

A-Probes, Case, and (In)Visibility*

Abstract

This article argues for a dependency between structural Case and phasal domains and against Case values as intrinsic properties of (C)-T and (v*)-V. Rather, Nominative or Accusative values are derived compositionally from properties of the entire Probing domain: (i) NOM occurs whenever the Probing domain is specified as [uD, u π], while (ii) ACC is assigned if the Probing domain is specified as [uD]. In the absence of an A-Probe, a DP's [uCase] feature automatically deletes upon Transfer but no Case value is assigned, so DP lexicalization fails. [uCase] is a uniform property of DP arguments, whether null or overt. Lexicalization, however, holds only of DPs with inherent intensions and extensions and not of variables, such as PRO. The analysis focuses on DP subjects in non-finite CPs, and relies on availability of null expletive *pro* as a UG primitive. It assumes Chomsky's Feature Inheritance Model (Chomsky 2007, 2008, Richards 2007), as well as Distributed Morphology (Halle and Marantz 1993, Embick 2007). It aligns with views where the Case Filter, while syntactically relevant (Legate 2008), is a PF constraint (Lasnik 2008, Sigurðsson 2008, 2012).

Keywords: Case, phases, agreement, expletive *pro*, PRO, non-finite CPs, lexical subjects

Introduction:

The paper attempts to refine our understanding of structural Case licensing and valuation, in view of recent assumptions that correlate all A-features to the presence of a phase head (Chomsky 2007, 2008) and question the role of ϕ -features (e.g. Baker 2012). It argues that availability of structural Case is divorced from ϕ -features and is instead incumbent on the phase

head transferring A-properties to its proxy. Second, T and v^* do not have intrinsic NOM and ACC, respectively. Rather, these values reflect properties of the Probing domain, with $[\pi]$ being the crucial feature yielding NOM. Syntax then “has no case features” (Sigurðsson 2008, 2009, 2012), such as NOM or ACC, but A-relations in syntax enable specific Case values.¹

DP arguments are kept distinct from other types of nominals (e.g. predicates, adverbials, dislocated phrases) as these are visible to A-relationships, of which at least theta-licensing involves Merge. Since Merge is a property of the computational system, the same must hold of this visibility condition. Consequently, I assume that DPs associated with a theta-role (i.e. ‘event-licensed’ in Sigurðsson’s 2012 sense) have a $[uCase]$ formal feature, denoting ‘active to A-relations’ until Spell-Out. If $[uCase]$ is checked at first Merge (i.e. by a head that event-licenses the argument), the appropriate inherent Case value ensues (e.g. DAT, GEN, ACC) upon Transfer (see Chomsky 1986 and Sigurðsson 2012 for an updated approach). If not checked upon first Merge, $[uCase]$ valuation depends on the feature composition of the domain that A-Probes it, as outlined below. If $[uCase]$ is never A-Probed for, it checks upon Transfer without valuation. This is a direct consequence of the initial view of the Case Filter as a PF rather than an LF interface requirement (Chomsky 1980 and, more recently, Lasnik 2008 and Sigurðsson 2008). Arguments that fail to engage in an A-relationship lack a Case value, so cannot lexicalize. This triggers a PF crash, unless the DP is inherently silent (e.g. PRO). Specifically, a violation of the Case Filter bleeds lexicalization, but failure to lexicalize is independent of Case.

The overt versus null status of arguments has no bearing on Case checking, a welcome result as syntax is not privy to phonetic features. Lastly, I assume that *lexicalized DP arguments* never bear default Case. If that were possible, the Case Filter would be vacuous (see also Schütze 1997, 2001).² DPs in non-argument positions, however, cannot be A-Probed, so lack $[uCase]$ and

a corresponding value (see also Markman 2009). Given that PF has to insert a vocabulary item, the language specific default Case form will be used in such cases (à la Schütze 2001).

Let us briefly elaborate. Since the seminal work of George and Kornfilt (1981), (pre)-Minimalism has correlated structural Case with agreement. Recently, this assumption has been argued against (e.g. Baker 2012 and Sigurðsson 2012) and this paper also contributes to the divorce between the two as cross-linguistic data makes it empirically difficult to maintain such a claim. For instance, Baker (2012) shows that in Amharic ACC and object agreement are not morphological manifestations of the same abstract relation. But perhaps the facts in Amharic are complicated by the pronominal clitic versus agreement controversy (i.e. Kramer 2010 contra Baker 2012). But there are also languages with NOM and ACC lexical (overt) subjects in domains lacking phi-specifications.³ Consider the data in (1) showing a NOM subject in a Romanian gerund adjunct, (1a), and an ACC subject in a Latin infinitival subject clause, (1b).⁴

- (1) a. [CP Fiind noi gata cu toții], am pornit la drum.
 [being.GER we.NOM ready with all] 1PL started on way⁵
 ‘Given that we were all ready, we started on our way.’ (Romanian)
- b. Me interest [CP te studere].
 me.ABL it is good [you.ACC study]
 ‘It is to my advantage that you study.’ (Latin, Wyngaerd 1994: 124)

Further complications arise once we consider languages where Case valuation in non-finite contexts is determined by linearization properties, with post-verbal subjects strictly NOM, as discussed by Mensching (2000:20) for Old Italian and shown in (2).

- (2) a. Tu non ti rallegri [CP aver io incontrata una morte]

you not CL delight [to-have I found a death]

‘You are not glad that I have found death.’

(Old Italian, D’Azeglio, ch. 18, p222, cf. Schwehendener 1923:72)

- b. Negar non voglio esser possibile, [CP lui essere beato ..
to-deny not (I) want to-be possible **him** to-be blessed
‘I do not want to deny that it is possible that he is blessed.’

(Old Italian, Boccaccio, Dec., I, 1; cf. Schwehendener 1923:82)⁶

Clearly, it is not possible to assume that both values in (2) are instances of some default. Ideally, any instance of systematicity should be assumed accountable.

Furthermore, variation is not restricted to lexical subjects and the T domain. For example, West Country varieties of English, show both NOM and ACC values on direct objects. Consider (3) from Newfoundland English (Ruth King, personal communication):

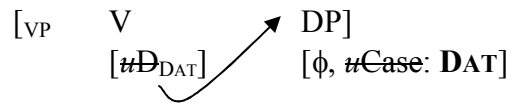
- (3) a. She pushed **me** / **I** down.
b. Pass **him** / **he** over to me.

According to the descriptive literature, instances of “pronoun exchange”, with NOM replacing ACC, are sensitive to object emphasis. However, it is noteworthy that these dialects of English have null expletives (Ihalainen 1991), a property shared with languages capable of lexicalizing NOM subjects in non-finite domains. I argue that this relationship is not accidental and propose that uninflected phasal domains allow for NOM values on argumental DPs only in languages with expletive *pro*. Specifically, expletive *pro* acts as a ϕ -Probe triggering NOM Case on its associate.

Summing up, “Case values” are equivalent to engaging in an A-relationship, with DP values as follows: (i) NOM, if and only if the Probing domain is specified as [uD, u π], where

[uD] is T's EPP (i.e. need for a nominal specifier); (ii) ACC, if the Probing domain is specified as [uD] (i.e. a nominal Probe); (iii) an inherent value assigned at first Merge; (iv) no value, if no Probing domain, hence no A-chain. In this last scenario, the DP fails to lexicalize. (4) provides schemas of how this works. For ease of exposition, I represent theta-roles as features (Adger 2003, Hornstein 1999, Manzini and Roussou 2000, etc), a possibility hinted at by Chomsky (2000), but nothing crucial hinges on this. Dotted arrows indicate feature-inheritance, while full arrows indicate an A-relationship (i.e. a (non)-trivial chain). Only relevant A-features are shown.

