without valued phi-features. If coordination counts as a target regarding the closest c-command, minimality will prevent  $T^0$  from establishing a relation with goals farther away, within the target. Thus, the recipe derives the contrast between Cases like (42a) and (16a). In conclusion, both the dependent Case account (m2) and the mixed model account (m3) have similar descriptive power, but m2 is better in simplicity than m3. Furthermore, Preminger (2020) argues that m2 has better explanatory adequacy than m3. In (44), the behaviour of pronouns in the subject position of the subjunctives is identical to that of regular finite clauses. By attributing that there is no over phi-agreement in the subjunctive clause in (44a), Preminger (2020) argues that m2 constitutes a very straightforward assumption for learners to adopt. Though the learners still need to figure out subjunctive  $T^0$  does not trigger agreement while finite T0 does. In this vein, NOM in English is Head Case assigned by finite  $T^0$ . ACC is an instance of Unmarked Case since it arises only when there are no other structural conditions available to assign other syntactic Case in the same spell-out domain.



(44)

a. I demanded that he/\*him be on time.

b. She demanded that [me and Kim]/\*[I and Kim] be on time.

(Preminger, 2020: ex. 18, p. 11)

However, Preminger's (2020) data analysis of (44) is problematic since the subjunctive clause in (44a) and (44b) are in fact both finite clauses. Even though in (44a), the subjunctive clause does not show any overt phi-agreement on the embedded predicate, the complementizer *that* shows clear evidence that this is a structured CP domain. Thus, the analysis could have been enhanced should Preminger acknowledge the size of domain, with or without morphological realization of agreement.

Lastly, Preminger (2020) also posits that m1 is a proper subset of m2 regarding expressive power since m2 have at least equal expressive power to m1 but not vice versa. Data such as Icelandic provides great challenge to an agreement-based Case theory. As (45) demonstrates, NOM on *Ólafur* 'Olaf' cannot be recouped under an account that a transitive functional head *v* assigns ACC. On the contrary, the dependent-based account fares better since the NOM marking on *Ólafur* 'Olaf' is accounted for. The embedded subject *henna* 'her' is supposed to have ACC marking due to ECM, but it is overridden by the DAT due to the embedded predicate *þótt* 'thought'. Thus, the unmarked Case NOM is checked on *Ólafur* 'Olaf' for it is the only DP left in this domain.

(45)

Ég tel **henna** hafa alltaf þótt **ólafur** leiðinlegur.  
I believe her-DAT to-have always thought Olaf-NOM boring-NOM  
'I believe her to have always thought of Olaf as boring.'

(Marantz, 1991: ex. 16, p. 19)

#### 4.4 Summary

In this chapter, theoretical and empirical counterevidence of the agreement-based Case account (Chomsky, 2000 and beyond) and the dependent Case account (Marantz, 1991) are presented. Regarding challenges to the agreement-based Case account, evidence shows that phi-completeness are neither a necessary nor a sufficient condition for syntactic Case valuation (Alboiu, 2006, 2009, 2020c; McFadden & Sundaresan, 2011). In addition to this, Case as [uT] on D is rebutted as well given that structural Case is proved to be possible even when Tense is not present in the clause (Alboiu, 2009, 2020c). In terms of the limitation of the dependent Case account, Bány and Sheehan (2021) offers data analysis of global Case splits, arguing that a Cyclic Agree account is much desirable to account for the observed Case patterns. Lastly, with a review on the dependent Case account in general, Preminger (2020) presents the claim that the mixed model of Case assignment (Baker, 2015) is a vacuous theory, which lacks simplicity in comparison with the dependent Case account. Concluding that data in languages like Icelandic can be easily accounted for by the Marantzian account but not the Chomskian perspective, Preminger (2020) advocates for the dependent Case account for its superior descriptive adequacy.

