**Chapter 5: Categories involved in dependent case assignment**

Over the course of the last two chapters, I have been fleshing out the schema for dependent case assignment in (1) and exploring its parametric possibilities for accounting for crosslinguistic variation in case assignment.

(1) If a category XP bears c-command relationship R to another category ZP in domain W, then assign Case C to XP.

So far we have investigated the range of relevant c-command relationships R, and the types of domains D, the latter being essentially the spell out domains implied by the theory of phases. The third major dimension to consider is what exactly must XP and ZP be in order for them to interact case theoretically. The core notion is that XP and ZP are overt nominals (NP or DP) that are arguments (that receive a thematic role). These are the quintessential argumental categories, and they are the main things that there can be more than one of in a clause, such that it is useful to have morphological marks that distinguish them. Dependent case marking will presumably apply to DP and NP in a language, if it applies to anything. But what exactly is an NP or DP? Here there might be some vagueness, and some room for crosslinguistic variation. In this connection, I consider the three-way distinction between NP, PP, and oblique NP; the distinction between NP, CP, and nominalized clauses (of different types); and the distinction between silent NPs of different kinds (pro, PRO, covert agent, wh-trace, NP-trace, ...). I show that there are in fact crosslinguistic differences in which of these borderline categories falls under the schema in (1).

The most elegant scenario is probably that the categories that can count as XP are the same as the categories that count as ZP—that the bearers of case are the same as the triggers of case on another constituent. And that is very largely true, I believe. But it need not be entirely true. At the end of this chapter, I show that NPs that are not arguments may undergo case assignment in some languages (=XP) but do not trigger dependent case on other expressions (they aren’t ZP). NP types that are relevant to this are expletive pronouns, nominal adverbs, and predicate nominals.

A bit of terminology will help us on our way. Borrowing a term from Bittner and Hale (1996), I refer to something that plays the role of ZP in (1) as a case competitor: ZP is a case competitor for XP if XP bears dependent case as a result of ZP being present in WP. Using this term, the theme of this chapter is what can be a case undergoer, and what can be a case competitor.

### 5.1 Oblique NP versus PP

Let us begin this stage of the investigation by considering the sometimes-minimal contrast between PPs and oblique NPs. We know from the generative tradition that it is often a debatable matter in particular languages whether a given constituent counts as a PP or as an NP with an oblique case marker. For example, to+NP is usually considered to be a PP in English, but a+NP is often argued to be a dative case NP in Romance languages (REFS). Similarly of+NP is sometimes considered to be a realization of an NP in genitive case in English, rather than a true PP. Moreover, whether a given phrase in a particular language is really a PP or an oblique NP could make an important difference to the dependent case rules: a PP presumably will not trigger dependent case on another NP in the clause, whereas an oblique NP might very well.\(^1\)

\(^1\) (Marantz said that they didn’t, thinking of dative subjects in Icelandic having nominative objects; but there is variation here that is now known – for example Dative subject verbs do have accusative objects in related Faroese.)
The fact that PPs do not count as case competitors is well established, and can be seen in many languages, particularly ergative ones. Transitive clauses in such a language have subjects in ergative case, but intransitive clauses do not. Moreover, clauses that have a PP complement rather than an NP complement count as intransitive for these purposes. (2), for instance, gives examples of an NP with a PP where the NP subject is nominative, not ergative.

(2)  

a. Koshi-bo xaran-ra e-a yaká-ke.  (Shipibo, Valenzuela p. 176)  
   chief-PL among-EV 1-ABS sitting.position.I:MID-CMPL  
   ‘I am seated among the authorities.’

b. Dasín há-e le hurúT-unom  (Burushaski, Willson 1996:3)  
   girl.ABS house-OBL in sit-PAST.FsS  
   ‘The girl sat in the house.’

c. Ahwmad suona ulul laatt.  (Ingush, p. 401)  
   Ahmed 1s.DAT next.to stand-PRES  
   ‘Ahmed is standing next to me.’

It is harder to show that PP is not a case competitor in an accusative language, simply because PPs are rarely subjects, hence they rarely c-command objects such that they could trigger accusative case on them. However, inasmuch as accusative languages might have locative inversion structures like “On the table stands a trophy” and inasmuch as the theme argument of such structures is bare-nominative rather than accusative, that confirms that PP is not in general a case competitor.

In fact, everyday examples like those in (2) tell us something else as well. Not only is the PP inside VP not a case competitor for the subject, but neither is the NP complement of the PP. The subject surely c-commands the NP inside PP, and the NP is the perfect category to be a case competitor. Presumably this then is another kind of domain effect: ‘I’ and ‘chiefs’ are not in the same spell out domain WP in (2a). Therefore, I assume that P is a phase head, so its complement is spelled out separately from the rest of the clause. This coheres with the fact that verbal functional heads cannot agree with the object of P in most languages (see Baker 2008:xx), and with the fact that movement out of PP is bad or highly restricted in most languages. (See, for example, van Riemsdijk’s (1978) classic analysis of extraction from PP in Dutch, arguing that it is possible if and only if the NP passes through what we would now call the edge of PP.) This opacity of PP for dependent case assignment can also be seen in accusative languages, in that the object of P is rarely accusative as triggered by the matrix subject. In Cuzco Quechua, for example, the object of P is unmarked nominative (L&M 133).

(3)  

Xwancha wasi ukhu-(pi) kawa-s-n.  (p. 133, p. 62)  
   Juan  house inside-LOC  live-3sS  
   ‘Juan lives inside the house.’

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2 See Baker and Vinokurova 2010:xx for an unusual exception with three Ps in Sakha, which are not phase heads, but are transparent for case assignment. (This can presumably be explained historically, since these Ps developed from verbs.)

Recall that null P heads that govern goal-experiencer arguments, in contrast, are often not phase heads, so that their complements can undergo accusative case when c-commanded by the subject (e.g. in Amharic) and can trigger ergative case on the subject (e.g. in Shipibo).
Indeed, this is what we expect if PP is a phase. Then the complement of PP is the only NP in PP when it is spelled out, and we expect to get default case on it (nominative, in Quechua and Turkish) rather than any kind of dependent case (such as accusative or dative). See chapter xx for more on the possibilities of structural case inside PPs.

Now in many languages NPs with semantic/inherent case are just like PPs in not triggering ergative case on the subject. Some examples are:

(4)  
\begin{itemize}
  \item a. Jose/*Josekan ochiti-ki raket-ai. (Shipibo)  
        Jose-(*ERG) dog-DAT fear-IMPF
        ‘Jose fears the dog.’
  \item b. Zamindáar [tshil yál-as-e gáne] mál-e r ni-imí. (p. 36)  
        Farmer.m/ABS water.y apply-INF-OBL for field.y-OBL to go-3ms/PAST
        ‘The farmer went to the field to water (it).’ (Burushaski)
  \item c. So zhwalegh qer. (Ingush, p. 416)  
        1s.ABS dog.LAT.pl fear
        ‘I am afraid of dogs.’
\end{itemize}

That is not surprising either, since NPs with semantic case are just like PPs in other respects too: for example, they are usually not targets of agreement, they can appear as arguments or adjuncts of the same kinds of predicates, etc. Like many other generativists, I assume that these NPs with semantic case simply are PPs in the syntax. The case ending is either the spell out of the P at PF, or it is an inherent case assigned by a null P as a lexical property (see chapter 1.xx and references marked there). On this assumption, the subjects in (4) are absolutive for exactly the same reasons that the subjects in (2) are.

With this firmly in mind, it now becomes interesting that a certain class of exceptions can be observed in some languages, particularly with NPs in so-called dative case. For example, Warlpiri has a number of verbs that take complements in dative case. Most of these verbs have absoultive subjects, as in (5a), but a small number of them have ergative subjects, as in (5b).

(5)  
\begin{itemize}
  \item a. Karnta ka-jana kurdu-patu-ku wangka-mi. (S p. 318)  
        woman.ABS PRES-3pO child-PL-DAT talk-NPST
        ‘The woman is talking to the children.’
  \item b. Ngarrka-ngku ka-rla karli-ki warri.  
        man-ERG PRES-3DAT boomerang-DAT look.for-NPST
        A man is seeking [looking for] a boomerang. (Simpson p. 326, originally Hale)
\end{itemize}

There are also a small number of ergative-dative or ergative-allative constructions in Burushaski and Ingush.\(^3\)

\(^3\) In Ingush, these come from former ditransitives, with the theme argument incorporated into the verb as a preverb. So la+duugh is ‘ear+put’ reduced from larjg ‘ear’. (Nichols p. 421) It is conceivable, then, that the nominal preverb is the case competitor for the subject in (6b) rather than the allative NP. However, I tentatively assume that the allative is the crucial case competitor because (a) the etymology of this verb seems somewhat opaque, and (b) there seem to be no instances of a historically incorporated nominal preverb triggering ergative on the subject when there is no other internal argument. (Check; in general read Ingush more thoroughly.)
Now these languages have no purely intransitive verbs that take ergative subjects. So we want to say that ergative in these languages is a dependent case (not an inherent case, as in Woolford 2006 and Legate 2008 says for Warlpiri). Therefore, we need there to be a case competitor for the ergative subject in (5b) and (6), and the dative or allative complement is the almost inevitable choice. But the subject is not ergative in (5a) or (4b), so it must not have a case competitor. In particular, the dative nominal in this sentence must not be a case competitor. This makes sense if the dative in (5a) and (4b) is a PP in the syntax (as usual), whereas the datives in (5b) and (6a) is a NP in the syntax. And that seems like a not unreasonable distinction, since the dative has more obviously the prepositional/directional meaning ‘to’ in (5a) than in (5b), where it expresses a kind of intentional object. Similarly, the internal argument is an affected animate NP in (6a), whereas it is an inanimate location in (4b) in Burushaski. Also in Warlpiri a number of verbs alternate between ergative-absolutive and ergative-dative frames, with the dative version getting more of an intentional reading (e.g., ‘look at’ (ABS) vs. ‘look around for’ (DAT); ‘dig up yams’ (ABS) vs. ‘dig for yams’ (DAT); ‘shoot the kangaroo’ (DAT) versus ‘shoot at the kangaroo’ (DAT); Simpson 327-330). It is reasonable to say that these verbs always select an NP complement, but how that NP is marked for case is influenced by semantic factors. In contrast, Simpson gives no examples of verbs that alternate between the absolutive-dative pattern and the ergative-absolutive pattern, suggesting that a true PP cannot be expressed alternatively as an NP. Absolutive-dative verbs on the other hand do alternate with absolutive-allative frames (allative being a clearer instance of semantic case in Warlpiri, hence a PP), and with monadic sentences with an absolute subject, whereas ergative-dative patterns do not alternate with monadic ergative or with ergative-allative patterns (or even with monadic absolutive, or absolutive-allative) (Simpson, p. 324-325, 333, etc). So the dative of absolutive-dative verbs alternates with clear PPs (allatives) not with NPs, confirming that it is a PP, and the dative of ergative-dative verbs alternates with clear NPs but not PPs, confirming that it is a NP. Overall, then Warlpiri, Burushaski, and Ingush seem to be like French, where

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(6) a. Ín-e hilé-r Garí-c-ubo. Burushaski (p. 37)
   3sh-ERG boy-OBL-to talk.badly-NONPAST-3sf/PRES
   ‘She scolds the boy.’

b. Waishietaz neanaga la+duugh.
   Aisha-ERG mother-ALL listen-PRES
   ‘Aisha listens to/obeys her mother.’

4 The one apparent exception for Warlpiri is some cognate object verbs like ‘dance’ and ‘sing’, in which the subject is ergative even if there is no overt cognate object. But it is easy to say that some covert expression of the cognate object is still present syntactically with these verbs.

5 A more subtle difference that Simpson mentions (tentatively) is that if the nonsubject argument of an ABS-DAT verb is an anaphor (nyanu) in the clitic complex, it can be doubled by a dative pronoun (p. 319, 321) whereas the anaphoric nonsubject argument of an ERG-DAT verb cannot be doubled in this way (p. 327, 332-333). The DAT in ERG-DAT sentences are more like simple absolutive objects in this respect (cf. p. 313). Simpson’s interpretation is that the Dative is an “argument relater” in the latter, but an “argument-taker” in the former, so the difference is like Mary saw a snake near her (OK) versus Mary showed the man her(*self) in English. This distinction of Simpson’s is approximately the same as my distinction between dative as pure case marker and dative as P heading a PP.

Some other grammatical processes do not distinguish between the Dative PP in ABS-DAT sentences and the Dative NP in ERG-DAT sentences, however. Both can be expressed as a dative clitic (-ra, in 3rd singular), and both can control the subject of a clause marked with –kurra. I need to say that these are things that both NPs and
I claim that very much the same contrast can be seen with dative subject constructions in the accusative language Tamil. Like many south Asian languages, Tamil has a set of verbs that seem to select for a dative subject. Interestingly, some of these so-called dative-subject verbs take nominative objects, as seen in (7), whereas others take accusative objects ((8)) (Asher xxx; Sarma 1999, etc).

(7) a. en-ga-ukku anda puttagam teve-ppat tł-tutu. (*?puttagatt-e)
   we-PL-DAT that book(NOM) need-suffer-3nS book-ACC
   ‘We need the book.’

   b. en-akku ranḍu naajig-ga-(*e) keɗe-tʃʃ-itʃʃi.
   I-DAT two dog-PL-(*ACC) get-PAST-3nS
   ‘I got two dogs.’ (also iri have, pooDu have enough, mukki jo value, (hurt, want))

   you-PL-DAT this town-ACC like-PRES-3nS-Q
   ‘Do you like this town?’

   b. Paala-kku anda paɗatt-e puri-tu.
   Bala-DAT the lesson-ACC understand-3nS
   ‘Bala understands the lesson.’ (also, teri know, pasi hunger, pasi hunger, (veenjo, want))

Informed by the situation in Warlpiri, I claim that the dative-accusative verbs are those that take an NP higher argument that has structural dative case, whereas for the dative-nominative verbs the dative expression is an optional PP adjunct. The NP argument predictably triggers accusative on its coargument (given other parameters, see below), and the PP adjunct predictably does not.

Previous literature on Tamil has not clearly recognized a syntactic difference between these two classes of dative subject predicates, or distinguishing either type of dative subject construction from ordinary transitive verbs. But independent evidence can be found for a distinction. First, there seems to be a lexical semantic correlate of the difference: the DAT-ACC verbs are generally psychological predicates, whereas the DAT-NOM verbs are possessional predicates (with some vagueness at the boundary). There are also some correlated differences that go with this. Sarma 1999 claims that NOM-ACC verbs have a v node that licenses the subject, whereas DAT-NOM verbs do not, as shown in the structures in (8).

PPs can do. Of course, PPs can control in English too sometimes (I signaled to John to leave quietly), and dative PPs and dative NPs can both cliticize to the verb in French (although with different forms, y versus lui etc.)

Burushaski even has two verbs that have ergative subjects plus a complement in oblique case –tse ‘onto’, with malefactive meaning, p. 39, suggesting that those can be NPs with oblique case rather than PPs as well.
I will adopt this distinction too. Some conceptual motivations are that the thematic roles of corresponding arguments line up well this way, assuming that the ‘subjects’ of DAT-NOM verbs are not agents but goals-experiencers. Then we can look at ‘give’ as being made up semantically of ‘get’ plus something (roughly ‘cause’). This also allows us to carry over the structural rule of dative case assignment taken from B&V 2010 and chapter 4 above from Sakha to Tamil: mark an NP as dative if it c-commands another NP within VP. This will work for both the goal arguments of verbs like ‘give’ and the experiencer subjects of a verb like ‘like’. Additional empirical evidence is that passive is possible (in more literary Tamil) for standard nominative-accusative verbs but not for either kind of dative subject verb:

(10) a. Maala veru-kka-pptaṭṭ-a. (NOM-ACC verbs) (give transitive versions to compare?)
    Mala hate-INF-PASS-3fS
    ‘Mala is hated.’

b. Anda puttagam mara-kka-ppat-tṭi.ji.
    This book forget-INF-PASS-PAST.3nS
    ‘This book was forgotten.’