(4) i. Inherent Case (e.g. Dative): theta-role comes equipped with Case value

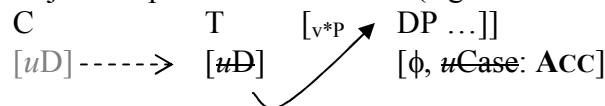


ii. Structural ACC Case:

(a) on objects

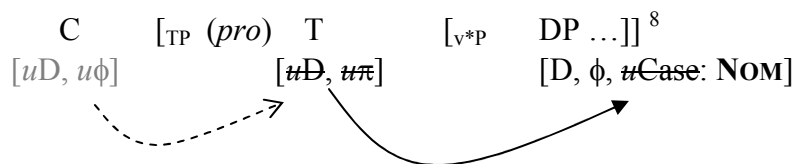


(b) on subjects in phi-feature-less CPs (e.g. non-finite clauses)

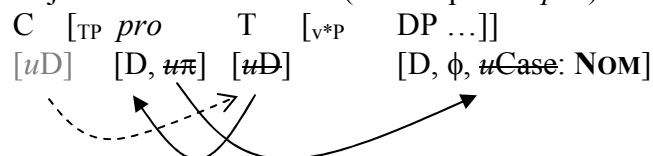


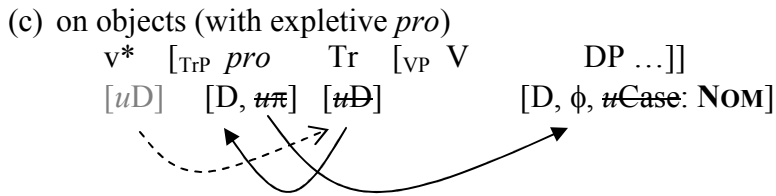
iii. Structural NOM Case:

(a) on subjects in finite CPs

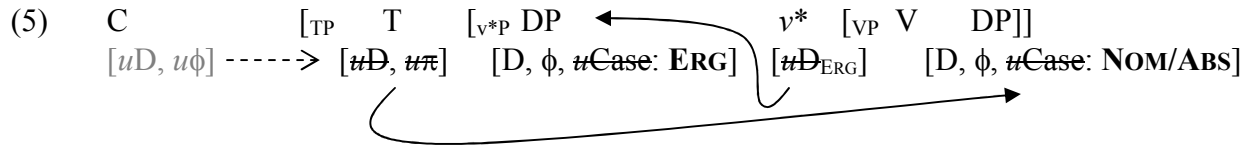


(b) on subjects in non-finite CPs (with expletive *pro*)





For Ergative-Absolutive languages, I follow Legate (2008), who follows Woolford (1997), and assume that Ergative is an instance of inherent Case on the external argument (see also Pesetsky & Torrego 2011), while Absolutive is equivalent to structural NOM (unless it is the morphological default).⁹ (5) is representative of ABS = NOM. Note that I do not show DP dislocation to Spec,TP.



Where does that leave PRO then? As an argument, it must bear [uCase]. The logic that PRO checks either null Case (Chomsky and Lasnik 1995) or is an instance of default (e.g. Boeckx and Hornstein, 2006, for Icelandic) is difficult to maintain, both conceptually and empirically once we agree that non-finite CP domains can value structural NOM or ACC. In addition, there is abundant literature arguing for PRO bearing either structural or quirky/inherent Case (e.g. Adger 2007, Bobaljik and Landau 2009, Cecchetto and Oniga 2004, Landau 2008, Schütze 1997, Sigurðsson 1991, 2008). Section 4 details an analysis of how PRO checks Case.

The paper assumes Chomsky's Feature Inheritance Model (Chomsky 2007, 2008, Richards 2007), as well as Distributed Morphology (Halle and Marantz 1993, Embick and Noyer 2007), and is organized as follows. Taking Chomsky (2007, 2008) as the point of departure, Section 1 focuses on the role of the phase head in linguistic computations, the limitations of equating Case with agreement, and the relevance of a phi-complete Probe in Case valuation.

Section 2 discusses some alternate Minimalist approaches to Case realization and introduces novel proposals for Case valuation. Section 3 focuses on non-finite CP domains. It proposes that null expletives, as ϕ -Probes, interfere with the encoding of Case. It offers a systematic account of Case values on lexical subjects in non-finite domains by examining Romanian, a null expletive language, and English, which lacks expletive *pro*. Section 4 focuses on PRO. I propose an analysis whereby PRO is cross-linguistically valued with structural NOM if A-Probed. Section 5 highlights predictions the analysis makes beyond non-finite CPs and offers a brief discussion of general implications for Case theory. Section 6 concludes the paper.

1 Phi-features (agreement) and structural Case

Chomsky's feature-inheritance model (2007, 2008) renounces [uCase] as a Probe and assumes that [u ϕ] acts as a Case Probe instead. The question is whether every phase head possesses a complete set of A-related features, specifically, EPP/[uD] and [u ϕ], or whether this varies with properties of the phase head. I argue that [u ϕ] is a strict property of finite C heads but take the EPP, a structural requirement of the CI interface, to be available across phasal heads.

Crucially, in the standard generative view, ϕ -complete T Probes are synonymous to lexical subjects with NOM Case and ϕ -complete v^* Probes are synonymous to DP objects valued ACC.¹⁰ However, it is unclear what properties of T and v^* would license this split (Sigurðsson 2009) or why ϕ -completeness should matter (Carstens 2001, Pestersky & Torrego 2004b). Carstens (2001: 148) observes that "Gender is systematically excluded from the features of subject agreement in Indo-European languages with gender systems," so such T is ϕ -incomplete. Also, given the lack of ϕ -feature agreement between v^* and the ACC DP, there is little evidence that v^* has [u ϕ] (see also Baker et al. 2005).¹¹

1.1 Against [uφ] as a Case prerequisite: evidence from non-finite CPs

The distinction between finiteness and non-finiteness is correlated to the presence of *inflectional* morphology on T (e.g. Binnick 1991, Ledgeway 1998).¹² Intuitively, CPs without inflectional morphology on T, in languages with otherwise inflected T paradigms, are φ-featureless (see Alboiu 2006, Bianchi 2008, Landau 2004, Roussou 2006). This is supported by various data.¹³

Subject clitics are illicit in non-finite CPs, even with NOM subjects. While in Friulian, a Northern Italian dialect, subject clitic doubling is extremely common (Poletto 2000), (6a) shows that gerunds rule out subject clitics but allow a NOM lexical subject. French gerunds make a similar point, see (6b from Reed 2011): non-clitic DP subjects are okay but not subject clitics.

- (6) a. (*E) Vint Marie / je ciacaraat cun ti, e ha
 SCL having Mary / she spoken with you, SCL have
 diciduu di cumprà el libri.
 decided of buy.INF the book
 ‘Having spoken with you, Mary decided to buy the book.’ (Paoli, p.c.)
- b. Les villageois/*Ils/*Eux étant pauvres, ils n’avaient pas
 the villagers/they/them being poor, they NEG-had NEG
 les moyens d’engager un expert.
 the means INF-hire an expert
 ‘The villagers/*They/*Them being poor, they didn’t have the financial resources needed to hire an expert.’

Following Roberts (2010), subject clitics in Northern Italian/Tuscan dialects are [uφ] bundles derived from C. Lack of a subject clitic in (6a,b) shows [uφ] to be absent in non-finite CPs.

Linearization of pronominal clitics in Romanian points to a similar conclusion. Săvescu-Ciucivara (2007) argues that Romanian clitic ordering is sensitive to Person ($\pi_1 > \pi_2$) and Case ranking (DAT > ACC), but that π ranking restrictions disappear in non-finite contexts. See (7).

- (7) a. * Ți m - a prezentat Ion la petrecere.
 CL.2SG.DAT CL.1SG.ACC- has introduced John at party
 ‘John has introduced you to me to the part.’
- b. Dându- ți- mă de nevastă,
 Giving.GER- CL.2SG.DAT- CL.1SG.ACC of wife,
 tata a câștigat mulți bani.
 father has gained much money
 ‘Giving me to you in marriage, my father has gained a lot of money.’

In conclusion, there is no ϕ -feature transmission from C to its proxy head in uninflected domains.

1.2 Case-valued subjects in non-finite CPs

Despite the absence of ϕ -feature transmission from embedded C to its proxy head, lexical subjects are sometimes available in these contexts, with variation for NOM or ACC values. These DPs are strictly NOM in at least infinitives and gerunds in most Ibero-Romance, Greek gerunds (Sitaridou 2002), West Flemish infinitives (Haegeman 1985: 125), absolute participial constructions in Hungarian (Liptak, p.c.), Albanian (Kallulli, p.c.), Italian Aux-to-Comp (Rizzi 1982, Belletti 1990), and Czech conditional infinitives (Tomić, p.c), as the data in (8) show.¹⁴

- (8) a. Îi pune la calculator [CP pentru a avea
 CL.3PL.M.ACC put.3SG at computer [CP for INF have

tu / *tine liniște] (Romanian)
 2.SG.NOM-*ACC quiet]

‘She would leave them at the computer for you to have peace and quiet.’

b. [CP Fiind noi gata cu toții], am pornit la drum.
 [being.GER we.NOM ready with all] 1PL started on way

‘Given that we were all ready, we started on our way.’ (Romanian)

c. [CP Odată (fata / ea) deșteptată (fata / ea)],
 [CP once girl-the.NOM / she awoken.SG.F, girl-the.NOM / she]
 mama puse de mîncare. (Romanian)
 mother-the put.PAST.3SG of food

‘The girl having awoken, mother started preparing some food.’

