

Case sensitivity reflects case structure: agreement, extraction, and clitics

Amy Rose Deal
ardeal@berkeley.edu

March 2025

1 Prologue: two questions

- Various syntactic phenomena seem to be conditioned by morphological case—the phenomenon of case discrimination/targeting/opacity/sensitivity

- (1) Some case sensitivity subphenomena (nonexhaustive list)
 - a. ϕ -agreement: whether a DP can agree depends on its case
 - b. Movement: whether a DP can move depends on its case
 - c. Clitic-doubling: whether a DP can clitic-double depends on its case

- Assuming syntactic operations lack direct access to morphological outputs, these patterns suggest that there is some syntactic representation which the operations are sensitive to and which also gives rise to m-case.

- Unpacking this requires answering two related questions:

1. What is the syntactic representation behind m-case?
2. How are syntactic operations to be formulated, such that they are sensitive to this type of representation?

- Question 1: What happens to a nominal when it is assigned (marked) case?

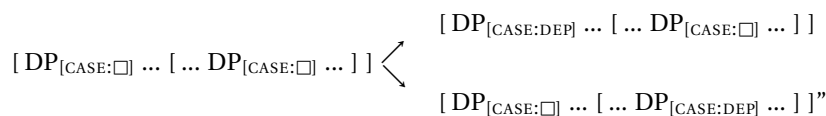
- Akin to asking about the *structural change* of a case assignment rule

- Two classes of views to be contrasted:

- (2) **Feature addition.** When a nominal is assigned case, the featural representation associated with the nominal is augmented.

- The general default in the literature, for both marked & unmarked cases

- (3) Poole (2024): “If DP_α c-commands DP_β , assign dependent case either to DP_α or to DP_β . This directionality is parameterized.



- An alternative position is found in various portions of the literature that associate case features to their own projecting heads, generally with marked-case nominals structurally larger

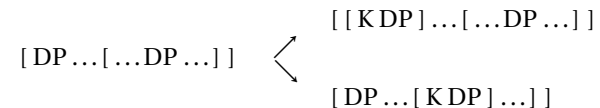
- (4) **Structure addition.** When a nominal is assigned case, the structural representation associated with the nominal is augmented.

- Bittner and Hale (1996b): “a nominal in a marked Case (accusative, ergative, or oblique) is a KP, while a nominal in the unmarked Case (nominative) is K-less, a bare DP or NP.”

- Nanosyntax “case containment” (Caha 2009, 2010)

- This type of representation suggests case assignment (at least of marked cases) countercyclically adds a layer of functional structure (Rezac 2004: ch 4):

- (5) Dependent case assignment by structure addition (cp. (3))



- Question 2: How does case sensitivity fit into a theory of syntactic operations?

- If we think movement, ϕ -agree, and clitic-doubling all reflect Agree, major case sensitivity phenomena amount to a series of constraints on Agree.

- General state of the literature: case sensitivity as somehow part of the Agree operation (usually an unanalyzed primitive)

- The most worked out version of the Agree-theoretic approach that I know of is found in the work of Drummond (2023), Akkuş, Embick, and Salih (2024):

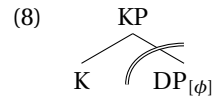
- (6) **Case sensitivity by probe specification.** Case sensitivity arises from case features being involved in probe specifications

- A probe may be specified to only copy features from / halt at / move DPs with particular case features on them.
- Note the tight connection to the featural view of case itself.

- I will defend an alternative approach (generalizing ideas from Rezac 2008) that instead connects to the structure addition view of case assignment:

(7) **Case sensitivity is structure sensitivity.** Case sensitivity reflects syntactic properties of KP structures, e.g. locality domains

- > The constraint on Agree seen in the best-studied case sensitivity phenomena is a more general and familiar one: *it's just phases*



- **Plan:** In the rest of this talk I will review a series of case sensitivity subphenomena to make the case for rejecting **feature addition + probe specification** in favor of **structure addition + structure sensitivity**

- §2 Case sensitivity in ϕ -Agree: agreement in Indo-Aryan
- §3 Case sensitivity in \bar{A} movement: ergative extraction constraints
- §4 Case sensitivity in clitic doubling: more case, more clitics
- §5 What status for *unmarked* case?
- §6 Conclusions and implications for cyclicity principles

2 Case sensitivity in ϕ -Agree: the case of Indo-Aryan

- We begin with the interaction between ϕ -agreement and marked case in Hindi, the canonical example of case discrimination following Bobaljik (2008)

- (9) Hindi agreement algorithm (Pandharipande and Kachru 1977, a.o.)
- If the subject lacks overt case, it controls agreement.
 - Else, if the object lacks overt case, it controls agreement.
 - Else, agreement takes a default form. (M.SG)

- (10) Hindi examples (Bhatia 2019)
- LaRkii ghazalē gaa rahii hE
girl.FS songs.FP sing PROG-F be.PRES.3S
The girl is singing songs. (*subject agreement, (9a)*)
 - LaRkii-ne ghazalē gaayiiM thiiM
girl-ERG songs.FP sing-PFV.FP be.PST.FP
The girl sang songs. (*object agreement, (9b)*)
 - LaRkii-ne in ghazalō-ko gaayaa thaa
girl-ERG these songs.FP.OBL-DOM sing-PFV.MS be.PST.MS
The girl sang these songs. (*default agreement, (9c)*)

> A nominal's ability to ϕ -Agree may be determined in part by its case

- Bobaljik (2008) argues that these facts are part of a larger typological picture revealing that accessibility for Agree must be stated in terms of case:

- (11) The finite verb agrees with (the highest) accessible DP in its domain, where accessibility for ϕ -agree is regulated by the hierarchy:
Unmarked (NOM/ABS) > Marked¹ (ACC/ERG) > Lexical/oblique
If a case category on the hierarchy is accessible for ϕ -agree, so are all higher case categories. (Bobaljik 2008, modulo fn 1 content)

- (12) Accessibility for ϕ -Agree: Hindi
unmarked case \ll marked case \ll oblique case
-

- (13) Accessibility for ϕ -Agree: Nepali
unmarked case \ll marked case \ll oblique case
-

- In Nepali, marked case nominals are available for agreement; this means that an ergative subject can agree, unlike in Hindi

¹Bobaljik uses the term 'dependent'. I avoid this term here because it is controversial whether ergative and/or marked (DOM) accusative in Hindi are dependent cases. See Agarwal (2022) for arguments against a dependent case analysis of Hindi ergative.

- The core prediction of this widely adopted theory is that hypothetical systems such as “Contra-Hindi” are ruled out:

(14) Accessibility for ϕ -Agree: Contra-Hindi (predicted impossible!)
 unmarked case \ll marked case \ll oblique case

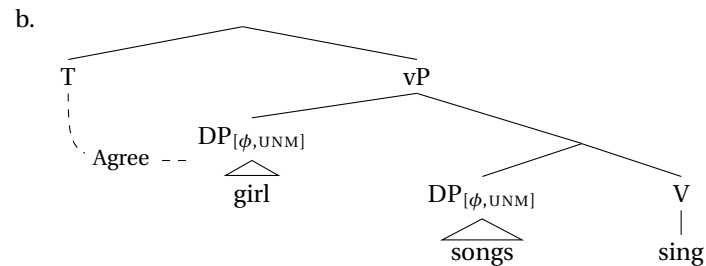


2.1 Feature addition + probe specification theory

- Suppose that all arguments in Hindi are DPs, with case-related differences confined to featural values
 - This is to say: assignment of case to a nominal consists in *adding a feature to that nominal*, but not any type of structure-building
 - This perspective on Hindi: Woolford (2001), Bobaljik (2008), Mahajan (2012), Agarwal (2022), Baker (2024), i.a.
- Suppose furthermore that all unmarked arguments in Hindi have a feature in common: [UNM] (an assumption to be re-examined below)
- A first part of the story: probe satisfaction
 - Only unmarked nominals can ϕ -agree. When there are two unmarked nominals, only the subject ϕ -agrees.
 - Standard approaches to this type of behavior invoke a probe above both potential targets, which finds the subject first and then halts.

(15) Agreement with an unmarked subject

a. LaRkii ghazalē gaa rahii hE
 girl.FS songs.FP sing PROG-F be.PRES.3S
 The girl is singing songs.

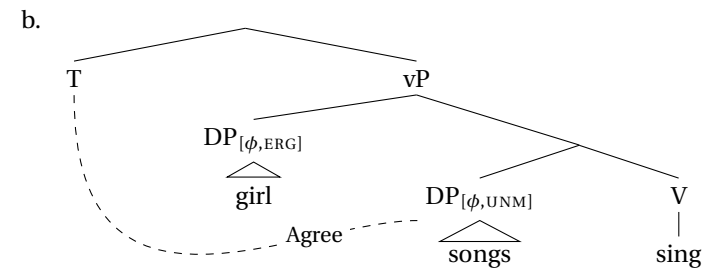


→ The nominative subject has a feature that satisfies the probe
 (= halts probing)

- The second part of the story is the crucial ‘skipping’ behavior:

(16) Agreement with an unmarked object past an ergative subject

a. LaRkii-ne ghazalē gaayiiM thiiM
 girl-ERG songs.FP sing-PFV.FP be.PST.FP
 The girl sang songs.



- The ergative does not satisfy the probe; probing continues past it. This shows the probe is not [SAT: ϕ] but rather [SAT:UNM]
- The ergative also apparently does not interact with the probe – its features are totally ignored for ϕ -agreement

- If case sensitivity reflects probe specifications, we could understand this effect in terms of an interaction condition:

- The proposal of Akkuş et al. (2024), if I understand correctly: case discriminating probes are such that only DPs with the accessible case values can have their features copied to the probe
- ‘Interaction as a [logic] gate’: suppose we understand [INT:F] as ‘copy all features from bearers of [F]’, *not* as ‘copy [F]’
 Interaction conditions of this form have been proposed, e.g. in Grishin (2023), Deal and Royer (To appear)
- Then Hindi could be modeled with a [INT:UNM, SAT:UNM] probe

- Case sensitivity in favor of nominatives is encoded by referencing the UNM feature directly in the probe specification: [INT:UNM, SAT:UNM]

- **Challenge 1.** Crucial to the analysis is the idea that all unmarked-case nominals have a syntactic feature in common (“[UNM]”).

