Chapter 3: C-command factors in case assignment

We saw in the last chapter that case values can be assigned by configurational rules of dependent case assignment, which depend on an NP’s position relative to other NPs in a syntactic constituent, as well an alternative to case assigned by agreement with a functional category. This configurational sort of case seems to be no small part of morphological case assignment. I have reasoned that all languages that have structural ergative case use this mode of case assignment, including ergative languages proper and tripartite languages. I have reported that most languages with overt accusative case that I have worked on also seem to be of this type, in that they either do not have object agreement or object agreement does not correlate with accusative case very well. We have also discovered that agreement on some functional heads (those that are sensitive to a particular case) depends on that NP already having a particular case, through a rule of dependent case assignment or a rule of default case assignment.

Now, while agreement-assigned case is arguably well enough understood already, given the extensive literature on Agree and its properties, the notion of dependent case is less familiar. It stands in need of further discussion and development to know what contribution it can make to understanding the case properties of the languages of the world. In particular, some conceptual analysis is in order in order to decide what is the likely range of parametric variation on the dependent case marking side. Ideally, this should be rich enough to be descriptively adequate, and restricted enough to be explanatory accurate. Developing the rules of configurational case assignment, then, is the task of the next three chapters.

In its most abstract terms, we can take the general form of a dependent case rule to be as in (1):

(1) If XP bears c-command relationship Y to ZP in local domain WP, then assign case V to XP.

Anything that fits into this schema can legitimately be considered a type of dependent case assignment, whereas anything that does not fit this schema is really a different kind of theoretical notion. What then needs clarification in this schema, and what can naturally be open to variation within it? There are three primary ingredients to consider: the categorical identities of XP and ZP, the details of the specific c-command relationship Y, and the locality domain WP. I believe that there are interesting possibilities for variation in all three, along with some subdistinctions to be made. Therefore, I consider each ingredient in turn, over the next three chapters, beginning in this chapter with c-command relationship Y.

3.1 Positive c-command conditions

What c-command relationship is used in (1) is perhaps the most obvious thing that can vary in this schema. The two obvious choices are “X c-commands Y” and its converse “X is c-commanded by Y.” In chapter 2 I already proposed that this is the difference between ergative case and accusative case, making explicit what Marantz 1991 meant by “dependent case assigned upward” and “dependent case assigned downward. These can be put in the format of (1) as follows (taking the domain tentatively to be TP, pending discussion in chapter 4, and other variables still to be filled in).

(2) a. If XP c-commands ZP in local domain WP (=TP), then assign ergative case to XP.
b. If XP is c-commanded by ZP in local domain WP (=TP), then assign ergative case to XP.

This aspect of variation has been part of the identity of dependent case assignment from the beginning, intended to capture certain similarities and parallels between accusative languages and ergative languages. We have already seen that individual languages can choose to included only (2a) (ergative languages, see also chapter 7), or only (2b) (accusative languages, chapter 6), or both (tripartite
languages, chapter 8), or neither (neutral languages). This has been discussed in chapter 2 in a preliminary way.

3.1.1 When c-command does not hold: NP in PP

We can ask, however, what is the evidence for assuming that (2) should be stated in terms of c-command per se, as opposed to some other prominence relationship—perhaps a nonstructural one like the thematic hierarchy, or the obliqueness hierarchy. Of course, this does not need much argument for a minimalist audience, since c-command is the syntactic relationship of choice; there is the assumption that c-command underlies all the more specific syntactic relations, possibly for fundamental derivational reasons (e.g. Epstein xxx; maybe Safir). Nor can we expect to find many difference between c-command and a notion like thematic prominence, since these notions of prominence are closely related, in general. But if we can find some evidence in favor of c-command as opposed to the alternatives, so much the better.

Normally when two NP arguments are in the same clausal domain, one of them will c-command the other. This may be largely guaranteed by Kayne’s (1994) linear correspondence axiom, which maps asymmetrical c-command onto linear order, and/or by fundamental laws of how predicates take arguments (cf. Hale and Keyser 1983). However, there is one fairly standard exception to consider. An argument might be a PP rather than an NP. The PP typically contains an NP, of course. But if the PP is the higher of the two arguments, then neither the NP contained in PP nor the other NP argument will c-command the other. If the P is overt, it is likely to be a phase head and to determine the case on its NP complement itself. But Ps can be transparent for purposes of dependent case assignment (see B&V 2010:xx on three transparent Ps in Sakha; include data here?). P heads can also be phonologically null, as Baker (2012a, 2012b) argues for Amharic (with many precedents in other languages). And perhaps Ps that are phonologically null are particularly likely to be nonphases. If so, then we can expect to see c-command effects in this domain. So we could look for structural contrasts like the following.

(3)  
   a. [ NP1 [ NP2 V ]]       Ordinary transitive  
   b. [ [PØ NP1] [NP2 V]]    Marked structure

In the normal transitive structure in (3a), NP1 c-commands NP2, and we expect to see ergative on NP1 and/or accusative on NP2. But in the special dyadic structure in (3b), neither NP c-commands the other. Hence, dependent case assignment should not happen, and (all things being equal) both NPs should have the default case nominative/absolutive.

Amharic is an accusative language that confirms this prediction, following the analysis of Baker (2012a, 2012b). To see this, consider first ditransitive constructions in this language. Amharic has (at least) two kinds of ditransitives: verbs like ‘give’ or ‘tell’ that select an agent, a theme, and a goal, and

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1 This is particularly true if one abstracts away from clause internal movement. NP movement for EPP type reasons can affect case assignment in languages like Amharic and Shipibo, as we shall see. (See also Tukang Besi, below.) On the other hand, scrambling does not affect case. It is common for (at least) head final languages with morphological case marking to allow some scrambling, for example, scrambling of the object past the subject to give OSV word order. This sort of scrambling may change the c-command relationships, but it typically does not affect case marking: the object is still accusative or absolutive, and the subject still ergative or nominative. (If anything, case may be more necessary in noncanonical word orders, so as to identify the grammatical functions despite the word order.) There are various ways to handle this: saying that case assignment happens prior to scrambling (maybe because scrambling is at PF), saying that scrambling is A-bar movement and only A positions are considered by the case rules, etc. However, domains probably play an important role in all this, so I defer further discussion until chapter 4. [I should have a good definitive answer to this somewhere.]
verbs like ‘rob’ that select an agent, a theme, and a source. In simple active clauses, the two types can look very similar, as shown in (4).

(4) a. Lamma Almaz-in tarik-u-n naggat-at. (*nagg-aw)
   Lemma.M Almaz.F-ACC story-DEF-ACC tell-(3mS)-3fO
   ‘Lemma told Almaz the story.’

   b. Lamma Aster-in gonzab-u-n sarrak-at. (*sarrak-aw)
   Lemma.M Aster.F-ACC money-DEF-ACC rob-(3mS)-3fO
   ‘Lemma robbed Aster of the money.’

In particular, the agent-subject has unmarked nominative case, is normally clause initial, and triggers subject agreement on the verb, whereas both the theme and the goal or source are accusative, bearing the suffix by-n (if they are definite, with a D head). So the agent is the highest argument, as expected. There is also evidence that the theme is the lowest argument, lower than the goal or source. The strongest support for this is that the verb shows object agreement with the goal or source, not with the theme in these structures (this is true even if one controls for animacy). For example, the verbs in (4) show feminine object agreement –at with Almaz/Aster, and cannot show masculine object agreement (-w) with ‘story’ or ‘money’. In addition, the natural word order is goal-theme-verb or source-theme-verb; example (5), for instance is quite degraded, whereas goal-theme-verb order is fine.

(5) ??Lamma mas’fah-u-n Aster-in assay-at.
   ‘Lemma showed Aster the book.’

There is also evidence from bound variable anaphora that is consistent with this. In (6) the quantified NP is only understood as the goal, not the theme, and, to the extent that the example is felicitous, it is possible to interpret the pronoun inside the second object as a variable bound by the first object.

(6) (?)Aster hullu-n saw abbat-u-n assayy-at.f.
   Aster.F all-ACC person father-3mp-ACC show-3fS
   ‘Aster showed everyone his own father.’

This supports saying that the goal A-binds the theme, and its location before the theme is not due to scrambling, which does not seem to feed bound variable anaphora in Amharic (see Baker 2012b:xx for a fuller paradigm on this matter).

But despite these similarities, goal DOCs and source DOCs look different when the verb is a passive form, as shown in (7).

(7) a. Almaz tarik-u-(*n) ta-nagr-ow-at nabbbar.
   Almaz.F story-DEF-(*ACC) PASS-tell-3mS.GER-3fO AUX
   ‘Almaz was told the story.’

   b. Aster jant’a-wa-n ta-sarrak-at.e.
   Aster.F suitcase-3fP-ACC PASS-rob-3fS

2 The goal argument in Amharic could also be dative rather than accusative; I put that option aside here for simplicity.
‘Aster was robbed of her suitcase.’

The crucial difference is seen most clearly in the verb agreement. The source argument in (7b) becomes the subject in a passive, and triggers subject agreement on the verb. The goal argument in (7a), however, does not become the subject of the clause: it triggers object agreement, not subject agreement, and subject agreement in (7a) is default third person masculine. (The fact that there is an auxiliary verb in (7a) but not in (7b) is not crucial to this; the two examples happen to be in different past tenses.) Why is there this difference in agreement (obviously) and in grammatical function (apparently)? My answer in Baker 2012a,b was that the goal argument is embedded in a PP with a null P head, whereas the source argument is a simple NP. The null headed PP prevents the goal argument from satisfying the EPP property of T (cf. Landau 20xx), and hence from agreeing with T. In contrast, the source argument can perfectly well satisfy the EPP of T, and hence T can agree with it. (Enough, or add further evidence and detail from Baker 2012b?) So we have evidence from agreement that the structure of (7b) is (3a), and the structure of (7a) is (3b).