d. Lo supimos [CP después de llegar él].
 we found out [CP after of arrive.INF he.NOM]

‘We found out after he had arrived.’ (Spanish, Ledgeway 1998: 5)

e. [CP Avendo Gianni / (lei) chiuso il dibattito], la riunione
 [CP having Gianni / (3SG.F.NOM) closed the debate] the meeting
 è finita prima. (Italian, adapted from Belletti 1990: 98)
 is finished before

‘Gianni (Her) having closed the debate, the meeting ended early.’

f. [CP Udělat to moje sestry], nic by se nestalo,
 [do.INF that my sister.NOM] nothing would REFL not happen.N.SG.PRTC
 (ale protože jsem to udělala já, matka se zlobí).
 but because it was done by me, mother is annoyed

‘If it was done by my sister, everything would be okay (but because it was done by me, mother is annoyed).’ (Czech, Olga Tomić, p.c.)

g.[_{CP} Mee ik da te zeggen], hee-se dat hus gekocht.
 [_{CP} with I.NOM that to say] has-she that house bought

‘Because of my saying that she has bought that house.’ (West Flemish)

These non-finite domains are adjuncts, so strong islands (à la Cinque 1990). In tensed (“personal”, Ledgeway 1998) infinitive clause adjuncts (8a, d, f, g), gerund adjuncts (8b, e) and absolute participial constructions (8c), NOM subjects are licit in the absence of [uφ] on T.¹⁵

However, as is well-known, the lexical subject of non-finite subject or adjunct domains can also be valued ACC. See English infinitive and gerund clauses, infinitives in Irish (McCloskey 1985), Latin (Wyngaerd 1994), and Ancient Greek (Sevdali 2005, 2007), as in (9).

- (9) a. [_{CP} For **him** to listen to that talk] was awkward.
 b. [_{CP} **Him** baking the pie] pleased everyone.
 c. Fe:mi [_{CP} se men egno:kenai peri touto:n]
 say-I you-ACC to know-PRF about these-GEN]
 [_{CP} eme de suneire:kenai tais sais epithumiais]
 [me-ACC to go along-PRF the your wishes-DAT]
 ‘I say that since you knew about these things, I went along with your wishes.’ (Greek, Isokrates, *Ad Philippum III*, 3:3-4. In Sevdali 2005: 134)
 d. Cánathaobh í a bheith chomh deacair?
 Why it.ACC be.INF so difficult
 ‘Why should it be so difficult?’ (Irish, McCloskey 1985: 194)

Lastly, Case in non-finite contexts can be sensitive to word order. In (2), postverbal subjects in Old Italian were seen to be strictly NOM. This also holds of Latin postverbal gerunds (shown in (10)), which otherwise typically appear with ACC subjects (Mensching 2000:202).

- (10) [In convertendo Dominus captivitatem Sion] facti sumus
 [in undoing Lord.NOM captivity.ACC Zion] made (we) are
 sicut consolati. (Vulgar Latin, Ps, 125, 1, cf. Kaulen 1904:299)
 like dreaming
 ‘When the Lord lets the prisoners of Zion go, we become like dreamers.’

Based on the above, we conclude that Case valuation is available systematically and potentially influenced by linearization in non-finite/ ϕ -less phasal C domains.

1.3 Phi-feature relevance and structural Case valuation

Here we show that various cross-linguistic data suggest that ϕ -features (and, crucially π) play a role in NOM Case assignment (see also Szabolcsi 2007). In Romanian, for example, only NOM DPs, whether subjects, (11a), or objects, (11b), trigger agreement, but an ACC DP forces the default 3rd singular verbal form (see 11c), despite [$u\phi$] on T being present.¹⁶

- (11) a. Vin / vine copiii mîine.
 come.3PL / come.3SG child.PL-the.NOM tomorrow
 ‘The children are coming tomorrow.’
- b. Îți plac fetele / ele (/ *de fete) ?
 2SG.DAT like.3PL girl.PL-the.NOM / they (/of girl PL.ACC)
- c. Îți place de fete?

2SG.DAT like.3SG of girl PL.ACC

‘Do you like (these) girls?’

Consider next the Belfast English data from Henry (1995) discussed in Schütze (1997:132-133).

- (12) a. Usuns is happy.
 b. *We takes the bus.
 c. Them’s no good, are they / *are them?

In (12), default 3rd singular, so lack of [uφ] on T, forces ACC subjects, while presence of [uφ] on the tag question, forces a NOM subject.¹⁷ Imbabura Quechua, an SOV language discussed in Cole and Jake (1978), points yet to a similar conclusion; data in (13) from Cole and Jake (1978:74).

- (13) a. Ñuca-Ø can-da ricu-ni/*-ngui.
 I-NOM you-ACC see-1SG/-2SG
 ‘I see you.’
 b. Ñuca-ta can-da ricu-naya-n/*-ni/*-ngui
 I-ACC you-ACC see-DES-IMP/-1SG/-2SG
 ‘I would like to see you.’

In (13a), subject-verb agreement denotes phi-features on T and the subject is valued NOM. In (13b), with a desiderative clause and no agreement, both arguments are valued ACC.

In sum, unrelated languages show that φ-Probes are crucial for NOM but not ACC values. And, since past participles and adjectival predicates cannot assign Case, despite instances of gender and number agreement, the relevant phi-feature must be person ([π]), which yields (14).¹⁸

- (14) a. NOM, if and only if the Probe is specified for [uD, u π]
b. ACC, if and only if the Probe is specified as [uD]

(14) allows for either ACC or NOM subjects, as these values are derived from the feature-al build up of the Probe, and not T or v*. (14) also assumes no [π] on v*; given the intrinsic deictic nature of π and, therefore its links to the left periphery (see Bianchi 2008), this is expected.¹⁹

2 Alternate views on Case

(14) does not explain the parametrization observed with non-finite subjects in Section 1.2. Interestingly, neither do Baker (2012) or Sigurðsson (2012). Earlier Minimalist approaches to Case realization explored in the next two sections also fail to offer a comprehensive solution.

2.1 Tense and Case values

Following Pesetsky & Torrego (2001, 2004a), the C-T (phase-level) relationship is taken as the defining condition for temporal deixis, formalizable as iT .²⁰ Since C licenses both Case and non-anaphoric T, the authors capitalize on this correlation and argue that Case is ‘Tense’ (see also Haeberli 200), Martin 2001, and Svenonius 2001). However, further scrutiny shows NOM Case to also occur without Tense (see also Pesetsky & Torrego 2011). Consider the Hungarian possessive construction, discussed by Szabolcsi (1983) and Kenesei (1986).

Kenesei (1986:115) notes that NOM Case occurs in “two constructions in Hungarian: (a) in tensed sentences, and (b) in possessive constructions.” The author argues that Tense cannot be assumed to play a role in the latter situation and concludes that NOM is dependent on Agr ([u ϕ]

here) given that an agreement suffix appears on the head noun with possessives. The examples in (15) show π and # (number), so a π -Probe, with NOM valuation in Hungarian possessives.²¹

- (15) a. a te ház-ad
the you.NOM house-2SG
'your house' (Kenesei 1986: 115)
- b. a fiú-k kapu-ja
the boy-PL-NOM gate-3SG/PL
'the boys' gate' (Kenesei 1986: 112)

In addition, Avram (2003) and Alboiu (2007) independently argue that semantic and syntactic properties of Romanian gerunds discussed in Section 1.2 show these to be Tense deficient. Nonetheless, we saw that these phasal domains trigger NOM Case valuation.

In conclusion, Case deficiencies cannot be satisfied by Tense any more than they can be satisfied by agreement. Temporal deixis, when present, just like agreement, is epiphenomenal.

2.2 Lexical subjects and default Case

Drawing on work by Marantz (2000), Schütze (1997, 2001) argues that not all morphological Case forms are a reflex of syntactic abstract Case. Specifically, Schütze argues for cross-linguistic and language specific availability of default Case (e.g. ACC for English but NOM for Latin), but he is careful to point out that wherever Case is determined by a syntactic mechanism, it cannot be default. For instance, Schütze (2001:208) mentions that overt subjects in non-finite clauses in Irish and Latin cannot be attributed to the availability of default Case (contra Chung

and McCloskey 1987), as the Case Filter would be vacuous if default Case were a syntactic feature. Consequently, subject lexicalization in (1)-(2) and (8)-(9) cannot involve default Case.

Conceptual issues aside, there are also empirical problems with assuming default Case in these instances. For instance, since Schütze (2001) argues that NOM is the default in Latin, the typically ACC overt subjects of non-finite domains, recall (1b), must be valued syntactically. In addition, Old Italian cannot have both ACC and NOM default subjects, yet infinitives allow both.

