

When dependent case is not enough

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While early minimalist approaches take case to be valued/checked via Agree (Chomsky 2000, 2001), more recent approaches often advocate for the view that case is (often) dependent. In all such approaches, the claim is that nominals can be licensed via a local dependency with another nominal (Yip et al. 1987, Marantz 1991, Baker 2015 etc.). Dependent Case Theory (DCT) successfully models contexts where case assignment is sensitive to the presence of other arguments. This is true for transitive-sensitive cases like ergative/accusative/dative in many languages. But Baker (2015) argues at length that it may also be true for ‘differential’ cases which are sensitive to the features of a given argument, if these features are responsible for the movement of said argument into or out of the vicinity of another argument. In this paper, we argue that there are, however, instances where Agree determines case even where the latter is differential or transitive-sensitive (see also Kalin & Weisser 2018). This challenges the strongest version of DCT whereby case is *never* assigned via Agree (Levin & Preminger 2015).

Transitive-sensitivity in caseless languages: Unlike an Agree-based approach to case, DCT predicts fundamentally different alignment patterns to emerge in languages with and without morphological case (see Baker & Bobaljik 2017): agreement is not expected to be transitive-sensitive, unless guided by (dependent) case. Ergative agreement does exist in some caseless languages, however, notably many Mayan languages (Coon 2017), Chamorro, and Carib. We discuss various ways of accommodating these languages under DCT and show that they all weaken the approach. Either we have to allow for transitive-sensitive Agree (independently of transitive-sensitive dependent case) or DCT also requires abstract morphological case.

Triggers are not always undergoers: An attractive aspect of dependent case theory is that it makes clearly testable predictions. One such prediction is that “the same constituents are subject to case theory both as undergoers of case marking and as triggers of dependent case marking.” (Baker 2015: 200). The behavior of CPs in various languages seems to be problematic for this prediction: CPs often count for transitivity in transitive-sensitive case systems without themselves being case-marked. This can be seen in ergative agreement systems, as in Kaqchikel (Henderson and Coon 2018). Crucially, CP complements behave differently from DP complements in other ways – Henderson and Coon show that only DP complements trigger syntactic ergativity, so CPs are not concealed DPs. The patterns attested in Tsez are particularly challenging. In Tsez, non-nominalised finite CP complements trigger ergative (Polinsky & Potsdam 2001):

(1) kid-**bā** [už-ā hibore-d bikori žek’-si-λin] eλis
girl-ERG [boy-ERG stick-INSTR snake hit-PST.EVID-COMP said
‘The girl said the boy hit a snake with a stick. (Polinsky & Potsdam 2001: 590)

Both nominalised clausal complements and these CP complements (introduced by *-λin*) can trigger gender IV agreement on the verb, if the matrix verb has agreement marking. Even nominalised clauses cannot bear ergative case, however (see Polinsky 2015: 126, (21b)):

(2) *[Eli b-āy-ru-li]-z-ä mi hayran y-oy-ä?
1PL.ABS.(IPL) IPL-come-PST.PTCP-NMLZ-OBL-ERG 3SG.ABS.(II) surprisedII-do-PST.WIT.INT
intended: ‘Did it surprise you that we came?’ (addressing a woman)

In Tsez, then, CPs cannot bear case but they can Agree and trigger ERG. A similar pattern of transitive-sensitivity is found in languages in which causees are realised as either dative or accusative. In French, Italian and Catalan, causees are only dative where the embedded verb is transitive, and finite/non-finite CPs also count for transitivity (see Kayne 1975):

(3) Je **lui**/*l’ ai fait penser que c’ est trop tard.
I him.DAT/ACC have made think that it is too late
‘I made him think that it’s too late.’

This is often modelled via DCT (see Folli & Harley 2007, Pitteroff & Campanini 2013).

The causees in such constructions need to be agentive, ruling out clausal causees on semantic grounds, but elsewhere in these languages, finite CPs do not appear to require obligatory case marking. French ditransitives always require dative case on one internal DP argument, for example, but verbs taking a finite CP and a DP do not:

(4) Je l'ai envoyé *(à) Sophie.

I it=have sent DAT Sophie

(5) Je l'ai convaincu (*à) que ça te guiderait dans la bonne direction.

I it=have convinced DAT that that you= guide.COND in the right direction

Once again, then, we see that CPs can be case triggers without being case undergoers. It is, of course, possible to stipulate that CPs count as case competitors, but this again weakens the dependent case approach in making it less predictive empirically. It also undermines proposals regarding the linearization-based motivation for dependent case (Richards 2010, Baker 2015) as these CP arguments do not behave like DPs in other ways and so must be categorially distinct. In short, 'transitivity' cannot be reduced to there being two DPs in a local domain.

Differential cases: Challenges also arise for dependent case in relation to differential cases. In addition to the evidence in Kalin & Weisser (2018), we provide evidence that differential cases also cannot be reduced to there being two DPs in local domain. Our evidence comes from global case splits, in which the case-marking of an argument depends on properties of two arguments, e.g. the person of both the subject and the object. This is essentially the case-based equivalent of inverse agreement systems. This phenomenon is particularly interesting because it can involve a dependency between two arguments in the clause which cannot be defined in terms of c-command and is thus difficult to model using purely structural dependent Case assignment. This is most obvious in cases where a case split is triggered by the relative ϕ -features of arguments without evidence for distinct structural positions of these arguments. The Kashmiri data in (6) illustrate this. Simplifying somewhat, when the subject's person is higher than the object's on the hierarchy $1 > 2 > 3$, the object appears as NOM, otherwise as DAT. Thus, the 2SG object is NOM in (6a) but DAT in (6c).

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|-----|----------------|-------------------------|----------------|-------------------------|
| (6) | a. <i>bi</i> | <i>chu-s-ath</i> | <i>tsi</i> | <i>parina.va:n</i> |
| | 1SG.NOM | be.M.SG-1SG.SBJ-2SG.OBJ | 2SG.NOM | teaching |
| | | 'I am teaching you.' | | |
| | b. <i>tsi</i> | <i>chu-kh</i> | <i>me</i> | <i>parina.va:n</i> |
| | 2SG.NOM | be-M.SG-2SG.SBJ | 1SG.DAT | teaching |
| | | 'You are teaching me.' | | |
| | c. <i>su</i> | <i>chu-y</i> | <i>tse</i> | <i>parina.va:n</i> |
| | 3SG.NOM | be.M.SG-2SG.OBJ | 2SG.DAT | teaching |
| | | 'He is teaching you.' | | (Wali & Koul 1997: 155) |

This kind of system, we contend, cannot be derived via DCT. Under Baker's (2015) approach, differential cases arise where the features of a given DP trigger movement of that DP into or out of the domain of another DP. But here what is relevant is the *relative* ϕ -features of the two DPs. Different word orders of subject and object do not affect case-marking (the same is true for the split in Wampis, Peña 2015). Moreover, the trigger for movement of the object in (6b,c) would have to be the ϕ -features of the subject. Patterns like (6) can easily be handled via Agree: the verb agrees with both its subject and its object and the ϕ -features of the subject and object are compared before the verb assigns case (following Keine 2010; Georgi 2012).

Conclusions: We have presented problems for DCT in transitive-sensitive and differential case systems. In each context, analyses involving Agree relations between functional heads and the case-marked XPs fare better than DCT, suggesting that the latter is not the only means of assigning case. It is noteworthy that Agree already needs to be sensitive to multiple arguments in other contexts (see Béjar & Rezac 2009). We argue that cyclic Agree, conversely, can be extended to cover to transitive-sensitive and differential cases.