This conflicts with Legate’s conclusion (2008) that Hindi is an ABS=DEF(ault) language: objects and intransitive subjects do not have the same behavior

- Nonfinite clauses in Hindi cannot have unmarked-case subjects, but they can have unmarked-case objects
- > If ‘unmarked’ is the union of two syntactic case categories A and B, we need a disjunctive probe: [INT:A,B, SAT:A,B]

- **Challenge 2.** This system leaves no clear way to rule out Contra-Hindi:

(17) Contra-Hindi (to be ruled out)

unmarked case \ll marked case \ll oblique case



- We are assuming there are features NOM,ERG,ACC, etc; case assignment consists in associating such features to DPs
- Any case feature, not just UNM, could be referenced in probe specifications:

(18) Some predicted probes

- [INT:ERG] – only copies features from an ergative
- [INT:ACC] – only copies features from an accusative
- [INT:ERG,ACC] – disjunction – only copies features from an ergative or an accusative (skips nominative)

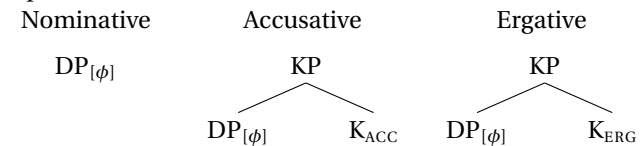
- We predict a system where only ergatives ϕ -Agree.
- We predict a system where only datives ϕ -Agree.
- If interaction conditions work allow disjunction, we predict Contra-Hindi via probe specification (18c).

- Baker (2015), Akkuş et al. (2024) conclude that this result is basically right and that Bobaljik’s generalization is too strong (so the absence of Contra-Hindi is accidental).
- Those who *do* wish to explain Bobaljik’s generalization will need to look beyond the feature addition + probe specification theory.

2.2 Structure addition + structure sensitivity theory

- On the feature addition theory, we assumed that all arguments in Hindi are DPs, with case-related differences confined to featural values
- Let us now suppose that case assignment is structure building, and in particular that *marked-case nominals are structurally larger than unmarked ones*
 - For simplicity, I will show ERG and ACC nominals as the same size; not taking a stand here on their relative size
 - I also for simplicity follow Bittner and Hale (1996b) (rather than Caha 2009) in treating nominatives as case-structure-less

(19) Proposed structures for Hindi



- While little discussed in connection with case sensitivity generally, representations of this type are common in the literature on Hindi-Urdu (e.g. Butt and King 2004, Spencer 2005, Sinha 2017, Bhatia 2019, Kidwai 2023)²
- Some language internal evidence for (19):³
 - The ERG and ACC markers are, morphologically, phrasal clitics (they attach to an entire DP, outside of focus particles, coordinations, etc); this follows if they realize a head above DP

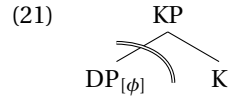
(20) Yassin=ne [kʊtte or gʰoʀe]=ko dekʰ-a hɛ
 Yassin=ERG dog and horse=ACC see-PERF.M.SG be.PRES.3SG
 Yassin saw the dog and the horse. (Butt and King 2004: (22a))

²There are also some authors who describe the case markers as ‘postpositions’, suggesting some level of functional structure above DP, but nevertheless treat arguments syntactically as DPs (e.g. Davison 2004, Anand and Nevins 2006).

³Another kind of pattern discussed in the literature as evidence for (19) is the use of a distinct inflectional ‘oblique’ form for nouns and adjectives inside marked-case nominals. For Spencer (2005), this oblique form reflects an actual case *feature* determined by the presence of the case *postposition*—so case assignment involves both feature addition and structure addition. (A similar perspective is taken in Sinha 2017.) An alternative is as follows: case assignment is purely structure building (merge K). The inflectional form of a nominal in Hindi reflects the domain it occupies at PF: “oblique” is a KP-internal form of the “unmarked” case. On domain-specific choices for “unmarked” case, see Baker (2015).

– The linear order of DP-K follows from the general head-finality of Hindi⁴

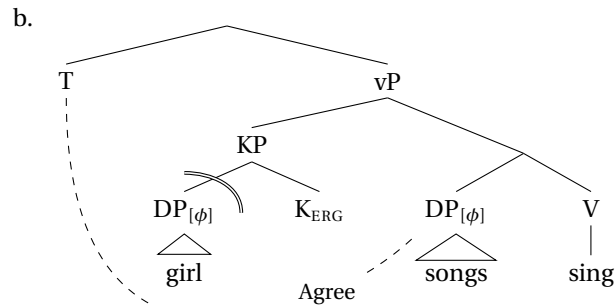
- Given these structures, we can account for the ϕ -invisibility of marked-case nominals using standard locality tools: the case projection is phasal, concealing lower ϕ -features from higher probes (Rezac 2008 for datives; Sinha 2017, Keine 2019: 17n3, Kidwai 2023 for Hindi-Urdu)⁵



- In an ERG-UNM structure, even if the probe is able to interact with all ϕ -features, the only ϕ -features visible are those of the unmarked object

(22) Agreement with an unmarked object past an ergative subject

a. LaRkii-ne ghazalē gaayiiM thiiM
 girl-ERG songs.FP sing-PFV.FP be.PST.FP
 The girl sang songs.



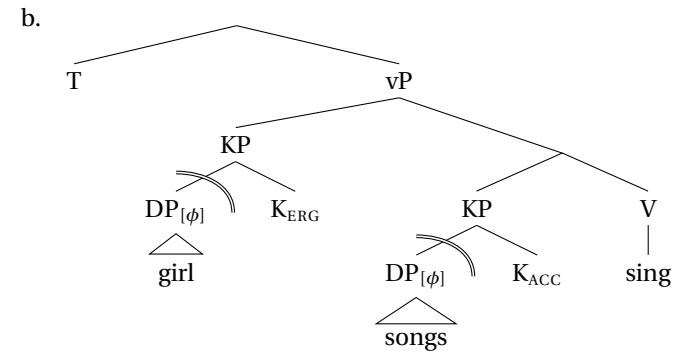
- For the same reasons, when both nominals are in marked case, Agree fails

(23) Both arguments case-marked: default agreement

a. LaRkii-ne in ghazalō-ko gaayaa thaa
 girl-ERG these songs.FP.OBL-DOM sing-PFV.MS be.PST.MS
 The girl sang these songs.

⁴Bittner and Hale (1996b) make this type of argument for KPs on a crosslinguistic basis.

⁵This is to say that KP structure presents an *absolute* locality effect. Rezac (2004) and Bhatia (2019) propose that K blocks ϕ -Agree with DP because it is itself a (defective) ϕ -goal—an explanation in terms of *relative* locality. These theories differ in their predictions for operations other than ϕ -Agree potentially targeting DP. The discussion in §3 will favor the absolute locality (phase-based) approach.



- The case sensitivity effect reflects not particular probe specifications, but rather the representation of case-marked nominals themselves.

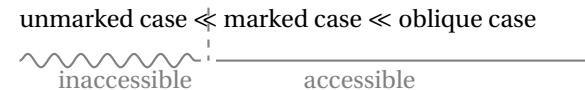
- Returning to the challenges noted above for the feature addition theory:

#1 ‘Unmarked case’ does not need to be a featurally-unified class in Hindi:

- Rather than a system where case features are *singled out for more* Agree, we now have a system where case structures can *block* it.
- We no longer need a specific featural representation common to unmarked nominals, nor a disjunction of features that jointly do this (There need be no syntactic feature [UNM])
- Unmarked case is a kind of default, the class of nominals that are *not* enclosed in a KP layer

#2 Contra-Hindi is *not* expected, on reasonable assumptions

(24) Contra-Hindi (predicted impossible!)



- Marked cases are always larger than unmarked cases, and this additional structure is what triggers ‘case opacity’
- Bare DPs are unmarked and inherently unable to resist ϕ -Agree
- Even if KPs had ϕ -features visible on them, the result would be that *all* nominals, DPs and KPs alike, would be able to ϕ -Agree.⁶

⁶We would lose our ability to rule out the undesired system if we made both of the following assump-

- In sum: I have argued that we account both for the Hindi pattern and the absence of Contra-Hindi if we treat marked-case nominals as possessing structure (not merely features) that unmarked case nominals lack.
 - > Whatever case assignment operation is responsible for assigning marked cases, the result is that KP structure is added.
 - > Case sensitivity is a standard locality effect, not a property of Agree specifications for particular probes.

2.3 Structure addition + locality beyond Hindi

- Extending the analysis to other Indo-Aryan languages, Hindi, Nepali and Gujarati present the following empirical picture for case accessibility:

(25) Agree accessibility by case⁷

NOM	ACC (DOM)	ERG	DAT	
✓	-	-	-	Hindi
✓	✓ (g/n only)	-	-	Gujarati
✓	?	✓	-	Nepali

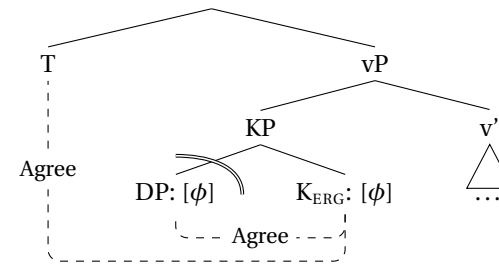
- Nepali allows ergatives to Agree; Gujarati allows accusatives to Agree in gender/number (Magier 1983).⁸ *Data is in the appendix.*
- How are ergatives or accusatives able to ϕ -Agree? Proposal: the relevant K head ϕ -Agrees with its complement, ferrying features out of the KP phase

tions: (i) Interaction conditions are logic gates, as discussed above; (ii) There is a probe [INT:K]. In view of (i), (ii) would produce a probe that copies all features only from KPs. My suspicion is that this is ruled out because the ‘interaction as a gate’ theory is incorrect. If we understand interaction conditions as stating strictly *what features are to be copied, if found*, then an [INT:K] probe, if it existed in a language, would just copy the K feature. An [INT: ϕ] probe is required for ϕ -copy, and such a probe will not be able to access features on KPs without also accessing them on DPs.