Furthermore, Icelandic distinguishes between a default and a structural NOM, as evidenced by agreement facts (Sigurðsson 1991, 2008, 2009). More specifically, default agreement occurs in the presence of dislocated and vocative DPs, seen in (16a), but not with PRO subjects, shown in (16b). As such, I assume together with Sigurðsson (*ibid*) that non-finite NOM in PRO contexts is structural and not default (*contra* Boeckx and Hornstein 2006).

- (16) a. Strákurinn, við hann var ekki dansað/*dansaður
the.boy.NOM with him.ACC was not danced.DFLT/*NOM.SG.M
‘The boy, nobody danced with him.’ (Sigurðsson 1991: 338)
- b. Þessi saga var skrifuð til [að PRO vera
this story.NOM.F.SG was written for to be
lesin/*lesið].
read.NOM.F.SG/*DFT (Sigurðsson 2008: 409)

In addition, according to Schütze (2001), both Swedish and German have default NOM, but neither language permits NOM subjects in infinitives (Sigurðsson, *p. c.*). So, while there is an undeniable place for default morphological Case in UG, there is significant cross-linguistic evidence that DP subject lexicalization in CP non-finite domains involves Case-checking.

The task is to offer an analysis that yields a principled account for Case realization in our data and beyond. To this purpose, Section 3 provides an explanation for the NOM-ACC valuation dichotomy for non-finite domains, while Section 4 addresses Case values on PRO.

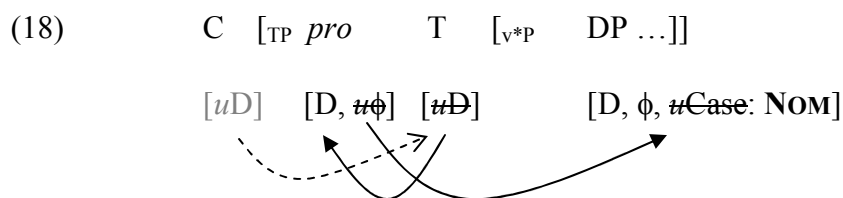
3. Null expletives as Probe correlates

Assuming that phi-features are absent from non-finite C, the question is what ensures the π -Probe, necessary for NOM values, in languages with NOM lexical subjects in these domains.

Ledgeway (1998) and Sitaridou (2002) note that NOM lexical subjects in non-finites is a property of null subject languages. However, West Flemish only allows for null expletives and not *pro*-drop (Haegeman, p. c.) despite NOM in infinitives in (8g). Western dialects of English (e.g. Newfoundland English, working-class Somerset English) also lack null subjects, but have null expletives (Ihalainen 1991), and allow for NOM in infinitives, as seen in (17).

(17) For **he** to listen to that talk was awkward. (Newfoundland English, Ruth King, p.c.)

I propose instead that expletive *pro*, [D, $u\phi$], as an uninterpretable phi-feature bundle, has a role in Case valuation. Specifically, its person (π) deficiency guarantees a NOM value on its associate.²² (4iib), repeated as (18), shows the null expletive merged in Spec,TP to check off [uD], acts as a Probe engaging the thematic subject in an A-chain, thus licensing NOM Case.²³



In non-finite CPs, illustrated in (18), merge of *pro* in Spec,TP cancels T's status as a D-related

Probe. As *pro* does not branch and c-commands the subject DP, it can freely probe it.²⁴

The empirical prediction of this analysis is that uninflected phases can only license NOM values in languages with expletive *pro*. As Table 1 shows, the prediction is borne out as we see a clear cross-linguistic correlation between null expletive languages and lexical NOM in non-finites. We also see variation in some languages, which we address in Section 4.2.²⁵

Table 1 *Data summary for lexical subjects in non-finite CPs*

Language	CP-internal structural NOM & ACC Case on overt subject in non-finites	Null Subject Language <i>pro</i> [D, iφ]	Null Expletive Language <i>pro</i> [D, uφ]
Ancient Greek	ACC, NOM	✓	✓
Modern Greek	NOM	✓	✓
Latin	ACC, NOM	✓	✓
Old Italian	ACC, NOM	✓	✓
Mod. Italian	NOM	✓	✓
Romanian	NOM	✓	✓
Spanish	NOM	✓	✓
West Flemish	NOM	*	✓
Newfoundland English	ACC, NOM	*	✓
Hungarian	NOM	✓	✓
Czech	NOM	✓	✓
Albanian	NOM	✓	✓
Icelandic	*	*	*
German	*	*	*
English	ACC	*	*
Irish	ACC	*	*

3.1 On expletive *pro*

At this point we need to clarify (i) what triggers the presence of *pro* in the lexical array, and (ii) whether the ‘null’ status of this expletive has any bearing on the issues at hand.

3.1.1 Expletive *pro* in the lexical array

Expletives are formatives devoid of semantic content beyond their categorial status, so they only involve formal features. Arguably, nominal expletives (whether overt or null) check off the EPP/[uD] of phasal heads, itself a structural requirement coerced by CI interface conditions (Chomsky 2006:14/2007). While, Alexiadou and Anagnostopoulou (1998) argue against null expletives (see also Manzini and Savoia 1997, 2002), suggesting instead that the EPP can be checked by verb raising to T in languages without lexical DPs in Spec,TP, this option is only available to environments where verbal agreement morphology includes the relevant nominal features required by the EPP. Since in non-finite domains verbs lack any nominal features, EPP checking must be assumed to resort to *pro* at least in such contexts.²⁶

The factors driving *pro* insertion in the Numeration cannot be Case-related, as syntactic relevance of Case is not a property of Probes, just a computational visibility requirement on DPs. The expletive's role in Case-valuation is epiphenomenal, a welcome outcome of its ϕ -deficiency. Checking EPP via expletive *pro*, ensures that the subject, a contentful DP, is free to occupy structural positions with various semantic and pragmatic relevance with the effect of what is often referred to as a 'free word-order' language. The presence of a [D, u ϕ] lexeme in the lexical array would thus ensure the desired flexibility in positioning of a semantically relevant DP.²⁷

For example, Alboiu (1999, 2002, 2007) argues that Romanian exploits syntactic structure to encode information structure. Furthermore, Alboiu (2002) shows that Romanian preverbal DPs are subject to a specificity effect, hence discourse configurationally displaced.²⁸ Consequently, preverbal DP subjects cannot be assumed to dislocate for EPP considerations.

Various empirical and conceptual arguments can be made in support of expletive *pro*. Rizzi and Shlonski (2005:1) argue that "criterial freezing", defined as the phenomenon whereby

“an element moved to a position dedicated to some scope-discourse interpretive property, a criteria position, is frozen in place,” can be obviated in the presence of expletives. See (19):

- (19) a. *What do you think that t_{what} is in the box?
 b. What do you think that there is t_{what} in the box? (Rizzi&Shlonski 2005:11)

Consequently, the well-formedness of (20a), presupposes a null expletive, *pro*. Same for (20b).

- (20) a. Chi credi [che [*pro* Subj vincerà t_{chi}]]
 ‘Who do you think that will win.’ (Italian, R&S 2005:11)
 b. Cine crezi [că [*pro* va câștiga t_{cine}]]?
 Who think.2SG [that FUT.3SG win t_{who}]
 ‘Who do you think will win?’ (Romanian)

A brief look at generics in Romanian further reinforces availability of the null expletive in this language, especially for non-finite CP domains. Consider (21)-(22).

- (21) a. Păsările cântă. GEN, \exists
 bird.PL-the sing.3PL.PRES
 ‘Birds sing/are singing.’
 b. Cântă pasărilor. *GEN, \exists
 sing.3PL.PRES bird.PL-the
 ‘Birds are singing.’

- (22) non-finite CPs: *GEN, \exists
 a. Punea muzică [pentru a cânta pasărilor].

put.3SG.PST music [for INF sing.INF bird.PL-the
 ‘S/he’d play music for the birds to sing.’

b. [Cîntînd păsările], ne-am înveselit cu toții.
 singing.GER bird.PL-the CL.REFL1PL.-AUX.1PL happified with all

c. [Păsările cîntînd], ne-am înveselit cu toții.
 bird.PL-the singing.GER CL.REFL1PL.-AUX.1PL happified with all

‘Because the birds were singing, we were all in a better mood.’

‘*Because birds sing, we were all in a better mood.’

According to Diesing (1992), while with episodic sentences subjects can be located in either Spec,IP (Spec,TP here) or Spec,VP (Spec,v*P here), with generics, these must raise out of the nuclear scope into the restrictive domain and thus occupy Spec,TP. (21) illustrates this for Romanian. In addition, the fact that (21b) is well-formed but cannot be interpreted as a generic also illustrates that subject DPs do not raise to Spec,TP at LF.²⁹ The EPP must thus be satisfied by expletive *pro*. Crucially, in non-finite clauses, a generic interpretation is never possible, regardless of linearization (see (22c)).³⁰ We conclude that expletive *pro* uniformly satisfies the EPP in Romanian non-finite CPs and that the preverbal subject is in a Topic position in (22c). This explains why lexical subjects are exclusively valued as NOM in Romanian non-finite CPs.