## Chapter 5

### Conclusion

In this chapter, I summarize the findings of this MRP, while also highlighting some unanswered questions. In chapter 2, the agreement-based approach of Case assignment emerges from Government and Binding (Chomsky, 1980), when it is initially treated as a requirement for nominal argument licensing at the PF level (Chomsky & Lasnik, 1977; Vergnaud, 1977). This approach later is reinterpreted as a result of a functional head that bears the uninterpretable features (i.e., [ $\text{u}\phi$ ]) probing for a Goal bearing the relevant features (i.e., [ $\text{i}\phi$ ,  $\text{uCase}$ ]) (Chomsky, 2000) in the Minimalist Program. Pesetsky and Torrego's (2001, 2004) proposal further elaborate on the Agree approach and argues that Case as [ $\text{uT}$ ] on D. The Agree relation being the core of Case assignment, the agreement-based theoretical account successfully predicts some Case phenomenon but not all. As discussed in chapter 4, Case (including NOM) may occur in the absence of  $\phi$ -features and  $\phi$ -features does not guarantee Case. In various crosslinguistic data, especially in non-English data, syntactic Case and agreement morphology are not essentially concurrent. Specific arguments include Alboiu's (2020c) examples of structural Case in non-finite contexts in languages such as Romanian and old Italian. Furthermore, McFadden and Sundaresan (2011) also provide their skepticism of the validity of Case as the result of Agree by offering data such as in Tamil. Even when  $\phi$ -features are present, Case is not guaranteed. Alboiu (2006) argues that it is the size of the domain that determines whether Case can be properly assigned or not. Lastly, to refute Pesetsky and Torrego's (2001, 2004) claim that Case is construed as [ $\text{uT}$ ] on D, Alboiu (2020c) utilizes empirical evidence involving Hungarian possessives and Romanian gerunds to show that Case is possible with the absence of T.

Similarly, the dependent Case theory (Marantz, 1991) introduced in chapter 3 has its own merits and downfalls. Following the Case tier theory (Yip, Maling & Jackendoff, 1987), Marantz (1991) maintains that Case is assigned by following a set of rules. First, lexically governed Case (quirky Case) is assigned by any particular lexical item. Second, for pairs of remaining DPs in the same spell-out domain, dependent Case is assigned to the lower DP in NOM-ACC system or the higher DP in the ERG-ABS system. Third, unmarked Case is checked upon any remaining nominal phrases that have not received Cases. Fourth, default Case is assigned to any free-standing DPs. Case theory of this sort accounts for the Case phenomena in Icelandic where the agreement-based Case account fails to do so. Moreover, a mixed model regarding Case assignment is put forth (Baker, 2015; Baker & Vinokurova, 2010), suggesting that the agreement-based Case account and dependent Case account can coexist in the Universal Grammar of a single language. Baker (2015) and Baker & Vinokurova (2010) strengthen their claim by accounting for the Sakha data, in which ACC and DAT are argued to be assigned via the dependent Case account whilst NOM and GEN are posited to be assigned via the agreement-based Case approach. In chapter 4, Bárány and Sheehan (2021) claim that the dependent Case account is insufficient in that it fails to account for the Global Case splits in languages such as Kashmiri and Wampis. In order to argue against Baker's (2015) mixed model of Case assignment, Preminger (2020) criticize it as a vacuous theory, advocating that the agreement-based Case account is a proper subset of the dependent Case approach.

The crosslinguistic data presented in this MRP clearly illustrates that neither the agreement-based Case account nor the dependent Case approach is impeccable. Though they might be complementary in explaining Case phenomenon in one language or another, it appears to that both accounts are scrutinized as being insufficient to cover the Case issues

crosslinguistically. With substantial counterevidence presented, it is still not entirely sure if Case assignment can be reduced to either one of the theoretical accounts. What is more significant, to me, is not to find the winner between the two accounts but to find a betterment for each approach. It seems that whether it is agreement-based or dependent Case approach, the saturated phasal status is what matters to Case valuation, which, in my opinion, should be stressed in the further research of the topic. Since most non-Anglocentric data exhibit counterevidence of the agreement-based Case theory, it is worthwhile to explore if they also always demonstrate a CP domain whenever a structural Case is assigned. To face the scrutinization of dependent Case theory, it would also be intriguing to examine whether a saturated domain exists when Global Case splits occur.

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