    Banana-fruit get-INF-PASS-3nS
    ‘Bananas are obtained (at the market).’

    Fruit have.enough-PASS-3nS
    ‘Fruit are had enough of.’

(12) a. ??Maala piri-kka-pptaṭṭ-r-aa. (DAT-ACC verbs)
    Maala like-INF-PASS-PRES-3fS
'Mala is liked.'

b. ?*Anda paḍam puri-je-ppaṭṭ-utu.
   This lesson understand-INF-PASS-3nS
   ‘This lesson is understood.’

This is expected if passive is an alternative form of v, that replaces the agentive v of the active version and does not assign an agentive thematic role. This suggests that verbs that normally have that the agentive v can undergo passive, but those that do not cannot. Both types of dative subject verbs come out as not having a theta-role assigning v by this test. Similarly, the ‘reflexive voice’ affix –kki- is found on NOM-ACC verbs that have a reflexive interpretation, not on DAT-ACC verbs that have the same sort of interpretation. This –kki is another possible filler of the v node, and once again it looks like that node is not present when the subject is dative.

(13)  
   Bala self-ACC kill.past-REFL-PAST-3mS
   ‘Bala killed himself’

   Bala self-ACC hate-PAST-REFL-PAST-3mS
   ‘Bala hates himself.’

(14)  
   Bala-DAT self-ACC like-PRES-3nS
   ‘Bala likes himself’

   Baala-DAT self-ACC want-3nS
   ‘Bala wants himself.’

Therefore, there is some evidence for a structural distinction between verbs with nominative subjects and verbs with dative subjects. Not also that since no dative subject verb has a theta-role assigning v node, then then the object in dative-accusative verbs cannot get its accusative case from entering into Agree with that sort of v. We should hope, then, that the accusative on these objects can be understood as being dependent case.

The harder question, then, is whether there is a structural distinction within the class of dative subject verbs, which distinguishes those with nominative objects from those with accusative objects.

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7 Tamil also has some doublets: two verbs based on the same root, where one takes a DAT-ACC case frame (teri ‘know’, puri ‘understand’) and the other is a normal NOM-ACC verb (teri-nji-koo ‘know’, puri-nji-kko ‘understand’). In these cases, the NOM-ACC version is longer, more morphologically complex. It is thus plausible to think that the extra morphology corresponds to the v node, which is present in NOM-ACC verbs but not in DAT-ACC verbs.

8 Ura (2000), for example, does not propose a structural distinction between the two kinds of dative subject verbs, but rather a lexical distinction. The three classes of predicates all have subjects theta-marked by v, but the v of NOM-ACC verbs does not assign lexical case to its subject and does assign accusative case, the v of DAT-ACC verbs assigns inherent dative to its specifier and also accusative, the v of DAT-NOM verbs assigns inherent dative to its specifier, but does not assign accusative, leaving it to T to assign nominative to the object. This might account for...
The alternative view would be that this is just a lexically specified difference of no syntactic import. A simple observation that provides us with a starting point is that the dative NP is optional with DAT-NOM verbs, but it is required with DAT-ACC verbs. Since Tamil is a language that allows null pronouns, the forms in (16) count as utterable sentences, but they are understood as having a subject that refers to some definite individual known from the context, whereas no such reference is inferred from the examples in (15).

(15)  
  Sugarcane juice here get-PRES-3nS-Q  
  ‘Is sugarcane juice available here?’
- b. tanți ți pooț u.  ‘There is enough water.’ (NOT nec.: ‘X has enough water.’)
- c. kasu teve.  ‘Money is necessary.’
- d. Kasu mukijō.  ‘Money is important.’

(16)  
- a. Kasu pirikkidi.  ‘X likes money’ (Not: ‘Money is liked/likeable’)
- b. Anda paç am puridi.  ‘X understands the lesson.’ (Not ‘The lesson is understandable.’)
- c. paç il terijo.  ‘X knows the answer.’ (Not: ‘The answer is known.’)
- d. Kasu veņț ô.  ‘X wants money.’ (??‘Money is wanted/desirable.’)

The difference between the two types of predicates is even more striking when they are embedded under the control verb virumbu ‘want’. For DAT-NOM verbs, the nominative “object” can be the argument understood as controlled by the matrix subject (semantics permitting):

(17)  
- a. Naan (Mala-kku) tevepattu virumb-an-een. (DAT-NOM verbs)  
  I Mala-DAT need-INF want-PAST-1sS  
  ‘I want to be needed (by Mala).’ (NOT: ‘I want to need X.’)
- b. Naan (Mala-kku) mukijom-aa iri-kka virumb-an-een.  
  I Mala-DAT important-ADV be-INF want-PAST-1sS  
  ‘I like to be important (to Mala).’ (NOT: ‘I want to value X’)

In contrast, it is impossible for the non-dative argument of a DAT-ACC verb to be controlled by the matrix subject; only the dative experiencer argument can be so controlled, as shown by the interpretations of the examples in (18).

(18)  
  I understand-INF want-PAST-1sS  
  NOT: ‘I want to be understood.’ (only ‘I want to understand X.’)
- b. Naan (*Mala-kku) piri-kka virumb-an-een. (OK w/ ACC: Maala-ve)  
  I Mala-DAT like-INF want-PAST-1sS  
  NOT: ‘I want to be liked (by Mala).’ (only: ‘I want to like X (e.g. Mala)’)

I conclude from this that the argument structures of the two types of verbs are different. Verbs of the ‘like’ class do genuinely have two arguments, with the experiencer argument being the higher one (<Exp, Theme>). As a result, the experiencer is always understood, even if it is not expressed overtly
(see (15)), and the experiencer blocks the theme from being controlled (assuming that only the highest argument in a nonfinite clause is available for control. In contrast, verbs of the ‘need’/’get’ class are basically intransitive, with an argument structure like ⟨Exp⟩, Theme⟩, with the dative argument being at best optional.

Now, given the notion of dependent case, it is not surprising that the “theme” argument of ‘need’/’get’ type verbs is nominative when the dative NP is absent, as in (15). Nor is it too surprising that the theme argument of ‘like’/’understand’ type verbs is accusative, since a structurally higher argument is always present. I simply need to assert that this argument is an NP, not a PP, and that NPs bearing dative case can be case competitors in Tamil.

The remaining piece of the puzzle, then, is to understand why the theme argument of a ‘need’/’get’ type verb is in nominative case even when the dative argument is present, as in (7). Just saying that this argument is optional is not enough: after all, verbs like ‘break’ have an optional agentive subject in many languages, but when that subject is present it triggers accusative on the obligatory theme argument, giving pairs like ‘vase-NOM broke’ and ‘child-NOM vase-ACC broke’. Why doesn’t the optional dative subject have the same effect in Tamil?

My answer is that this so-called argument is never a true argument, but rather an adjunct, probably of category PP. In other words, these are not really dative subject constructions in Tamil after all. The structural distinction can then be represented as in (19).

\[(19) \quad \begin{align*}
\text{a. DAT-ACC verb} & \quad \text{b. DAT-NOM verb} \\
\text{TP} & \quad \text{TP} \\
\text{VP} & \quad \text{VP} \\
\text{T} & \quad \text{PAST} \\
\text{NP} & \quad \text{PP(?)} \\
\text{Mala} & \quad \text{Mala} \\
\text{DAT} & \quad \text{DAT} \\
\text{book} & \quad \text{book} \\
\text{like} & \quad \text{be.needed} \\
\text{ACC by (9)} & \quad \text{NOM} \\
\text{Agree} & \quad \text{Agree}
\end{align*}\]

Since the dative expression in (19b) is a PP rather than an NP (and an adjunct rather than an argument) it does not count as a case-competitor, triggering accusative case on the theme. By the same token, it does not block T from agreeing with the theme argument, nor does it block the theme from being controlled in (17). In contrast, the dative expression in (19b) is an NP, so it does block T from agreeing with the theme (a defective intervention effect), it does block the theme from being controlled ((18)), and—most relevant to my over all theme—it does count as a case competitor, triggering accusative case on the object. (Given the results of chapter 4, we must also say that Tamil is a language in which
accusative is assigned when VP is spelled out, as well as when TP is spelled out, like Amharic as opposed to Korean. This assumption does no known harm.9)

Indeed, further evidence can be found that the dative nominal in ‘need’/’get’ verbs is an adjunct PP, different in grammatical status from the dative nominal of ‘like’/’understand’ verbs. First, the dative argument of ‘need’ or ‘get’ resists being controlled itself, as shown in (20) (contrast with (18)).

(20) a. ??Naan valappalam keɖ e-kke virumb-an-en.
   I banana get-INF want-PAST-1sS
   ‘I like to get bananas.’

   b. ??Naan anda puttagam teveppaṭṭa virumb-an-en.
   I the book need-INF want-PAST-1sS
   ‘I like to need the book.’

Second, the dative phrase of these verbs resists being the antecedent for an anaphoric nominative theme, as shown in (21); this is different from the dative subjects of ‘like’/’understand’ class verbs, as shown back in (14).10

(21) a. *Bala-ktu taan keɖ e-tf -itʃ i.
   Bala-DAT self get-PAST-3nS
   ‘Bala got himself’

   b. *Bala-ktu taan mukijō.
   Bala-DAT self important
   ‘Bala is important to himself.’

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9 It might even do some good. One of the clearest differences between Amharic and Korean is the fact that, in the passive of a ditransitive verb, the higher NP can still trigger accusative on the lower NP in Amharic but not in Korean. Since no new argument is introduced on the CP cycle in the passive, this is evidence that accusative is assigned on the VP cycle in Amharic but not Korean. The prediction would be that the non-subject argument in the passive of a ditransitive could be accusative in Tamil, and (i) shows that it can be. I leave this as tentative, however, since passive in Tamil is really only a feature of the literary language, and because the baseline syntax of ditransitive constructions would need more study.

(i) Avan pariṣ-e varanga-paṭṭ-udu . (from xx, confirmed by Naga)
   He.NOM prize-ACC award-PASS-3nS
   ‘He was awarded a prize.’

10 However, an alternative explanation for this contrast could be the anaphor agreement effect of Rizzi (xxx) and Woolford (xxx), given that T in Tamil agrees with the nominative theme of a DAT-NOM verb, but not with the ACC theme of a DAT-ACC verb.

   Both kinds of dative NP can be the antecedent of a reflexive in an adjunct, or functioning as the possessor of the theme. My working assumption here is that anaphors in nonargument positions have less stringent conditions on what can bind them, perhaps because they are logophoric (cf. R&R xxx). Note also that I do not have to deny that the dative expression in DAT-NOM verbs have some properties that have been called subject properties in the literature—for example anteceding certain kinds of anaphors, and controlling certain kinds of PRO (Lehman xxx, Ura 2000). Precisely what property these things depend on is not clear (at least to me); it could be that being the highest nominal in the clause (even if it is an adjunct) can be enough (or it could be something more semantic-pragmatic, like being a topical element capable of establishing a point of view for logophoric phenomena).
One final difference, discovered by Naga Selvanathan, appears in cleft-type constructions. He identifies two kinds, one in which only the subject or object NP of the clause can appear after the verb, and the other which targets any kind of constituent. The more restrictive kind has the postverbal constituent unmarked for case, and the verb bears a pronoun-like suffix that agrees with it. (22) shows that, starting from a ditransitive construction, the nominative subject can be clefted in the way, but the dative goal cannot be. (Check).

(22)  
\begin{enumerate}[a.]  
  \item Mala Balan-ikki soor-e samec-aal  
      Mala Balan-dat rice-acc cook-3sf  
      'Mala cooked rice for Balan.'  
  \item Balan-ikki soor-e samec-aval Mala  
      Balan-dat rice-acc cook-she Mala  
      'The one that cooked rice for Balan is Mala.'  
  \item *Mala soor-e samec-avan Balan/ Balan-ikki  
      Mala rice-acc cook-he Balan/ Balan-dat  
      'The one that Mala cooked rice for is Balan.'  
\end{enumerate}

With this as a baseline, we can try clefting the dative subject of both DAT-NOM verbs and DAT-ACC verbs. For DAT-ACC verbs, the cleft is possible ((23)), but for DAT-NOM verbs it is not ((24)). (In both constructions, the non-dative theme argument can be clefted, as expected.)

(23)  
\begin{enumerate}[a.]  
  \item Inta uur-e piDic-ave Maala.  
      This town-acc like-she Maala  
      'The one who likes this town is Maala.'  
  \item anda paDatt-e puri-nj-avan Baala  
      that lesson-acc understand-past-he Bala  
      'The one who understood this lesson is Baala.'  
\end{enumerate}

(24)  
\begin{enumerate}[a.]  
  \item *maneivi teve-ppatt-avan Baala  
      wife need-suffer-he Baala  
      'The one who needs (his) wife is Baala.'  
  \item *nalla purusen kedec-ave Maala.  
      good husband get-she Maala  
      'The one who got a good husband is Maala.'  
\end{enumerate}

This confirms that the dative nominal in a DAT-NOM construction is really a PP adjunct, whereas the dative in a DAT-ACC construction is an NP. The case marking of the other nominal follows from that. Thus, we have rather robust evidence for the structural difference in this language. The minimal difference drives home the idea that NPs trigger dependent case on nearby NPs but PPs do not.

\[\text{\textsuperscript{11}}\] I thank Naga Selvanathan for discovering this difference, bringing it to my attention, and providing the data. [NOTE: I still need to go over the material from summer of 2012 for any changes. As I remember, it replicated and extended to some further verbs, BUT CHECK.]
It is important to note, however, that even closely related languages can vary in these respects. The Australian language Warlpiri has ERG-DAT verbs as well as ERG-ABS verbs, but the Australian language Diyari only has ABS-DAT verbs, with no lexical variation (reported by Austin, anyway). Thus (25) in Diyari can be contrasted with (5b) in Warlpiri.

(25) əna pirki-ŋa wara-yi maɗa-ya. (p. 135)
3plS play-PART AUX-PRES stone-DAT
They were playing for money.

Similarly, the Dravidian language Tamil has DAT-ACC verbs as well as DAT-NOM verbs, but in the Dravidian language Kannada verbs that take dative subjects always have nominative objects:

(26) Tanna taayi-ge soomanu tumba iSTa. (Kannada: internet)
Refl-GEN mother-DAT Soma.NOM much like (Dryer 1982:313)
‘His mother likes Soma a lot.’

The question then arises as to what is the nature of this variation.

One minimal way to account for this would be to say that dative expressions are always PPs, never NPs in languages like Diyari and Kannada. And indeed there are other differences between Diyari and Warlpiri that might support this. In particular, dative is used on the goal argument of ditransitive verbs in Warlpiri (Simpson 339) but not in Diyari, where one has two absolutive/accusative NPs instead (Austin 115).

(27) a. Yangka ŋapa kuja-rla yi-nyi yapa-ngku jarntu-ku-ju. Warlpiri
The water thus-PRES-3DAT give-NPST person-ERG dog-DAT-EU
A person gives that water to a dog.’ (Clefting in gloss undone for clarity)

b. нулу пуланча ни̠ча путу ы̠нкы-на вара-ы̠.
3sgnFA 3DIO 3sgnFO thing-ABS give-PARTAUX-PRES Diyari ditransitive
He gave them that thing.