To sum up, null expletive *pro*, is a parametrized UG primitive with an effect of semantico-pragmatic encoding and NOM Case valuation.³¹

3.1.2 The relevance of ‘null’

Under a view of late vocabulary insertion (adopted here), phonetic features are not available prior to Spell-Out. However, I suggest that the ‘null’ status of the expletive is the result of its

morphosyntactic deficiencies, specifically its lack of intrinsic ϕ -features.³² I adopt Sigurðsson's (2008) account for the silence of PRO - viewed as independent of Case and as a direct result of variable reference and phi-features - and suggest that the same holds of null expletive *pro*.

Interestingly, what this entails is that overt expletives must have some degree of ϕ -specification. Agreement facts show that French *il*, English *it* and Icelandic *það*, are all specified as 3rd person singular neuter (see Chomsky 1995, Rezac 2004, and Rizzi&Shlonski 2005). Chomsky (2000) argues that English *there* is specified for 3rd person but no number, while Kayne (2008) also adds deixis. Rezac (2004) shows Czech *von* to have person. This yields (23).

(23)	[D, $u\phi$]	[D, $\pi:3$, #:SG, g:N]	[D, $\pi:3$]	[D, $\pi:3$, $u\#$, ug] ³³
	<i>pro</i>	<i>il, it, það</i>	<i>there</i>	<i>von</i>

Crucially, none of the lexicalized expletives in (24) are π -Probes, so lack a role in NOM Case.³⁴

3.2 Structural Case valuation in non-finite domains

The next subsections provide brief analyses for lexical subjects in non-finite CP domains by looking at data from an exclusively NOM language (i.e., Romanian) and a typical ACC language (i.e., English). Micro-parametric variation within null expletive languages is also addressed.

3.2.1 Structural NOM subjects: the view from Romanian

Section 3.1.1 argued that expletive *pro* uniformly satisfies the EPP in Romanian infinitives and gerunds. Consider the personal infinitive and gerund adjuncts in (24a) and (24b), respectively.

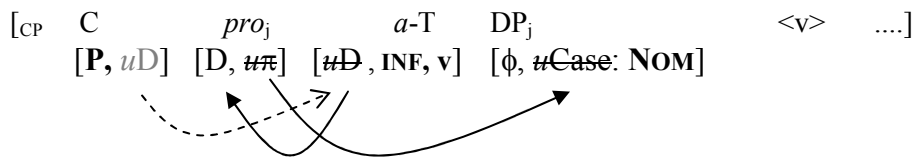
(24)	a.	[_{CP} Pentru	a	avea	tu	liniște],	plecă.
		[_{CP} For	INF	have	2.SG.NOM	quiet]	leave.PST.3SG

‘S/he left so that you can have peace of mind.’

- b. [CP (tu) fiind (tu) gata], am și pornit.
 [CP 2.SG.NOM be-GER 2.SG.NOM ready] AUX.1PL also started
 ‘Once you were ready, we started on our way.’

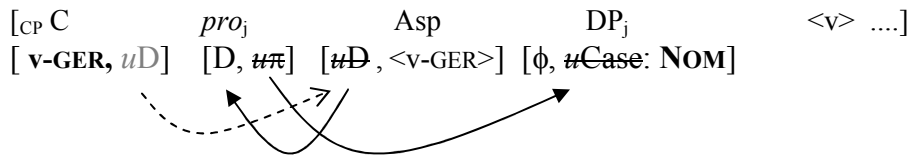
Schematically, these infinitives can be represented as in (25), with *pro* satisfying [uD] on T and the verb raised to T but not further, as in Dobrovie-Sorin (1994). The expletive π -Probe targets the thematic subject, which at Spell-Out is thus valued NOM. Overt items are bolded.

(25) Romanian personal infinitives:

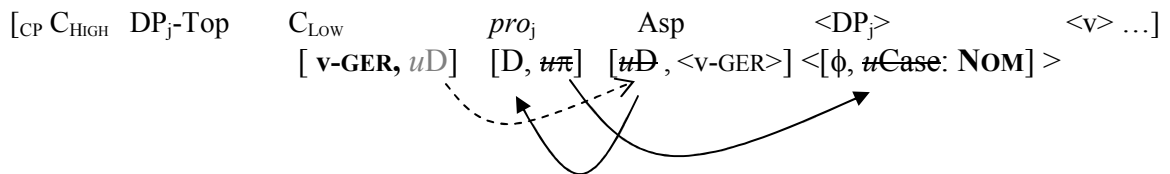


With gerunds, the subject may occur preverbally and the verb undergoes movement into the C domain.³⁵ The representations in (26) show the EPP feature being transferred to Infl-Asp assuming T is absent, as discussed. Unvalued ϕ -features and Case check as for infinitives.

(26) a. Romanian gerund adjuncts with VS linearization:



b. Romanian gerund adjuncts with SV linearization:



In addition, (26b) differs from (26a) in projecting an expanded CP domain, with a Topic position sandwiched in-between a high C head (i.e., “Force”) and a low C head (i.e., “Finite”) to accommodate the topicalized preverbal subject (in the spirit of Rizzi 1997, 2004). While in (26b) the gerund only raises to a low C head, a high (phasal) C head must be present for [uD].³⁶

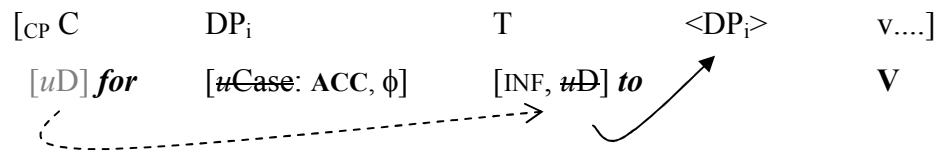
3.2.2 Structural ACC subjects: the view from English

There are two structural configurations where English lexicalizes ACC subjects: *for-to* infinitives and clausal gerunds. (27) illustrates by resuming (9a, b).

- (27) a. [CP *(For) **him** to listen to that talk] was awkward.
 b. [CP **Him** baking the pie] pleased everyone.

It is well known that *for* must be present in infinitives or else PRO is forced. While Romanian only allows prepositional complementizers with adjunct infinitives (e.g., *pentru* ‘for/in order to’, *pînă* ‘until’, *de* ‘of’, based on semantic clause type), disallowing them in subject infinitives, in English the presence of *for* is linked to the presence of a lexical subject, and not status or type of clausal infinitive. We return to this issue in Section 4. (28) is a schematic representation of (27a).

(28) *for-to* CP infinitives



Since there is no π -Probe and the subject DP is simply D-probed, it lexicalizes as ACC.

Consider next clausal gerunds (CG, see Reuland 1983). Reuland (1983) and later Pires (2001) discuss five types of CGs, as in (29), illustrated in (30).

- (29) a. ACC-ing as complements to verbs; see (30a).
 b. ACC-ing as complements to subcategorized prepositions; see (30b).
 c. ACC-ing in subject position; see (30c).
 d. ACC-ing in constructions in adjunct prepositional phrases; see (30d).
 e. Absolute constructions; see (30e-f).
- (30) a. I_i don't like [them / PRO_i watching that much TV].
 b. I_i asked about [them / PRO_i leaving tomorrow].
 c. [Us / PRO_i leaving] saddened [our friends]_i.
 d. Sam_i found a wife [without/ after/ before (us / PRO_i) coming to town].
 e. Mike expected to win the game, he / him being the best athlete in the school. (Pires 2006:3)
 f. PRO_i being the idiot that he_i was, John_i was unable to keep his_i job.