Given this, observe then that there is also a difference between (7a) and (7b) in terms of structural case. The theme argument of a source passive in (7b) must be accusative, whereas the theme argument of a goal passive in (7a) cannot be. This is just what we expect given that the rule of dependent case assignment is stated in terms of c-command. The unembedded source argument c-commands the theme argument and triggers accusative case on it, whereas the goal NP is embedded in PP, so it does not c-command the theme argument. Indeed, neither argument here c-commands the other, and the result is clauses with two bare nominative NPs in Amharic. Even though the P is only a slight one, it is enough to stop the higher thematic role from becoming the subject, and it is also enough to prevent it from triggering accusative on the theme. In contrast, a simple alternative stated in terms of a nonstructural thematic hierarchy fails here: the goal argument (like the source argument) is higher on the thematic hierarchy than the theme argument, as shown by data like (6), but this does not trigger accusative on the theme argument. This then is evidence that dependent case marking should be stated in terms of c-command—and not in terms of thematic hierarchy, etc.

Just like the passive of a triadic verb with a goal argument are certain dyadic constructions with a possessor or experiencer argument and a theme. In these structures too the thematically higher argument cannot become the subject or trigger subject agreement; nor does it trigger accusative on the theme.

(8)  

a. Almaz(-ɨn) zamad mot-at.  
Almaz.F-(ACC) relative die-(3mS)-3fO  
(*mot-ə[tʃ])  
die-3fS  
‘Almaz had a relative die on her.’

3 Note that P apparently blocks c-command more strictly for dependent case marking than it does for bound variable anaphora or binding reflexives in English, since the object of a “little” P can sometimes bind lower NPs outside of the PP. But this is not unexpected, and some have questioned whether c-command really is a condition on bound variable anaphora (see Higginbotham, Safir).

4 The affectee can bind a pronoun in the theme, showing that it is the higher argument (and again that BVA is not blocked by the null pronoun; see note (3)).

(i) Hullu saw liďš-u t’aff-a-w.  
all person child-3mP lose-3mS-3mO  
‘Everybody lost his own child.’
b. Lamma sejt lidʒ-u t’affa-aw.
   Lemma.M female child-DEF lose-(3mS)-3mO
   ‘Lemma lost his daughter.’

c. Sost lidʒ-o’tʃʃ all-a-ɯnŋ.
   three child-PL exist-3mS-1sO exist-3ps-1pO
   ‘I have three children.’

The syntactic structure is essentially the same, but these are intrinsically dyadic unaccusatives with a goal and theme argument, rather than triadic verbs where the agent has been suppressed by passivization. Examples like (8) cannot be compared directly with corresponding active transitive examples, but they are still valuable for comparative purposes, because other languages may have unaccusative structures comparable to these, even if they do not have a syntactic passive.

Some of these goal-theme structures in Amharic can appear in other forms too. For example, they can exist in a version in which the theme argument triggers subject agreement explicitly on the verb (as opposed to the verb having default agreement), and accusative case shows up on the affectee. This possibility is seen in (9), to be compared with (8b).

(9) Lamma-n sejt lidʒ-u t’affa-tʃtʃ-aw.
   Lemma.M-ACC female child-3mP lose-3fS-3mO
   ‘Lemma lost his daughter.’

In (9), I claim that the subject agreement shows that the theme has moved to SpecTP, so T can agree with it, without the affectee argument ‘Lemma’ intervening. (The word order, with ‘Lemma’ initial, then comes from this NP being topicalized. This topicalization is not obligatorily, perhaps, but it is common/normal in this sort of sentence.) Note also that the affectee argument ‘Lemma’ has accusative case in this version. This is what we might expect, because once the theme argument moves higher, to SpecTP, it c-commands the goal argument. This tells us a couple of things. First, we see that null P is intrinsically transparent for dependent case assignment; it is not a phase head, that hides its NP complement from the rest of the derivation. Second, the geometry of the clause implies that P does not block c-command in the configuration NP ... P-NP ... V, where the PP is the lower of the two arguments, although it does block c-command in the configuration P-NP ... NP ... V, where the PP is the higher of the two arguments. Therefore, c-command has just the right properties to account for this paradigm. Third, we see that (A-)movement can change c-command relationships and hence dependent case assignment. In contrast, something like the thematic hierarchy does not work here, since the thematically lower theme argument triggers accusative on the thematically higher experiencer argument in this version.\footnote{Also possible, but less instructive, is the theme triggering subject agreement on the verb, but the goal remaining bare-nominative. Following Preminger’s analysis of Hebrew, I assume that the theme undergoes a short movement, so it is equidistant to the goal, so accessible to T, but not higher than it, to trigger accusative on it. [Dependent case needs asymmetrical c-command? Cf. Montalbetti’s suggestion re identificational copular sentences.] I don’t think I have accusative affectee with default Agr on T. Am I confident enough of this to boast?}

The crucial structures are summarized in (10).
With these results in hand, consider next the possibility of this kind of \([P-NP \ldots NP \ldots V]\) structure in an ergative language. Given the symmetry between ergative and accusative built into the dependent case theory, we expect to observe a similar effect. In an ergative language, if neither NP c-commands the other because of the presence of a (possibly null) PP shell, then ergative case assignment will not apply to the higher argument. The result should be a double absolutive structure, somewhat the double nominative structures observed in Amharic. And such things are observed in some ergative languages. One is Burushaski. Burushaski normally has ergative patterns, as seen chapter 2:xx. But Burushaski also has approximately 12 verbs that take two absolutive arguments; these are nonagentive verbs, including ‘need’, ‘find’, ‘obtain’, ‘hear’, (pp. 43-44) and ‘perceive’ (p. 54n81).

(11) a. Dasín redyó du-mó-yal-umo (p. 5)
   Girl.ABS radio.x/ABS d-3sf-hear-3sf/PAST
   ‘The girl heard the radio.’ [d- is often anticausative]

   b. jé káman peesá d-á-can-abaa.
      1s/ABS some money.x/ABS d-1s-need-1s/PRES
      ‘I need some money.’

The lexical semantics of these predicates is in the same ballpark as those in Amharic: they have experiencer or possessor arguments as well as theme arguments, no agent argument. So it is reasonable to think that they also have a null P introducing the experiencer argument, and this prevents either NP from c-commanding the other.\(^6\) The result is two absolutive arguments, as expected.

\(^6\) Note that these verbs show subject agreement as well as object agreement with the experiencer/possessor. This shows us (i) that Kinyalolo’s Generalization doesn’t hold in Burushaski, whereas it does in Amharic (Baker 2012:xx), and (ii) the theme doesn’t move past the experiencer in this language – and hence there is no possibility of it becoming ergative. Does this indicate that the experiencer is not in PP in Burushaski, the way it is in Amharic? Not necessarily: the difference in agreement could be that Burushaski T does not have an EPP property, or that its EPP is not linked to agreement (that PP can move to SpecTP in Burushaski). [But make sure I am consistent on this: I did suggest using a PP shell to explain why one can have object agreement but not subject agreement with dative NPs in Burushaski.]

Shipibo is another ergative language that has a limited number of nonagentive verbs that take two absolutive arguments. But in Shipibo there is an interaction with applicative constructions that points to a different reason why ergative is not assigned, in one in terms domains; see Baker 2012 and chapter 4 for discussion. The Shipibo analysis could work for Burushaski too, potentially making the positing of a null headed PP redundant and unnecessary in this case (although not in Amharic).
It is worth noting that Amharic has double nominative constructions but no dyadic accusative constructions. Conversely, Burushaski has double absolutive constructions but no double ergative constructions. If we simply say—as descriptive grammars often do—that a language can have a few verbs that have anomalous case frames, as a pure lexical property, then we do not necessarily explain this asymmetry. However, if we say that certain arguments of a particular kind can be PPs rather than NPs, then we do explain this. It is easy to see how a PP node can lead to neither argument c-commanding the other, so no dependent case is assigned but only unmarked case. However, one cannot have an extra bit of structure that will cause both arguments to c-command each other. This sort of c-command involved in the realization of argument structure is intrinsically antisymmetric, hence one cannot have the same dependent case assigned to both arguments of a two-argument clause.\textsuperscript{7} This is another subtle advantage of developing dependent case assignment in terms of c-command, as opposed to listing case frames in lexical entries.

I should emphasize that there is no requirement that a language have the sort of structures discussed in this section. Speaking impressionistically, it seems that at least as many do not as do. I do not know of double nominative structures in Sakha, for example, or of double absolutive structures in Ingush. But this is not necessarily surprising. There are two possible reasons. First, a language might have \{P+NP [NP V]\} structures, but the case shows up differently because the null P assigns case to its NP complement, perhaps dative. If so, then the structure will result in a Dative-nominative/absolutive-V pattern rather than in a nominative-nominative-V pattern. In that sort of language, we cannot be sure whether the theme is nominative because the higher argument doesn’t c-command it, or if it is nominative because the higher argument has quirky dative case and NPs with that sort of case don’t count as tiggers of dependent case (see Marantz 1991:xx; chapter 5). [Find a likely actual example: maybe Ingush? It depends on whether dative case is structural in the language or not....] So the dative-nominative surface realization is consistent with doing dependent case in terms of c-command, but it does not provide unambiguous support for it.

The other possibility is that a language might simply lack \{P+NP [NP V]\} structures entirely. It seems that only experiencer-possessor-goal arguments can be PPs, not agents for example. And it seems that even this class of arguments does not have to be a PP. Baker 2012 points out that this seems to vary from language to language, and even in the same language: I don’t know why a goal should be in PP in Amharic but not a source should not be, nor why a goal should be in a PP in Amharic but not in Bantu languages.\textsuperscript{8} And we know from IE languages that it seems to be partially idiosyncratic which

\textsuperscript{7} The one structure in which one might have two NPs symmetrically c-commanding each other is in an identificational copular construction, in which the two NPs are (maybe) merged together without a projection of a verb structuring them (Montalbeti, p.c.). In such structures too, one gets no dependent case, rather than double dependent case. Perhaps this means that we should stipulate asymmetric c-command in the rules of dependent case assignment.