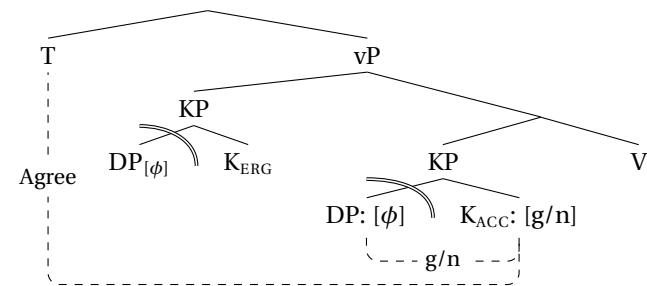
⁷Regarding the ? in (25): it is impossible to assess whether DOM accusatives can control agreement in Nepali, because such objects occur only with unmarked or ergative subjects (not datives). Unmarked and ergative subjects always Agree, so we cannot tell whether the object features are also visible to Agree.

⁸Note that this is different from unmarked objects, which also Agree in person (Magier 1983, Class 2023). I conclude that Bobaljik (2017)’s approach to Gujarati, on which its DOM accusative marker is present only post-syntactically, cannot be correct; if this were so, a DOM accusative object should Agree in person just like an unmarked object does. See the appendix for data.

(26) Nepali: agreement with the ergative subject

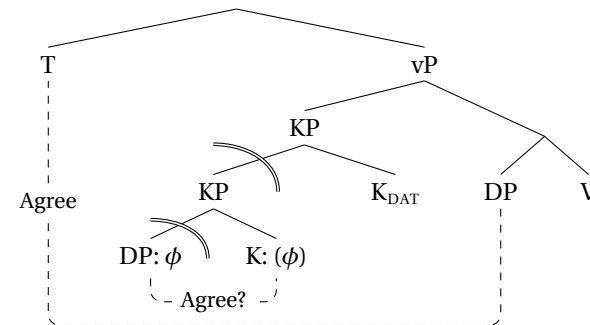


(27) Gujarati: partial agreement with the accusative object



- Why are datives consistently unable to ϕ -Agree? If datives are strictly less able to ϕ -Agree than ergatives/accusatives (Bobaljik 2008), they likely contain *more structure* than ergatives/accusatives do:

(28)



- Even if the inner K Agrees with DP, the higher K blocks DP’s features from outside probes

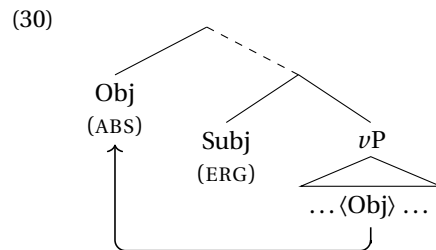
- The overall idea is that the Agree-accessibility cline in (25) reflects syntactic size: the biggest structures (e.g. DAT) are the most opaque, the smallest (e.g. unmarked) are the least opaque
 - The overall size hierarchy generally matches what Caha (2009) concluded, but was arrived at in a very different way

3 Case sensitivity in \bar{A} movement

- Kalaallisut (a.k.a. ‘West Greenlandic’) famously shows a pattern of absolutive-only relativization; ergatives cannot be relativized

- (29) a. miiqqa-t [_{ABS} sila-mi pinnguar-tu-t]
 child-PL.ABS [_{LOC} outdoors-LOC play-REL[-TR]-PL]
 ‘the children who are playing outdoors’ (Bittner 1994a: 55)
- b. miiqqa-t [Juuna-p _{ABS} paari-sa-i]
 child-PL.ABS [Juuna-ERG _{TR} look.after-REL[+TR]-3SG.PL]
 ‘the children that Juuna is looking after’ (Bittner 1994a: 55)
- c. *Meeraq [_{ERG} akornuser-aanga]
 child.ABS _{TR} disturb-3SG>1SG.PART
 Int: ‘The child that disturbed me’ (Mikkelsen and Thrane 2024)

- There is a long tradition of analyzing this type of restriction as involving syntactic “inversion” in the clause structure of certain ergative languages⁹
 - > The absolutive object A-moves above the ergative subject
 - > Object movement over the subject blocks A’ movement by the subject



⁹For Inuit, see Bittner 1994b, Bittner and Hale 1996a,b, Yuan 2018, 2022; more broadly, see Aldridge 2004 *et seq*, Coon, Mateo Pedro, and Preminger 2015, Coon, Baier, and Levin 2021, Assmann, Georgi, Heck, Müller, and Weisser 2015, Tollan and Clemens 2022, Royer 2022, Brodtkin and Royer 2024.

- In Deal, Mikkelsen, and Thrane (2024), we argue that the inversion theory cannot be correct for Kalaallisut
 - Ergatives can hyperraise → they can occupy the highest A-position
 - Default word order is SOV → subjects are highest
 - Putative object raising neither feeds nor bleeds condition C
 - Contra Bittner (1994b), scope provides no argument for inversion
- We conclude that the absolutive-only requirement on relativization in Kalaallisut reflects case sensitivity
 - Other work concluding \bar{A} movement may be sensitive to the syntax of case: Otsuka 2006, 2010, Legate 2012, Deal 2016, 2017, Drummond 2023
- The restriction to absolutives in Kalaallisut seems non-arbitrary. Accessibility for relativization has long been understood in terms of hierarchies:

(31) Keenan and Comrie’s (1977) accessibility hierarchy for relativization
 Subject > Direct Object > Indirect Object > Oblique > Genitive
- Otsuka (2006) argues that morphological case, not GE, is what’s truly relevant

(32) Accessibility for extraction is regulated by the hierarchy:
 Unmarked Case (NOM/ABS) > Marked Case (ACC/ERG) > Oblique
 If a case category on the hierarchy is accessible for relativization, so are all higher case categories. (Otsuka 2006)

 - Otsuka’s proposal is a direct antecedent of Bobaljik’s (2008), making a prediction of the same form:

(33) a. Accessibility for extraction: Kalaallisut
 unmarked case \ll marked case \ll oblique case
 ————— | ~~~~~
 accessible inaccessible