That is consistent with dative being a structural case on NPs in Warlpiri, but being a semantic case, not distinct from PP in Diyari. This would be the strongest version of the theory, in which all the differences in whether dative (or other oblique) counts as a case competitor reduces to the NP-PP distinction.\(^{12}\)

However, it is also possible that this will prove too strong, that the distinction between dative NPs and dative PPs will be found to exist in Kannada and Diyari too. If so, then we could put some of the variation into the rule of dependent case assignment itself. This would be by saying that the case competitor ZP in (1) must not be case-marked at the time that the dependent case marking applies in one class of languages (Kannada, Diyari), whereas the case competitor may already bear its own case in another class of languages (Warlpiri, Tamil, Burushaski). The first possibility was in fact Marantz’s original assumption (see the phrase “not marked” in his (xx)). However, Marantz acknowledges in his text (p. 25) that this is “something of a stipulation as written”, and therefore it is conceivable that other languages would opt for the opposite stipulation; that then would be the parametric option. The difference this would make is that in languages where an NP must not be case marked to be a case competitor, the PP/oblique NP distinction may exist for dative expressions, but will not be significant for

\(^{12}\) Book found with “Kannada dative subjects” search might argue this for Kannada too. [Check, and see if Tamil is indeed different in the relevant ways.]
case theory; rather, datives (and other obliques) will pattern uniformly in this respect. In the second class of languages, the PP/NP distinction does play an important role in accounting for lexical variation in case assignment, i.e. the difference between Erg-Dat constructions and Abs-Dat constructions, or between Dat-Acc constructions and Dat-Nom constructions.

I would not be surprised to learn that case theory itself is parametrized in this way. This should be a fairly straightforward empirical question: it would be relevant, for example, whether all dative nonsubjects have the same control properties in Diyari, and whether all dative subjects in Kannada have the same inability to bind a coargument anaphor, or whether one sees the same kind of variation in these matters that one does in Warlpiri and Tamil, although not the consequences for dependent case. But I do not know these facts, and linguists have perhaps been less motivated to look for syntactic distinctions among (say) dative nominals when there is no overt morphological distinction to relate it too.

5.2 Embedded clauses with and without nominalization

Somewhat similar issues come up in constructions in which a verb seems to take an embedded clause. Here too, we might expect some case theoretic variation both within and across languages. In particular, we know that embedded “clauses” vary within and across languages in whether they are nominalized or not (or to what degrees). True CPs are categorically distinct from NP/DP, but superficially rather similar constructions that denote propositions or events but are headed by a gerund or verbal noun are not. These distinctions should be important for how these clause-like constituents function with respect to case theory.

Without tinkering with the dependent case rule, we expect fully nominalized clauses to both undergo and trigger dependent case assignment, whereas true CPs should neither trigger it nor undergo it. This can be seen internally to Sakha, for example. Sakha has two common forms of clausal complement: finite verbs used with the complementizer dien, and participial verbs that bear possessive marking with their subjects and have no complementizer. The latter can be shown to be more nominal than the former in a cluster of ways that do not have to do with case theory directly. For example, the participial clauses can appear in subject position and inside PPs as well as in complement position, whereas finite clauses with dien are only possible as complements; see Baker xxx for data and other evidence. Correlated with this distinction, there is a clear difference with respect to case theory: participial clauses are marked accusative if there is a distinct thematic subject in the clause; dien clauses are not so marked.

(28)  

| a. | Sardaana bügün Aisen kel-er dien ihit-te. (CP: least nominal) | (NV:363) |
|-----|----|---------------|----------| |
|    | Sardaana today Aisen(NOM) come-AOR.3sS that hear-PAST.3sS | ‘Sardaana heard that Aisen is coming today.’ |

| b. | Min ehigi bügün kyaj-byk-kyt-yn ihit-ti-m. (PtplP: somewhat nominal) | (NV:361) |
|----|--------------|---------------|----------| |
|    | I you(NOM) today win-PTPL-ZpP-ACC hear-PAST-1sS | ‘I heard that you won today.’ |

Similarly, participial clauses trigger dative case on a coargument in a causative construction, whereas dien clauses do not. (See B&V 10 and section 4.xx above for dative being a dependent case in Sakha.)

(29)  

| a. | Sargy [Keskil-ge/*i] [Aisen kel-er-in] erenner-de]. (Ptpl clause) | |
|----|------------------|---------------|----------| |
|    | Sargy Keskil-DAT/*ACC Aisen come-AOR-3sP.ACC promise-PAST.3sS | ‘Sargy promised Keskil that Aisen will come.’ |
So gerund-like constructions function as both case undergoers and case competitors within the dependent case schema in (1), whereas true CPs play neither role.

A more subtle distinction might whether the complementizer head of CP is itself verbal in nature or nominal (see Webelhuth xx on the significance of the distinction in Germanic languages). Dien in Sakha is clearly on the verbal side: it is historically a converb from of the verb ‘say’, as is common in many languages. In contrast Cuzco Quechua sometimes uses a demonstrative-like form chay ‘that’ as a complementizer (L&M 1988). Since this C head is nominal in nature, it gives something of its nominal character to the projection it heads. As a result, both gerund-like constructions and CPs with a distinct C undergo dependent accusative case marking in Quechua.

(30)  

   woman come-PR-3 that-ACC see-1sS  
   ‘I see that the woman is coming.’

b. Xwan hamu-na-n-ta yacha-ni.  
   Juan come-NOM-3-ACC know-1sS  
   ‘I know that Juan is to come.’

So we see that the case theoretic distinction between CP and NP seen in Sakha in (29) is neutralized because of the nominal nature of the C in Quechua.

In ergative languages, what we expect to see is less whether the sentential complement itself is structurally case-marked depending on how nominal it is, but rather whether it triggers dependent ergative case on the subject. (This is because sentential complements are reasonably common, but sentential subjects of transitive verbs are less so, maybe never required.) In Shipibo, Valenzuela presents nonfinite verbs as being nominalized,¹⁴ and she remarks that all verbs that take these as complements are treated as transitive verbs. Included in this is the fact that they take ergative subjects.¹⁵

(31)  

   3-ERG-EV get.scared-INF:ABS know-NEG-CMPL  
   ‘He never gets scared.’ (Lit. ‘He doesn’t know how to get scared.’)

¹³ This example is also OK with Keskil marked dative (NV:367). I assume that in this situation dative is an inherent case, assigned by a null adposition, as is also possible in Sakha (B&V xx) (probably because the verb is a lexicalized causative). The point is that the internal NP argument can be accusative if the theme argument is CP, but not if it is a participial clause or gerund.

¹⁴ It is not super clear why she says this, though, apart from the fact that they are embedded. (Case marking on the arguments of the embedded clause is unaffected, for example.) She does suggest that nominalized clauses can be case marked...

¹⁵ An apparent exception is keen ‘want’, the subject of which is absolutive, not ergative, in the presence of an infinitival complement. But this is a property of keen, not a property of its complement type, since the experiencer argument of keen is absolutive even when its internal argument is a simple nominal. The reason is ultimately because keen takes two VP-internal arguments, the experiencer and the theme, as discussed in Baker (to appear) and Chapter 4.
   Jose-ERG Rosa call-INF think-PERF
   Jose thought to call Rosa.

However, there are certain verbs in Shipibo which plausibly select for a complement marked by switch reference morphology (SSS –i) rather than by the infinitival marker –ti or the participle ending –ai. These verbs have absolutive case subjects, not ergative.¹⁶

   I-ABS-PRT work-SS.SIM start-MID-PERF
   ‘I started to work.’

So we can say that verbs bearing –ti are nominalized, but verbs bearing –l are not, and this difference is reflected in the case of the matrix subject.

Burushaski is another ergative language in which verbs that take control complements also take ergative subjects. Indeed, they do so whether the complement is in dative case or in (unmarked) absolutive. (33) has the dative version.

(33) Jé-e(ún) ní-as-e rái ét-c-abaa. (Willson p. 30)
   1s-ERG you.ABS go-INF-OBL to want 3sy-do-NONPAST-1s/PRES
   I want (you) to go.

We already know that nominals bearing dative case can trigger ergative on the subject in Burushaski, as discussed above. Therefore it is not surprising that a nominalized clause bearing dative case can do this as well. Moreover, the fact that an infinitival clause can undergo dative marking confirms that they are nominal for the purposes of case theory, and hence they are sufficient to trigger ergative on the subject.

The Caucasian language Lezgian is another language in which the case of the subject varies with the kind of nonfinite form that is used in the complement of the verb. On the one hand, so-called masdars (verbal nouns, realis clauses) used as complements trigger ergative on the subject of the selecting verb, as shown in (34) (MH p. 361, 362).

    He.ERG far-PL-DAT look-MSD continue-AOR
    ‘He kept looking into the distance.’ (masdar)

This kind of clause is also known to be nominal in that they can be inflected for (oblique) case themselves (MH: 363-364), and they can appear in any position that a simple NP can (MH:153). In contrast, complements in which the verb is a so-called infinitives (irrealis clauses) do not in general

¹⁶ There is more to say about this construction, since for some speakers it is used only if the embedded verb is intransitive; if it is transitive, then a transitive version of ‘start’ is used (and the subject is ergative). But those details should be independent of the point at hand, since the embedded verb is also intransitive in (31a), but there the subject is ergative.
trigger ergative on the subject (MH:356); rather the subject is absolutive (unless it has lexical case\textsuperscript{17}), as in (35).

(35) Nabisat-ni Cükwer [PRO [čeb derbentlu-\(i\)-\(n\) pataw fi-da] luhu-z] gzaf alaq\textsuperscript{h}-na
Nabisat-and Cükwer selves D-PL-GEN to go-FUT say-INF much try-AOR
‘Nabisat and Cükwer tried hard to say that they were going to the people from Derbent.’

This nonnominal behavior goes along with the fact that Infinitives also cannot bear case themselves (p. 359), and they are not used in the same positions as simple NPs, but are otherwise used only as adverbiacl clauses (HM:156). In this language, too, the same constituents are visible to case theory from both directions, both as undergoers of case marking and as triggers of dependent case marking. The general situation is similar in Ingush, although the details are not: for example, verbs with Asyndetic finite verb complements apparently take ergative subjects (p. 541, if the subject is not quirky); verbs with subjunctive complements (p. 548) and infinitive complements (p. 552) have absolutive subjects (again, if the subject is not quirky, and if no other object is present).

Once again, the strongest theory would be that all the variation here is variation in the categorical features of the clause-like constituent, for which independent evidence can be sought and often found, as in the examples shown here. If that can be carried out completely, then no significant variation in the rule of dependent case marking itself needs to be posited. But it is conceivable that there is also crosslinguistic variation in how clauses are treated that is internal to case theory, not attributable to the categorical properties of the clause itself. If that turns out to be the case, we can tolerate some variation in what can be XP and ZP within the case assigning principle itself. In general, we know that CPs have both similarities and differences with NPs/DPs crosslinguistically. For example, CPs typically are like NPs in that they can function as arguments and can antecede pronouns, but they can often appear only in a subset of NP positions and cannot undergo nontrivial agreement. Using the terms of Baker (2003), CPs can be seen as being like NPs in having referential indices, but they differ in not having phi-features. Therefore, in a family tree of categories, CP and NP are not twins, but cousins. It is imaginable, then, that some languages consider nominality more broadly and others more narrowly when it comes to dependent case assignment. Some might say that two phrases interact case-theoretically if both have phi-features (true CPs excluded), others that they interact for case if both have referential indices (true CPs included). This is something else to watch for in a typology of case marking.\textsuperscript{18}

5.3 Phonetically null NPs

Another place to look for variation across languages is in the area phonetically null NPs. Generative theory makes potentially available a rather rich variety of these, including pro, PRO, the subject of an imperative, the implicit agent of a passive, the implicit agent of a nominal, wh-traces (possibly different kinds), NP traces, and the traces of noun incorporation. These are typically full-fledged units at LF and in the semantics, but they are entirely absent at PF; that is the definition of what it is to be an empty category. What about for case theory, which is a phenomenon at the interface of the syntax proper and PF? Do the various kinds of null NP count as being present in this respect or not?

\textsuperscript{17} It so happens that many of the verbs that take an infinitival complement also take oblique subjects (DAT subjects with want, know how to; ADEL/SREL subject with ‘be able to’). Since lexical case of this sort preempts structural case, we cannot expect to see if dependent case is triggered on the subject with these verbs.

\textsuperscript{18} In Kurmanji, agreement bearing verbs that appear after the main verb can trigger ergative on the subject in the past tenses. That could be a relevant case (depending on how things shake out).
In fact, it is not hard to see that this varies somewhat across languages. For example, the passive agent apparently counts for determining accusative case on the theme argument in Sakha. That accounts for the example in (36) (as discussed in B&V in and xx above).

cup-ACC intentionally hammer-INST break-PASS-PAST.3sS
‘The cup was intentionally broken with a hammer.’ (* with caakky ‘cup(NOM)"

In contrast, the theme argument of a passive sentence cannot be accusative in Amharic, as shown in (37).

(37) dinggay-u-(*) ta-warwawar-a (Amberber 2002 :9, confirm *ACC)
stone-DEF-(*ACC) PASS-throw.PF-3mS
‘The stone was thrown (by someone).’

Sakha seems to be the outlier here, with most languages behaving like Amharic, including Turkish, which is related to Sakha.

Variation can also be seen in with what is perhaps the least controversial of the empty categories, the null pronouns of pro-drop languages. In many languages, if the subject is a null pronoun, the object is nevertheless accusative. That can be seen in (38b) from Finnish (compare (38a) with an overt subject).

(38) A. Sotilaa-t tuhos-i-vat tämä-n kylä-n. (p. 331)
Soldier-PL.NOM destroy-PASS-3pS this-ACC village-ACC(GEN)
‘(The) soldiers destroyed this village.’

b. Tuo-n karhu-n. Kiparsky p. 333
bring-1sS bear-ACC(GEN)
‘I’ll bring the/a bear.’

But this is not universal either (partially) tripartite language Coast Tsimshian looks differently. The examples in (39) have a pro subject, and the proper noun object is marked as absolutive (-as cliticized to the previous word), not accusative (-at clitic).

(39) a. La-n-wil niidz-as Meli (not –at) Dunn p. 65
T-1sE-then see-ABS.PN Mary
I’ve just now seen Mary. (pro subjects)

b. Wayi, dayaga-t La dm-t saali-s Lgu syen-t gya’wn. Mulder p. 213
Well say-3ABS Near FUT-3E invite-ABS.PN little pitch-3POSSS now
‘Well, he said that he would invite Little Pitch now.’

This time Coast Tsimshian seems to be the outlier, with more languages acting like Finnish.

In this section, I survey some of the variation that is found in this area, and what it might mean. I divide the discussion into two parts, looking first at empty categories that are not the result of a

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19 More info on CT morphosyntax here? That could depend on where the major discussion of CT ends up, in the discussion of split ergativity.
movement relation—broadly pronominal empty categories—and then at “gaps” that are the result of movement—what used to be called traces. For the broadly pronominal empty categories, there seems to be a scale, where they range from those that are most likely to trigger dependent case on a nearby NP (pro) to those that are least likely to do so (covert agents of passives and nominals). PRO is an interesting and instructive intermediate case. Here I claim that some covert categories are endowed with more nominal features than others, and the more nominal features a category has the more languages it triggers dependent case on. As for empty categories left by movement, here I claim that the variation is less structured, having to do with whether the nominal features of the copy are deleted along with its phi-features at PF or not. Throughout the discussion also compare ergative and tripartite languages with accusative ones, to emphasize the overarching theme that the same factors that influence whether accusative case is assigned also influence whether ergative case is assigned. This is exactly what the dependent case view expects, but is problematic for theories that have very different views of the two—for example, theories in which ergative is an inherent case whereas accusative is assigned by agreement with a functional category.