The interaction of case assignment and movement needs to be considered too. It is conceivable that NP1 could c-command NP2 prior to movement, and NP2 could c-command NP1 after movement, resulting in dependent case on both. But such structures will be rare or impossible, since normally it will be NP1 that moves higher, not NP2, by relativized minimality/shortest move (particularly for A-movement). [I need a general statement on the relationship of movement to case assignment somewhere, after the relevant cases have been collected.]

\textsuperscript{8} Or, more precisely perhaps, why a goal NP can move out of a null headed PP on its way to SpecTP in Bantu languages but not in Amharic (Baker 2012b:xx). Compare the fact that some language allow preposition stranding of overt Ps and others do not, for unclear reasons.

Another way of expressing the point made in the text is that the Uniformity of Theta-role Assignment Hypothesis (Baker 1988, 1997) may governs where this sort of argument is relative to other arguments in syntactic gross structure, but not whether it is expressed as an NP or a PP.
experiencer like constructions have oblique subjects and which do not: ‘Mary likes John’ does, but ‘Mary loves John’ does not, for example, in Icelandic and other languages. Given this, we do not expect all languages to have exactly the same nominative-nominative predicates or absolutive-absolutive predicates, although we do expect many of them to be in the same vicinity. And, as a limiting case, we do not necessarily expect all languages have any such predicates, just as there are languages with no dative subject constructions at all. The upshot is that we can conclude something about case marking from predicates like these when they are present in a language, but we probably cannot conclude too much from it when they are absent.

3.1.2 When c-command doesn’t hold: containment and chains

The tripartite language Nez Perce has a kind of nominative-nominative structure, where the conditioning factor seems to be quite different from the experiencer-possessor constructions we have seen so far. Nevertheless, I claim that a promising analysis also involves a failure of c-command, albeit for a different reason.

(12a) shows a typical transitive clause in Nez Perce, where the subject is ergative and the object accusative. However, both Rude (19xx) and Deal (2010) point out that clauses in which the understood possessor of the object is identified with the subject higher in the clause have special case marking properties in this language. This sort of configuration inhibits the assignment of both ergative and accusative case. (12b) is a sentence that is minimally different from (12a), in which the object is understood as being possessed by the subject, and here the subject is not ergative and the object is not accusative accusative. Rather, both are in the unmarked nominative/absolutive case otherwise used for intransitive subjects.

(12) a. Pit’ín-im páá-’ýáaX-na picpic-ne.  Deal p. 75
   Girl-ERG 3/3-find-PERF  cat-ACC
   The girl found the cat.

   b. Pit’ín hi-’ýáaX-na picpic.  Deal p. 75
   Girl 3S-find-PERF cat
   The girl found her cat.

Why is there no ergative or accusative in examples like (12b)? Both facts would follow immediately if we said that ‘girl’ does not c-command ‘cat’ in this example, although it does so in (7a). If there is no c-command relationship, then there is no dependent case assignment. But achieving this desirable result involves tinkering with the details of the definition of c-command some.

The simplest informal notion of c-command is given in (13).  [introduce this earlier?]

(13) X c-commands Y if the first category that properly contains X also contains Y.

However, it is quite standard to exclude from c-command the case in which the potentially c-commanding NP actually contains the potentially c-commanded NP; see for example, Chomsky 1981:166, Epstein xxx:xx, etc. This gives us instead:

(14) X c-commands Y if the first category that properly contains X also contains Y, and X does not contain Y.
This extra qualification is introduced to prevent certain embarrassments in the binding theory, like having an anaphor inside an NP bound by the NP as a whole—something that seems to be impossible (*The artist M.C. Escher was the first to draw a picture of itself). So a containment relation obviates a c-command relation which might otherwise have held. Now suppose we make this exemption symmetrical, in a sense, by also excluding from c-command a situation in which the potentially c-commanded NP contains the potential c-commander. This would give us the statement in (15).

(15) \[ X \text{ c-commands } Y \text{ if and only if the first category properly containing } X \text{ also contains } Y, \text{ and } X \text{ does not contain } Y \text{ and } Y \text{ does not (properly) contain } X. \]

Now one might well ask how this new qualification could make any difference. Could a node that is contained in another node also ever be immediately contained in a category that properly contains that other node, such that it is worth adding this qualification? The answer is no, if we restrict consideration to simple structures formed only by external merge. But in structures derived by movement (=internal merge), this situation arguably arise. Movement creates multiple copies of the moved item (Chomsky 1993, etc.). These copies are understood as being, in a rather strong sense, instances of the same linguistic entity. Now a potentially c-commanded phrase \( Y \) could very well contain a copy (second instance) of a potentially c-commanding phrase \( X \). This will happen whenever \( X \) moves out of \( Y \) to a higher position. Our interest here is in the special case in which \( X \) and \( Y \) are both noun phrases, hence both natural targets for structural case assignment. Instances in which an NP raises out of another NP are instances of so-called possessor raising constructions (broadly construed). Indeed, this is arguably what we have in (12b), given that the first NP does not form a constituent with the second NP on the surface but is necessarily interpreted as the possessor of the second. We can say that this example has the schematic structure in (16).

(16) \([\text{TP} [\text{NP1 girl}] \ldots [\text{VP} [\text{NP2 [NP1 girl] cat}] \text{ find } ]]\)

(Note that this form of possessor raising seems to involve raising to a theta position, SpecvP, prior to raising to SpecTP, given that ‘girl’ is interpreted as the agent of finding as well as the possessor of the object. But that isn’t necessarily crucial to the logic explored here; see section xx below for a more standard kind of possessor raising in Choctaw and Oromo.)

Now in a structure like (16), NP1 c-commands NP2 according to standard definitions in (13) and (14), but not according to the revised definition in (15). NP1 does not contain NP2, and the first phrase that contains NP1 (TP or equivalent) does contain NP2. However, NP2 contain a copy of NP1, and that sours the deal.\(^9\) Given this, the usual c-command conditions on case assignment in (2) take over to give the desired results. The subject ‘girl’ c-commands the object ‘cat’ in (12a) but not in (12b)/(16), hence ergative case is not assigned to the subject in (12b) by (2a), nor is accusative case assigned to the object in (12b) by (2b).

This proposal hinges crucially on subject and the possessor being two copies of the same item, related by movement. One would not get the same effect if the possessor of the object were merely a pronoun bound by the subject, since the pronoun is a distinct lexical item from its antecedent (I assume,

\(^9\) Note, however, that the higher position of NP1 does c-command the lower position of NP1 in (61), if we understand \( Y \) in (60) as not containing itself; it is proper containment that for relevant clause of (60) forbids in c-commanding relationships, not complete containment, i.e. identity. This understanding may be important if one wants to maintain an active condition that a moved phrase must c-command its trace (lower copy)—if the so-called Proper Binding Condition of xxx does not follow from the definition of Move and other basic features of the syntactic derivation.
apart from certain instances of resumptive pronouns; see Safir xx). We can see this difference at work internal to Nez Perce. Deal (2010) mentions that there is a second way of expressing possession in Nez Perce, which does not cause caselessness on the object or the subject. There is a restricted class of kinship nouns which have special roots and bear a prefix that expresses the possessor. This is seen in (17b), as contrasted with the more productive construction in (17a).

(17) a. ‘iin-im pist
    me-GEN father1 ‘my father’ (p. 97)

    b. Na-‘tót
    1sP-father2 ‘my father’

When this second type of possessive construction appears as the object of a transitive sentence, the object is accusative and the subject is ergative, even if the subject is coreferential with the possessor of the object, as shown in (18a) (contrast (18b), which is the same sort of construction as (12b)).

(18) a. Qó’c wéye na-‘tóot-ap ‘e-séepn’i-yu’.
    Yet soon 1sP-father2-ACC 3O-ask-PROSP
    ‘Yet soon I will ask my father.’

    b. Píst hi-hi-ne.
    Father 3S-tell-PERF
    ‘She told her father.’

The contrast follows if we simply say that the pronominal possessor element in kinship nominals like (17b)/(18a) is not a copy of the agent, but a true pronoun. As such, it is a distinct element of the numeration, which may or may not be referentially dependent on the subject. Once this assumption is made, then the lower NP does not contain a copy of the higher one in (18a), so they are independent terms in the necessary way defined in (15), and c-command holds. Then, since c-command holds, dependent case marking applies to both the subject and the object. I think that this assumption is independently plausible. Expressions like na-‘tót do not have to be bound by anything in general, so they are not intrinsically anaphoric. It may also be significant that there is an overt realization of the possessor inside (18a) but not in (18b) or (12b). If the prefix is a cliticized pronoun (rather than true agreement), then it is the possessor, and a copy of the agent cannot be. In contrast, there is nothing else to be the possessor in (12b) or (18b), just a gap which can be interpreted as a copy, deleted by the principles of copy deletion.10

There is other evidence that a strong form of anaphora is needed to suppress case marking in Nez Perce, not mere coreference. Deal (2010) points out that when the possessor of the object is anaphoric to the subject, dependent case is not assigned, but when the possessor of the subject is

\[\text{Hekí-ce ‘iin-im ‘íníit.} \]
\[\text{See-IMPF 1sg-GEN house} \]
\[\text{I see my house.} \]

If this is possible in general, then I have to allow an overt pronominal to count as a copy of a moved NP, under some conditions. [check Deal pc for possible other issues]

10 Deal (2010) gives one example of a possessive construction with caseless object and an overt pronoun as its possessor (and I think Deal to appear may have others).
referentially dependent on the object, dependent case is assigned, as shown in the following minimal pair from Phinney 1934.

(19)  
  a. Píst hi-hí-ne.  
    Father 3S-tell-PERF  
    She told her father.  
  b. Pée-ne pisít-pim. p.95  
    3S/3O-tell-perf father-ERG  
    ‘Her father told her.’

