

## Challenges for dependent case

In the minimalist program, Case/case has often been formalised in terms of an uninterpretable feature which requires checking or valuation by a phi-feature-bearing head (Chomsky 2000, 2001; Preminger 2014). More recently, however, dependent case approaches have gained currency, with the claim being that nominals can be licensed via a local dependency with another nominal (Baker 2015, building on Yip et al. 1987, Marantz 1991). Dependent case 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, as Baker (2015) argues at length, it may also be true for ‘differential’ cases which are sensitive also 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. For example, differential object marking (DOM) can be analysed as case-marking on an object which has undergone object shift. In this talk, we present some challenges for dependent Case. Our main claim is that there is a role for Agree in determining Case/case even where case is differential or transitive-sensitive (see also Kalin & Weisser 2018). Our evidence arguably supports Marantz’s (1991) original view that functional heads mediate dependent Case assignment (see also Harley 1995).

**Transitive-sensitive systems:** Our first piece of evidence comes from the fact that clausal complements often count for transitivity in transitive-sensitive case systems. This can be seen in ergative systems such as Kaqchikel, in which finite CPs count for transitivity, as Henderson and Coon (2018) show, triggering ergative agreement with the subject. Kaqchikel is an agree-based system, so may fall outside the remit of dependent case approaches, but the same pattern is observed in other languages. Consider Tsez, in which non-nominalised finite CP complements surface with an ergative subject (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):

This pattern of transitive-sensitivity is found also in languages in which dative is a transitive-sensitive case.. In French, Italian and Catalan, for example, in which causees are only dative where the embedded verb is transitive, finite and non-finite CPs also count for transitivity (see Kayne 1975):

- a) 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.’

As Ingason (2018) shows for Icelandic, moreover, clausal subjects also function as case competitors for accusative case:

- (2) [CP Að Gunnar skyldi ekki hafa mætt]            drap    alveg    stemninguna.  
[CP that Gunnar should not have attended]    killed    totally    mood.the.ACC  
‘It killed the mood that Gunnar did not attend.’            (Ingason 2018: 9)

While it is of course possible to stipulate that CPs count as case competitors, this renders the linearization-based rationale of dependent Case (Richards 2010, Baker 2015) less compelling as these CP arguments do not behave like DPs in other ways and so must be categorially distinct. Moreover, the behaviour of CPs further challenges the dependent case approach in that it provides important evidence that XPs can systematically receive a certain case without ever displaying it morphologically. We therefore conclude that transitive-sensitivity often does not reduce to two there being two DPs in a local domain, weakening the attraction of the dependent case approach.

**Differential cases:** Challenges also arise for dependent case in relation to differential cases. In addition to the evidence presented by 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 another argument, e.g. 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  $\phi$ -features of several arguments without evidence for distinct structural positions of these arguments. The data in (1) from Kashmiri (Wali & Koul 1997) 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 (1a) but DAT in (1c).

- (1) a. *bi* *chu-s-ath* *tsi* *parina.va:n*  
**1SG.NOM** be.M.SG-1SG.SBJ-2SG.OBJ **2SG.NOM** teaching  
 'I am teaching you.'
- b. *tsi* *chu-kh* *me* *parina.va:n*  
**2SG.NOM** be-M.SG-2SG.SBJ **1SG.DAT** teaching  
 'You are teaching me.'
- c. *su* *chu-y* *tse* *parina.va:n*  
**3SG.NOM** be.M.SG-2SG.OBJ **2SG.DAT** teaching  
 'He is teaching you.'

(Wali & Koul 1997: 155)

This kind of differential system, we contend, cannot be derived as a dependent case. That is because 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. This allows for the following kinds of systems, where local = 1<sup>st</sup>/2<sup>nd</sup> person:

subject	object	Case marking
local	local	Object only
Non-local	local	Subject, object
Non-local	Non-local	Subject only
local	Non-local	neither

In all these cases, a local DP will receive DOM and a local subject will not, as it moves out of the domain of the object before case assignment. No interactions are predicted between the relative features of the two arguments. Such cases can easily be handled, however, in Agree-based models where the verb can agree with both its subject and its object and the  $\phi$ -features of the subject and object are compared before the verb assigns case (following Georgi 2012; Barany 2017).

**Conclusions** We have presented problems for dependent case even in transitive-sensitive and differential case systems. In each case, analyses involving Agree relations between functional heads and the case-marked XPs fare better than purely structural dependent case, suggesting that the latter is not the only means of assigning Case or that Marantz's (1991) account of DC mediated by functional heads is necessary.

**Selected refs.** • Barany, A. 2017. *Person, Case, and Agreement*. OUP. • Coon, J. & O. Preminger. 2012. Towards a Unified Account of Person Splits. *WCCFL* 29, 310–318. • Georgi, D. 2012. A Local Derivation of Global Case Splits. In A. Alexiadou, *et al.* (eds.), *Local Modelling of Non-Local Dependencies in Syntax*. De Gruyter. • Merchant, J. 2006. Polyvalent case, geometric hierarchies, and split ergativity. *CLS* 42(2), 47–67. • Kalin, L. & P. Weisser. 2018. Asymmetric differential object marking in coordination. To appear in *Linguistic Inquiry*. • Poole, Ethan. 2015. A Configurational Account of Finnish Case. *UPenn WPL* 21(1), 1–10.