5.3.1 Broadly pronominal empty categories

I begin with the empty categories not created by movement. As usual, we can contemplate two possible views about this sort of variation. It could be brute-force variation in the rule of dependent case marking itself, in the list of what elements can function as XP and ZP in the schema in (1). Alternatively, it could be subtle variation in the syntactic representation of the null NP itself. My proposal will be something in between the two. I claim that the different empty categories differ in the number of nominal features they have, roughly along the lines of Landau’s xxx distinction between strong and weak implicit arguments, although potentially more fine grained. At the same time, languages differ as to how many nominal features a phrase needs to have to count as a case competitor, functioning as ZP in (1). This gives a kind of structured crosslinguistic variation, where languages vary but not randomly, but rather with a kind of implicational hierarchy.

How can we know independently of dependent case assignment how well-endowed a particular empty category is in features? One probe into this would be agreement: if a functional head F agrees with an empty category in features X, then the empty category must have those features. Consider in particular the phi features of person number and gender. One might well say that all overt NPs have specified phi-features, but some covert ones may not. In the best case, we might be able to tell which NPs have phi-features and which do not on independent grounds, for example, by whether they are possible controllers for agreement or not. (Of course, this will only work if the null NP is in the right place in a structure to be agreed with in the first place.)

By this standard, the null pronoun pro is (typically, always?) well-endowed with features, since it almost always triggers agreement if it is in the right position to do so. Indeed, the fact that pro agrees with (say) Tense has often been thought to play a role in the licensing of this kind of empty category. Therefore, these instances of pro do have phi-features. Given this, it is not surprising that pro does trigger dependent case in most languages. We already saw that the pro subject triggers accusative on the object in (38) from Finnish. The same is true for all of my primary accusative languages, Sakha, Tamil, Amharic, and Quechua, and many others.

(40) a. Djie inn-in kyraskalaa-ty-m. Sakha (NV: 170)
    house front-3.acc paint-past.1sg
    'I painted the front of the house.'

b. Tamil example
c.  
\text{bet-u-n ajo -hw-at} \text{ Amharic (notes, 2-3-10)}
\text{house-DEF-ACC see-1sS-3mO}
\text{‘I saw the house.’}

d.  
\text{Runa-ta waki-n-ta riku-sha-ni (CQ, L&M 37)}
\text{Man-ACC some-3-ACC see-PR-1}
\text{‘I see some of the men.’}

Burushaski and Chukchi are ergative languages that have object agreement, the agreement showing that the null object has phi-features. In both the subject is ergative even if the object is pro-dropped.

\begin{align*}
(41) \text{ a. } & \text{jé-e Cam gó-t-am.} \quad \text{Burushaski Willson p. 54} \\
& \text{1s-ERG poke 2sO-do-1sS/PAST} \\
& \text{‘I poked you.’ [Not ideal ex because of LVC; check other sources.]} \\
& \text{Báša we sés-e désqalča étén, nē rēnči darōyoan bim.} \\
& \text{When the people-ERG come-after [3mO?]do-3pS he.erg hand baton be.} \\
& \text{At the moment when they were going to take him, he took in his hand a baton. (Text 1)}
\end{align*}

b.  
\text{γan-an təm-ə-tko-nat!} \text{ (Dunn, p. 354)}
\text{2sg.ERG kill-0-ITER-3pO}
\text{‘You killed them!’}

Shipibo and Semelai are languages with ergative case marking but no object agreement. Nevertheless, they do allow null pronoun objects, and these objects trigger ergative case on the subject.

\begin{align*}
(42) \text{ a. } & \text{ki=gon la=Ilos} \quad \text{p. 259} \\
& \text{3A-bite A-flying.ant} \\
& \text{‘the flying ant bit him’}
\end{align*}

b.  
\text{Apo jo-ke-tian-ra, e-n oina iki} \text{ (Shipibo, dictionary intro)}
\text{President come-PRF-DS-PRT I-ERG see AUX}
\text{When the president came, I saw him.}

Although these languages don’t have the right agreement properties to reveal the phi-features of their pronominal objects, it is easy to extrapolate that the object is of the same sort in (42) as in (41), and therefore it has the same effect on the case of the subject. Finally, Nez Perce is a tripartite language with agreement with both the subject and the object, and pro-drop of both (I assume). If the subject is pro-dropped, the object is nevertheless accusative, and if the object is pro-dropped then the subject is still ergative.

\begin{align*}
(43) \text{ a. } & \text{?a-mc’i-s-a miya ?ás-na.} \quad \text{(Aoki p. 106)} \\
& \text{1S/3O-hear-? child-ACC} \\
& \text{‘I hear a child.’}
\end{align*}

b.  
\text{?ip-ním pée-?wiy-e} \text{ Rude 1988}
\text{he-ERG 3S/3O-shoot-ASP}
'He shot it.'

Overall, then, we see that null pronouns do trigger dependent case on other NPs in a wide range of languages, and this works the same way for both ergative and accusative case.

Indeed, Coast Tsimshian (CT) is the only language in my sample in which pro regularly does not act as a case competitor for a nearby NP. The crucial examples are repeated in (44).

(44) a. La-n-wil niidz-as Meli (not –at) Dunn p. 65
    T-1sE-then see-ABS.PN Mary
        I’ve just now seen Mary.
        (pro subjects)

b. Wayi, dayaga-t La dm-t saali-s Lgu syen-t gya’wn. Mulder p. 213
    Well say-3ABS Near FUT-3E invite-ABS.PN little pitch-3POSSS now
        ‘Well, he said that he would invite Little Pitch now.’

Note that the subject pro does trigger phi-features on T, resulting in first person agreement –n in (44a) and 3rd person –t in (44b). Therefore we we cannot deny that pro in CT has phi-features. Rather, this quirk of CT suggests that this language requires something more of a constituent than simply having phi-features in order to count as a case competitor for another constituent. This is presumably a degree of variation within the rule of dependent case assignment itself.

There is also an interesting contrast in CT between subject pronominals and object pronouns. Subject pronouns are pros licensed by agreement on T, whereas object pronouns are clitics, D heads that move to adjoin to the end of the verb in syntax. The simplest evidence for this distinction is that 3rd person subject agreement –t is present on the verbal complex even if an overt NP subject is present, as in (45a), whereas the third person object affix –t seen on the verb when there is no overt object in (45b) is not found on the verb in (45a) when there is an overt object.

(45) a. Yagwa-t t’uus-dit Dzon-it Meli. (p. 67, ACC, not abs with PN object)
    Pres-3sE push-ERG.PN John-ACC.PN Mary
    John is pushing Mary.
        (not yagwa-t t’uus-t-(di)t)

b. ALga na-m-dm dzagwa-t, ‘niidi? (p. 79)
    NEG past-2sE-FUT kill-3ABS PRT
    ‘You wouldn’t have killed it, would you?’

It may also be relevant that the subject affix attaches to the tense-aspect particle, whereas the object affix encliticizes onto the verb. (See section xx for more supporting arguments.) The relevance of this subtle but real distinction for current purposes is that object pronouns cliticized to the verb do still trigger ergative case on the subject, as shown in (46).

(46) Na-t ‘niidz-n-t Dzon.
    Past-3sE see-2Obj-ERG.PN John
    ‘John saw you.’ (Dunn 1995:63)

This is not primarily a subject-object asymmetry, since in special tense-aspects the subject can be absolutive in CT, and hence a clitic not a pro. The absolutive clitic representing the subject does triggers accusative on the object:
I conclude that whatever feature CT requires a constituent to have beyond simple phi-features in order for it to count as a case-competitor, it is something that a clitic pronoun has but pro does not have.

At the other end of the spectrum, there are implicit arguments that are syntactically present for some purposes, but are rarely if ever visible for agreement. This is true, for example, of the implicit agent in a passive. Thus in languages that have a syntactic passive as well as an agreeing T node, T routinely bypasses the covert agent (wherever it is) to agree with a thematic object instead. This holds true even in languages in which the object does not necessarily move to the SpecTP position, such as Italian, as seen in (48). ((48a) makes it clear that the verb agrees with theme; (48b) shows that the theme in inside the VP proper, not extraposed to the right edge of the clause.)

(48) a. Saranno invitati molti esperti. (Ne saranno invitati molti, Burzio 1986 : 23)
   Be.FUT.3pS invited.PL many experts
   Many experts will be invited.

   a. È stato messo un libro sul tavolo. (Belletti 1988 :9)
   Has been put a book on.the table
   ‘A book has been put on the table.’ [not plural even if subject is ; or use PL theme]

This might correlate with the fact that the theme argument of a passive is only rarely allowed to trigger accusative on the object. It does not in Amharic, for example, as seen back in (37). Neither does it in Finnish or in Tamil.

(49) a. näh-tiin-kö Matti Finnish Kiparsky p. 334
   see-PAST.PASS-Q Matti.NOM
   Was Matti seen ?

  b. Ba :la-(*ve) (oru paNDi-jaale) kollappaTTaan. [style mismatch, confirm *]
     Baala-(*ACC) a pig-INSTR will-PASS-3mS Tamil
     ‘Baala was killed by a pig.’

Of course suppression of object properties on the theme argument, including accusative case, is one of the prototypical properties of the passive on all accounts. (Cuzco Quechua may not have a true verbal passive; see L&M 1988:213-214).

This time it is Sakha that is something of an outlier, given that the theme argument of the passive can be accusative, and must be, if the implicit agent is present enough to license agent oriented adverbs and instruments. This was seen in (36), repeated here as (50).

   cup-ACC intentionally hammer-INSTR break-PASS-PAST.3sS
   ‘The cup was intentionally broken with a hammer.’ (* with caakky ‘cup(NOM’)')

Nevertheless, the passive agent is still invisible in Sakha for purposes of agreement, which must be default 3rd person singular in a passive sentence with accusative object, even if the understood agent is known/assumed to be plural. (Confirm.) So there is no evidence from agreement that the covert agent
has phi-features in Sakha any more than it does in Amharic or Finnish. So again we seem to have variation in the formulation of the accusative case rule itself, not in the representation of the implicit agent. Whereas Coast Tsimshian puts more requirements than normal on the features of the case competitor, Sakha puts fewer requirements than normal: the constituent need not even have phi-features.

Indeed, there is some independent evidence that Sakha is especially tolerant in this respect: it also allows accusative case on the theme argument of a deverbal nominalization. This is possible for both event denoting nominals (which may be gerunds) and agent-denoting ones (which are otherwise as nominal as their English equivalents). These nominalizations arguably have some kind of grammatical representation of the agent argument of the verb, but not one that has detectable phi-features. For example, the covert agent in the event nominal in (51a) does not trigger D-like agreement on the nominalized verb, whereas overt agents do trigger such agreement.\(^{20}\) If this is right, then it is not a coincidence that Sakha has accusative case in both the passive in (50) and the nominals in (51), whereas most other languages have accusative NPs in neither construction (including related Turkish).

\[\text{(51)}\]
\begin{enumerate}
\item terilte-ni salaj-yy \\
\quad company-ACC manage-EV.NOML \\
\quad \text{‘the management of the company’}  \\
\item Terilte-ni salaj-aaccy kel-le.  \\
\quad Agent-denoting nominal \\
\quad company-ACC manage-AGNOML come-PAST.3sS \\
\quad \text{‘The manager of the company came.’}
\end{enumerate}

This somewhat special fact about Sakha played an important role in opening my eyes to the value of a dependent case approach to accusative, especially for this language. However, it is not necessary that these constructions have accusative case for the dependent case hypothesis to be of value.\(^{21}\)

At this point, we would like to consider the parallel issue of phi-featureless object arguments in ergative languages, to see if they trigger ergative case on the subject. However, the comparison cannot be direct, because the implicit argument of a passive is always the subject/external argument, not the object/internal argument. But many languages are like English in allowing a verb like ‘eat’ or certain verbs used habitually to be used without an overt object. These covert object arguments are usually interpreted with narrow scope existential quantification, rather like passive agents without an overt by-phrase are. So these are candidates of phi-feature-less nominals in object position. And we do seem to find some variation here. In Burushaski, a transitive verb nominals in object position. And we do seem to find some variation here. In Burushaski, a transitive verb used intransitively in the sense has an absolutive subject. This can be seen in the contrast in (52).

\[\text{(52)}\]
\begin{enumerate}
\item This man.ABS sees. (is not blind) Abs  \\
\item This man-ERG sees the woman ERG French Burushaski grammar
\end{enumerate}

In contrast, verbs like this always take ergative subjects in Shipibo, even when the covert object is interpreted existentially, rather than taking an antecedent in the discourse, as is the case in (42b).

\[\text{(53)}\]
\begin{enumerate}
\item José-kan-ra pi-ke.  \\
\quad compare: E-n-ra bimi koko-ke
\item José-ERG-PTL eat-PRF I-ERG-PTL fruit eat-PRF
\end{enumerate}

\(^{20}\) In this case, the covert agent may not be distinct from PRO, on which in Sakha see below.
José ate.

I ate fruit

b. Rosa-n patsatai.
Rosa-ERG wash-IMPF.
(Every Monday), Rosa washes/does the washing.

Given this contrast, I tentatively assume that Shipibo is the ergative equivalent of Sakha, where even featureless empty nominals trigger dependent case, whereas Burushaski is the ergative equivalent of Amharic and other languages where featureless empty nominal do not count as case competitors. (The conclusion is tentative, however, because one would like other tests to show whether these implicit arguments are syntactically represented of not, and if (say) Burushaski and Shipibo might differ in this regard.  

Next, let us consider PRO, the special null subject of nonfinite clauses. This seems to be an interesting intermediate case. Since it is typically in nonfinite clauses, where T does not agree anyway, it may not be obvious by this test whether it has phi-features or not. However, PRO can in fact trigger agreement in some languages: in Portuguese with its inflected infinitives (check), in Balkan languages like Greek, where infinitives have been replaced by subjunctives (on the analysis of Terzi, etc). Another reason for saying that PRO may have phi-features is the phi-feature agreement between it and a reflexive anaphor that depends on it, as in examples like Mary wants PRO to find herself/*himself/*themselves. So PRO may have, and probably does have phi-features in general. And this fits with the fact that in most languages, probably, the object of an infinite that has a PRO subject is accusative as normal. Examples include Tamil and Amharic.

(54) a. Naan anda para-tte mara-kka virumb-aneen. (notes Tamil)
   I.NOM the lesson-ACC forget-INF like-PAST-1sS
   ‘I like to forget the lesson.’

b. Amharic example

Some other ergative languages seem not to allow null indefinite objects at all. For example, Nichols (p. 496-497) says that in Ingush “There is no antipassive and almost no object removal even in verbs such as ‘eat’, ‘cook’, ‘sew’, ‘read’, which crosslinguically are often used without objects as activity verbs.” In these situations, Ingush uses a dummy object, often hama ‘something’. (An exception is ‘read’ without an object to mean ‘study, be a student’; this still has an ergative subject.) Similarly, Haspelmath mentions no transitivity alternations where the subject of the transitive is equal to the subject of the intransitive in Lezgian, and Austin (p. 66-67) says for Diyari that “All main verb roots are strictly sub-categorized into one of three mutually exclusive classes according to their inherent transitivity” (i.e. intransitive, transitive, and ditransitive).

Possibly also relevant to this topic could be antipassive clauses in some ergative languages, if those have an implicit theme comparable to the implicit agent of passives. Typically, the subject of the antipassive will be absolutive not ergative, just as the object of a passive is typically nominative not accusative. The following is a potential example from Chukchi.