One might have a kind of referential dependence in (19b), but not c-command. Therefore, in my terms, the coreferential positions cannot be two copies of a moved NP in (19b). So neither NP contains a copy of the other, c-command holds, and dependent case is assigned. Furthermore, anaphora between the possessor of the theme and the agent does not suppress case and object agreement when there is a goal in a ditranstive construction.

(20)  
  ‘iwéep-nim wáaqo’ pe-én-ye laqáas-na c’oláakstímt. P. 97  
  Wife-ERG already 3S/3O-give-PERF mouse-OBJ hand.drum  
  The wife already gave her hand drum to the mouse.

Here we might say that there is a chain relationship between the agent of the clause and the possessor of the theme, so that the agent does not c-command the theme. However, the agent does still c-command the goal, and neither one contains (any copy of) the other, so that is enough for the agent to be marked ergative and the goal accusative, quite apart from the theme. Therefore this analysis covers the complex data of Nez Perce in this domain to a quite substantial degree.

Just as there is no guarantee that a language will have experiencer arguments embedded in PPs (null headed or otherwise), so there is no guarantee that a language will have possessor raising of this sort. Many languages do not—English, for example—or if they do, they might have a different type altogether (e.g. Sakha). In languages that do not have the right kind of possessor raising (or the right kind of dependent case system), one does not expect to observe this kind of case suppression induced by this characterization of c-command. And indeed we do not find a similar effect in any of the other simple ergative, accusative, or tripartite languages in my core sample.

Of course, the (properly) suspicious reader may doubt whether it is worth adjusting the definition of a fundamental syntactic relation like c-command simply to account for this rather unusual construction in Nez Perce. Certainly I cannot claim this as independent evidence that c-command relations as we have known them are the key to dependent case assignment. However, the

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11 I am assuming that there is no sidewards movement, and more generally that not all coreference reduces to movement as claimed by Kayne (xxx) (and Hornstein xxx?).

12 Nor is the caselessness of the theme anything that needs a special explanation in this context; see chapter 4 on domains for case assignment.

13 But does this account wreck the B&V account of possessor raising to dative in Sakha? Maybe that needs to be recast in terms of binding, not literal raising qua movement. Then are there independent ways to tell the two apart?

14 Maybe relevant: the fact that possessors have to raise out of object in an applicative-like structure in Nez Perce independently, creating a possible condition B violation. That could give it language internal pressure to have this otherwise unusual form of possessor raising)
modification proposed here will also be very helpful in the next section, and hence come into its own. I therefore ask readers to willingly suspend their disbelief until then.

3.2 Negative c-command conditions

So far we have considered how the two most obvious c-command relationships are at work in case theory, namely ‘c-command’ and ‘is c-commanded by’. These are positive c-command conditions, in the sense that a particular case is assigned to one NP if and only there is another NP that enters into the relevant c-command relationship with that NP. But a broader range of c-command conditions can be imagined. In this section, I argue that they should be imagined. In particular, I propose the following additional possibilities:

(21)  a. Assign NP1 marked nominative if there is no other NP, NP2, in the same domain WP as NP1 such that NP2 c-commands NP1.
     b. Assign NP1 marked absolutive if there is no other NP, NP2, in the same domain WP as NP1 such that NP2 is c-commanded NP1.

In other words, an NP gets marked nominative if it is the highest NP in the domain (there is no higher one), and an NP gets marked absolutive if it is the lowest NP in the domain (there is no lower one). These are negative c-command conditions, in that they say that there must not be an NP in the specified c-command relationship to the NP in question.

The impetus for this more radical extension of the dependent case ideal is that recent typological literature has distinguished another, less common kind of case system, the so-called marked nominative languages (Comrie 2005, handbook author). These are languages in which the subjects of transitive and intransitive clauses bear the same overt affix, whereas the object(s) of a transitive clause do not bear this affix and are typically morphologically marked. Such languages are different from ergative languages in that the subject of the intransitive verb is marked the same as the subject of a transitive verb; they are different from typical accusative languages in that it is the subject that bears the overt affix, rather than the object. This sort of case system is said to be an areal feature of Africa, especially north eastern Africa. The Ethiopian language Oromo is an example.

(22)  a. Särée-n adii-n ni” iyiy-i-f-l (p. 100) Oromo
      Dog-NOM white-NOM FOC bark-FEM-IMPF intrans, unergative
      ‘The white dog is barking.’

     b. D’axáa-a maná duubá: b-bu’e. p. 110
      Rock-NOM house behind LOC-fell intrans, unaccusative
      ‘The rock fell behind the house.’

     c. Húrrée-n arká d’olki-t-i. (p. 99) Oromo
      Fog-NOM sight(ABS) prevent-f-IMPF transitive (although not agentive)
      ‘Fog reduces visibility.’

Some North American languages are said to be of this type too, notably Yuman languages like Maricopa and Digneño. I also take Choctaw to be of this sort: it has a clear subject case marker, and, although it is said to have object case as well, objects can be morphologically unmarked and in practice are some 80-
90% of the time (Broadwell xx:xx). If that optional and less common case marker is put aside, then Choctaw looks like a marked nominative language.  

(23)  
a. Hattak-at taloowa-tok  Choctaw p. 128 unergative  
   Man-NOM sing-PAST  
   ‘The man sang’  

b. John im-ofi-it illi-tok. Choctaw, p. 68  
   John III-dog-NOM die-PAST  (unaccusative, so –it not a marker of agency)  
   ‘John’s dog died.’  

b. Ópah tîkchi-it alla i-paya-ttook. (Choctaw, broadwell p. 68)  
   Owl wife-NOM child III-call-DPAST  
   ‘The owl’s wife called the children.’ (also OK, but less common: alla-ya child-ACC)

In Baker (xxx), I also argued that Tukang Besi nominative case na is assigned by (21a), whereas the “core” marker te is a default case marker, assigned to all other NPs, based on data and insights from Donohue xxx. For purposes of this discussion, I focus on Oromo and Choctaw, with occasional mention of the others (see chapter 9 for more). The question then is whether case is assigned in these languages in the same way as in other nominative-accusative languages, with the only difference being in the morphological spell out, or whether case is assigned differently, with nominative actively assigned by (21a) and accusative being the elsewhere case—the opposite of a standard accusative language like Sakha. I argue for the latter. 

There is also one (and only one) “marked absolutive” language known to recent typological discussions: Nias, an Austronesian language. Nias uses a morphologically marked form for the subjects of intransitive verbs and the objects of transitive verbs, and a morphologically unmarked form as the subject of transitive verbs, as shown in (24).

(24)  
   Return again ABS-father-1pP Tohônavanaetu LOC Maenamölo.  
   ‘Ama Tohônavanaetu came back again to Maenamölo. (D&B 1999) intrans  

b. I-a [m-bavai] [ama Gumi]  
   3sS.REALIS-eat ABS-pig (ERG,)father Gumi  
   ‘Father Gumi eats pigs.’ (D&B 1999) transitive

One detail about Nias, not evident in (24), is that the marked absolutive case is not in general realized as a segmental affix, but as a change of feature on the initial consonant of the root—e.g., voicing of a voiceless consonant. But there is apparently no doubt about which form is derived from the other, and I take this to be a detail of the morphophonology, of no significance for the morphosyntax. Again, this is the opposite of the usual situation, where ergative case is morphologically marked and absolutive case is morphologically unmarked. It raises the question of whether the difference is only morphological, or whether absolutive is the case positively assigned in the syntax of Nias, whereas ergative is positively assigned in other ergative languages.

\[15\] Indeed –ya might be a switch reference marker (marking different subject) rather than a true case marker; see Jelinek xxxx.
3.2.1 Negative conditions in syntax versus markedness reversal in morphology.

To see the relative advantages of the case assignment rules in (21) more clearly, let us spell out explicitly the morphological alternative. The morphological approach to Oromo or Choctaw would be as in (25), where accusative and nominative are assigned just as in Tamil, but the language makes a different choice at PF of which case to spell out as an overt affix. The syntactic approach that I am recommending is embedded in a larger system in (26).

(25)  
\begin{align*}
\text{a. If NP1 is c-commanded by NP2 in the same TP, assign NP1 accusative.} & \quad \text{SYNTAX} \\
\text{b. Otherwise NP is nominative.} \\
\text{c. Case } \rightarrow -n \text{ (Oromo) -it (Choctaw) / NOM} & \quad \text{PF} \\
\text{d. Case } \rightarrow -\emptyset \text{ elsewhere}
\end{align*}

(26)  
\begin{align*}
\text{a. Assign NP1 marked nominative if there is no other NP, NP2, in the same TP as NP1 such that} & \quad \text{SYNTAX} \\
\text{NP2 c-commands NP1.} \\
\text{b. Otherwise NP is absolutive.} \\
\text{c. Case } \rightarrow -n \text{ (Oromo) --it (Choctaw) / NOM} & \quad \text{PF} \\
\text{d. Case } \rightarrow -\emptyset \text{ elsewhere}
\end{align*}

(25) proposes that there is a mismatch between syntactic markedness and morphological markedness: nominative is the elsewhere case in the syntax, but it is the special affix in the morphology. In contrast, (26) keeps these two kinds of markedness more closely aligned. Similarly, the morphological approach to marked absolutive case in Nias is in (27) and the recommended syntactic approach is filled out in (28).