Cases (30a-d) instantiate a subcategorized CG situated in a canonically Case-marked position. Crucially, subjects are licensed throughout, realized as a lexical ACC DP (and NOM in the absolute construction) or as PRO. (30e-f) are clausal adjuncts, so phases, as is the subject CG in (30c). Prepositions in English select phasal domains (i.e., P or D), so the CGs in (30b, d) are equally phasal. Verbs may select non-phasal arguments (e.g. perception verbs and raising verbs), but since obligatory control can obtain, the CG in (30a) must also be a C phase. In conclusion, CGs have uniform CP phasal status, so check off [uCase] upon Transfer.³⁷

The relevant literature on gerunds (Abney 1987, Chomsky 1981, Emonds 1970, Horn 1975, Moulton 2004, Pires 2001, Reuland 1983, among others) typically argues for *-ing* as either a nominal category or a participial category. Following Cowper (1995), I adopt a monosemic

approach and assume a single lexical entry for *-ing*, a category neutral affixal functor, lacking nominal or verbal status. The distinct properties of various *-ing* environments, result from other factors, such as insertion site (à la Marantz 2001). In CGs, the *-ing* GER(UND)/PART(ICIPIAL) feature merges high, as a C head, to denote the relevant clause type (i.e. its status as a gerund rather than, say, an infinitive clause).³⁸ However, this formative can also merge lower, as an aspectual non-phasal head (e.g., when selected by perception verbs or by T). The affixal nature of *-ing*, alongside lack of lexical verb raising in English, entails that *-ing* uniformly linearizes lower than its initial Merge site (i.e., in the v domain or on the highest available verbal root).³⁹

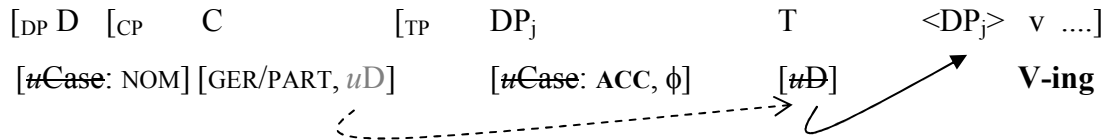
As a category neutral affix, *-ing* itself cannot be equipped with [uCase], nor can it account for the well-known asymmetrical data in (31), which shows that subject CGs but not finite or infinitive CPs may occupy Spec,TP, a nominal position.⁴⁰

- (31) a. * Did [that he baked a cake] please everyone?
 b. *Did [for Sam to act like that] look suspicious?
 c. Did [him staying up late] upset you?

I suggest that CG are selected by a null D head. This is due to the argument nature of gerunds and possible given the category neutral status of C (but ruled out with infinitives and finite CPs which are more verbal in nature).⁴¹ In effect, CG arguments are nominal CPs whose [uCase] feature on its null D head is valued as either ACC or NOM, depending on properties of the Probe. Crucially, however, Case valuation of the null D does not affect ACC Case valuation of the subject internal to the CG (pace Pires 2007).⁴² See the schematic representations in (32).⁴³

- (32) a. English object gerunds (null D probed by v*):
 [DP D [CP C [TP DP_j T <DP_j> v]
 [~~uCase~~: ACC] [GER/PART, uD] [~~uCase~~: ACC, φ] [~~uD~~] **V-ing**
-

b. English subject gerunds (i.e. null D probed by finite T):



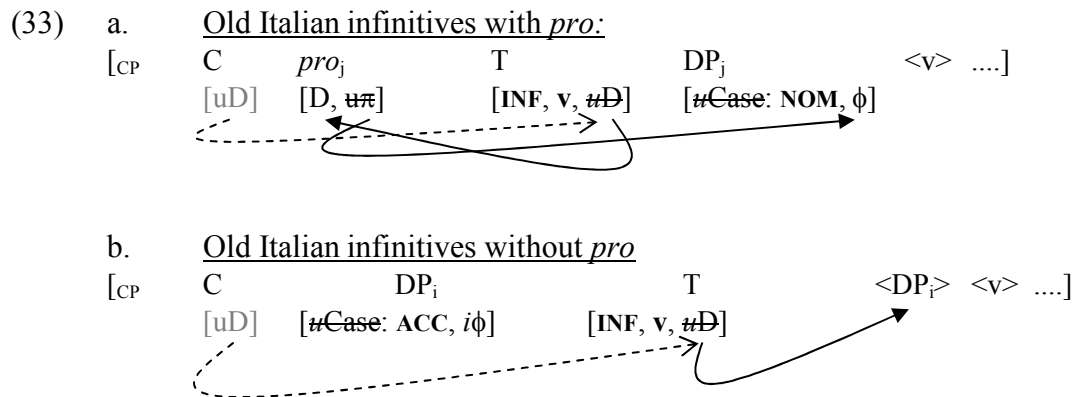
Let us now return to adjunct CGs (i.e., absolute constructions). While the ACC subject in (30e) is readily explainable as per (32) above, the NOM one less so, since NOM in non-finite CPs should only be available to grammars with null expletives as part of the mental lexicon.

First, note that there is variation in native speaker acceptance of (30e). To quote Michael Barrie (p. c.), “The ‘he’ versions sound like you’re hyper-correcting for some 19th century grammarian.” To quote an anonymous reviewer, “**Roddy tried to avoid Elaine, him being a confirmed bachelor* is dreadful”. To cite an example from Schütze (1997:56), “*Him / *he liking beans, they bought some.*” Since judgments vary from unacceptable, to prescriptive, to required, I suggest that these structures have dubious current productivity and are a relic of a time when the English allowed for a null expletive. Old and Middle English, while not fully *pro*-drop, did have null expletives (Fischer et al, 2000) – preserved today in some dialects as noted. However, while null expletives disappeared in Early Modern English, the NOM absolute construction did not. The construction was perpetuated by prescriptive grammarians, so we can assume that some speakers have “learnt” to allow for a null expletive in these constructions despite the fact that null expletives are no longer part of standard English. Crucially, exactly as our analysis would predict, ACC subjects start to appear alongside the NOM in the 16th and 17th century (Poutsma 1929), so precisely around the time that English *lost* the null expletive. This explains the variation in judgments, as well as the telling prescriptive flavor. It also explains variation with ACC and lack of NOM in other English non-finites. Furthermore, given low (i.e. in v*P domain)

lexicalization of the GER/PART feature, linearization is uniformly SV, regardless of subject status.

3.2.3 Variation in subject lexicalization

This section briefly focuses on Old Italian infinitives which, following Mensching (2000), allow for both lexical ACC and NOM subjects, with postverbal subjects strictly NOM. Assuming that discourse conditions determine whether [uD] was checked via expletive *pro* or subject DP dislocation, I offer the representations in (33) for the data introduced in (2a,b).⁴⁴

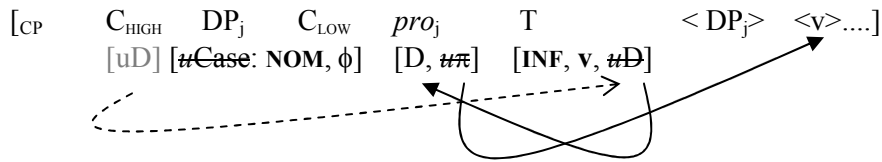


In (33a), the [uD] feature transmitted from C to its T proxy head is satisfied by external Merge of the expletive, with NOM consequences for the subject, while in (33b), this feature is satisfied by the subject itself, with ACC consequences. Furthermore, akin to what we saw for Romanian gerunds, Old Italian NOM subjects were also attested preverbally in these infinitives, presumably as Focus or Topic. See (34a), schematically represented as in (34b).⁴⁵

(34) a. perchè io disso [io aver trovato iscritto ...]
 because I said [I to-have found written
 “because I said that I had found that it was written ...”

(Mensching 2000:133, Malispini, ch. 42, 13th c; cf. Diez 1882:946)

b. Old Italian infinitives with *pro* and subject fronting :



To sum up then, *pro*-availability does not automatically guarantee insertion in the lexical array and various language specific phenomena might either prevent or require the presence of the expletive in the Numeration.

4. PRO

PRO triggers Case concord on various associates (e.g. predicates, quantifiers, participles), a fact taken as evidence for it having Case (e.g. Adger 2007, Bobaljik & Landau 2009, Cecchetto & Oniga 2004, Landau 2008, Schütze 1997, Sigurðsson 1991, 2008). As a DP argument, PRO is indeed equipped with [uCase] and gets structural or lexical/inherent Case (contra Chomsky 1982, Chomsky & Lasnik 1995, Uriagereka 2008). The challenge rests in explaining the facts.⁴⁶

4.1. Formal features of PRO

Given that PRO and (c)overt pronouns are arguments, while expletives are not, I assume that the former but not the latter require a referential index, [R], with referentiality kept distinct from phi-features.⁴⁷ While pronouns have variable reference/extensions, they have stable intensions, since their φ-features are fixed. PRO, however, has both variable extension and variable intension. Furthermore, PRO's deficiencies cannot be 'uninterpretable' features (i.e., [uφ], [uR]) since neither PRO nor anaphors act as Probes (i.e., they have to be in the c-command domain of their licenser and not vice versa). Hence, their variable status is reflected by [α], as indicated in (35).⁴⁸

- (35) a. PRO: [D, uCase, $\alpha\phi$, αR]
 b. argumental *pro*: [D, uCase, $i\phi$, αR]

While treating PRO uniformly as an [$\alpha\phi$] runs counter to traditional GB proposals (Chomsky 1981, 1982), which assume an anaphoric and a pronominal PRO, this approach is in line with much current work (e.g. Kratzer 2009, Landau 2001, 2004, Sigurðsson 2008). It also arguably explains PRO's uniform silence.⁴⁹ We next address Case checking mechanisms in PRO contexts.