(i) γəmo t-ena-n-walom-at-ə-k (Dunn p. 216)
   1sg.ABS 1s-APASS-CAUS-hear-TH-0-1sS
   ‘I made an announcement’ (Literally: I caused [people] to hear.)

In some sense there is an implicit object here, because the sentence implies that there were some who heard. If that object is syntactically represented, then it is not a case competitor for the subject, since the subject is absolutive. However, the syntactic activity of the implicit theme of an antipassive for issues like control, predication and binding has not been well-established, as far as I know.
Finnish, however, is interestingly nuanced here. Uncontrolled PRO does not trigger accusative case on the object in Finnish, as shown in (55).

see-INF Naples.NOM and die-INF  
‘To see Naples and to die!’

Interestingly, though, controlled PRO does trigger accusative case on a nominal that it c-commands (this is a subcase of what Kiparsky calls Johanson’s Rule). (56) gives a minimal pair that drives this home. In (56a), the subject ‘we’ of ‘want’ controls the subject of ‘run’ (via the subject of ‘try’) and the NP ‘a kilometer’ is accusative (also called genitive).23 The structure of (56b) is the same, except that the matrix verb is an impersonal passive. As such, there is no controller in the matrix (alternatively, there is a null argument controller, but one that does not have phi-features), so the PRO subject of ‘run’ does not get phi-features from its controller, and ‘kilometer’ is in unmarked nominative case.

(56) a. Halus-i-mme yrittä-ä juos-ta kilometri-n kahde-ssa minuuti-ssa.  
Want-PAST.1sS try-INF run-INF kilometer-ACC two-INESS minute-INESS  
‘We wanted to try to run a kilometer in two minutes.’ (Kiparsky 339)

Want-PAST.PASS try-INF run-INF kilometer-(NOM) two-INESS minute-INESS  
‘People (/we) wanted to try to run a kilometer in two minutes.’ (Kiparsky 339)

So here it seems that we want to draw a distinction in the featural content of a controlled PRO as opposed to uncontrolled PRO. A plausible view might be that PRO itself has no intrinsic phi-features, but it receives them in the course of the derivation, as part of the mechanism of control (particularly if that is agreement-like: see Landau?). Some simple support for this comes from agreement in Sakha. The nonfinite forms in Sakha that are closest to the English infinitive are the so-called aorist participle (there is also a future participle); these need not bear any agreement, but it can bear a type of agreement, depending on the syntactic context (see Vinokurova 2005, and xxx for details). In (57a), the nonfinite clause is in subject position, and its covert subject is interpreted as PRO-arb. Here the participle does not show any agreement with the subject. In contrast, in (57b), the nonfinite clause is in object position, and its covert subject is interpreted as controlled by the matrix subject Masha. Here the controlled PRO does trigger 3rd person singular agreement. I take this as support for the idea that PRO inherits phi-features as a result of control.

(57) a. Saharaj sibekki-ni ürg-üür ücügej.  
Yellow flower-ACC pick-AOR good  
It is good to pick the yellow flower. (4 March 2008)

Masha book-ACC read-AOR-3sP.ACC enjoy-AOR.3sS  
‘Masha likes to read the book.’ [pick different example to avoid fusion with ACC?]

23 Kiparsky shows that ‘a kilometer’ in sentences like this is not a direct object but a nominal adverb. However, he also shows that such adverbs undergo dependent case marking (Johansson’s Rule) in Finnish on a par with objects. See below for some data and discussion.
Then we can relate the contrast in (56) in Finnish to the one in (57) by saying that having phi-features is the crucial factor for counting as a case competitor in Finnish. Controlled PRO gets phi-features from its controller, and does trigger accusative on the local object; uncontrolled PRO remains without phi-features, and does not trigger accusative on the local object. In contrast, we already know that phi-features are not essential to being a case competitor in Sakha, because passive agents and subjects of nominalizations trigger accusative on their clausemates. Therefore, it is not at all surprising that the contrast between different types of PRO that we see in Finnish is not seen in Sakha: both controlled PRO and arbitrary PRO trigger accusative on the object in (57).

Another interesting language to consider with regard to PRO is Cuzco Quechua, as described by L&M 1988. They show that an uncontrolled PROarb subject does not permit an accusative object, similar to (55) in Finnish, and different from (57a) in Sakha.

(58) Papa-(*ta) mikhu-y allin-mi. (p. 120, 39)
Papa-(*ACC) eat-NOM good-AF
‘Eating potatoes is good.’

However, even a controlled PRO does not trigger accusative in CQ, as seen in the purpose-like clause in construction with a verb of motion in (59),

(59) *T’anta-ta ruwa-q hamu-ni (p. 250)
bread-ACC make-AG come-1sS
‘I come to make bread.’

24 There is much more to say about Finnish than I can take up here. Kiparsky mentions further complexities to Johannson’s rule. Kiparsky’s examples on p. 356 suggest that the object of a verb like ‘let’ or ‘force’ controls PRO and makes the object of the embedded verb genitive/acc (as expected), but if the verb is passivized, resulting in a genitive subject, the object is nominative. Also p. 350 shows that having an imperative subject allows a nominative embedded object even if it looks like object control. I won’t speak about these intriguing details. (Kiparsky’s interpretation is simply that the domain of the rule is the finite clause, with PRO not counting. That would make Finnish the same as Quechua below. However, whereas the matrix predicates in Quechua do look like normal restructuring predicates in other languages, and there is independent evidence of restructuring in that language, restructuring looks like a less obvious fit for the full range of Finnish data.)

See Kiparsky for further fascinating details, which I do not go into here (?): the passive doesn’t have an ACC subject even when it is used colloquially as a first plural form, with overt subject me ‘we.NOM’; imperatives in 2nd and 1st person can have overt subjects that do not agree with the verb, and the object is still nominative, but in 3rd person imperatives the subject agrees with the verb and the object is accusative (genitive); structural genitive subjects of infinitives trigger accusative objects but quirky genitive subjects of verbs do not; if an embedded clause has a PRO subject, the case on its object. Also the null subject of an imperative does not trigger accusative on the object in Finnish. I don’t know how common that might be across languages.

(i) Tuo karhu! Kiparsky p. 333
bring.IMPER bear(Nom)
Bring the/a bear!

[Discussion of pronouns bearing accusative case –t in Finnish in a broader range of contexts than –n on nouns could go about here. It would be something like an NP with phi-features triggers ACC on an NP, but any NP triggers ACC on a pronoun. Or maybe only in a note...]
Only when the infinitive is the complement of a limited class of verbs may its object surface with accusative case. These verbs include muna ‘want’ (also ‘know’, ‘forget’, ‘remember’, ‘begin’, ‘finish’, ‘be able to’ (with infinitive), and ‘be’ with –q to give the past habitual.

(60) a. Papa-ta mikhu-y-ta muna-ni. L&M p. 120
Potato-ACC eat-NOM-ACC want-1sS
‘I want to eat potatoes.’

b. T’anta-ta ruwa-q ka-rqa-ni. L&M p. 250
bread-ACC make-AG be-1sS
‘I used to make bread.’

L&M give a series of good arguments to show that (60) involves restructuring, not merely control. These include clitic (object marker) climbing, scrambling, wh-movement, quantifier float, validation marking, and licensing of the negative marker –chu, in addition to the difference in accusative case assignment illustrated in (59) versus (60). All of these properties show that (60) behaves like a monoclusal structure, whereas (59) behaves like a biclausal structure (for most speakers). Adopting Wurmbrand’s (2001) theory of restructuring, the infinitive is in a full CP (a phase) with a PRO subject in (59), but it is only a VP (not a phase) with no PRO subject in (60). So we can conclude from this data that PRO never counts as a case competitor in itself in Cuzco Quechua. The matrix subject, however can, and it counts as being in the same clause as the object in (60) but not in (59). So as in Finnish, we find some diversity in accusative case assignment in infinitival structures, but in Quechua the crucial differentiating factor is restructuring rather than control.

Putting this together, we can see the outlines of a set of implicational relationships emerging. It is plausible to put pronoun-like null categories on a kind of scale, where the categories on the left have fuller feature specifications, and those on the right have sparser feature specifications, each one having a proper subset of the features of the category to its left.

(61) Overt NPs >1 pro >2 controlled >3 arbitrary >4 implicit agent of passive >5 PP, CP, etc.
and clitics PRO PRO agent of nominal
nonspecific object

This is similar in spirit to Landau’s (2010) distinction between “weak implicit arguments” and “strong implicit arguments”, where the latter have all the features of the former ( phi-features for Landau) plus some additional (D-feature for Landau). (61), however, is tentatively more fine-grained, distinguishing more than two kinds of “implicit argument”. Languages then differ in how many nominal features the require a category to have in order to count as a case competitor for purposes of dependent case assignment. Coast Tsimshian draws the line at point one, so that nothing but a fully articulated overt NP counts. Cuzco Quechua draws the line at point two, so that pro counts along with overt NPs, but no kind of PRO counts, nor do implicit arguments. Finnish draws the line at point 3, so that pro and controlled PRO trigger accusative but uncontrolled PRO and implicit agents do not. Amharic and Tamil draws the line at point 4, separating pro and the PROs from implicit arguments. This might in fact be the most common dividing point; not that it corresponds to Landau’s distinction between strong and weak implicit arguments, and he shows that predication and the binding of anaphors is also sensitive to just this distinction in the languages he studies. Finally, Sakha and Shipibo draw the line at point 5, such that all kinds on implicit arguments count, but nonnominal categories like PP and CP do not. If this is right, then we see that there is a fair degree of crosslinguistic variation on this point. However, as long as long as the nominal features are organized in strict set-subset relations, and each language states what its
case rule sees in terms of a coherent set of features, we don’t expect random collections of null categories to trigger dependent case. Rather, we expect implicational relationships, such that if a certain type of covert nominal triggers dependent case in language X, then all the stronger types of covert nominal will as well. Of course, this picture needs eventually to be filled out with specific proposals as to what are the specific nominal features that underlie the hierarchy in (61), but I have nothing useful to say about that beyond what I have already said.

There is one other pronominal empty category that might be considered here: that is expletive pronouns found in subject positions in some languages in order to fulfill EPP requirements. In English and French, these are overt, but in most languages that are even modestly pro-drop, they are not; they are evident if at all only in the 3rd singular subject agreement on the predicate, and even that might be default agreement. If the idea is right that the more features a nominal category has—and in particular the more phi-features it has—the more languages it will trigger dependent case in, then we expect null expletive pronouns in subject position to rarely if ever trigger dependent accusative case on an NP that they c-command. (Since these pronouns are primarily or only in subject positions, it would be rare or impossible for them to have a chance to trigger ergative on the higher NP in the same clause.) And this prediction seems right: possible expletive pronouns never trigger accusative case in my sample.

Consider, for example, Sakha, which we know to be relatively generous in what counts as a case competitor. Baker and Vinorkurova (2010) found two environments in this language where an expletive pronoun might be needed to fill the subject position, but it did not trigger ergative case on another NP in its c-command domain. The first was with verbs that select clausal complements. Consider the following three-way contrast, which was a major part of our motivation for adopting a dependent case approach to accusative in Sakha in the first place.

   Keskil Aisen come-NEG.AOR.3sS that become.sad-PAST.3sS
   ‘Keskil became sad that Aisen is not coming.’ (p. 366)

   b. Keskil [Aisen-\( \bar{y} \) [-\( \bar{y} \) kel-bet dien]] xomoj-do.
   Keskil Aisen-ACC come-NEG.AOR.3sS that become.sad-PAST.3sS
   ‘Keskil became sad that Aisen is not coming.’ (p. 366)

   c. Bügün munnjax-xa [Masha-(\*ny) [ehiil Moskva-qa bar-ya
today meeting-DAT Masha-(\*ACC) [next.year Moscow-DAT go-FUT.3sS
dien]] cuolkajdan-na.
   that] become.certain-PAST.3sS
   ‘It became clear today at the meeting that Masha will go to Moscow next year.’

 Null cognate objects, if they exist with unergatives, seem particularly invisible to case theory. Hence ergative languages are more common than active languages (unless the object is overt, as in Basque and often in Burushaski). Similarly, these cognate objects rarely if ever trigger dative case on the causee of the morphological causative of an unergative.

There might be ways other than agreement to tell one from the other too. For example, Landau 2010 distinguishes weak implicit arguments (passive agents, implicit objects) from Strong implicit arguments (PRO, pro). He argues that both kinds are visible as controllers and as binders for conditions B and C, but only the strong ones are visible as subjects of predication and as binders for anaphors (condition A). This suggests other ways of classifying null categories in principled ways that case theory could then be sensitive to. Landau’s specific proposal is not exactly along the lines of the text: he says that all kinds have phi-features and only the strong ones have D features. But either his proposal might be recast in terms of differences in phi-features, or we might say that Dependent case marking looks for a D feature.
If the subject of the embedded clause stays inside the embedded clause proper, as in (62a), then it is spelled out in a different domain from the matrix clause, and does not receive dependent accusative case. If, however, it moves to the edge of the embedded clause, as in (62b), then it is not spelled out with the embedded clause, but comes under the influence of the matrix subject Keskil, causing it to be assigned accusative. We then offered examples like (62c) as a further control: this is an example in which the embedded subject may move to the edge of the embedded CP, but nevertheless it cannot receive accusative, because there is no thematic subject in the matrix clause to trigger dependent accusative case on ‘Masha’. There might, however, be an expletive pronoun in the matrix clause, like overt ‘it’ in the English translation. If so, then it clearly does not trigger accusative on the NP at the edge of CP in (62c).

Another context where there might be expletives in Sakha is in impersonal weather-type sentences like ‘it is hot’. A quirk of a small number of postpositions in Sakha is that they are not phase heads (as most Ps) are; therefore there complements can (optionally) get dependent case under the influence of a thematic subject, as in (63a). However, when the same PP is found in a clause with a weather predicate, as in (74), the object of the P cannot be accusative.

(63)  
  a. Ynax-tar ambaar-(y) tula meccij-di-ler.  
     cow-PL barn-(ACC) around graze-PAST-3pS  
     ‘The cows grazed around the barn.’
  b. Ambaar-(*y) tula itii.  
     barn-(ACC) around hot  
     ‘It is hot around the barn.’

So here too, if Sakha has expletive pronouns, they do not count as case competitors on a par with referential pronouns and other thematic subjects. I should emphasize that we had no positive proof that there are expletive subjects in these constructions; that probably needs to be decided on theoretical grounds concerning the status of the EPP in Sakha and crosslinguistically. But if there are, then they do not trigger dependent case in Sakha, which is otherwise quite tolerant about what can be a case competitor, because of their extreme lack of features.\(^\text{26}\)

Another sort of construction that expletives might play a role in is dyadic unaccusative constructions, in Amharic for example. We saw in chapter 3 that the goal argument of a dyadic unaccusative or a passive ditransitive cannot become the subject in Amharic, because it is contained in a null headed PP. In this situation, the theme argument may or may not become the subject of the clause. If it does, the theme agrees fully with T and triggers accusative case on the goal argument, as in (64a); if it does not, then the verb bears default agreement and there is no accusative case on either the theme or the goal, as in (64b).

(64)  
  a. Lamma-n sejt liḍ̣-u t’affa-tʃʃ-əw.  
     Lemma.M-ACC female child-3mP lose-3fS-3mO  
     ‘Lemma lost his daughter.’