(27)  
\begin{align*}
\text{a. If NP1 c-commands NP2 in the same TP, assign NP1 ergative.} & \quad \text{SYNTAX} \\
\text{b. Otherwise NP is absolutive.} \\
\text{c. Case } \rightarrow +\text{nasal/+voiced / ABS} & \quad \text{PF} \\
\text{d. Case } \rightarrow -\emptyset \text{ elsewhere}
\end{align*}

(28)  
\begin{align*}
\text{a. Assign NP1 marked absolutive if there is no other NP, NP2, in the same TP as NP1 such that} & \quad \text{SYNTAX} \\
\text{NP2 is c-commanded NP1.} \\
\text{b. Otherwise NP is absolutive.} \\
\text{c. Case } \rightarrow +\text{nasal/+voiced / ABS} \\
\text{d. Case } \rightarrow -\emptyset \text{ elsewhere}
\end{align*}

The differences between the morphological approach and the syntactic approach arise when we consider NPs that are not in ordinary argument positions within a verbal clause—NPs that are not subjects or objects in a clause-like domain like TP. For those NPs, the special dependent case rule in (25a), (26a), (27a) or (28a) fails to apply, since these rules mentions TP as the domain explicitly (see chapter 4 on domains for dependent case assignment). Therefore, the isolated NP should be in the language’s syntactic default case. According to the morphological approaches in (25) and (27), these isolated NPs should then get morphologically overt case—nominative in Oromo and Choctaw, absolutive in Nias—since syntactic markedness and morphological markedness are reversed. But according to the syntactic approaches in (26) and (28), the isolated NPs should have the morphologically null case: absolutive in Oromo or “ergative” in Nias.

It is the second prediction that is the correct one, as is well documented in the sources. One case in point is NPs not contained in a larger syntactic structure at all. For example, in Choctaw,
Broadwell (p. 69) observes that NPs that answer a question are bare, not nominative. This is true even if the question word in the initial question is explicitly nominative.

(29) Q: Kata-sh apa-tok? A: John-at apa-tok or just “John”, NOT “*John-at”.
   ‘Who ate it?’ A: ‘John ate it’ or ‘John’

Similarly, in Nias the NP of a short answer is not marked absolutive, even when the same NP in a full sentence answer would be.

(30) a. Q: Hanata zi möi? (*n-)Ama Doli (cf. Möi n-ama Doli). (Nias)
   Who ABS.REL go (*ABS-)Ama Doli go ABS-am Doli
   ‘Who went?’ ‘Ama Doli’ (cf. Ama Doli went).

   what PASS-steal money-3sP 3sP-steal ABS-money-3sP
   ‘What did they steal?’ ‘his money’ (cf. ‘They stole his money.’)

I do not have direct information about this matter in Oromo, but Donahue xx observes for Tukang Besi that a question word cannot be nominative in this language (p. 451), and that an NP fragment answer must match the NP question word used to elicit it (p. 452). We can infer from this that an isolated NP in Tukang Besi can never be marked nominative, although it can bear core (default) case (p. 452). So this kind of data, where available, suggests that marked nominative and marked absolutive are not default cases in these languages, but are explicitly assigned by a structure-sensitive rule.

Another sort of structure to consider in this regard is focused and topicalized NPs that appear outside the core clausal domain, in the periphery of the clause, hence outside the purview of clause-internal case rules keyed to TP. In some languages these may carry the case assigned to the associated variable or gap position inside the clause, but in some structures of some languages they do not. When they do not, they might reveal the default case of the language. For example, hanging topic sentences like Him/*he, I think – has a good chance of succeeding have been used to claim that accusative is the default case in English. If similar elements in other languages are base generated at the edge of CP or outside the clause together, then they get default case. For Oromo, we see this in the so-called “focused possessor” construction described by Owens, and the topic is unmarked, not nominative.

(31) Obbolesá xiyya, makiiná-n isá c’apt’e p. 122
    Brother my car-NOM his broke-f-PAST
    (As for) my brother, his car broke.

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16 But one can infer it from the fact that question words cannot be nominative (because they are focused, see below), so probably the answer that corresponds to that question word is not either (p. 206, 208, see xx).
17 Other isolated NPs that are complete utterances might be curses (“you bastard”, “the devil”), and vocatives that don’t have a special case of their own. Broadwell (xx:xx) mentions that curses are morphologically unmarked in Choctaw. However many available grammars do not specify how these are marked, if they exist. Unmarked forms, not marked nominative or marked absolutive, are also used as the citation forms of nouns in all these languages, which may be further support. However, I am not sure if that counts as core native speaker competence, or if it is a metalinguistic use fixed by the grammatical tradition of analysis of the language.
Choctaw is a bit less clear, perhaps, but may be similar. It can have a non-subject NP at the left periphery of the clause, before the subject and the rest of the clause, often set off by an intonation break. Such an NP certainly does not show up with marked nominative case; neither is it bare, rather it must be marked by the “accusative” case marker –aN. (Broadwell p. 39, also elsewhere)

(32)  Tákkon-aN/?*Tákkon, John-at choNpa-h.
Peach-ACC/peach John-NOM buy-TNS
John bought a peach.

(Broadwell is interested in variations of word order, and hence he does not say what topicalization of a subject looks like, if it is possible.) I tentatively take this –aN to be a switch reference marker (indicating that the referent of N is different from subject of matrix clause) rather than a true case marker (see Jelinek 19xx, in part), explaining why it is used here in clause peripheral position, but often not when the object is in situ inside the VP. Be that as it may, the clause-peripheral topic is clearly not nominative. 18 See also Gordon p. 74 for topics not being marked nominative in Maricopa, and Donohue p. 60 for Tukang Besi. Finally, (33) shows a topicalization structure in Nias. Since the topicalized element expresses the object of a transitive verb, it would be marked absolutive case if it were in situ, but on the periphery it is in the unmarked case, otherwise used as ergative.

(33)  Si’o höö ma=i-taru-ö ba danö.  Brown 2001, from C.
Stick DIST PERF-3s.S.R-plant-TR LOC MUT.ground
‘That stick, he planted in the ground.’

A third construction type that is relevant to this issue is predicate nominals. Unlike NP fragments and hanging topics, these are found inside the clause proper. However, they have special case properties across languages—probably because the predicate nominal does not count as an argument. (See chapter 5 for discussion.) In conventional nominative-accusative languages, the predicate nominal is typically nominative (bare). In conventional ergative-absolutive languages, the predicate nominal is typically absolutive (bare), as is the subject. If marked nominative and marked absolutive languages have the same syntax as conventional accusative and ergative languages, as the morphological theory claims, then we would expect the predicate nominals to be nominative/absolutive in these languages too, hence morphologically marked in the same way as the subject. But this is false; instead, the predicate nominal is consistently in the other structural case in these languages. (34a) shows that the predicate nominal is bare, not marked nominative, in Oromo; (34b) shows the same thing for Choctaw. 19

(34)  a.  Isi’-n obboleetti tiyya.  Oromo
She-NOM sister my
‘She is my sister.’

 b.  John-at Chahta’ (a-ttook)  p. 47 (also p. 175)
John-NOM Choctaw be-RPAST

18 I think I also saw a scene-setting sort of locative at the beginning of the clause not marked for case in some incidental Choctaw example….
19 Yuman is exceptional in this regard, for historical reasons, as discussed by Munro xxx. In that language the predicate nominal bears nominative, and the subject is unmarked, because it comes historically from a sentential subject construction like “John being an Indian is”.

16
John is (was) a Choctaw.

Similarly, Brown (2005) says that predicate nominals are in unmarked case in Nias, not marked absolutive.

(35) Te’ana ya’ia z=a=mira.
    Neg him ABS:R EL-IMPF-write
    ‘The writer is him.’

This argues rather forcefully that unmarked isn’t accusative in Oromo or Choctaw, and unmarked isn’t ergative in Nias, since it is rare for a predicate nominal to be accusative (only in classical Arabic?) and perhaps unheard of for it to be ergative. Rather, the predicate nominal is in default case, and that is not the same as marked nominative or marked accusative in these languages.

Particularly interesting on this point is Tukang Besi, because in addition to its marked nominative case marker na, it also has an overt exponent for unmarked/default case, namely te ‘core’ in Donohue’s terms. In a predicate nominal, the subject can be nominative, as one might expect, but the predicate is not. However, the predicate is not entirely bare either; rather it is marked by te.

(36) Mbeaka te guru, toka te mia modaga na iaku p. 354
    Not CORE teather but core personREC-SI-trade NOM 1SG
    ‘I’m not a teacher, but rather a trader.’  (Tukang Besi, p. 354)

This shows that the predicate nominal is not totally exempt from case theory, but rather it does get default case—at least in Tukang Besi, and hence this is an option in UG. So marked nominative cannot be the default case in Tukang Besi, and there must be a positive rule of nominative case assignment. In contrast, the syntactic system built around the negative c-command condition works fine for Tukang Besi and the other marked nominative languages. The subject of the predicate nominal construction is not c-commanded by any other nominal, so it gets marked nominative; the predicate NP is c-commanded by the subject, so it does not—end of story.

There is thus a clear attraction to saying that it is the nominative case that is assigned by an explicit rule, and the so-called accusative (or absolutive, in Oromo) that is left to be the default case. But nominative case cannot be a dependent case in the normal sense, since it is used in intransitive clauses where there is no other NP in the same domain. My proposal is that this can be fit into the

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20 This is one form of predicate nominal constructions in Tukang Besi, but not the most common/neutral one. The other form is “te Subject te Predicate”, with neither NP nominative. I assume that this is derived from the source “te Predicate na Subject” by the normal rule of topicalization in TB, which can put any NP (including a subject) clause initial with te marking. The fact that the topicalized version is more common—hence perceived as relatively neutral—with predicate nominal clauses than with other clauses I take to be a pragmatic fact.

21 For Nias, this is less straightforward: we have to say that the predicate nominal is invisible to the marked absolutive rule, so it does not get absolutive itself, and it doesn’t count against the subject getting absolutive. This is parallel to the fact that a predicate nominal does not trigger ergative on the subject in a language with a positive c-command condition either; see section 5.xx for discussion. There I claim that predicate nominals do not participate in dependent case assignment because they are not argumental. But that does not imply that they fail to undergo default case assignment (depending on the language, perhaps). If so, they show clearly which is the default case in a given language.
dependent case schema if we say that the c-command condition can be is a negative one like “is not c-commanded by” rather than a positive one.22

3.2.2 Negative c-command conditions versus case assigned by agreement

There is one other serious contender, given the results of chapter 2: it could be that the special marked case in languages like Oromo, Choctaw, and Nias is an agreement-assigned case, assigned when the NP enters into an Agree relation with some particular functional head in the language. We can imagine a system like this: F assigns NOM (or ABS) under agreement, and everything else gets default case. Then at PF nominative is spelled out morphologically as (say) –n (in Oromo), whereas default case is spelled out as null. This option could be particularly attractive for marked nominative languages, since we know that subjects of transitive and intransitive verbs are the easiest phrase for a high functional head to agree with.