b. Accessibility for extraction: Contra-Kalaallisut (pred. impossible!)
 unmarked case \ll marked case \ll oblique case
 ~~~~~ | —————  
 inaccessible        accessible
- I will argue that the structure addition + structure sensitivity theory again is necessary to capture the implicational hierarchy, for exactly the same reasons as we saw with  $\phi$ -Agreement.

### 3.1 Feature addition + probe specification

- A theory of case sensitivity in terms of feature addition + probe specification is presented by Drummond (2023) for Nukuoro (Polynesian outlier)
  - All arguments are DPs; they differ at the level of case features
  - Absolutives have a syntactic feature in common, [ABS]
  - Conjunctive satisfaction, move-what-satisfies: the relativization probe is [SAT:Ā+ABS<sup>M</sup>]
  - Only when this probe is satisfied can an RC be built; this requires Ā features on an absolutive.
- As applied to Kalaallisut:

(34) Absolutive relativization, (29a)

- a. The probe finds a DP bearing both [Ā] and [ABS] and agrees:

[CP C̄ [TP OP<sub>[Ā,ABS]</sub> sila-mi pinnguurtut ]]  
 outdoors-loc play  
 ‘who are playing outdoors’

- b. This target satisfies the probe and therefore movement is triggered:

[CP C̄ [TP OP<sub>[Ā,ABS]</sub> sila-mi pinnguurtut ]]  
 outdoors-loc play

- c. Agree halts (and a RC is now built)

(35) Attempted relativization of an ergative, (29c)

- a. The probe isn't satisfied by the subject: no [ABS]. No movement!

[CP C̄ [TP OP<sub>[Ā,ERG]</sub> *pro*<sub>[ABS]</sub> akornuseraanga ]]  
 OP 1SG.ABS disturbed  
 ‘who disturbed me’

- b. The probe isn't satisfied by the object: no [Ā]. No movement!

[CP C̄ [TP OP<sub>[Ā,ERG]</sub> *pro*<sub>[ABS]</sub> akornuseraanga ]]  
 OP 1SG.ABS disturbed  
 ‘who disturbed me’

- c. All targets for Agree are exhausted and no movement has been triggered. No RC is built.

- Just as discussed for Hindi, case sensitivity in favor of absolutes is encoded by referencing the ABS feature directly in the probe specification: [SAT:Ā+ABS]
- **Challenge 1.** It is again crucial all unmarked-case nominals have a syntactic feature in common, [ABS] — and this assumption is, again, problematic
  - While Kalaallisut morphology is famously ergative-absolutive, this is actually only true for a singular non-pronominals
  - Plurals and free pronouns are entirely unmarked—full case syncretism
  - The case forms of certain Kalaallisut quantifiers and focus particles differ between intransitive subjects and transitive object (Fortescue 1984: 88)

(36) Kalaallisut case patterns (Deal et al. 2024)

|                                    | ERG (A)  | NOM (S) | ACC (O) |
|------------------------------------|----------|---------|---------|
| singular DP (ex: Naja [name])      | Najap    | Naja    |         |
| plural DP (ex: meeqqat ‘children’) | meeqqat  |         |         |
| pronoun (ex: illit ‘2sg’)          | illit    |         |         |
| ‘only’ (see (37))                  | kisimi   | kisiat  |         |
| ‘all’                              | tamarmik | tamaasa |         |

- (37) a. Naja-p **kisimi**/\***kisiat** ikior-paanga  
 N.-ERG only.NOM/\*only.ACC help-3SG>1SG  
 ‘Only Naja helped me.’ (Deal et al. 2024)
- b. Naja **kisimi**/\***kisiat** angerla-jaar-poq  
 N.ABS only.NOM/\*only.ACC leave-early-3SG  
 ‘Only Naja left early.’ (Deal et al. 2024)
- c. Naja **kisiat**/\***kisimi** ikior-para  
 N.ABS only.ACC/\*only.NOM help-1SG>3SG  
 ‘I helped only Naja.’ (Deal et al. 2024)

- In Deal et al. (2024), we concluded that absolutive is a morphological case category in Kalaallisut, but NOT a syntactic one
  - In Legate’s terms: ABS=DEF(ault).  
 “Absolutive” in Kalaallisut is a default morphological form — *there is no [ABS] feature in the syntax*
  - In the syntax, Kalaallisut has a tripartite case system, NOM/ERG/ACC
  - > Implementing a Drummond-style analysis would require a complex mix of conjunctive *and* disjunctive probing: [SAT:NOM+Ā<sup>M</sup>,ACC+Ā<sup>M</sup>]



- **Challenge 2.** There is also no clear way to rule out Contra-Kalaallisut:

(38) Accessibility for extraction: Contra-Kalaallisut (to be ruled out)  
 unmarked case  $\ll$  marked case  $\ll$  oblique case



- Just as discussed for  $\phi$ -Agree, we expect that any case feature could be referenced in probe specifications:

(39) Some predicted probes

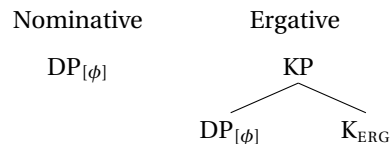
- [SAT:ERG+ $\bar{A}^M$ ] – only  $\bar{A}$  moves an ergative
- [SAT:ACC+ $\bar{A}^M$ ] – only  $\bar{A}$  moves an accusative
- [SAT:ERG+ $\bar{A}^M$ , DAT+ $\bar{A}^M$ ] – only  $\bar{A}$  moves an ergative or a dative

- We predict Contra-Kalaallisut via probe specification (39c).
- Drummond (2023) concludes that this result is basically right and that Otsuka's generalization is too strong
- Those who *do* wish to explain Otsuka's generalization will need to look beyond the feature addition + probe specification theory.

### 3.2 Structure addition + structure sensitivity theory

- Suppose once more that case assignment is structure building, such that marked-case nominals are structurally larger than unmarked ones

(40) Proposed structures for Kalaallisut nominative and ergative



- I set aside accusative temporarily

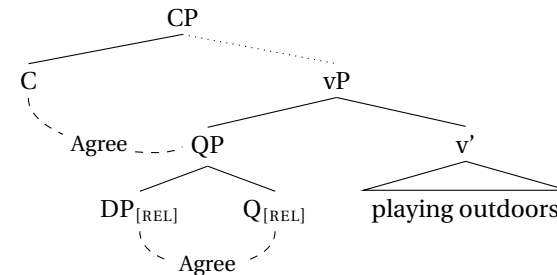
- Given structures like this, movement of an ergative  $\bar{A}$  operator is pied-piping: the operator in DP pied-pipes KP

- Cable (2010)'s theory of piped piping provides tools to capture ergative extraction restrictions straightforwardly:

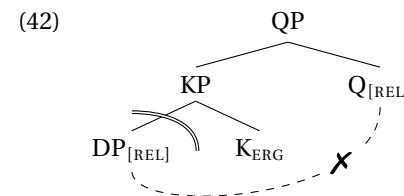
- $\bar{A}$  movement is triggered by Q particles, e.g.  $Q_{REL}$ ,  $Q_{WH}$ ,  $Q_{FOC}$ ;  $\bar{A}$  movement arises when C heads Agree with and move QPs
- In some languages, the Q head must Agree with the operator DP
- Agree is sensitive to phases

- Suppose that Kalaallisut requires its  $Q_{REL}$  to Agree with DP. In structures with nominative relativization, this works out fine:

(41) intransitive subject relative: 'who are playing outdoors', (29a)

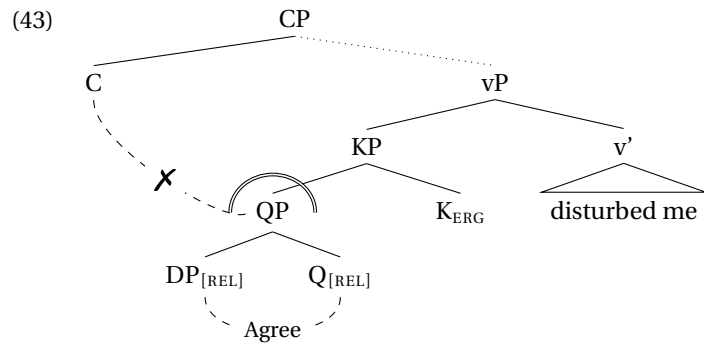


- Like for Hindi, the key behavior of marked cases that disrupts this picture is the phasal status of K. QP cannot Agree with DP if it merges above KP:



- It doesn't help to merge Q *between* KP and DP: it would be inside the KP phase and unable to Agree with C<sup>10</sup>

<sup>10</sup>This possibility also violates Cable's QP-intervention condition, on the assumption that K is a functional head that selects DP.



> Case sensitivity in  $\bar{A}$  extraction arises from the representation of case-marked nominals themselves.

• Returning to the challenges noted above for the feature addition theory:

#1 The absence of deep syntactic absolutivity is not a problem:

- Intransitive subjects are DPs, and objects are KPs, but both can host [REL] features on the topmost nominal layer.
- The split between ergative and accusative is a bit like in Gujarati  $\phi$ -Agree: certain features of DPs accrue to accusative KPs via Agree, but not to ergative KPs<sup>11</sup>

#2 Contra-Kalaallisut is *not* expected, on reasonable assumptions

(45) Contra-Kalaallisut (to be ruled out)  
 unmarked case  $\leftarrow$  marked case  $\ll$  oblique case



- Bare DPs will surface as unmarked nominals, and are inherently unable to resist Agree in operator features with Q heads
- Even if K heads Agree with DPs in operator features, KPs will never become *more* available in QP structures than DPs are

> Case sensitivity is a standard locality effect, not a property of Agree specifications for particular probes.

#### 4 Clitic doubling

##### 4.1 Counterexamples to Bobaljik's generalization?

• We have seen that Otsuka (2006) and Bobaljik (2008) propose essentially the same hierarchy for relativization and for  $\phi$ -Agree, respectively

(46) Accessibility for extraction/ $\phi$ -Agree is regulated by the hierarchy:  
 Unmarked Case (NOM/ABS) > Marked Case (ACC/ERG) > Oblique  