\(^{26}\) In B&V 2010, we claimed that expletives were not case competitors because they were not arguments, rather than because they did not have phi-features. But I now revise that view because of the evidence in the next section that adverbs, which are also not arguments, do participate in dependent case marking in some languages (although not in Sakha).
b. Lamma sejt lid\textsuperscript{3}-u t'Affa-aw.
   Lem\text{ma} M \text{female} child-\text{DEF} lose-(3\text{mS})-3\text{mO}
   ‘Lamma lost his daughter.’

But again we need to consider the EPP with respect to (64b). If the EPP requires that the subject position be filled in Amharic, then it must be filled with a null expletive pronoun in this version—with a third masculine singular pronoun, matching the default agreement on the verb. Then that expletive pronoun does not trigger accusative on either of the other two NPs, even though it surely c-commands them both. (And note that the goal can in principle undergo accusative case assignment, because it is accusative in (64a), the version in which the theme argument is the syntactic subject. Again, the expletive pronoun (if it exists) must not be a case competitor, because of its lack of features. Similar considerations imply that expletive pronouns must not count as case competitors in the marked nominative language Choctaw, because in Choctaw sentences like (64a) both NPs get marked nominative (see example (xx) in section x.xx) and this should not happen if they are c-commanded by an expletive pronoun that is visible to the rules of dependent case assignment.

[Before moving on, we can pause for a moment to consider whether these types of empty nominals undergo dependent case marking as well as triggering it. In general it will be hard to tell, because case marking on an unpronounced element is itself unpronounced. However, certain languages might have agreement phenomena that can reveal the case of a covert category indirectly. Cf Icelandic ... [Agreement on adverbs shows pro and PRO are ergative in Shipibo. But one would guess that the passive agent will not be.]

5.3.2 Gaps left by movement

Next I consider briefly the other large category of null noun phrases, namely the traces left by movement. For concreteness, I focus the discussion on perhaps the most robust and least controversial of these, namely the gaps left by A-bar movement, including question-movement, operator movement to form a relative clause, and topicalization/clefting type movements triggered for information structure reasons. At the end of the section I will give a couple of remarks about how the other known types of traces, traces of NP movement and of head movement, might fit in. All of this discussion is really a prelude to what should be a fuller study.

In many languages, traces of A-bar movement do trigger dependent case assignment, just as an unextracted subject would. For example, in many accusative languages, when the subject is extracted, the object is nevertheless accusative. (62) shows this for a relative clause in Sakha, for a pseudo-cleft in Tamil, for a relative clause in Amharic, and for an embedded clause in Cuzco Quechua where the subject has moved into the matrix clause.

(65) a. [-- Baaska-ny üöxt-\text{e} \text{dien}] san-yyr \text{uol-un}. \text{Sakha, relative clause}
   -- Baaska-ACC scold-PAST.3sS that think-AOR boy-2sP
   ‘the boy that you think scolded Baaska’

   b. anda paDatt-e puri-nj-avan Baala \text{Tamil, pseudo-cleft}
   that lesson-acc understand-past-he Bala
   ‘The one who understood this lesson is Baala.’

   c. Amharic relative clause from Leslau
d. Mariya Xwancha-ta-n muna-n [-- platanu-ta ranti-mu-na-n-ta].
   Maria Juan-ACC-AF want-3S banana-ACC exchange-CIS-NOML-3S-ACC
   ‘Maria wants Juan to buy bananas.’ (L&M p. 142)

So the specific constructions that use A-bar movement many vary, but the effects of A-bar movement for case theory are reasonably consistent across a range of languages.

In ergative languages, the instructive thing to do is to extract the object and see if the subject is still ergative. The answer is yes in relative clauses in Lezgian and in Shipibo, as shown in (63).

(66) a. Itim-r.i Cül-ler-a -- iji-zwa-j wiri k'walax-ar… MH p. 340
   man-PL(erg) field-PL-INESS do-IMPF-PTP all work-PL
   ‘All the work that the men used to do in the fields (fell on the women).’

b. Shipibo example

This can also be seen in Semelai, a tripartite language; (64) shows that relativization of the object does not bleed ergative case marking on (or ergative agreement with) the subject.

(67) jkɔs [mə=ki=jal la=ɕ -- ]paloh (p. 251)
   porcupine REL=3A-bark.at A=dog flee
   ‘The porcupine that the dog barked at fled.’

It seems clear, then, that the most common situation is that A-bar traces do trigger dependent case on other nominals in the neighborhood.

But this is not necessarily true in all languages. Coast Tsimshian, in particular, seems to be different in this respect. It is a tripartite language, similar to Semelai in a number of respects. However, in this language A-bar movement of the object bleeds ergative case on the subject, and A-bar movement of the subject bleeds accusative case on the proper noun object. Thus, in (76a), a case of clefting or topicalization, the subject is extracted and the object is marked absolutive –s, not accusative –at. In (76b), a relative clause, the object is extracted and the subject is marked with absolutive –(i)s, not with ergative –dit.

(68) a. Jack int k’yilam xwaal=s Alex p. 407 Subject trace
   Jack TOP give gift-ABS.PN Alex
   ‘Jack gave Alex gifts.’

b. Al sgiüü-ga hakwdak [dzab-ís niyaa-t -- ]. Object trace
   In.evidence be.lying-CN bow make-ABS.PN grandfather-3Poss
   He already had a bow [which his grandfather made].

So we see that A-bar traces do not necessarily count as case competitors in all languages.

Comparing this result with the results of the preceding subsection, it is notable that Coast Tsimshian puts the most stringent requirements on what it takes to be a case competitor when it comes to pronominal type empty categories as well. One suspects that this might not be a coincidence. Suppose, then, that the remaining features of the lower copy of a A-bar movement chain are roughly the same as those of a null pronoun. (This might cohere with the fact that minimal pronouns, including pro when it is licensed, can be in the variable position as so-called resumptive pronouns in many languages.) It would then follow that languages will treat pro and wh-trace the same for purposes of
case theory: both are case competitors in the majority of languages, but neither is in certain languages, including Coast Tsimshian.  

With this in mind, consider briefly traces of head movement. The possibility of such a trace being a case competitor presumably only arises if the moved head is nominal, hence the sort of thing that would be a case competitor if it had not moved. So we should be thinking of noun incorporation here. And since only direct objects (and some intransitive subjects) undergo incorporation, we should be considering ergative languages, to see if the trace of the incorporated object still triggers ergative case on the subject. The answer is often no. For example, Chukchi is an ergative language with productive noun incorporation of direct objects, and it is clear in this language that noun incorporation bleeds the assignment of ergative to the subject, as seen in the following minimal pair, with and without object incorporation (Polinskaja and Nedjalkov 1987:240).

(69) a. ṛtn-l-e matqә-mәt kawkwә-әk kili-nin. (no NI, erg subject)
    Father-ERG butter-ABS bread-LOC spread-3sS/3sO
    ‘The father spread the butter on the bread.’

b. ṛtn-l-an kawkwә-әk matqә-rkele-g’e. (NI, abs subject)
    father-ABS bread-LOC butter-spread-3sS
    ‘The father spread the butter on the bread.’

Similarly, incorporated objects do not trigger ergative on the subject in Coast Tsimshian (Dunn 1995:61; Mulder 1994:110) (if NI is syntactic in this language, which is unclear). However, again there may be variation on this point. Lezgian, in particular, may go the other way. This ergative language that has a restricted type of incorporation for event-denoting nominals in light verb constructions. This incorporation does not bleed ergative case assignment to the subject, as shown in (67).

(70) a. Ada k’wal x ji-zwa.
    she-ERG work do-IMPF
    ‘She is doing work.’ MH p. 284

b. Mu’minat-a k’walax-zawa. (< k’walax awun ‘work do’)
    Muminat-ERG work-IMPF
    ‘Mu’minat is working.’ MH p. 84

Hence Haspelmath (ch.15) presents examples like (67b) as the only clear case in which what looks like an intransitive verb on the surface takes an ergative subject in Lezgian.

Now with the results of the previous section in mind, we might conjecture that the copies of a noun-movement chain are treated grammatically like implicit arguments of passives and nominalizations, and like the null indefinite objects of transitive verbs. Equating noun incorporation and null indefinite objects is particularly plausible from a semantic point of view, since the two often have

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27 Another factor that might be relevant in Coast Tsimshian is that wh-traces seem to lose their phi-features. Thus, when (say) a first person ergative pronoun is clefted, T shows dummy 3rd person agreement with it (-t), not full first person singular agreement (Mulder p. 137; Dunn p. 68). This suggests that phi features are deleted on the wh-trace in CT, as Baker, Aranovich, and Golluscio 2005 propose for Berber and Baker does for Ibibio. Then if having phi-features is an important condition for being a case competitor, wh-traces in this sort of language will not count. This would call for a study seeing if there is any connection between so-called Anti-Agreement Effects (evidence of loss of phi-features) and dependent case marking in relevant languages.
similar interpretations, as narrow scope existentials. Given the hierarchy in (61), then, the expectation would be that traces of noun incorporation will not be case competitors in the majority of languages, but can count as such in the most permissive languages—languages with case systems like Sakha and Shipibo.  

The last major type of empty category to consider is NP-trace, the trace left behind by instances of passivization, unaccusative advancement, and raising to subject, and the like. Opportunities to investigate this will be limited given other known factors. For example, many languages presumably have traces of an NP in simple passive or unaccusative clauses, but such clauses will often only have one argument, hence no chance of dependent case assignment (cf. Marantz 1991:xx). Also, if only the subject of an embedded clause can raise into a matrix clause for reasons involving the locality of NP-movement, then its trace might trigger accusative on another NP in an accusative language, but we cannot expect it to trigger ergative on another NP in an ergative language, simply because the trace itself must be the higher NP. So the opportunities to observe NP-trace in case-theoretic action are intrinsically limited, and my opportunities have been even more limited. In the cases that I know of, the trace does apparently count as a case competitor. For example, Sakha has an apparent instance of subject-to-subject raising with a verb meaning ‘seem’, as shown in (68). Note that the object of the lower clause is indeed accusative.

(71) Masha seem buy-PTPL car-ACC (in Sakha).

Similarly, L&M:121 show that the object of a verb can be accusative in CQ when the subject is raised to object in the matrix clause, with a perception verb like ‘see’.

(72) Xwancha-\text{-}ta [\text{-- ima-}\text{-}ta-\text{pas ni}\text{-}\text{q-}\text{ta}] riku\text{-}ni.
Juan-ACC what-ACC-IND say-AG-ACC see-1sS
‘I see Juan say something.’

Also, when we recall from section 4.xx that one NP can trigger dependent case (dative or oblique) on another inside VP, it is clear that the trace of passive can trigger these cases just as much as a simple object NP can. For example, in Sakha dative case assigned to the higher NP in VP in ditransitives and morphological causatives; for example, ‘Erel’ in (70a) is dative under the influence of ‘book’. But ‘Erel’ is still dative in (70b), the passive version where ‘book’ has moved to Spec, TP. Since dative is assigned in the presence of a lower argument, not a higher one, this must because of the trace of ‘book’ in its original position.

(73) a. \text{Sardaana} Erel-ge kinige-ni aax-tar-da \quad (NV: 311)
Sardaana Erel-dat book-acc read-caus-past.3

\footnote{Note also that the incorporated object in Chukchi does not trigger object agreement on the verb either. This is consistent with treating it like a weak implicit argument, since those (passive agents, null indefinite objects) do not trigger agreement either. See Baker, Aranovich, and Golluscio (2005) for an analysis of the lack of object agreement in Chukchi and some other NI languages in terms of the deletion of phi-features on the trace of NI. That will also account for the absolutive case on the subject if we say that having phi-features is a necessary condition for being a case competitor in Chukchi.}

\footnote{I assume that this ‘raising to object’ with perception verbs is different from the ‘Move case’ phenomenon that happens with a wide range of matrix verbs in CQ, although that is not totally clear from L&M’s discussion. It seems that (only) the subject of the embedded clause may and must raise into the matrix clause with perception verbs, whereas any element can raise in the move case phenomenon. This restriction makes the perception verbs seem more like A\text{-}movement, whereas the move case examples are A\text{-}bar movement.}
‘Sardaana made Erel read the book.’

Book Erel-dat read-caus-pass-past.3
‘The book was made to be read by Erel.’

Conversely, the higher object of two in the VP triggers dependent oblique case on the lower in Chamorro (see xx), as seen in a causative like (71a). Again, this is maintained in passive, when the higher NP moves to Spec,TP and its trace triggers oblique case on the theme argument within the VP.

(74) a. In na’-fa’gasi si Jesse ni kareta. (Gibson p. 76)
  1pex CAUS-wash PN Jesse OBL car
  ‘We made Jesse wash the car.’

b. Ma-na’-fa’gasi si Henry ni kareta (nu l famagu’un). Gib 87
  PASS-CAUS-wash PN Henry OBL car OBL the children
  ‘Henry was made to wash the car by the children.’

Similarly, the higher NP in VP can trigger ACC case on the lower NP in VP if it c-commands it in Amharic, and the trace of that NP still triggers accusative case on the lower NP in a passive version; see (xx) for an example. Therefore, it does seem like NP-traces can trigger dependent case on another NP under the right circumstances. However, I do not know of enough clear instances to discern reliably if there is crosslinguistic variation in this or not.

[There are also theoretical issues to consider here, concerning timing. It is very possible that in all these constructions the NP triggers dependent case on the other NP in the same domain before it moves into the higher domain, given assumptions about cyclic derivation/derivation by phases. If so, then it is not a trace at the point in which dependent case applies. Then we would expect no variation across languages, since the properties of chains do not come into it crucially, and full NPs trigger dependent case assignment in all languages. This might also play a role in the theory of passive, since one needs to say something about WHICH argument becomes the subject of the passive in languages like Sakha and Chamorro: it is the causee in Chamorro, but the lower theme in Sakha. It seems that this is decided by what sort of dependent case marking is available in the language: whichever NP is not marked for dependent case inside VP is the one that moves to Spec,TP and becomes the subject. This works if and only if dependent case marking in VP happens before the NP movement involved in passive. Therefore, we might conclude that dependent case assignment on spell-out domain X happens before A-movement of an NP out of X. (THINK THIS THROUGH AND DECIDE.])

Overall, then, I have raised the issue of where the traces of movement fall as possible case competitors, triggering dependent case assignment. I have also offered some tentative results: that traces of wh-movement are like pro in triggering dependent case in most languages but not all, and that traces of head movement are like existentially bound implicit arguments in triggering dependent case in a few languages but not most. Ideally, this would be deduced from a fuller theory of nominal features,

30 Similar timing issues might apply in wh-movement: it might be that the +wh NP triggers dependent case on another NP before it moves, rather than the trace of the NP triggering case after movement. However, we do have at least one language (CT), where wh-movement does in fact bleed dependent case assignment, so case assignment must happen after wh-movement in that language.
and how that theory interacts with the theory of movement and copy deletion. However, for now I need to be satisfied with raising the issue and providing an initial scouting report on the lay of the land.\footnote{Throughout this discussion, I have only considered languages with positive c-command conditions, i.e. ordinary accusative, ergative, and tripartite languages. Interesting issues could arise also in marked nominative languages. In particular, one might predict that there could be a marked nominative language in which the object of a transitive clause is in nominative if and only if the subject is some kind of empty category. Although this would be a surprising pattern, I don’t know that it is more surprising than what we see in Finnish and Quechua and Coast Tsimshian. However, very few marked nominative languages exist, and it is more common than not for PRO, pro, and wh-trace to count as case competitors, so lack of a relevant example may well be accidental. (Check!)}

## 5.4 Nominal Adverbs

Another area where there is interesting crosslinguistic variation in what undergoes dependent case assignment is the area of adverbs, especially nominal adverbs. Some adverbs like ‘yesterday’ or ‘tomorrow’ rather clearly at least can be nouns, because they can be used as NPs in normal argument positions, as seen in (75).

\begin{itemize}
  \item \textbf{a.} Yesterday seemed to last forever. (Subject)
  \item \textbf{b.} John spent yesterday at the beach. (Object)
  \item \textbf{c.} After yesterday, how can we trust him? (object of P)
  \item \textbf{d.} Yesterday’s lecture was rather dull. (possessor)
\end{itemize}

Nevertheless, ‘yesterday’ can also be used freely as an adverb, where it has no evident theta-role assigner, as in (76).

\begin{itemize}
  \item \textbf{(76)} John went to the beach.
\end{itemize}

Other adverbs in English seem more adjectival than nominal—e.g. manner adverbs like quick(ly). However, there are many languages in which the distinction between nouns and adjectives is weak at best (REF) and in those languages even things like manner adverbs may qualify as more or less nominal. The question then arises, do nominal adverbs participate in dependent case assignment?