But this alternative does not work either, since there is evidence that agreement is independent of case in these languages. The evidence for this is different in different languages, however. Consider first Oromo. Oromo does indeed have overt subject agreement on finite verbs (see (22)), and the distribution of case and agreement is reasonably close in several respects. For example, the verb agrees with the theme in a passive sentence but not a transitive sentence, as in IE languages, so nominative case and agreement with the finite verb correlate in that respect. Furthermore, embedded subjunctive clauses have verbs that agree with their subjects and those subjects are in nominative case, whereas verbal nouns (gerunds) do not have subject agreement and have subjects in genitive case. However, these facts are easy to account for with the rule of marked nominative too: for example, we can plausibly say that subjunctive clauses contain TP projections and gerunds do not, and (21a) applies only in TPs, by hypothesis. But there are also some constructions in which a direct 1-to-1 relationship between case and agreement breaks down. For example, Oromo has certain paradigms in which there is no phi-feature agreement realized on the verb, but the subject is still nominative. One is the past negative, formed by prefixing hin with a high tone on the first syllable of the verb and using an invariant suffix that, in other paradigms, would express the first person plural.

22 There is a more subtle version of the morphological solution, which is harder to argue against empirically. This would take advantage of Marantz’s distinction between unmarked case (which is relative to particular domain) and default case (which has no structural requirement at all). Thus, we could have the more complex syntax in (i) together with the morphology in (ii).

(i)
  a. If NP1 is c-commanded by NP2 in the same clause, assign NP1 accusative.
  b. Otherwise, if NP is an argument in TP, NP is nominative.
  c. Otherwise, NP has default case

(ii)
  a. Case → -n (Oromo), -it (Choctaw) / NOM
  b. Case → -Ø elsewhere

This covers the data given above, and it will be hard to find data against it. However, it is more complex, and has some theoretical flaws that should perhaps remove it from contention. First, it crucially assumes that there is a default case, distinct from any structural case used otherwise in the language. I’m not sure that we ever see such a three-way case distinction in a language in which all cases are morphologically overt. Second, it has a tricky kind of disjunctive ordering, where the same morphological rule is left to spell out both the most marked case in the system (accusative) and the least marked case (default). Perhaps this should not be allowed on theoretical grounds (cf. Bobaljik on the absence of ABA patterns in comparative suppletion). [If so, this constrains how Kurmanji is analyzed.]
Another case in point is clauses meaning ‘it is possible’, which can be formed from a nonagreeing verbal noun plus an invariant particle oolu. Even though neither element manifests agreement, the subject is still marked nominative.

Yet another such context is predicate nominals, which do not bear subject agreement in Oromo (nor is a copula needed; see (34a); verbs agreeing with 3fsg subject bear –t, pp. 66, absent in this example). One might of course insist that all of these Oromo clauses have T and it undergoes agreement in the syntax, but it cannot be spelled out in the usual way at PF, for morphological reasons. I do not have any strong evidence that this cannot be the case—although it is somewhat hard to maintain for the past negative in (37), because a normal realization of T is present (-e ‘past’), and so is the agreement slot (-n), although its exponent does not vary. But the negative c-command view in which there is no need to posit agreement where we do not see it has at least a slight advantage here.

Examples (37) and (38) have nominative subjects, but no subject agreement, at least on the surface. The one-to-one relationship between nominative case and subject agreement also breaks down in the other direction: Oromo has clauses with more person-number-gender agreement than nominative subjects, namely those with periphrastic tenses consisting of a past or imperfective main verb and an auxiliary verb. In such constructions, both verbs agree with the subject in phi-features, including person, but presumably both cannot assign the subject nominative case.

In terms of Baker 2008, these examples imply that Oromo is a CDAP=no language, where agreement is not contingent on the agreeing head assigning case to the agreed with NP. But if T does not assign case to NP in the course of agreeing with it, then the nominative case must come from elsewhere. The rule of marked nominative case assignment can say from where. (There is also a breakdown between case and agreement in possessor raising constructions in Oromo, which can have two nominative NPs but only one agreeing T; see below for data and analysis.)

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23 Similar auxiliary plus main verb constructions with multiple agreement imply that T does not assign marked nominative under agreement in Maricopa. In addition, Maricopa also has embedded clauses in which the verb agrees with the subject in the usual way, but the subject is not marked nominative, but rather is bare. Also the copula in a predicate nominal construction agrees with the subject even though the subject is not marked nominative in Maricopa, for idiosyncratic reasons (see note xx).
The relationship of case and agreement in Choctaw is a particularly complex topic (see Davies 1986 for an older analysis). But one key bit of evidence that nominative case does not depend on agreement with a particular functional head comes from certain unaccusative and experiencer subject verbs. Normally Choctaw has one affix that agrees with (nominative) subjects and another that agrees with (non-nominative) objects, as in (40). Since third person subject and object agreement is null and 1st and 2nd person pronouns are normally pro-dropped, it is unusual to see both the agreement paradigm and the case of the agreed with argument in a single example. Therefore, we must compare across examples with local arguments and examples with third person arguments, looking at (40a) to see the agreement form and at (40b) to see the corresponding case form.)

(40) a. \(\text{Chi-pi-sa-li-h.} \) 2SI-see-1SI-TNS
    I see you.

b. Pam-at John-(a) 0-0-piša-tok. (based on p. 74; find better?)
    Pam-NOM John-(ACC) 3S-3O-see-PAST
    ‘Pam saw John.’

There is also evidence that agreement with the subject is associated with the tense-mood of the clause, whereas agreement with the object is not. This comes from negation: negation appears near the tense marker in the morphological structure of the verb, and it triggers a special form of subject agreement, but it leaves object agreement unchanged.

(41) 0-Sa-piša-tok vs. Ik-sa-pįs-o-tok.
    3S-1SO-see:N-PAST 3N-1SO-see:L-NEG-PAST
    ‘She/he/it/they saw me’ She/he didn’t see me.

Consider now intransitive verbs. Agentive intransitive verbs take nominative subjects and show subject agreement with them, as in (42a). But for many nonagentive verbs, the subject triggers object agreement on the verb, not subject agreement, as shown in (42b).

(42) a. Iya-li-ttook
    Go-1SS-DPAST
    ‘I went.’

b. Sa-niya-h; Naah sa-yop-pa-ttook p. 140
    1SO-fat-TNS 1so-thing 1SO-happy-DPAST
    I am fat. ‘I was happy’

Negation patterns confirm that this is a true instance of object agreement, not a quirky morphological realization of subject agreement. When an example like (42a) is negated, we get the special negative form of agreement with the subject, as expected, parallel to (41). But when an example like (42b) is negated, the ‘quirky’ object agreement remains unaffected, just as normal object agreement does in (41).

(43) a. Ak-i-iy-o-kii-ttook.
    1SN-go:L-NEG-NEG-DPAST
    ‘I didn’t go.’
b. Ik-sa-niiy-o-h.  
N(3S)-1slII-fat:L-NEG-TNS    (p. 149)  
‘I’m not fat.’

Furthermore, a striking fact about (43b) is that a negative agreement prefix shows up as well, but it is an invariant third singular form ik- (like in (41)), not one that agrees in person and number with the theme subject (not ak-, as in (43a)). I take these facts to mean that, because it is generated inside VP, lower than an normal agenteive subject, the theme subject triggers agreement on v. Since this NP has already agreed with v, T cannot also agree with it; the first agreement renders the NP inactive in some sense (cf. Chomsky 2000, 2001). T still has unvalued phi-features, so it is spelled out as default (third person singular) agreement. In affirmative clauses this is null, so it is not discernible, but in negative clauses there is an overt morpheme ik- for third singular, so it shows up overtly in (43b). Thus, T and v are both present as agreement hosts, but only v actually agrees with the nonagenteive argument in (42b) and (43b). Now if this interpretation is approximately correct, we can draw a clear conclusion for case assignment: nominative is not assigned by agreement with a designated functional head. When the sole argument of a verb is overt, not pro-dropped, it is clearly nominative, regardless of whether the verb is agenteive or none agenteive. Thus the examples in (44) can be compared with those in (42).

(44)  
a. John-at Oklahoma 0-iya-ttook.  p. 68  
    John-NOM Oklahoma 35-go-DPAST  
    ‘John went to Oklahoma.’  

b. John-at 0-niya-h  
    John-NOM 30-fat-TNS  
    (Broadwell p. 32)  
    ‘John is fat.’

Thus, T agrees with the NP in (44a) but not in (44b), nevertheless they are both nominative. Moreover, v agrees with the sole NP in (44b) and with the object in (40b), but the former is nominative and the latter is non-nominative. So the case of an NP in Choctaw is not determined by what functional head it agrees with. Rather, it is determined by something else, and the negative c-command condition in (21a) does the job well. The absolute position of the subjects in (44a) and (44b) might be different, accounting for the difference in agreement, but the relative position is similar: neither is c-commanded by another argumental NP in the same clause. Hence both get marked nominative.

The independence of agreement and case marking is especially clear in Tukang Besi, another marked nominative language. This can be seen by comparing the two examples in (46).

(45)  
a. No-kiki’i te iko’o na beka.  
    3R-bite CORE you NOM cat  
    ‘The cat bit you.’

b. No-kiki’i-ko te beka na iko’o  
    3R-see-2sO CORE cat NOM you  
    (check word order possibilities)  
    ‘The cat bit you.’