 If a case category on the hierarchy is accessible, so are all higher case categories.

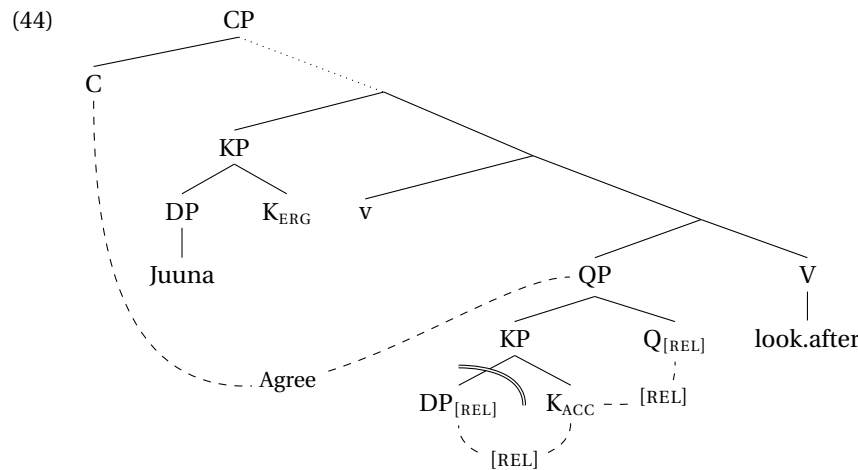
<sup>11</sup>This could be taken as evidence that accusative KPs are smaller than ergative KPs—perhaps ergative KPs contain accusative KP shells.

> There is no legitimate QP structure for the ergative relative clause, producing an ergative extraction restriction.

• We have seen morphological evidence (distinctive accusative marking) that the case system of Kalaallisut is syntactically tripartite, rather than deeply ERG/ABS

• Suppose then that accusatives also have a KP structure in Kalaallisut. How can they relativize? As we saw for Nepali and Gujarati: DP-KP Agree

- Ergatives and accusatives  $\phi$ -Agree in Kalaallisut:  $K_{ERG}$  and  $K_{ACC}$  both Agree with DP in  $\phi$ -features
- $K_{ACC}$  also Agrees with DP in the feature [REL]



- For both phenomena: *ergative should be accessible only if unmarked also is*
- There is an asymmetry in the apparent strength of the typological evidence for the hierarchy when we consider relativization vs.  $\phi$ -Agree:
  - Relativization: no known counterexamples<sup>12</sup>
  - “ $\phi$ -Agree”: special ergative-only indexing in Sorani Kurdish (Akkuş et al. 2024), Semelai (Baker 2015), Tsimshianic (Baker 2015, Forbes 2021)
- Proposal: “leakage” in Bobaljik’s generalization is due to not  $\phi$ -Agree proper, but rather clitic-doubling.

#### 4.2 Case hierarchy in clitic doubling

- I focus on cases where “a clitic co-occurs with a full DP in argument position” (Anagnostopoulou 2017), setting aside left/right dislocation
- First hint of a new generalization: we know of numerous accusative languages where objects are clitic-doubled but nominative subjects are not
  - Bulgarian: objects and *marked case* subjects are clitic-doubled, nominative subjects are not (Franks and Rudin 2006, Iovtcheva 2019)
- I suggest that clitic doubling shows the *reverse* of the case-based hierarchy seen in simple  $\phi$ -Agreement. (To my knowledge, this is a novel proposal.)

##### (47) Clitic Doubling Accessibility Hierarchy

Accessibility for clitic doubling is regulated by the hierarchy:

Dative > Marked Case (ACC/ERG) > Unmarked Case

Relative to a referentiality class (e.g. definites), if a case category is accessible for clitic doubling, so are all higher case categories.

##### (48) A hierarchy for “referentiality”

pronouns > definites > specific indefinites > nonspecific indefinites

- Consider object clitic-doubling in Spanish:

- Possible case values for Spanish internal arguments: unmarked, marked accusative (DOM), or dative
- Spanish DOM is similar to its Indo-Aryan counterpart in various ways: sensitive to animacy and specificity/definiteness, form of the DOM marker is identical to dative
- > DOM in Hindi *takes away* an object’s ability  $\phi$ -Agree; DOM in Spanish *increases* an object’s ability to clitic double

- CD accessibility hierarchy: internal to one referentiality class, across languages

##### (49) Definite DPs across Spanish varieties: accessibility to doubling<sup>13</sup>

| UNMARKED | ACC (DOM) | DAT |                      |
|----------|-----------|-----|----------------------|
| –        | –         | ✓   | Standard Spanish     |
| –        | ✓         | ✓   | Buenos Aires Spanish |
| ✓        | ✓         | ✓   | Lima Spanish         |

- CD accessibility hierarchy: internal to one variety, across ref. classes

##### (50) Lima Spanish across referentiality classes: accessibility to doubling

| UNMARKED | ACC (DOM) | DAT |                      |
|----------|-----------|-----|----------------------|
| –        | –         | ✓   | Bare plural          |
| –        | ✓         | ✓   | <i>un</i> indefinite |
| ✓        | ✓         | ✓   | definite             |

- The basic idea will be that adding more structure provides more potential merge sites for a clitic, and thus more marked case → more clitic doubling
- I will frame this within one of the oldest ideas in the generative clitic-doubling literature (Kayne 1972): the clitic and its DP associate originate as a single nominal constituent
  - > “Big DP theory” (Uriagereka 1995, Anagnostopoulou 2003, Franks and Rudin 2006, Roberts 2010, Nevins 2011, Arregi and Nevins 2012, a.m.o.)
- A locus of variation: what nominal structure sponsors a clitic (= provides a site where a clitic can Merge)? I will propose that **both DP and KP** are potential clitic sponsors.<sup>14</sup>

<sup>12</sup>Drummond (2023) presents Roviana (W. Oceanic, Solomon Islands) as a counterexample, based on Collins and Schuelke (2020). I suggest the relevant factor here is that, unusually, transitive subjects are unmarked and objects/intransitive subjects are marked in Roviana. It is once again the case that the less marked argument is more able to extract than the more marked one.

<sup>13</sup>I follow Zdrojewski and Sánchez (2014) for Buenos Aires and Lima Spanish.

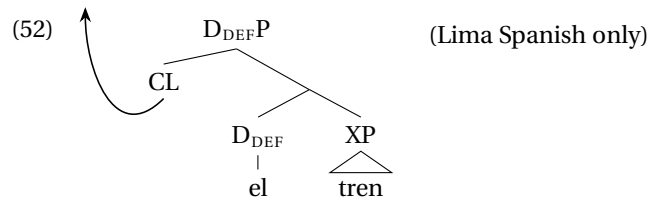
<sup>14</sup>On DP as a sponsor, see Uriagereka (1995), Roberts (2010); on KP as a sponsor, see Franks and Rudin (2006), Nevins (2011), Arregi and Nevins (2012).

### 4.3 Case study: definite DPs across Spanish varieties

- Consider definite (nonpronominal) DPs across Spanish varieties: data is schematized in Table (49).
- In Lima Spanish, but not in Buenos Aires or Standard, unmarked definites can be clitic-doubled:<sup>15</sup>

- (51) Lo manejó **el TREN**, (no el camión).  
 CL drive.PAST.3SG DEF train not DEF truck  
 She drove the TRAIN, not the truck.  
 a. Lima: ✓    b. Buenos Aires: ✗    c. Standard: ✗  
 (Zdrojewski and Sánchez 2014)

- $D_{DEF}P$  in Lima Spanish, but not in BA or Standard, can sponsor a clitic. Thus Lima definite DPs contain a structure in which a clitic originates; the clitic leaves DP and moves into the clausal spine.<sup>16</sup>



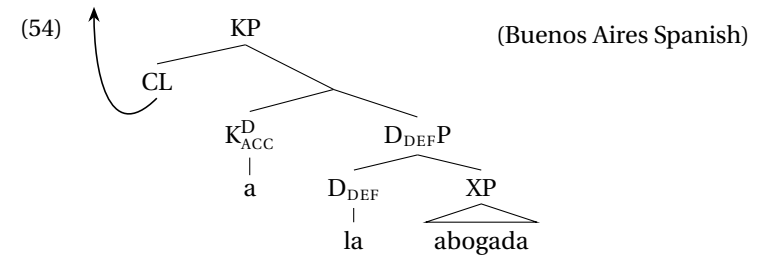
- Adding DOM: when the object is marked accusative (DOM), clitic-doubling is possible also in Buenos Aires Spanish (and remains possible in Lima):

- (53) La saludé **a la abogad-a**.  
 CL greet.PAST.1SG ACC the lawyer-F  
 I greeted the lawyer.  
 a. Lima: ✓    b. Buenos Aires: ✓    c. Standard: ✗  
 (Zdrojewski and Sánchez 2014)

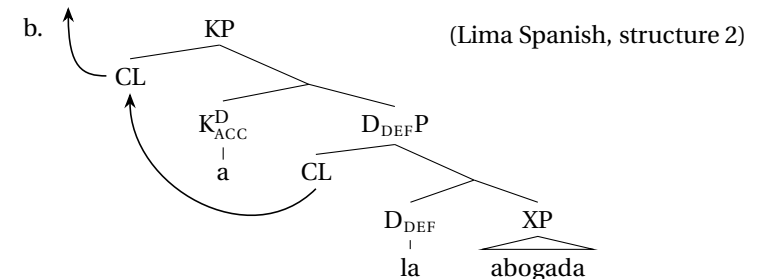
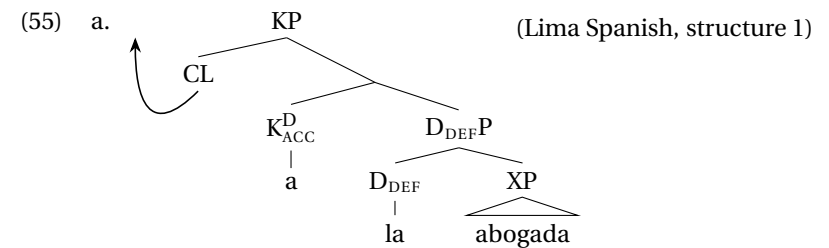
<sup>15</sup>The contrastive structure in (51) is a control against dislocation; see Zdrojewski and Sánchez (2014).

<sup>16</sup>Why can subjects not double in Lima Spanish, then? Perhaps because it is  $\nu$  that attracts clitics in Spanish (Roberts 2010). Assuming CD involves movement, the impossibility of CD for external arguments could be analyzed as an antilocality effect.

- In Buenos Aires Spanish, the clitic must originate within KP, given that DP origin is not possible. The  $K_{ACC}^D$  that combines with definite DPs sponsors a clitic:



- In Lima, clitic-doubling of a DOM accusative can arise either from this structure or from lower sponsorship of the clitic, plus cyclic movement out of KP:



- Two parts of the explanation for the CD accessibility hierarchy:

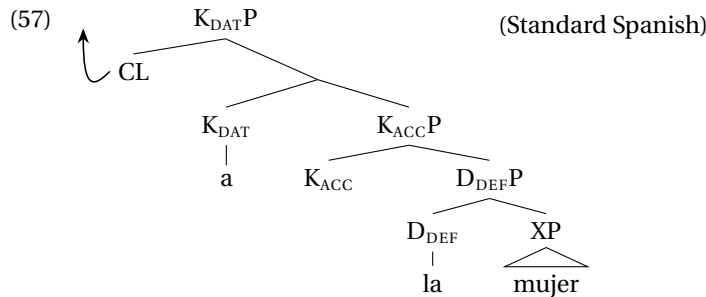
- *Anchoring to the marked*. Adding case structure can make clitic doubling possible → more marked cases have more CD than less marked cases
- *Implicational hierarchy*. Clitics can move cyclically out of KP → if CD is possible for less marked case, it remains possible for more marked case

- Datives provide further illustration of both points. In the dative case, clitic-doubling is possible in all varieties:

(56) Miguelito le regaló un caramelo a la mujer.  
 Miguelito CL.DAT gave a candy DAT the woman  
 Miguelito gave the woman a piece of candy.

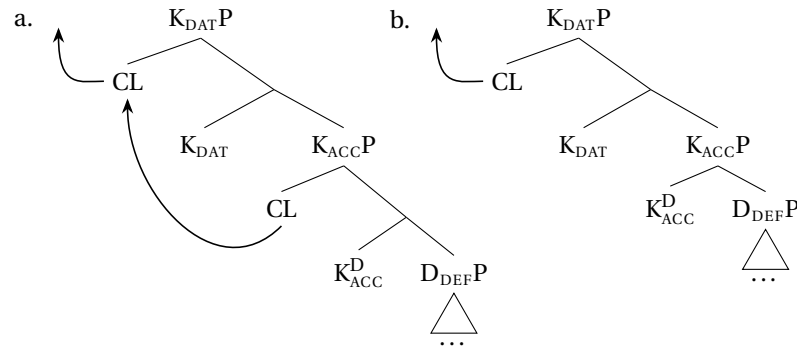
- a. Lima: ✓      b. Buenos Aires: ✓      c. Standard: ✓

- Suppose that the lower case layer inside dative KP is accusative KP. In Standard Spanish, the clitic must originate within  $K_{DAT}P$ , given that  $K_{ACC}P$  or DP origin are not possible.  $K_{DAT}$  sponsors a clitic:



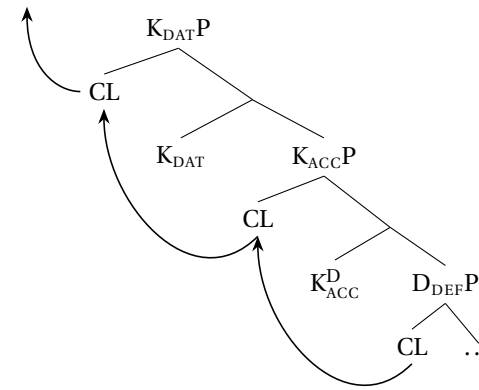
- Assuming cyclic movement of clitics as before, Buenos Aires Spanish has two options for dative clitics:

(58) Clitic-doubling of datives in Buenos Aires Spanish



- And Lima has a third option as well:

(59) Clitic doubling of datives in Lima Spanish: (58) PLUS this:



- The overall proposal is that variation reflects how “big” a structure must be to sponsor a clitic

(60) Definite DPs across Spanish varieties: accessibility to doubling

| UNMARKED | ACC (DOM) | DAT |                      |
|----------|-----------|-----|----------------------|
| -        | -         | ✓   | Standard Spanish     |
| -        | ✓         | ✓   | Buenos Aires Spanish |
| ✓        | ✓         | ✓   | Lima Spanish         |

- Thanks to the structure-addition theory of case, we can explain both why more marked cases are more likely to sponsor clitics and why CD accessibility in less marked cases entails CD accessibility in more marked cases:

(61) Clitic Doubling Accessibility Hierarchy

Accessibility for clitic doubling is regulated by the hierarchy:

Dative > Marked Case (ACC/ERG) > Unmarked Case

Relative to a referentiality class (e.g. definites), if a case category is accessible for clitic doubling, so are all higher case categories.

- Varieties that require a large structure to sponsor a clitic will have clitics only in more marked cases
- When a clitic is possible in a small structure (e.g DP), it will also be possible in larger structures, because clitics can move cyclically through KPs

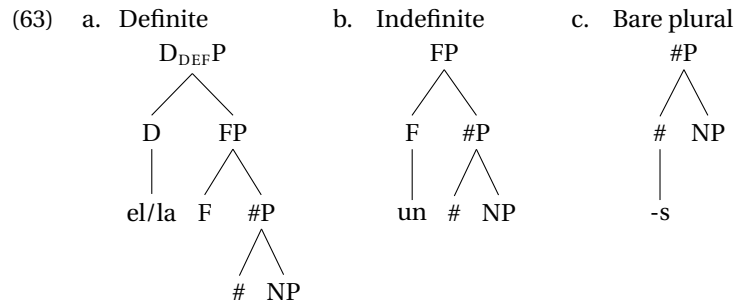
#### 4.4 Case study: Lima Spanish across referentiality classes

- The same basic idea can be applied to variation within a single language across referentiality classes, as in Lima Spanish:

(62) Lima Spanish across referentiality classes: accessibility to doubling

| UNMARKED | ACC (DOM) | DAT |                      |
|----------|-----------|-----|----------------------|
| -        | -         | ✓   | Bare plural          |
| -        | ✓         | ✓   | <i>un</i> indefinite |
| ✓        | ✓         | ✓   | definite             |

- Here there are two moving parts: how much KP structure is there? And how much sub-KP structure (DP structure) is there?
- I will assume that definites are bigger than indefinites, which in turn are bigger than bare plurals



- We saw above the Lima Spanish definite objects can clitic-double in any case, including unmarked.  $D_{DEF}P$  sponsors clitics, regardless of any higher KP

(64) Lo manejó el TREN, (no el camión).  
 CL drive.PAST.3SG DEF train not DEF truck  
 She drove the TRAIN, not the truck. (Zdrojewski and Sánchez 2014)

- Un* indefinites require marked case to double:

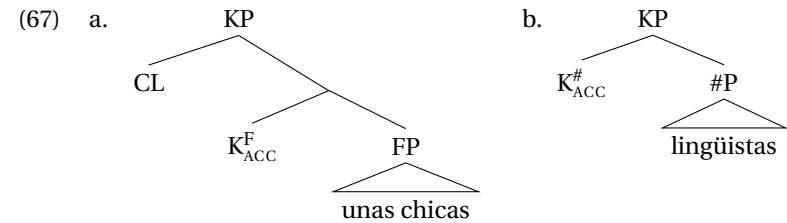
(65) a. \* Lo manejó un TREN, (no un camión).  
 CL drive.PAST.3SG INDEF train not INDEF truck  
 Intended: ‘She drove a TRAIN, not a truck.’ (L. Sánchez, p.c.)

b. Las vio a unas chicas  
 CL see.PAST.1SG ACC INDEF girls  
 I saw some girls. (L. Sánchez, p.c.)

- But marked accusative does not allow *all* nominals to double—bare plurals still cannot.

(66) \* Juan los ha conocido a lingüistas.  
 Juan CL has met ACC linguists  
 Intended: Juan has met linguists. (L. Sánchez, p.c.)

- I propose that  $K_{ACC}$  comes in multiple flavors. The flavor combines with FP or greater sponsors a clitic ( $K_{ACC}^F$ ), but not the version ( $K_{ACC}^\#$ ) that combines with bare plurals (#Ps):

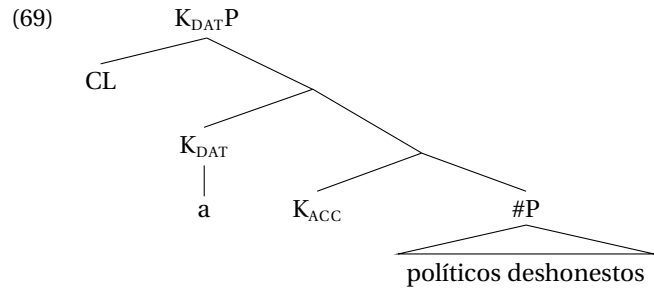


- Bare plurals can clitic-double only when dative:<sup>17</sup>

(68) a. \* Los manejó TRENES GRANDES, (no camiones pequeños).  
 CL drive.PAST.3SG train.PL big.PL not truck.PL small.PL  
 Int: ‘She drove BIG TRAINS, not small trucks.’ (L. Sánchez, p.c.)  
 b. Le dio dinero a políticos deshonestos  
 CL.DAT gave money DAT politicians dishonest  
 ‘He gave money to dishonest politicians’ (L. Sánchez, p.c.)

- Given the KP shell structure proposed for dative, it is unsurprising that doubling is possible regardless of the internal structure of the nominal itself.  $K_{DAT}$  just sponsors the clitic:

<sup>17</sup>Liliana Sánchez notes that examples such as (68b) are best when the bare plural is modified. The prescriptively singular form *le* in (68b), despite the plural dative, is found in spoken Lima Spanish.



- If dative involves nested KP shells, then DOM accusative can be more “picky” than dative can because  $K_{ACC}$  is more local to DP

4.5 Take-aways

- Clitics require certain relatively large nominal structures, and adding structure can make a clitic more possible, either at the DP level or at the KP level
- Dative has more structure than accusative, which has more structure than unmarked<sup>18</sup>
- The structure-addition/-sensitivity approach offers a basic path to analysis here, and a way to capture the *inverse* patterning of  $\phi$ -Agree and clitic doubling:

(70) a. Indo-Aryan  $\phi$ -Agree

| UNMARKED | ACC (DOM)    | DAT |          |
|----------|--------------|-----|----------|
| ✓        | -            | -   | Hindi    |
| ✓        | ✓ (g/n only) | -   | Gujarati |

b. Clitic doubling of definite DPs across Spanish varieties

| UNMARKED | ACC (DOM) | DAT |                      |
|----------|-----------|-----|----------------------|
| -        | -         | ✓   | Standard Spanish     |
| -        | ✓         | ✓   | Buenos Aires Spanish |
| ✓        | ✓         | ✓   | Lima Spanish         |

<sup>18</sup>Much prior work has sought to explain the greater extent of clitic doubling with datives in Spanish as opposed to DOM accusatives. For instance, Suñer (1988) proposes that accusative clitics are [+specific] whereas dative clitics are not; Bleam (1999) proposes that dative clitics are really agreement (unlike accusative clitics). As far as I can tell, neither account extends to the three-way division among case categories in Lima Spanish.

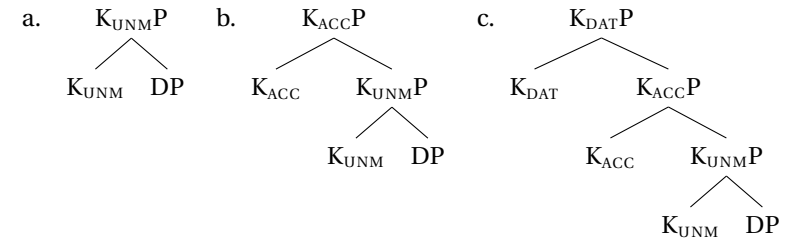
5 Comments on unmarked case

- Though our focus has been on marked case, two perspectives on unmarked case have emerged so far:
  - Unmarked case as DP not KP (Hindi)
  - Unmarked case as a purely morphological category, not a syntactic one (Kalaallisut)
- Some perspectives on unmarked case one might take:

A. All (argumental?) nominals present a KP layer (Caha 2009, Levin 2015)

The analyses above can largely work with this as long as ‘unmarked nominals’ have a smaller KP-shell structure than marked-case nominals do

(71) All nominals in KPs, unmarked is smallest



- For  $\phi$ -Agree: if unmarked case is always  $\phi$ -visible,  $K_{UNM}$  must always  $\phi$ -Agree with its complement DP
- For pied-piping: if unmarked case is always  $\bar{A}$ -visible,  $K_{UNM}$  must always [OP]-Agree with its complement DP
- For clitic-doubling: the clitic-sponsoring properties attributed to DP can be attributed to  $K_{UNM}$ ; potential challenge in accounting for the asymmetry between  $K_{ACC}$  and  $K_{DAT}$  in sensitivity to nominal features (since neither now directly takes DP as a complement)

B. Some unmarked nominals are really DPs, some are KPs

- Actual *marked case* in the morphology requires a VI to insert for K (or conditioned by K)
- The absence of such a VI can make a KP look like a DP in its morphology; this is what I proposed for Kalaallisut

- Case sensitivity should not track morphological case *per se*; it tracks the syntactic structures underlying case (as emphasized in Legate 2008)
- Learners can find positive evidence for KP structure in case sensitivity patterns!

### C. Additional dimensions:

- *Nominals in unmarked case may be diverse in how they are licensed*: as generally proposed for Hindi (e.g. Bhatt 2005, Legate 2008)
- *The form of unmarked case may vary depending on the domain*: as argued by Baker (2015)