For some languages, the answer seems to be no. For example, in Baker and Vinokuroka (2010) we observed that bare NP adverbs are not marked accusative in Sakha, even though they may be c-commanded by the subject, as shown in (77).

\begin{itemize}
  \item \textbf{(77)}
    \begin{itemize}
      \item \textbf{a.} Bihigi beqehee ystan. (< ystan-ny-byt). (NV:241)
        we yesterday jump.PAST.1pS
        ‘We jumped yesterday.’
      \item \textbf{b.} Bihigi tya-qa sajyn-(*) kös-tü-büt
        we countryside-DAT summer-(*ACC) move-PAST.1pS
        ‘We moved to the countryside in the summer.’
    \end{itemize}
\end{itemize}

In contrast, (78) shows that the same lexical item as in (77b) must be marked accusative when it functions as the object of a transitive verb, confirming that it is (can be) a genuine instance of the category NP.\footnote{Check!}
Because of contrasts like this, we stipulated that only NPs functioning as arguments participated in dependent case assignment. Other accusative languages in which adverbs do not undergo accusative marking are Tamil and Amharic [I guess, confirm].

However, a broader perspective shows that there is a point of crosslinguistic variation. In a nontrivial range of languages adverbial NPs do undergo dependent case assignment. For example, they can be accusative in Korean (Maling 1989), Finnish, and Quechua, among others. For Cuzco Quechua, L&M 1988 say that –ta “is found not only on direct objects but also on any constituent appearing in the verbal domain that is not inherently case marked.” This includes both the time adverb ‘tomorrow’ and the manner adverb ‘good, well’ in (80). (Note that Quechua is indeed a language that does not draw a strong distinction between adjectives and nouns: see Weber xxx, for example.)

Evidence that this use of accusative is a structural case in Quechua, not an inherent/semantic case, comes from the fact that it depends on the syntactic position: an adverb like ‘tomorrow’ must be accusative when it follows the subject, but need not be when it precedes the subject.

This makes sense if one combines a dependent case view with the idea that there is a certain range of variation in the position in which (certain) adverbs are generated (Jackendoff 1972?). If the adverb is generated lower than the subject, it undergoes dependent accusative marking; if it is generated higher than the subject, then it predictably does not. (The option of accusative in (80a) could be the result of an adverb being generated lower than the subject, undergoing case marking in that position, and then moving higher via A-bar movement, focus or topicalization.)

Additional evidence for that accusative on adverbs is structural in Quechua is the fact that manner adverbs are like direct objects in not being marked accusative in embedded clauses. We saw above that the PRO subject of a nonfinite clause is not a case competitor according to CQ’s standard of nominality, so it doesn’t trigger accusative on the object of the clause. This carries over also to Poss-Ing

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32 Vinokurova (2005:395) also shows that ‘two kilometers’ is marked accusative in a phrase like ‘run two kilometers’ in Sakha. She gives independent evidence from causatives and passives that ‘two kilometers’ is a true direct object of the verb ‘run’, not an adverb.

33 Maling also mentions Warumungu, according to Simpson 1991)
type gerund constructions, where the genitive subject in Spec,DP controls PRO inside the verbal complement of the nominalization head, as see in (81a), under the analysis in (81b).

(81) a. [Juan-pa papa miku-sqa-n-ta] yacha-ni.
   Juan-GEN potato eat-NOML-3-ACC know-1sS
   I know that Juan ate potatoes. (from LS; see L&M88:118-119)

   b. 

      PossP
      /   \   
     /     \   
   NP/DPk  Poss'
     /   \         
   Juan-GEN NPk  Poss
      /   \          
     VP   Ni        
       / \   \     
      V  Agr NP
      / \   /     
     potato eat

Now (82b) shows that when a manner adverb is contained in this sort of gerund-like construction, it also fails to be accusative; compare (82b) with the simple matrix clause in (82a), where the adverb is accusative as usual.

(82) a. Paqarin usqay-ta Lima-man ri-saq . L&M p. 16
   tomorrow fast-ACC Lima-to go-1sS.FUT
   ‘I will go to Lima fast tomorrow.’

   b. Paqarin usqay Lima-man ri-na-yki-ta yacha-n. L&M p. 16
   tomorrow fast(NOM) Lima-to go-NOML-2sP-ACC know-1sS
   ‘He knows that you are to go to Lima fast tomorrow.’

Clearly, then, the adverbs are undergoing the same case alternations as objects do in CQ, showing that they bear the same kind of structural (dependent) case. In particular, the subject of the smallest clause-like constituent containing the adverb in (82b) is PRO, and that does not trigger accusative on the adverb for the same reason that it does not trigger accusative on the object in (81).

Finnish is another accusative language that has accusative case on certain kinds of adverbs. In Finnish it is clear that this accusative case is structural because these adverbs, like objects, follows Johnson’s rule: if the subject is not a case competitor, then the adverb is not accusative (Kiparsky, Maling case book, others). Thus, the time adverb is accusative in (83a) but bare/nominative in (83b), an impersonal passive where the covert agent is not a case competitor.

(83) a. Opiskel-i-n vuode-n. Finnish, Kiparsky 323
Study-PAST-1sS year-ACC(GEN)
‘I studied a year.’

b. Opiskel-tiin vuosi. Finnish, Kiparsky 323
Study-PAST.PASS year(NOM)
‘People/we studied a year.’

Similarly, when the subject is oblique, hence PP(like), an adverb is nominative rather than accusative, just as an object would be (Maling, p. 79).

\[(84)\] Lapsen täytyy lukea koko päivä-(*n).
child-GEN must read all day.NOM-(*ACC)
‘The child must read all day.’

A third accusative language known to have accusative adverbs is Korean (REFS). In this language, we know that the adverbs have structural accusative case because that case is lost in passive examples, where there is no external argument. See chapter 6 for some discussion.

Following the symmetry built into dependent case theory, we would expect that adverbs could also receive dependent ergative marking in some ergative languages. This is seen, for example, in the Australian languages Diyari and Warlpiri. We can recognize this as being a structural case in that the adverb is ergative if and only if there is a direct object—in (85b) but not in (85a). Thus adverbs in Diyari seem to fall under the same rule of ergative case marking as subjects do, just as adverbs in Quechua and Finnish fall under the same rule of accusative marking as objects do.

\[(85)\] a. Wata yini parapara pitį-ya. (p. 108)
Not 2sgS energetic fart-IMP Intransitive, bare adverb
‘Don’t fart loudly!’

b. nulu kaņa-li kira parapar-li wara-yi. (p. 108)
3sgNFA person-ERG boomerang-ABS energetic-ERG throw-PRES
‘The man throws the boomerang energetically.’ Transitive, ergative adverb

Manner adverbs also have this property in Warlpiri (Simpson 1991:200), including muurlpa ‘carefully’, yaruju ‘quickly’, wakurtrudu ‘loudly’.

\[(86)\] a. Kalaka pali-mi yaruju. Intransitive, bare adverb
ADMON die-NPST quick
He might die soon

b. Yaruju-rlu-rlupa-ny宽 pu-ngka! Transitive, ergative adverb
Quick-ERG-1pis-REFL fight-IMPER
‘Let’s hurry up and fight each other.’

Simpson treats these adverbs as being predicated of the subject, such that they undergo case concord with the subject, as predicated items do generally with the NP they are predicated of in Warlpiri. But it is less clear that this view is semantically justified to adverbs for ‘quickly’ than it is for ‘carefully’, since often it is the event that is quick, not necessarily the agent (Parsons 1990). And, strikingly, the ergative marking in Warlpiri extends also to locative expressions, which can be predicated of the event as a
whole, rather than of the subject participant in that event (Simpson p. 207), and even to time adverbs like ‘today’, as in (87).

(87) Jalangu-rlu ka-lu-jana puluku turnu-ma-ni yapa-ngku (p. 208)
Today-ERG PRES-3ps-3po bullock muster-CAUS man-ERG
‘The people are mustering the cattle today.’

Here it is certainly not the people who occur today, but the mustering event that does. Therefore, it does not make much sense to say that this ergative marking is concord justified by control or predication in the normal sense. My view that nominal adverbs can undergo dependent case marking does not require this dubious assumption about predication. According to it, ergative case is triggered on the adverb by the presence of the object ‘bullock’, just as ergative case on the subject ‘people’ is. Note also that this is the same type of time adverbs that undergo ergative marking in Warlpiri are known to undergo accusative marking in Quechua. It would be very odd to say that a time adverb is predicated of the subject in Warlpiri but the object in Quechua, in the absence of any evident semantic difference. Rather, what seems clear is that these adverbs can undergo whichever dependent case rule a language happens to have, structural factors and morphological paradigms permitting. Adverbs also undergo ergative case marking in Shipibo (Baker xxx:xx; see Valenzuela on ‘participant agreement’). On the other hand, nominal adverbs do not undergo ergative case marking in XXX (Chukchi? Ingush? Others?)

What then can be said about which adverbs undergo dependent case marking and which do not? This question has both within language and across language dimensions. On the within language level, there has been discussion of the issue in the literature on Korean and Finnish at least, usually in semantic terms (e.g. Sells xxx, Wechsler and Lee xxx). I have little to add on this point, except to point out a straightforward prediction of the dependent case theory: it should be middle-to-high adverbs that get ergative case in an ergative language, whereas it should be low-to-middle adverbs that get accusative case in an accusative language. This follows because an adverb must be higher than the object to receive ergative, and that might not be true of the lowest adverbs. Conversely, an adverb must be lower than the subject to receive accusative, and that might not be true of the highest adverbs (see ‘tomorrow’ in CQ in (80a)). Therefore, it is not surprising if time adverbs like ‘yesterday’ are common receivers of ergative case in ergative languages but not of accusative case in accusative languages, whereas duration and frequency adverbs are common undergoers of accusative in accusative languages but apparently not of ergative in ergative languages. Manner adverbs are plausibly in the middle field, hence liable to be ergative in an ergative language like Warlpiri or Shipibo and accusative in an accusative language like Quechua. It is possible, then, that some of what has been treated semantically in previous literature actually has a structural component, where the semantics of an adverb is related to where it appears in the clause, and the case properties are determined simply by its position. However, other factors will no doubt be relevant too, including lexical factors like whether the adverb in question has nominal category features or not, and morphological factors like whether the adverb bears some other inflection that is incompatible with the realization of a case affix (a semantic case perhaps) and what declension class the adverb belongs too.34 I leave the pursuit of these details to specialists in the relevant languages.

Roughly the same factors could be relevant to the cross language dimension, about why semantically comparable adjectives get dependent case marking in some languages but not others. The most elegant solution would be to discover that the adverbs are NPs in some languages but not others.

34 An example of declension class being a factor is that manner adverbs do not bear accusative case in tripartite Diyari. This follows from the fact that they are common nouns that do not have feminine gender, and such nouns do not take overt accusative affixes in this language anyway. [get page and check details]
That could well be true for manner adverbs, for example, which might be related to the category adjective in some languages (English) but to nouns in others (Quechua, Warlpiri). But it is less likely to account for the fact that ‘yesterday’ undergoes case marking in Quechua but not in Sakha, for example, given the evidence that ‘yesterday’ is (or can be) a noun in Sakha as shown by (78). [really ‘summer’] I do not rule out the possibility that we will discover that ‘yesterday’ is really the complement of a null P head (or equivalent) in Sakha but not Quechua (cf. Larson xxx for this view of bare NP adverbs in English) this null P being a phase head that hides its complement from dependent case marking. But I do not have positive evidence for this difference either, nor is it obvious where to look for such evidence. The alternative would be simply to say that nominal adverbs are somehow less nominal than nominal arguments (have fewer nominal features), and they fall above the threshold for dependent case marking in some languages and below it in others—a style of analysis that is parallel to the one pursued for empty categories in the previous section. Which of these is correct should be an empirical question, to be decided by matters like whether there are other differences in the syntax of the adverbs or not (for example, can they move, as apparently they can in Quechua). But I have nothing else to bring to bear on this matter for now.

It is well worth noting, however, however, that while we have plenty of evidence that nominal adverbs can undergo dependent case marking in some languages, we have very little evidence adverbs can trigger dependent case marking on another NP in the same clause. On the contrary, we have evidence that they cannot. For example, we know that ‘tomorrow’ is nominal enough to receive accusative case in Cuzco Quechua, but nevertheless it does not trigger accusative case on the subject in an example like (80a), repeated here as (88)

(88) Paqarin Xwancha Lima-man ri-nqa . L&M p. 50
    Tomorrow Juan Lima-to go-3FUT
    ‘Tomorrow Juan will go to Lima.’

Here ‘Juan’ does not trigger accusative on ‘tomorrow’ because it doesn’t c-command it, ‘tomorrow’ being very high in the clause. But then ‘tomorrow’ should c-command ‘Juan’, so why isn’t ‘Juan’ accusative in (88)? Similarly, we know that ‘forcefully’ is nominal enough to receive ergative case in Diyari, but nevertheless it does not trigger ergative case on the subject that (presumably) c-commands it in an example like (85a), repeated here as (89).

(89) Wata yini parapara pit li-ya. (p. 108)
    Not2sg5 energetic fart-IMP Intransitive, bare adverb
    ‘Don’t fart loudly!’

The subject does not trigger ergative on the adverb (although an object would) because it is higher than the adverb—but then why doesn’t the adverb trigger ergative on the subject in this version? Here we see for the first time some significant separation between what can play the role of a case competitor and what can play the role of a case undergoer. And as far as I have seen this is quite general: I have not encountered any ergative (or tripartite) language in which the subject becomes ergative if there is a

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35 Note that if one follows this line one will have to distinguish different dimensions of nominality, because we know that Sakha is less stringent than Quechua and Finnish when it comes to empty categories triggering dependent case, but more stringent than Quechua and Finish when it comes to adverbs undergoing dependent case. Therefore we cannot put adverbs in a well-defined position along the same scale. Rather, we would need to say that Sakha has high standards of nominality along the adverb-noun dimension but low standards along the phi-feature dimension.
lower adverbial NP in the clause but no object. Neither have I encountered any instances of an accusative (or tripartite) language in which the theme argument becomes accusative solely because an adverb is present and c-commands it—say in an unaccusative structure where the theme argument is generated low, in the c-command domain of the adverb.

The brute force approach at this point would be to bite the bullet and to stipulate that the case competitor in the dependent case schema (ZP in (1)) has to be an argument, whereas the case undergoer in this schema (XP in (1)) does not have to be, and least not in all languages. But one certainly wonders why there should be this subtle difference. Moreover, there is one piece of evidence that this would not be quite right. In Maling’s (xx:81) analysis of Finnish, she considers a structure in which the subject is not a case competitor, there is no direct object, and there are two adverbs of the sort that are eligible for accusative case in Finnish. The interesting result, shown in (90a), is that (what I take to be) the higher adverb is bare nominative and the lower one is accusative. In contrast, (90b) shows that when the same adverb appears without the higher adverb in this type of construction, it is nominative, not accusative.