In (45a), the realis verb agrees with the agentive subject in this (approximately) VOS language, and the subject is marked with nominative case, as expected. So we could think that T assigns nominative to NP under agreement here. But (45b) shows that it is possible for the object to move to a position higher
than the thematic subject—higher being on the right in this (superficially) left-branching language. On its way up, it triggers object agreement on the verb (v), perhaps in the same way that object movement triggers agreement on past participles in French and Italian (Kayne 1989, etc.). The realis prefix still agrees with the agent, as seen in (45b). But the case marking in (45b) is quite different from that in (45a): in (45b) the agent has default case and the theme has nominative case. So T can agree with something that is either in nominative case or in default case, and the NP in nominative case can agree with T (as in (45a)) or with v (as in (45b)). So case is independent of agreement in this marked nominative language too. This somewhat unusual pattern of facts presumably stems from the known fact that Austronesian languages permit theme arguments to move past agents in Spec vP to land in SpecTP in a way that many other languages do not (see GHT’s classic analysis of Malagasy and Tagalog). Given this, the marked nominative rule in (21a) succeeds where an Agree-based rule fails: if the theme moves to SpecTP then it c-commands the subject and is not c-commanded by anything else in the clause, so the theme gets nominative and the subject does not; if the theme does not move up in this way, then the subject gets nominative and the theme does not. Agreement with functional heads happens, but it is independent of case. See Baker (xxx) for a more detailed discussion of this analysis, as well as other constructions where nominative and subject agreement part ways in Tukang Besi.

Finally, let us consider the issue of case and agreement in Nias, the marked absolutive language. Here it is a priori less tempting to say that absolutive is assigned by agreement with a functional head, since we don’t know why F would agree with the intransitive subject but not the transitive one apart from case. And the empirical facts confirm that we should be suspicious of this. Agreement works differently in Nias depending on the mood of the clause. In realis clauses, the verb agrees only with the ergative subject in unmarked case; there is no agreement with absolutive subjects or objects, as shown in (46).

(46)  
   a. l-tolo zi’ila ama-gu.  (Brown 2003 from C)  
   3sE.R-help ABS.village.advisor (ERG) father-1sP         
   My father helped the village elders.  
   b. Mofanö n-ama-gu.  
      Leave ABS-father-1sP  
      ‘My father left.’  

So if anything it seems like it would be the ergative case that is assigned by agreement with T (alias mood) in this language, not absolutive. More telling still, in irrealis clauses case marking still follows the marked absolutive pattern, but the verb agrees with all subjects, both ergative ones in transitive clauses and absolutive ones in intransitive clauses:

(47)  
   a. Ndra-m’a’ege-ö n-drao.  
      3pS.IR-laugh-TR ABS-me  
      ‘They will laugh at me.’  
   b. Ya-te-bato deu.  
      3sS.IRR-RES-stop ABS.rain  
      ‘The rain will stop.’

This confirms that case does not come from agreement in Nias either—at least not from Agree that has anything to do with overt agreement. Rather, we can say that absolutive is assigned by the marked
absolutive rule in (21b). In addition, irrealis T agrees with the closest NP regardless of case, and realis T is case sensitive in the sense of section 2.4 above: it can only agree with an NP that has default case.

Overall, then, we see that there are mismatches of agreement and case marking in all of the marked nominative/absolutive languages. This shows that an Agree-based theory is not a good alternative to a dependent case style theory that uses a negative c-command condition rather than a positive one.

3.2.3 When c-command fails in languages with Negative c-command conditions

In the earlier part of this chapter, I supported the idea that c-command is involved in dependent case assignment (not just something like thematic prominence) by looking at two configurations in which there are arguably two NPs in the same clause but neither c-commands the other. One was dyadic unaccusative constructions in which the higher argument is a goal or experiencer embedded in a PP, with the P potentially null. The other was a possessor raising construction, where the raised NP does not technically c-command the NP that it raised out of, because the lower NP contains a copy of the higher one. In languages that have these structures, ergative case does not show up on the higher-seeming NP (Burushaski, Nez Perce), and accusative case does not show up on the lower-seeming NP (Amharic, Nez Perce). So we get examples with two NPs in unmarked case—double nominative constructions or double absolutive constructions, depending on the larger system in the language.

These special configurations in which two NPs do not stand in a c-command relation to each other should be revealing in languages with marked nominative or absolutive case too. But in these languages, the prediction should be that one gets more morphologically marked case in such clauses, rather than less. That turns out to be true.

Consider first dyadic unaccusative constructions in Choctaw, with “subjects” that are goals, experiencers or possessors, rather than agents. These exist, and indeed both arguments of the verb show up in marked nominative case. Here are some examples:

(48)  a. John-at iskali-yat im-ásha-h. p. 310, 342
     John-NOM money-NOM 3III-be:PLUR:N-TNS
     ‘John has money.’ (note possessee/theme governs verb suppletion)

     b. Pi-tikba’ Abraham-at ... Chihuowaw holiittopa-yat at i-hayaaka-ttok. (p. 310)
     1III-front Abraham-NOM God  holy-NOM  come:and  III-appear-DPAST
     ‘Holy God appeared to our forefather Abraham.’

     c. Hattak-at holisso-t im-ihaksi-tok (Davies p. 8)
     Man-NOM book-NOM 3III-forget-PAST
     The man forgot the book. (also ‘lose’, Davies)

This is just what we would predict. The structure is presumably something like (49).24

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24 Since some of these examples have a possessive meaning—(48a), for example—one could think that the dyadic unaccusative construction in Choctaw might be eliminated in favor of the possessor raising construction discussed below. But Broadwell gives two reasons for thinking that this is not so. First, not all of these examples have a possessive reading: (48a) might be glossed as ‘John’s money exists’, but (48b) is not plausibly glossed as ‘Abraham’s God appeared’. Second, Broadwell shows that a difference appears in negative sentences, where the agreement with the third person theme argument is overt, in the form ìk-. Then agreement with an experiencer-goal argument, like the ones in (48), appears inside of the subject agreement with the theme (the expected order),
Here nothing c-commands ‘Abraham’, since that is (part of) the highest argument, so that gets marked nominative. But no NP c-commands the theme ‘God’ either, since ‘Abraham’ is embedded in a PP. So that gets marked nominative too. ( Apparently ‘God’ does not/need not move to Spec, TP to satisfy an EPP property in Choctaw; if it did, then only it should be nominative. This alternative structure may also be possible, in that Broadwell says that nominative case is optional on the goal-experiencer argument.)

The marked absolutive language Nias also has experiencer constructions that are relevant. In this language, both arguments of this special class of verbs bear marked absolutive. (50) is an example.

(50) A-ta’u m-ba’e n-ono matua. (Brown 2005, from C)
    ST-fear ABS-monkey ABS-child male
    ‘The monkey is afraid of the boy.’

The structure is like (49), with ‘monkey’ in the place of ‘Abraham’ and ‘boy’ in the place of ‘God’. ‘Boy’ doesn’t c-command any other argument, because it is the lowest argument, so it gets marked absolutive. ‘Monkey’ doesn’t c-command any other argument, because it is embedded in a PP, so it also gets marked absolutive. (And apparently neither can move out of its base position to Spec,TP, so these cases are required, not optional, as in Choctaw.)

Consider next the possibility of possessor raising. This is possible in several situations in Choctaw. First, Choctaw allows possessor raising from the theme of the transitive verb. When this happens, the raised possessor triggers (indirect) object agreement on the verb. However, it does not get nominative case; only the agentive subject is nominative, as one would expect.

(51) Am-ofi-t miNko takkon im-apa-tok. (Davies p. 46; cf. Broadwell p. 305-6)
    1poss-dog-NOM chief apple 3DAT-eat-PAST
    ‘My dog ate the chief’s apple.’
    (cf. Am-ofi-t [miNko iN-takkon] apa-tok; same meaning, no raising.)

Here we might say that the possessor raises out of the theme and adjoins to the verb phrase, as Broadwell p. 306 proposes. This movement feeds a form of (indirect) object agreement on the verb. However, it does not get nominative case; only the agentive subject is nominative, as one would expect.

More interesting for our purposes is the fact that Choctaw also allows possessor raising out of the theme argument of an unaccusative verb. (52a) is the unreased version, and (52b) is the raised version. In this situation the raised possessor is nominative:

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whereas agreement with a raised possessor appears outside of the subject agreement (perhaps suggesting that this is really a clitic, not true agreement).

25 Broadwell says that nominative is optional on the theme argument too. Maybe that shows that the goal argument can raise out of the null headed PP to Spec,TP in Choctaw, hence c-commanding the theme from Spec,TP and preventing it from getting marked nominative. The picture then would be that neither argument in Choctaw c-commands each other from their original merge positions, but either one (or neither) can move to Spec, TP, in which case it does c-command the other. Then marked nominative must appear on one of the NPs and can appear on both, matching the facts that Broadwell describes.
The marked nominative language Oromo also has possessor raising construction, if the noun is inalienably possessed.\(^{29}\) As in Choctaw, the possessor of the object can be raised, and show up after the

(52)  
\[
\begin{align}
\text{a. John } & \text{ im-ofi-yat } \text{ illi-h.} \quad (p. 303) \\
& \text{John } \text{ III-dog-NOM die-TNS} \\
& \text{‘John’s dog died.’}
\end{align}
\]

\[
\begin{align}
\text{b. John-}^{(*)} \text{ piláashaash ofi-yat } \text{ im-illi-h.} \quad \text{p. 304.} \\
& \text{John-NOM yesterday } \text{ dog } \text{ III-die-TNS} \\
& \text{‘John’s dog died yesterday.’}
\end{align}
\]

(See also Munro and Gordon 1982 for the Chickasaw version.\(^{26}\)) This makes sense too: the possessor raises to a position higher than the theme (necessarily so, since movement cannot be downward) and this time there is no higher agent argument. Therefore, nothing c-commands the raised possessor, and it receives marked nominative case by (21a). In addition, note that the possessor is also marked nominative in (52b). This is to be expected if (52b) has the structure in (53) and we use the definition of c-command given in (15) above.\(^{27}\)

(53)  
\[
[\text{TP John yesterday} [\text{VP [NP } \text{<John> dog } \text{ die }]]
\]

Here the term ‘John’ does not c-command the NP headed by ‘dog’, because that NP contains (a copy of) ‘John’. Therefore there is no other NP in TP that c-commands the one headed by ‘dog’. Therefore this NP is eligible to get marked nominative case in accordance with (21a).\(^{28}\)

The marked nominative language Oromo also has possessor raising construction, if the noun is inalienably possessed.\(^{29}\) As in Choctaw, the possessor of the object can be raised, and show up after the

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\(^{26}\) They mention that one can also have possessor raising from a raised possessor, so it is an iterative process, giving examples with three nominatives: Bonnie-NOM 3-house-NOM room-NOM be.five ‘Bonnie has a five room house’, literally ‘The rooms of Bonnie’s house are five.’ (Iterative possessor raising giving 3+ nominatives is also possible in Japanese (Kuno 1973).)