## 6 Implications for case assignment and cyclicity

- I have argued that case sensitivity phenomena and implicational hierarchies thereof require a structure addition view of case assignment:

- (72) Structure addition + structure sensitivity (defended)
- Case assignment is structure addition.
  - Case sensitivity reflects the syntactic behavior of KP structures

- The syntactic behaviors I have attributed to KP are *locality* and *clitic sponsorship* (both independently proposed for KPs in prior work)
- In the literature, KP (or even PP) views have been prominent for dative and ergative arguments—potentially ‘inherent’ cases
  - Straightforward mechanics: the theta-head selects a KP specifier
  - Avoids issue of countercyclic insertion of KP structure
- I have defended a KP view of a broader set of marked-case phenomena, including DOM accusative—I take it that an inherent case view is not suitable here.
- Notably, if the case-hierarchical generalizations above are correct, they must extend to systems in which ergative and accusative are clearly *dependent*, i.e. available only when another DP occupies the same domain
  - Agarwal (2022), Baker (2024): DOM accusative in Hindi is dependent
  - Dependent accusative shows case opacity just like (inherent?) dative does

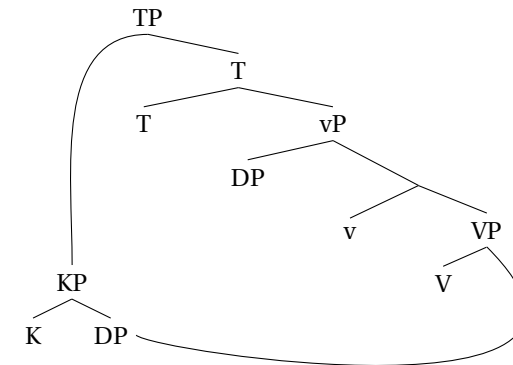
> We come to the question of countercyclicity with this in mind.

- Perspectives on insertion of case structure in syntax in the literature:

1. It involves movement to the root (+/- multidominant merge) and is thus strictly not countercyclic (Kidwai 2023, Keine and Bhatt to appear)

- At the point when dependent accusative is assigned, the accusative is remerged at the root node as part of the case-assignment process
- An implementation via ‘layering’ (Thoms and Heycock 2022, Keine and Bhatt to appear): K is merged with DP as a new root node (via multidominance), which is then remerged at the clausal root
- Dependent case is only assignable *after* the case competitor is merged, meaning at least vP is fully projected; some theories require TP for dependent accusative (Poole 2024, Clem and Deal To appear)

(73) Dependent accusative by multidominant ‘layering’



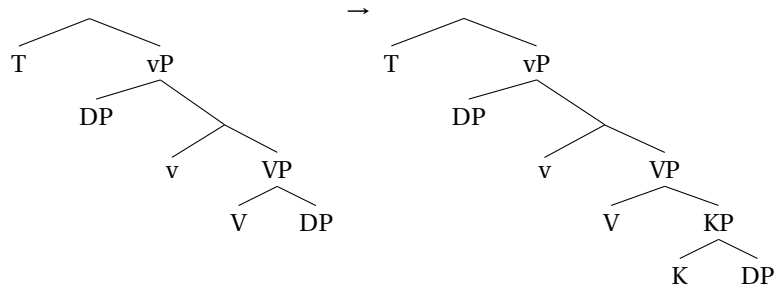
- As far as I can tell, this predicts obligatory inversion (object A-movement over the subject) whenever dependent accusative is assigned
- But there are languages with dependent accusative case where objects cannot A-move over subjects. E.g. Finnish:
  - \* Dependent case per Poole (2015, 2023)
  - \* WCO effect: no option of inverting A-movement

(74) Kene- $t_i$  [ hän-en $_{j/*i}$  äiti-nsä ] näki  $\_\_i$ ?  
 who-ACC [ 3SG-GEN mother-POSS ] saw  
 Who $_i$  did his $_{j/*i}$  mother see? (Huhmarniemi and Brattico 2013)



2. It involves true countercyclic structure-building, below the root (Rezac 2004)
- KP shell insertion is part of the case assignment operation
  - Again, for dependent accusative, this operation must take place after the case competitor is merged

(75) Dependent accusative by pure countercyclic structure addition:



- Rezac (2004): yes, this violates the extension condition, but that is not a deep primitive of grammar (rather something to derive) ('How I learned to stop worrying and love countercyclicality')
  - Fox (2002), Bhatt and Pancheva (2004), Takahashi and Hulsey (2009): countercyclic merge is possible whenever interpretable
- The evidence available at present favors a version of theory #2
  - If case-assignment is goal-flagging under Agree (Clem and Deal To appear a.o.): Agree builds structure on the goal just as it does on the probe.



## References

- Agarwal, Hashmita. 2022. Phases are read-only. Master's thesis, UCLA.
- Akkuş, Faruk, David Embick, and Mohammed Salih. 2024. Case and the syntax of argument indexation: An analysis of Sorani Kurdish. Manuscript.
- Aldridge, Edith. 2004. Ergativity and word order in Austronesian languages. Doctoral Dissertation, Cornell.
- Anagnostopoulou, Elena. 2003. *The syntax of ditransitives: Evidence from clitics*. Walter de Gruyter.
- Anagnostopoulou, Elena. 2017. Clitic doubling. In *The Wiley Blackwell Companion to Syntax, Second Edition*.
- Anand, Pranav, and Andrew Nevins. 2006. The locus of ergative case assignment: evidence from scope. In *Ergativity: emerging issues*, ed. Alana Johns, Diane Massam, and Juvénal Ndayiragije. Springer.
- Arregi, Karlos, and Andrew Nevins. 2012. *Morphotactics: Basque auxiliaries and the structure of spellout*. Springer.
- Assmann, Anke, Doreen Georgi, Fabian Heck, Gereon Müller, and Philipp Weisser. 2015. Ergatives move too early: On an instance of opacity in syntax. *Syntax* 18:343–387.
- Baker, Mark. 2015. *Case: its principles and its parameters*. Cambridge University Press.
- Baker, Mark. 2024. On dependent case and the sometimes independence of ergativity and dom. In *The place of case in grammar*, 25–50. Oxford University Press.
- Bhatia, Sakshi. 2019. Computing agreement in a mixed system. Doctoral Dissertation, University of Massachusetts Amherst.
- Bhatt, Rajesh. 2005. Long distance agreement in Hindi-Urdu. *Natural Language and Linguistic Theory* 23:757–807.
- Bhatt, Rajesh, and Roumyana Pancheva. 2004. Late merger of degree clauses. *Linguistic Inquiry* 35:1–46.
- Bickel, Balthasar, and Yogendra Yādava. 2000. A fresh look at grammatical relations in Indo-Aryan. *Lingua* 110:343–373.
- Bittner, Maria. 1994a. *Case, scope and binding*. Dordrecht: Kluwer.
- Bittner, Maria. 1994b. Cross-linguistic semantics. *Linguistics and Philosophy* 17:53–108.
- Bittner, Maria, and Ken Hale. 1996a. Ergativity: Toward a theory of a heterogeneous class. *Linguistic Inquiry* 27:531–604.
- Bittner, Maria, and Ken Hale. 1996b. The structural determination of case and agreement. *Linguistic Inquiry* 27:1–68.
- Bleam, Tonia. 1999. *Leísta Spanish and the syntax of clitic doubling*. Doctoral Dissertation, University of Delaware.
- Bobaljik, Jonathan. 2017. In defense of a universal: A brief note on case, agreement, and differential object marking. Manuscript.
- Bobaljik, Jonathan David. 2008. Where's Phi? Agreement as a postsyntactic operation. In *Phi theory*, ed. D Harbour, D Adger, and S Béjar, 295–328. Oxford: Oxford University Press.
- Brodkin, Dan, and Justin Royer. 2024. Ergative anaphors and high absolutive syntax. In *Proceedings of WCCFL 39*, ed. Robert Autry et al, 477–485.
- Butt, Miriam, and Tracy Holloway King. 2004. The status of case. In *Clause struc-*

- ture in *South Asian languages*, ed. Veneeta Dayal and Anoop Mahajan. Dordrecht: Kluwer.
- Cable, Seth. 2010. *The grammar of Q: Q-particles, wh-movement and pied-piping*. Oxford University Press.
- Caha, Pavel. 2009. The nanosyntax of case. Doctoral Dissertation, University of Tromsø.
- Caha, Pavel. 2010. The parameters of case marking and spell out driven movement. In *Linguistic Variation Yearbook 2010*, 32–77.
- Class, Joe. 2023. Case discrimination is relativized to individual probes: Evidence from standard Gujarati. Paper presented at WCCFL 42, UC Berkeley.
- Clem, Emily, and Amy Rose Deal. To appear. Dependent case by Agree: ergative in Shawi. *Linguistic Inquiry*.
- Collins, James, and Peter Schuelke. 2020. Roviana fronting and the relationship between syntactic and morphological ergativity. In *Proceedings of AFLA 26*, ed. Ileana Paul.
- Coon, Jessica, Nicholas Baier, and Theodore Levin. 2021. Mayan agent focus and the ergative extraction constraint: facts and fictions revisited. *Language* 97:269–332.
- Coon, Jessica, Pedro Mateo Pedro, and Omer Preminger. 2015. The role of Case in A-bar extraction asymmetries: evidence from Mayan. *Linguistic Variation* 14:179–242.
- Davison, Alice. 2004. Structural case, lexical case and the verbal projection. In *Clause structure in South Asian languages*, ed. Veneeta Dayal and Anoop Mahajan, 199–225. Kluwer Academic Publishers.
- Deal, Amy Rose. 2016. Syntactic ergativity: analysis and identification. *Annual Review of Linguistics* 2:165–185.