(90) a. Kävel-tiin kilometri koko talve-n. (*talvi)
    walked-IMPS kilometer.NOM whole winter-ACC *winter.NOM
    ‘There was walked a kilometer the whole winter.

b. Kävel-tiin koko talvi. (*talve-n)
    walked-IMPS whole winter.NOM *winter-ACC
    ‘There was walked the whole winter.

Generalizing (wildly?) from this, we seem to have the more nuanced generalization in (91).

(91) a. Arguments can trigger dependent case on arguments or adjuncts.
    b. Adjuncts can trigger dependent case on adjuncts but not on arguments.

Why this should be is an intriguing puzzle, but it evidently does not have anything to do with the status of adverbs as being NPs or not. Therefore, I leave it aside for now, returning to it in chapter 6, when I try to be more specific about exactly when dependent case assignment takes place in the course of the derivation.

5.5 Predicate Nominals

Finally, I need to mention here one more relevant construction—one in which (perhaps surprisingly) there is little or no crosslinguistic variation. This is predicate nominal constructions. I admit up front that these will not be a particular strength of my analysis, but something should be said about what the facts are, and where these fit in.

Predicate nominal constructions have, by definition, have two nominal phrases in them: the predicate nominal itself and its subject. But despite this, it is striking that, in language after language, dependent case assignment does not apply to these constructions. Consider first ergative languages. Here we might have expected the predicate nominal to trigger ergative case on the subject. But it does not, in any of the languages I have investigated. Rather, the subject is consistently absolutive, as seen in the examples in (92).

(92) A. Ino-ra onsá yoina iki. (Shipibo) (*Ino-n-ra)
    jaguar:ABS-EV dangerous animal COP
The jaguar is a dangerous animal.

b. Zu buba Joxanes kešiš ja. (Lzeqian) (MH: 311)
   I.GEN father Johannes prest COP
   ‘My father Johannes is a minister.’

c. Other? Burushaski?

Nor is the subject of a predicate nominal construction ergative in tripartite languages like Diyari or Nez Perce.

(93) a. ŋanIL puluka-yiţa. Diyari (Austin p. 102)
   1sgS cattle-HABIT
   ‘I am a stockman.’

   man 3sS-be-ASP old.man
   ‘The man is an old man.’

Similarly, when we turn to accusative languages, we observe that the predicate nominal is not accusative, even though it is c-commanded by the subject, which is typically an NP or DP. (94) gives some examples.

(94) a. Baaska byraas e-t-e (Sakha)
   Baaska doctor AUX-PAST-3sP
   ‘Baaska was a doctor.’

b. əñña bala-nna mist nän. (Amharic, Leslau p. 271)
   we.NOM husband-and wife(NOM) be.1pS
   ‘We are husband and wife.’

c. Juan-ka mayistru-mi (ka-rka). (Cole, p. 67 for IQ – get CQ ?)
   Juan-TOP teacher-VALID be-PAST.3
   ‘Juan is (was) a teacher.’

We can also see in the tripartite language examples in (93) that the predicate nominal does not receive accusative case in those either.

One of the professed virtues of the dependent case view is that it constrains where we can look for solutions to issues like these, since there are only so many ways that dependent case can fail in a language that has it. My options, then, are these: saying the subject doesn’t c-command the predicate, saying that the subject is not in the same spell out domain as the predicate, or saying that either the subject or the predicate is not (sufficiently) nominal. And the first of these, appealing to the c-command condition, looks like a non-starter. On all standard accounts, the subject c-commands the predicate, and

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36 The one language I know of that has accusative case on a predicate nominal is Classical Arabic, and even then the predicate nominal is only accusative if there is an overt copula. One might plausibly say that it is like other languages with regard to dependent case assignment, but the copula (or some functional head associated with it) assigns accusative case in its c-command domain under Agree.
this is confirmed by (for example) its ability to bind an anaphor inside the predicate, or even constituting
the predicate, as in (95) from English.\footnote{For the special identificational copular sentences like ‘That man is John’, it is possible that the core of the sentence is simply two DPs merged together directly (Moro?). If so, then we might say that the two DPs are in a relationship of mutual c-command, whereas dependent case applies only if one DP asymmetrically c-commands the other. (Thanks to Mario Montalbetti (p.c.) for pointing out this possibility.) Unfortunately, this account is unlikely to extend to typical instances of predicational copular sentences, like most or all of the examples in (92)-(94).}

(95)  
\begin{enumerate}[a.]  
\item John is a harsh critic of himself.  
\item Mary is not herself today.  
\end{enumerate}

Saying that the subject and the predicate are not in the same spell out domain is more
tempting. We might try to achieve this by saying that Pred (in the sense of Baker 2003 and related
work) is a phase head, like the similar external-argument introducing category v, triggering the spell out
of its complement in a schematic structure like (96a).

(96)  
\begin{enumerate}[a.]  
\item \[
\begin{array}{c}
\text{PredP} \\
\text{That} \\
\text{Pred} \\
\text{DP (a) [DP picture (of Paris)]} \\
\end{array}
\]
\item \[
\begin{array}{c}
\text{PossP} \\
\text{John’s} \\
\text{Poss} \\
\text{NP picture (of Paris)} \\
\end{array}
\]
\end{enumerate}

Indeed, I already said exactly this in section 4.xx to explain why the complement of a noun (e.g. \textit{Paris} in
(96)) cannot get dependent accusative case in either a predicate nominal construction or a possessive
construction like (96a). But if the NP/DP complement of Pred is a spell out domain, it is one thing to say
that a nominal properly contained in it is invisible to the subject, but it is something else to say that the
NP/DP predicate as a whole is invisible to the subject. That would not follow from the normal
understanding of phase theory (although I am not sure it has been specific on this point, since the
particular structure may not have been considered in this light). Moreover, I clearly want to make the
opposite choice for the possessive nominal structure in (96b): ‘Paris’ here is indeed invisible for
dependent case assignment at the level of the whole possessed nominal, but ‘picture of Paris’ is not; rather it triggers ergative case on the possessor in a good number of ergative languages (see section
4.xx). Based on this, the spelled out domain as a whole should still be visible on the next cycle. But then
there is little that distinguishes these two structures from a structural viewpoint to account for the fact
that ergative appears on the possessor in (96b) but never on the subject in (96a).\footnote{\textbf{NOTE to self: But what about PP, in a structure like [John arrive at the field] (vs. John reached the field). ‘The field’ does not interact with ‘John’. I have assumed that is because P is a phase head. But then the NP node as a whole should still be visible? Am I wrong about the assumption and need to revise the account of possessive NPs? Or do PPs have more complex structure with something higher than P the phase head.}} An account in terms
of domains might still be salvaged if Pred were decomposed into two distinct heads, X and Y, such that
the higher head X takes YP as its complement and Y in turn takes NP/DP as its complement. Then if it is
X that is the phase head, DP/NP is properly contained inside YP and will not be visible to the subject in
SpecXP after YP has spelled out. But then we would like to know what X and Y are.

The third possibility is to say that one or the other phrases in the predicate nominal construction
is not really an NP or DP—at least not in the sense required by the dependent case schema. If it is not, then it will neither trigger nor undergo dependent case assignment. Of the two, it is presumably the
predicate nominal that we should be taking a hard look at, since there is little or no reason to think that
the subject of a predicate nominal construction is any different syntactically from the subject of any
other clause type.
At this point some linguists might be happy to appeal to the NP/DP distinction, saying that it is DPs that participate in dependent case marking, whereas a predicate nominal is an NP. But I am not one of them, for several reasons. First, I do not believe that all languages necessarily have DPs distinct from NPs; many articleless languages for example may not, as I assumed in Baker (2003), drawing on Chierchia (1998); see also Boskovic’s DP-NP parameter. But in an articleless language like Sakha object NPs become accusative and predicate nominals do not, and in an articleless language like Shipibo object NPs trigger ergative on the subject but predicate nominals do not. Nor does the NP- DP distinction look very promising even for a language with articles, more like English, given that the complement of Pred in (96a) sure looks like a DP (since a is needed with a singular count noun) whereas the complement of Poss in (96b) is presumably an NP (no article is possible here). Nevertheless, the later consistently triggers ergative in relevant languages and the former does not. Maybe the predicate nominal is contained in something that affects its behavior with respect to case theory, but it is probably not DP that draws the distinction.39

With this analysis in mind, the way through the difficulties that I propose could be considered an implementation of both the domains option and the non-nominal object. I suggest that there is indeed an additional head in the structure of predicate nominal constructions, between NP/DP and Pred. This is symbolized as E in (97).

\[(97) \quad [\text{PredP} \quad \text{That} \quad \text{Pred} \quad [\text{EP} \quad \text{E} \quad [\text{DP} (\text{a}) \quad [\text{DP picture (of Paris) }])]\]

First, this creates enough distance between the phase head Pred and the NP/DP constituting the core of the predicate nominal for the predicate nominal to be contained in a different spell out domain from the subject of predication, as discussed above—a version of the domains option. Second, I assume that EP itself is not a nominal category, so it does not count as something that should undergo or trigger dependent case marking. In terms of section xx (based on Baker (2003), EP does not inherit the referential index of its NP/DP complement. Rather, NP/DP inside EP is sheltered from case theory interactions with the outside world much as NP/DP inside PP is; see section 5.1 for examples and discussion. In that way, (97) is also a version of the non-nominal option.

So what is E? I am not entirely sure, but I think that I have seen one in the wild. Tamil is one of my go-to accusative languages, but I have not mentioned it in this section yet. It is typical in that it does not have accusative case on the predicate nominal. But it is somewhat special in that it has two visible elements in a predicative clause beyond the subject and the predicate nominal: a normal looking verbal copula, but also the so-called adverbial suffix –aa. This is seen in (98).

\[(98) \quad \text{Avaru} \quad \text{DisTrikt inspekTar-aa} \quad \text{iru-nt-aaru.} \quad \text{(Asher p. 71)}\]

\[\text{He.NOM district inspector-ADV be-PAST-3sS.HON}\]

39 Another possible factor to consider is whether predicate nominals need to undergo some kind of pseudo-noun incorporation (PNI) with the copular verb to form a single predicate at LF. If so, that might explain why there is no accusative case on the predicate nominal, just as there is no accusative on PNIed objects in Tamil (Baker in Press). This could be part or even all of the story in some languages—particularly those in which the predicate nominal needs to be linearly right-adjacent to the copula (like Sakha). But I doubt that this type of explanation is enough to capture the observation in full generality, for two reasons. First, there are also languages in which the predicate nominal does not need to be in a particular position next to the copula, but has some freedom to move around, and for them there is no obvious support for a PNI analysis. [Name one or two.] Second, PNIed objects which lose their own case feature can still trigger dependent case on another NP. For example, PNIed themes in Sakha still trigger dative case on goals and causes that c-command them in VP, and PNIed objects (in light verb constructions) still trigger ergative case on the subject in past tense sentences in Kurmanji. Given that this can happen, we cannot explain why predicate nominals never trigger ergative on the subject in terms of PNI.
‘He was a district inspector.’

This –aa is otherwise used in the language to mark adverbs as distinct from adjectives; for example, the adjective nalla ‘good’ can be used as an adverb ‘well’ in the form nallaa. See also ‘quickly’ in (99).

(99) Maala veeg-aa anda pustagatt-e paçi-cc-aa. (Tamil)
Maal quick-ADV the book-ACC read-PAST-3fS
‘Mala read the book quickly.’

This shows that –aa is not a realization of the Pred head, since Pred should not be involved in adverbial modification. Rather, it is something lower (closer to the noun) and intuitively it might have the function of suppressing the NP’s referential index, so that it can be used nonreferentially, as a predicate. This then could be a realization of the E head in (97), whereas the copula realizes the Pred head (directly or indirectly).

Another language that has a visible extra bit of morphosyntax in copular constructions is the ergative language Chukchi. As expected, the subject is (100) is absolutive, not ergative, even though there is another nominal in the clause. But in Chukchi, the predicate nominal is not in bare absolutive case; rather it is in a special “equative” case, dedicated to this purpose. This special noun form is typically used along with a copular verb, as in Tamil.

(100) anqen jokwajo ipe ?ly-u n-it-qin. (Dunn p. 317)
DEM.3s.ABS eider.duck.3s.ABS truly wolf-EQU HAB-be-3sS
‘That duck was actually a wolf, ha ha!’ (note equative: if PP like, no surprise)

So this is equative morpheme –u is another candidate for being the realization of the E head. (And indeed I used the label E to invoke ‘equative’). And inasmuch as the predicate nominal looks rather like an oblique in (100) it is therefore not too surprising that it does not trigger ergative case on the subject. Therefore, there is morphological evidence of there being a bit of extra structure in predicate nominal constructions in at least a few languages. My suggestion, then, is that this is true below the surface in all languages—even though the E and Pred heads can both be null in many of them. This then is what the special case theory properties of predicate nominal constructions are due to, I claim. I leave the exact nature of the E head and its contribution to the semantics of the clause open for now.

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40 There is in fact sort of a technical need for this within the framework of Baker (2003), so that predicate nominals do not violate the Noun Licensing Condition (unless the Pred head truly theta-marks its NP complement, which is what I assumed there.)

41 An additional detail is that Tamil is a language that does not need to have an overt copula if the clause is interpreted as present tense. However, if the copular verb is not present, then the predicate nominal is not marked by –aa either. This is good in the sense that it confirms that –aa and the copula act as a team, and one cannot appear without the other. However, it leaves open what the structure of copula-less predicate nominal clauses is in Tamil. (It would be nice if copula-less predicate nominals were really identificational copulas, in which case the analysis here could be combined with the one mentioned in note 37. However, that doesn’t seem to be true: sources suggest that both predicational and Identificational sentences can appear in both copular and copula-less versions (also Selvanathan 2013).

42 Also as in Tamil, copula-less predicate nominal constructions are possible in Chukchi in some (limited) circumstances, and when there is no copula the predicate nominal can be absolutive rather than equative; compare note 41.

43 This hypothesis should also work for languages with negative c-command conditions, in particular the marked absolutive language Nias. In Nias, an NP gets marked absolutive case if and only if there is no
As advertised, there are no stunning successes of the dependent case view to boast about here. But neither does it seem that we have to abandon this view which otherwise has much to commend it in light of the special properties of predicate nominal constructions. Hopefully future research into copular constructions will either fill out what is missing here and confirm it, or point toward some other account that is even better.

Conclusion:

In this chapter, I have considered what kinds of phrases participate in dependent case marking, both as the case undergoer and as the case competitor. The short answer is that overt NPs do, as distinct from PPs (including those called NPs with inherent case), CPs, certain unpronounced NPs, and (tentatively) the special EPs found in predicate nominal constructions. This helps to sharpen our sense of exactly what dependent case marking is all about. We also see that there is some crosslinguistic variation in this domain, both in terms of what constituents happen to be NPs in a particular language, and in terms of how many nominal features a constituent must have for the rule of dependent case assignment to see it.

NP in the local domain that it c-commands (section 3.xx). Consider, then, how this applies to predicate nominal constructions. If a predicate nominal counts, then the subject c-commands it and the subject should not have marked absolutive case in Nias. But if the predicate nominal is not visible to the subject because it is embedded in the nonnominal category EP, then the prediction is that the subject of a predicate nominal in Nias will have marked absolutive case. And this new prediction is the right one:

(i) Te’ana ya’ia z=a=mira. (Brown 2005:xx)
    Neg him ABS:[REL-IMPF-write
    ‘The writer is him.’