4.2 On Case and PRO

Authors have focused on the Case of the associated predicate, quantifier, or some other syntactic object in order to determine the Case of PRO. (36) gives some relevant cross-linguistic data.

- (36) a. Strákarnir_i vonast til [að PRO_i leiðast ekki öllum_i
 boys-NOM hope for [to PRO.DAT bore not all-DAT
 í skóla]. (Icelandic, Sigurðsson 1991, in Landau 2003:492)

in school]

‘The boys hope not to be all bored in school.’

- b. Hún bað Ólaf_i [að PRO_i fara bara
 she.NOM asked Olaf.ACC [to PRO.NOM go just
 einn í veisluna]
 alone.NOM to party.the

‘She asked Olaf to just go alone to the party.’ (Icelandic, Sigurðsson 2008: 414)

- c. [að PRO vera ríkur] er ágætt.

to PRO.NOM be rich.NOM is nice

‘It’s nice to be rich.’ (Icelandic, Sigurðsson 2008: 417)

d. Ivan ne znaet [kak tuda PRO dobrat’saj

Ivan.NOM not know [how there PRO.DAT to.reach

odnomu]

alone.DAT]

‘Ivan doesn’t know how to get there by himself.’ (Russian, Landau 2008:884)

e. [PRO philanthropon] einai dei

friendly.ACC.3SG to-be must-3SG

‘One needs to love people.’

(Ancient Greek, Isocrates, II:15. Adapted from Sevdali 2005: 137)

The idea here is that PRO agrees with its predicate, quantifier, and so on, so bears the same Case value. However, such an assumption is problematic. For example, based on (36d), Landau (2008) argues that non-finite C assigns DAT Case in Russian. But this is difficult to maintain given that Russian predicates also surface with Instrumental Case in non-finites, (37a), and that Case on the adjectival predicate does not always match Case on the subject; compare (37b)-(37c,d).

(37) a. Harasho [CP PRO byt bogatym]

nice be.INF rich.INSTR

‘It is nice to be rich.’

b. (Ja) bogatij.

1.SG.M.NOM rich.NOM

‘I am rich.’

- c. (Ja) byl bogatym.
 1.SG.M.NOM be.PAST rich. INSTR
 ‘I was rich.’
- d. (Ja) budu bogatym.
 1.SG.M.NOM be.FUT rich. INSTR
 ‘I will be rich.’

Rather, the data in (37) suggest that INSTR Case is a property of the predicate domain, perhaps correlated with presence or absence of the copula (or aspectual properties, as in Richardson 2007), rather than a property of C. Furthermore, since Case transmission between subject and predicate is not required, we lack strong evidence for either INSTR or DAT PRO in Russian.⁵⁰

Since the Case of predicates need not agree with that of the DP (see also Richardson 2007), it cannot be taken as evidence for the Case of PRO. Predicates could have dedicated Cases (see Irimia 2009), or perhaps default Case, as hinted by Schütze (1997). So, in determining the case of PRO, I suggest that we rely instead on: (i) the morphological Case of quantifiers as, assuming these are part of the nominal domain, they denote an instance of Case concord; (ii) Case available to the domain of PRO occurrence; and (iii) lexicalization of PRO, where permitted. Icelandic data from (i) supports quirky/inherent Case on PRO (references cited). As for (ii), there is evidence for structural NOM from Icelandic where, in addition to the presence of non-default NOM on predicates (data in (16a-b)), structural NOM occurs on objects with quirky subjects, as seen in (38) from Freidin and Sprouse (1991:409), resumed in Legate (2008: 86).

- (38) Að PRO batna veikin er venjulegt.
 to PRO.DAT to.recover.from the.disease.NOM is usual

‘To recover from the disease is usual.’

Crucially, (38) shows that structural NOM is available in Icelandic PRO infinitives.

Lastly, there seem to be instances which arguably allow for PRO lexicalization. Specifically, in the presence of additional features, such as [wh], in (39b), or when PRO is focused/emphasized, as in (39c). (39a) shows *croire* ‘believe’ to be a control predicate in French and (39b) shows *qui* ‘who’ in the stead of PRO, while (39c) is an example of focused overt PRO in Romanian. Crucially, lexicalization has NOM value in both French and Romanian.

(39) a. Je_i crois [(**Georges*)/PRO_i être le meilleur].

‘I believe to be the best.’

b. Qui crois-tu être le meilleur?

‘Who do you believe to be the best?’

c. [CP A fi **(doar/numai)* tu prezent la adunare]

[CP INF be only 2.SG.NOM present at meeting]

e de neconceput.

be.PRES.3SG of inconceivable

‘It’s inconceivable that you be the only one present at the meeting.’

In sum, aside from quirky cases, cross-linguistic evidence points to structural NOM on PRO in non-finite domains.⁵¹ However, this NOM value cannot be due to expletive *pro*. Given the pragmatic role attributed to the null expletive, it is ruled out in derivations with PRO. PRO, as a null DP, cannot be relevant to discourse properties. Consequently, an alternate analysis than the one developed for lexical subjects in Section 3 is in order for Case valuation of PRO.

4.3 Deriving NOM PRO

Whether controlled or not, PRO is exclusively licensed from outside its phasal domain. Since, as a non-operator, PRO itself cannot move to the Phase Edge, assuming Chomsky's (2000 et seq.) Phase Impenetrability Condition gives us the conceptual motivation for postulating a Logophoric Operator (OP_{LOG}) in Spec,CP in these derivations.⁵² The OP_{LOG} has a human orientation, hence phi (including person) and referential features controlled either by discourse (D), with the result of a $[\phi_D, R_D]$ value, or a matrix argument, with the result of $[\phi_i, R_i]$. The OP_{LOG} ensures that at LF PRO is bound locally (i.e. bound within its Phase). Interestingly, the OP_{LOG} provides an elegant way of reconciling some otherwise apparently contradictory empirical data.

Baltin (1995) discusses data of the type in (40) which essentially shows that PRO does not raise to Spec,TP (i.e. stays within the predicate domain) in English given (40b).

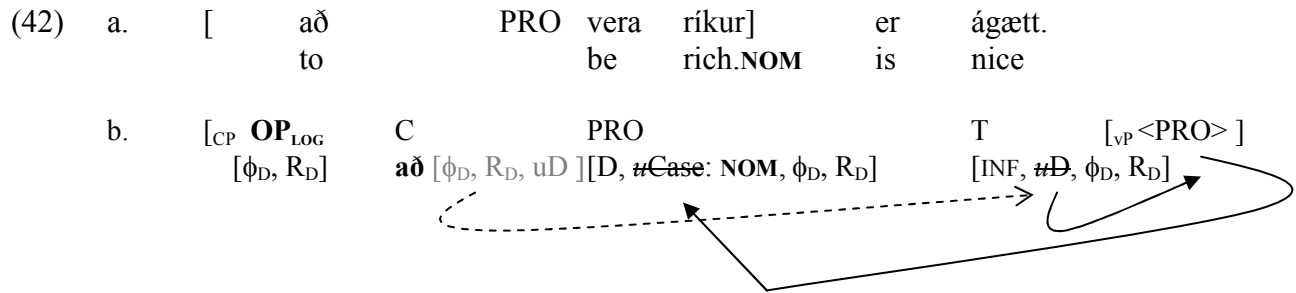
- (40) a. [To PRO all leave now] would be unthinkable.
b. *[All to PRO leave now] would be unthinkable.

Conversely, the legitimacy of (41) seems to indicate PRO movement outside of its initial Merge position (i.e. to Spec,TP of the raising predicate) or the reflexive should be ruled out.

- (41) John_i promised his psychologist [_{CP} PRO_i to seem to himself_i/*herself [_{<PRO_i>} to be competent] before leaving therapy]. (example offered by LI reviewer)

An OP_{LOG} in Spec,CP provides a straightforward account for (41), without requiring actual PRO dislocation, which is in line with (40b). OP_{LOG} licenses the reflexive in (41), just as it licenses in-situ PRO, since it c-commands both. Thus, we also have empirical motivation for OP_{LOG} .

While OP_{LOG} does not itself function as a π -Probe, the C-T domain does contain a π feature in these derivations which, assuming Spec-Head agreement within CP. If we are correct, T-probed PRO is consequently valued NOM, cross-linguistically.⁵³ See the Icelandic case in (42).