- Deal, Amy Rose. 2017. Syntactic ergativity as case discrimination. In *Proceedings from WCCFL 34*, ed. Aaron Kaplan, Abby Kaplan, Miranda K. McCarvel, and Edward J. Rubin, 141–150. Cascadilla Proceedings Project.
- Deal, Amy Rose, Line Mikkelsen, and Ellen Thrane. 2024. Syntactic ergativity without inversion in Kalaallisut. Handout, NELS, January 2024.
- Deal, Amy Rose, and Justin Royer. To appear. Mayan animacy hierarchy effects: a dynamic interaction approach. *Natural Language and Linguistic Theory*.
- Drummond, Emily. 2023. Clause structure and ergativity in Nukuoro. Doctoral Dissertation, University of California Berkeley.
- Forbes, Clarissa. 2021. Nominal types in Gitksan split-absolutive agreement. *Natural Language and Linguistic Theory* 39:1087–1128.
- Fortescue, Michael. 1984. *West Greenlandic*. Croom Helm.
- Fox, Danny. 2002. Antecedent-contained deletion and the copy theory of movement. *Linguistic Inquiry* 33:63–96.
- Franks, Steven, and Catherine Rudin. 2006. What makes clitic doubling obligatory? In *Ezidovedski izsledvanija v čest na 75-godišnjata ot roždenieto na St.N.S. i St.D.EN. Jordan Penčev*, 267–278. Bulgarian Academy of Sciences.
- Grishin, Peter. 2023. Lessons from CP in Passamaquoddy and beyond. Doctoral Dissertation, MIT.
- Huhmarniemi, Saara, and Pauli Brattico. 2013. On primary and secondary movement. *Acta Linguistica Hungarica* 60:173–216.
- Ichihashi-Nakayama, Kumiko. 1994. On dative ‘subject’ constructions in Nepali. In *Aspects of Nepali Grammar*, ed. Carol Genetti, volume 6 of *Santa Barbara Papers in Linguistics*.
- Iovtcheva, Snejana. 2019. The dative arguments in Bulgarian. Doctoral Dissertation, MIT.
- Kayne, Richard. 1972. Subject inversion in French interrogatives. In *Generative studies in Romance languages*, 70–126. Rowley MA: Newbury House.
- Keenan, Edward L., and Bernard Comrie. 1977. Noun phrase accessibility and universal grammar. *Linguistic Inquiry* 8:63–99.
- Keine, Stefan. 2019. Selective opacity. *Linguistic Inquiry* 50:13–61.
- Keine, Stefan, and Rajesh Bhatt. to appear. Crossover asymmetries. *Syntactic theory and research*.
- Kidwai, Sana Ausaf. 2023. Voice, case and the external argument: the perspective from Urdu. Doctoral Dissertation, University of Cambridge.
- Legate, Julie Anne. 2008. Morphological and abstract case. *Linguistic Inquiry* 39:55–101.
- Legate, Julie Anne. 2012. Types of ergativity. *Lingua* 122:181–191.
- Levin, Theodore. 2015. Licensing without case. Doctoral Dissertation, MIT.
- Magier, David. 1983. Topics in the grammar of Marwari. Doctoral Dissertation, University of California Berkeley.
- Mahajan, Anoop. 2012. Ergatives, antipassives and the overt light v in Hindi. *Lingua* 122:204–214.
- Mikkelsen, Line, and Ellen Thrane. 2024. Hyperraising in Kalaallisut. In *Proceedings of the Chicago Linguistic Society* 59, ed. Kutay Serova and M.K. Snigoff.
- Nevins, Andrew. 2011. Multiple Agree with clitics: person complementarity vs. omnivorous number. *Natural Language and Linguistic Theory* 29:939–971.
- Otsuka, Yuko. 2006. Syntactic ergativity in Tongan: resumptive pronouns revisited. In *Ergativity: emerging issues*, ed. Alana Johns, Diane Massam, and Juvénal Ndayiragije. Springer.
- Otsuka, Yuko. 2010. DP ellipsis in Tongan: is syntactic ergativity real? *Natural Language and Linguistic Theory* 28:315–342.
- Pandharipande, Rajeshwari, and Yamuna Kachru. 1977. Relational grammar, erga-

- tivity, and Hindi-Urdu. *Lingua* 41:217–238.
- Poole, Ethan. 2015. A configurational account of Finnish case. In *U. Penn Working Papers in Linguistics*, volume 21.
- Poole, Ethan. 2023. Improper case. *Natural Language & Linguistic Theory* 41:347–397.
- Poole, Ethan. 2024. Dependent-case assignment could be Agree. *Glossa* 9.
- Rezac, Milan. 2004. Elements of cyclic syntax: Agree and Merge. Doctoral Dissertation, University of Toronto.
- Rezac, Milan. 2008. Phi-Agree and Theta-related Case. In *Phi theory*, ed. Daniel Harbour, David Adger, and Susana Béjar, 83–129. Oxford: Oxford University Press.
- Roberts, Ian. 2010. *Agreement and head movement: clitics, incorporation, and defective goals*. MIT Press.
- Royer, Justin. 2022. Elements of (in)definiteness and binding: A Mayan perspective. Doctoral Dissertation, McGill University.
- Sinha, Yash. 2017. Ergative case assignment in Hindi-Urdu: Evidence from light verb compounds. In *Proceedings of the Linguistic Society of America*.
- Spencer, Andrew. 2005. Case in Hindi. In *Proceedings of the LFG05 Conference*, ed. Miriam Butt and Tracy Holloway King.
- Suñer, Margarita. 1988. The role of agreement in clitic-doubled constructions. *Natural Language and Linguistic Theory* 6:391–434.
- Takahashi, Shoichi, and Sarah Hulse. 2009. Wholesale late merger: Beyond the A/A' distinction. *Linguistic Inquiry* 40:387–426.
- Thoms, Gary, and Caroline Heycock. 2022. Deriving 'late merge' with external remerge. In *Proceedings of NELS*.
- Tollan, Rebecca, and Lauren Clemens. 2022. Syntactic ergativity as a constraint on crossing dependencies: The perspective from Mayan. *Linguistic Inquiry* 53:459–499.
- Uriagereka, Juan. 1995. Aspects of the syntax of clitic placement in Western Romance. *Linguistic Inquiry* 26:79–124.
- Woolford, Ellen. 2001. Case patterns. In *Optimality theoretic syntax*, ed. S. Vikner, G. Legendre and J. Grimshaw, 509–543. Cambridge, MA: MIT Press.
- Yuan, Michelle. 2018. Dimensions of ergativity in Inuit: Theory and microvariation. Doctoral Dissertation, MIT.
- Yuan, Michelle. 2022. Ergativity and object movement across Inuit. *Language* 98:510–551.
- Zdrojewski, Pablo, and Liliana Sánchez. 2014. Variation in accusative clitic doubling across three Spanish dialects. *Lingua* 151:162–176.

## Appendix: agreement in Nepali and Gujarati

### 6.1 Nepali

- Nominative and ergative subjects can  $\phi$ -Agree:

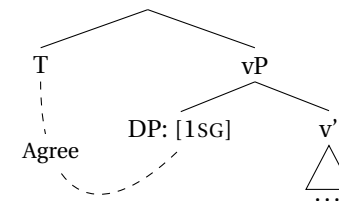
- (76) a. ma        yas        pasal-mā    patrikā        kin-ch-u.  
 1SG.NOM DEM.OBL store-LOC newspaper.NOM buy-NPST-1SG  
 'I buy the newspaper in this store.' (Bickel and Yādava 2000: 348)
- b. maile    yas        pasal-mā    patrikā        kin-ē  
 1SG.ERG DEM.OBL store-LOC newspaper.NOM buy-PST.1SG  
 'I bought the newspaper in this store.' (Bickel and Yādava 2000: 348)

- Datives cannot Agree:

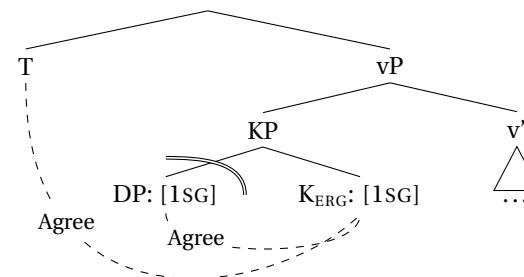
- (77) malaay    timi-haru    man    par-chaw  
 1SG.DAT 2M-PL    desire happen-2PM  
 I like you (pl). (Ichihashi-Nakayama 1994: 57)

- Structural proposals:

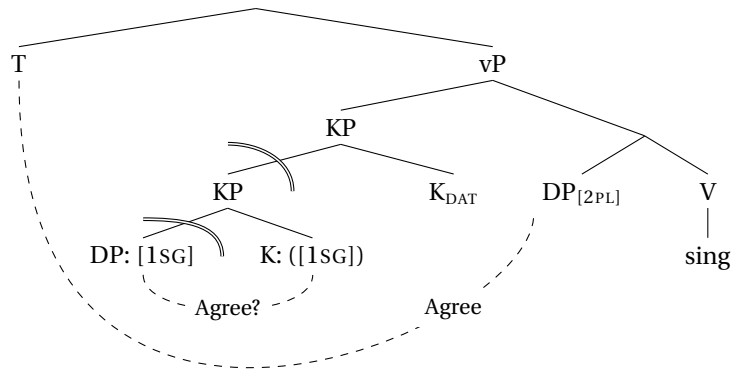
- (78) Structure for (76a)



- (79) Structure for (76b)



(80) Structure for (77)



6.2 Gujarati

• Hindi and Nepali can be handled within Bobaljik’s basic case-hierarchy system. Gujarati poses a challenge for it: the marked cases ERG and ACC behave distinctly from each other and from unmarked.

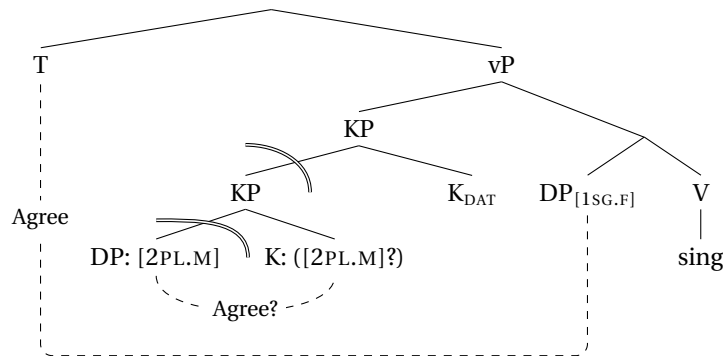
• The basic system is like Hindi:

- Unmarked nominals Agree in person, number, gender
- Ergatives and datives cannot  $\phi$ -Agree at all

(81) No agreement with a dative, full  $\phi$ -Agree with unmarked object

a. Tamne baddha-ne hū gam-**i** **hois**  
 you.MPL.DAT all-DAT me.FSG like.PRF-FSG FUT.1SG  
 You all (M) will have liked me (F) (Class 2023)

b.

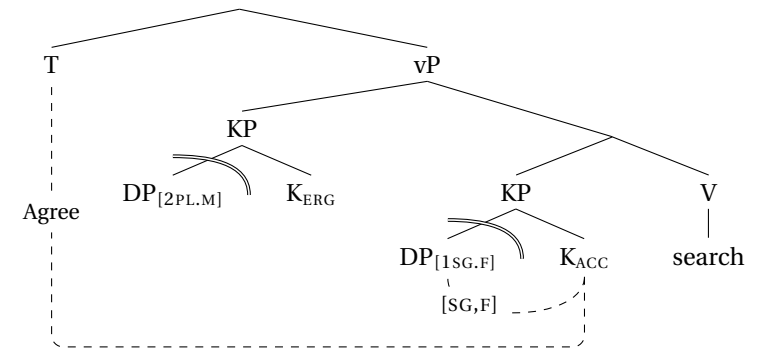


• The difference from Hindi: accusatives  $\phi$ -Agree! But this is limited to number and gender, NOT person (Magier 1983, Class 2023)

(82) No agreement with an ergative, *partial*  $\phi$ -Agree with marked object

a. Tame baddha-e ma-ne sodh-**i** **hase** /  
 you.MPL.ERG all-ERG me.FSG-ACC search.PRF-FSG FUT.3 /  
 \*hois  
 \*FUT.1SG  
 You all (M) will have looked for me (F) (Class 2023)

b.



• The special behavior of accusatives in Gujarati reflects the agreement behavior of  $K_{ACC}$ : it Agrees with its DP complement, but only in number and gender

• Following the logic used for Nepali: if accusatives/DOM objects are consistently more able to  $\phi$ -Agree than are ergatives, that suggests they have *less* structure.