\(^{27}\) There is a notable difference between possessor raising in Choctaw and possessor raising in Nez Perce, in that the higher NP in the Nez Perce examples seems to have a distinct thematic role (agent), whereas the higher NP in Choctaw does not (although it may have a distinct pragmatic role, like Topic). The Choctaw construction is thus a more classic case of what is usually called possessor raising in the literature. However, the difference may not be so large: I assume that Nez Perce involves raising to a theta-position, which is by now a fairly standard theoretical device– and Choctaw might too, if the raised possessor gets a kind of “affected argument” theta-role in its derived position (perhaps as an applied object), as seems common for possessor raising constructions. And anyway the status of NP1’s derived position with respect to theta-theory need not be crucial to case assignment. (Nez Perce also has some more standard possessor raising constructions; see chapter 8 for some discussion. TO BE ADDED.)

\(^{28}\) Broadwell (p. 304) reports some speaker variation on whether the possessed noun is marked nominative in an example like (52b) where there is no adverb between the raised possessor and the theme (his (6)). But for speakers who do not like this, the effect seems to be a superficial one: the example is good if an adverb intervenes, as in (52b), or if nominative case on the possessor is the distinct focus form –akoosh (B’s (7)), or in the closely related language Chicasaw (B’s (9b)). I assume that double nominative is the norm for this structure, and some speakers have a surface PF filter that penalizes having two NPs in a row with identical neutral nominal marking –at. Possessor raising is not possible from the subject of a transitive verb (Broadwell 307, Davies 59), presumably for syntactic reasons, possibly related to the subject island condition/condition on extraction domains, but the details are not clear. It is somewhat controversial whether possessor raising is possible out of the subject of an unergative verb or not. Broadwell tentatively says yes, giving one example with ‘run’ (see also Davies p. 59 with ‘fly’). But he also says that the construction is more lexically restricted than previously described, and the bulk of his examples are pretty clearly unaccusative (‘die’, ‘run’, ‘be hungry’, ‘be thirsty’, ‘be crazy’, ‘sweat’, and ‘cough’). If possessor raising is possible out of an unergative subject, then the raised possessor is clearly nominative, and that is consistent with my view.
subject and before the possessed noun, as in (54). In this configuration, the subject is higher than the raised possessor, and only the subject gets marked nominative case, as in Choctaw.

(54)    Inníi muxá sun, dame c’ap’se. p 123
          He.NOM tree that branch broke
          He cut off the branch of that tree.

But if the possessor of an intransitive stative predicate is raised, then the fronted possessor can take nominative case, as does the possessed N itself. This is seen in (55).

(55)    a.    Mux-níi sun, dame-n c’áp-t’uu p. 124 (104)
            Tree.M-NOM that branch.F-NOM broken-F
            ‘As for that tree, its branch is broken.’

    b.    Intal-tíi sun, k’eerans-ií d’éeraa.
            Girl-NOM that nails.M-NOM long
            ‘As for that girl, her nails are long.’

Notice that in (55a), the predicate agrees in gender with the possessed noun, not the possessor. So here we have another instance of agreement not matching nominative case: the possessor has nominative case but it is not agreed with. The analysis is essentially the same as in Choctaw: neither the raised possessor nor the theme argument c-commands the other, nor does anything else c-command them. Therefore both get marked nominative case by (21a).30

I should emphasize again that there is no requirement that a marked nominative/absolutive language have these distinctive constructions. They may not have experiencer-goal predicates with the goal argument generated in a null PP, and they may not allow possessor raising. If they do not have these syntactic configurations, then the distinctive pattern of a clause with two marked arguments will not surface, for predictable reasons. For example, Nias has experiencer-theme constructions, but no relevant possessor raising (that I know of). Oromo has possessor raising, but no double nominative experiencer construction (that I know of). Choctaw happens to have both; Tukang Besi has neither. So these constructions can give confirming evidence in favor of a negative c-command condition when they exist, but we cannot count on them existing. As usual, the case patterns found in a language are a function of both the case rules of that language and the syntactic structures of the language that the case rules apply to. Both can vary within certain limits, and in general we need to have some understanding of both.

Finally, let us step back and compare what we have seen in this section about marked nominative/absolutive languages with what we saw in section xx from normal accusative, ergative, and tripartite languages. In a superficial sense, they are opposites. In accusative, ergative, and tripartite languages we seem to have an underapplication of the case marking rules, in that we find less marked case than we would have expected. We expect a clause with two NPs to have one of them be ergative

29 Owen also describes a construction with alienable possession and a resumptive pronoun inside the NP. I take this to be sort of hanging topic construction, not true possessor raising. See (31) above for an example.
30 Owens says that double nominative constructions happen only if the predicate is nonverbal, an adjective rather than a true verb. Possessor raising is possible with eventive unaccusative verbs and with passives in Oromo too, but then only the possessor gets marked nominative, not the theme. I assume that this has to do with domain conditions, not c-command conditions: in Oromo marked nominative does not apply to NPs that remain in the VP phase, so are not present on the TP phase. See chapter 4 for relevant discussion of these domain conditions.
and/or accusative, but in fact neither is. In contrast, in languages like Oromo, Choctaw, and Nias, we seem to have an overapplication of the case marking rules, in that we find more marked case than we would have expected. We expect a clause with two NPs to have one of them with marked case, but in fact both of them have it. However, from a theoretical perspective we can see that both these outcomes are manifestations of the same underlying cause, given that some languages use a positive c-command condition (normal dependent case) and others use a negative c-command condition (marked nominative/absolutive case). What is special about these constructions, then, is that neither argument c-commands the other, only that. In languages that use positive c-command conditions, this takes away opportunities for special case assignment, whereas in languages that use negative c-command conditions, it creates new opportunities for case assignment. Therefore, what looks at first like opposite situations turns out to be essentially the same thing once we understand the factors at play theoretically—just what one wants a theory to do. I find this to be a satisfying result.

3.2.4 Negative c-command conditions in Japanese and Korean?

This discussion of multiple nominative constructions in Choctaw and Oromo calls to mind the famous multiple nominative constructions in Japanese and Korean. A reasonably standard analysis of these, since Ura 2000:106-107 (also Hiwaira?), has been that T agrees with more than one NP, and so assigns (or checks) more than one nominative under agreement. But there may be reasons to think of them more along the lines discussed here.

Japanese and Korean are not considered marked nominative languages by Comrie 2005 or xxx, because they have clear accusative particles too. But it is nonetheless true that they do have a strong nominative morpheme; subjects are clearly not morphologically unmarked, the way they are in many other nominative-accusative languages. It is also clear that T does not agree (overtly) with the person-number-gender features of the subject in these languages, making claims that nominative is assigned under agreement in these languages abstract and theoretically driven at best. A more elegant analysis, closer to the empirical ground, might be that nominative is assigned apart from agreement by (21a) in these languages as well. The presence of accusative case in the languages (a dependent case?) need not interfere with this, just as nonsubjects are marked for Core case in Tukang Besi.

Consistent with this is the fact that the subject of a predicate nominal is marked with ga, but that predicate itself is not (nor is it marked with accusative o as expected). This is the characteristic pattern for marked nominative languages.

(56) John-ga gakusei(*ga,*o) desu.
John-NOM student(*NOM,*ACC) is
‘John is a student.’  (Kuno 1973:37)

From this perspective, we might immediately expect to get multiple nominative constructions in the same circumstances that we do in Choctaw: in possessor raising contexts, and with dyadic unaccusatives. This fits quite well with Kuno’s (1973) description of the Japanese facts in particular; see also Koak (2012) on Korean. Kuno distinguishes three kinds of multiple nominative: a possessor raising kind, experiencer verbs, and existential/possessive verbs, but syntactically I’d collapse the last two.

(57) John-ga otoosan-ga sinda (Kuno p. 69) (also John-no)
John-NOM father-NOM died (Possessor raising type)

31 Some treat subject honorification as a kind of agreement between T and the subject in Japanese, including Ura, but this is controversial.
‘John’s father died.’
(also with ‘be able’, ‘be pretty’, ‘be short’, ‘be many’, ‘exist’, ‘stand-exist’, ‘scold-PASS’)

(58) Anata-ga okane-ga aru koto… (Kuno p. 85, 89)(also John-ni)
You-NOM money-NOM have that
...that you have money.
(also with understand, can, hear, see, have, need, and transitive adjectives)

In the first kind, the outer nominative can alternatively be marked with genitive –no; in the second kind (mostly) it can alternatively be marked with dative –ni (exception: ‘need’ is only double nominative). Kuno also mentions that “stative verbs” like the one in (58) cannot be passivized, which counts as evidence that they are dyadic unaccusative constructions, not normal transitive ones, as Koak argues for Korean (following Grimshaw 1990). The fact that the experiencer subject alternates between nominative and dative in many instances (Kuno p. 88f.,) also suggests the presence of a null P, which can assign dative.

So it is an intriguing possibility that Japanese and Korean might also be marked nominative languages in a relevant sense—with the consequence that this type is more common than it has been taken to be. However, the literature on these languages in general, and these constructions in particular, is large and complex, so I leave further development and testing of this conjecture to the experts on these languages.