A central tenet of the above analysis is involvement of PRO in an A-chain. However, following Baltin (1995), we argued that PRO fails to move to Spec,TP in English, so valuation cannot be assumed to proceed as in (42b). Crucially, however, control constructions in languages like Icelandic (or Romanian) show overt evidence for a C head distinct from T - i.e. the complementizer *að* ‘that’ in (42a), also used in finite clauses, see (43a). In English, on the other hand, PRO contexts rule out C morphology; see (43b).

- (43) a. Ég harma að þegar hafi María lesið þessa bók.
I regret that already has Maria read this book
‘I regret that Mary has already read this book.’ (Icelandic, Roberts 1993:59)
- b. [_{CP} (*For) to PRO_{arb} give up now] was unthinkable.

This suggests that, in control infinitives, C does not project independently of T in English, yielding a merged C/T head. Since in generative grammar (e.g. Culicover 1999, Giorgi and Pianesi 1997, Haider 1988) merged heads presuppose both feature sharing (i.e. an infinitive value here) and lack of an intervening specifier, in-situ PRO is now readily explained. Crucially,

lack of Spec,TP denotes absence of an A-Probe. Thus, the [uCase] feature on PRO remains unchecked in syntax (so, no value), deleting upon Transfer; see (44).^{54,55} Also, given that PRO is in the c-command domain of the OP_{LOG}, its intension and extension are licensed at LF.

- (44) English Prepositionless CP infinitives
- | | | | | |
|--|------------------------------------|-----------------|--|-----|
| | [CP OP _{LOG} | C/T | PRO | vP] |
| | [φ _D , R _D] | to [INF] | [D, uCase :?, φ _D , R _D] | |

Erasure without valuation does not renege on the Case Filter since, as is well-known, lexicalization is ruled out in these contexts: **To me/her/him give up now is unthinkable*. In a sense, Chomsky & Lasnik’s (1993) “null Case” account for PRO holds, at least for English.

We are now finally in a position to return to (14), updated as in (45).

- (45) *Checking [uCase] on DP arguments:*
- (i) [uCase] checked & valued at first Merge → inherent Case value (e.g. DAT, GEN, ERG)
 - (ii) DP is A-Probed → structural Case value:
 - if Probe is specified for [uD, **uπ**], then **NOM/ABS** value
 - if Probe is specified as [uD], then **ACC** value
 - (iii) neither 1. nor 2. → [uCase] checked upon Transfer & no Case value

(45) shows that abstract Case (both inherent and structural) presupposes a (non)-trivial A-chain (i.e. a syntactic relationship). In this case, PF receives “instructions” from the computational system and a specific DP value obtains. In the absence of an A-chain, the DP is left with unvalued (though checked) [uCase], yielding ungrammaticality, unless a PRO.

5 Predictions and general implications

5.1 Some predictions beyond non-finite CP domains

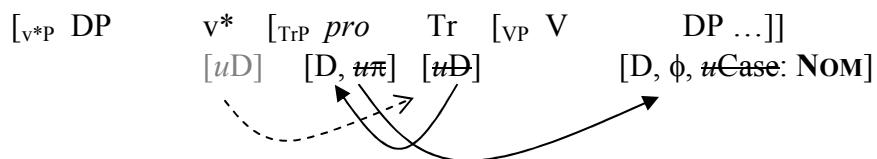
We have already seen contexts with identical Case valuation for both the subject and object (recall the Imbabura Quechua data in (13b), which is expected if T and v^* are not a priori associated with NOM and ACC, respectively). However, we might also expect contexts with ACC subjects in finite CPs and NOM objects with phasal v^* P. These predictions are indeed borne out.

Let us return to West Country varieties of English. These show what is referred to as “pronoun exchange”, specifically, use of NOM objects where one would expect ACC; see (46).

- (46) a. She pushed I down. (Newfoundland English, Ruth King, p.c.)
 b. Pass he over to me. (Newfoundland English, Ruth King, p.c.)

The typical explanation in the literature is that NOM replaces ACC whenever there is emphasis. Under our proposal, the object DP surfaces with NOM if and only if it is π -Probed. Since maximal rhematic focus obtains when a DP is deeply embedded within the predicate domain, we can assume that focused objects must stay in situ. In such cases, null expletive *pro* merges in Spec,TrP (the proxy domain of v^*), checking off [uD] and preventing object displacement. In addition, the expletive acts as a π -Probe, yielding NOM on the object, as shown in (47).

- (47) NOM objects with expletive *pro*:



5.2 General implications for Case

Following insights in Vergnaud’s (1977) seminal work, Chomsky (1980) proposes the Case Filter, initially viewed as a PF requirement given its focus on lexical NPs (and later A-chains).

Chomsky (1981) revises the Case Filter to include *wh*-traces and, with the PF motivation gone, capitalizes on work by Aoun (1979) suggesting instead that the Case Filter is motivated by LF, with Case rendering an argument visible for theta-role assignment. Lasnik (2008) revisits this split and, based on the fact that ellipsis (a PF process) “repairs” otherwise ungrammatical data, see (48), concludes that “the Case Filter is, in fact, a PF requirement,” Lasnik (2008:35).

- (48) a. *I alleged John to be a fool.
b. John, I alleged to be a fool.
c. Mary did [~~allege John to be a fool~~] too.

Specifically, while (48a) is ungrammatical since *John* fails to receive Case, (48b-c) are well-formed. If in (48b), A-bar movement satisfies the Case Filter (see Kayne 1984 and Bošković 1997), in (48c), deletion, a PF process, must be responsible for repairing the violation in (48a).

Lasnik’s (2008) conclusion is in line with work by Sigurðsson (2008, 2009, 2012) arguing for Case as a PF morphology property, with no LF or syntactic counterpart, but runs counter to proposals where Case is still assumed structurally relevant (Legate 2008). Furthermore, Lasnik’s (2008:35) final comment as to “what it means for items with no phonetic content (PRO, WH-trace) to have to obey a PF requirement” is left for future consideration.

The analysis in this paper supports Lasnik’s (2008) view while also maintaining the syntactic relevance of Case. Since the NOM versus ACC split is argued to be dependent on the presence versus absence of [u π], respectively, *Case valuation* is *syntactically determined*.

The presence of [uCase] as a deficiency on DP arguments is postulated for visibility requirements within the computational system. This follows once we observe that theta-marked DPs can be A-Probed, while non-argument DPs cannot. However, lacking semantic content,

[uCase] is irrelevant to LF on a par with agreement, so automatically checked upon Transfer.

On the other hand, *valuation* is relevant to PF. Feature complexes serve as instructions to morphological insertion, along the lines of DM models. Specifically, DP arguments must be A-Probed in order to lexicalize as PF cannot interpret the ‘?’ instruction in (49b) and ungrammaticality ensues.⁵⁶

(49) DP_θ [uCase]:

- a. inherent Case or A-Probed (lexical DP, referential *pro*, PRO)
→ specific valuation instructions sent to PF:
DP [uCase: K₁/ K₂/.../ K_n]
- b. not A-Probed (PRO only)
→ *DP_{lexical} [uCase: ?]:
no form (i.e. silence or crash) at PF

Returning to Lasnik’s last comment, A-probing is only irrelevant for null arguments like PRO. But the crucial point is that syntax is not privy to this irrelevancy as the computational component cannot tell whether something will be subsequently lexicalized or not. In effect, the Case Filter stands as initially postulated. But, at the same time, Case is still present in syntax, if only as a deficiency driving A-relationships and determining lexicalization.

6 Conclusions

This paper is an attempt at refining our understanding of Case licensing and valuation in view of recent Minimalist advances and DM models. It distinguishes between syntactic/abstract Case, construed as a [uCase] feature on DP arguments for computational visibility purposes, and morphological Case, seen as equivalent to DP lexicalization forms. It assumes that [uCase] is synonymous to the Case Filter and is driven by PF rather than LF considerations. While [uCase]

checks and erases upon Spell-Out, syntactic *valuation* (understood as A-Probing) of this feature is required for lexicalization purposes. Syntactic valuation obtains either if [uCase] is checked upon first Merge (inherent Case value) or if the DP is subsequently A-Probed (structural Case value). Morphological default Case forms cannot replace the Case Filter and are exclusively the domain of non-argument DPs.

Case licensing, understood as checking of [uCase], is shown to be a property of phase heads (i.e. points of Transfer) and not of agreement (or tense, or default options). Valuation as NOM or ACC is argued to be a dynamic property of the entire probing domain, rather than being associated with finite T and phasal v^* , respectively. Overall T (or I) is typically associated with NOM, and v^* with ACC, because the issue of finiteness and, implicitly, the presence of a [u ϕ] Probe on an inflectional head is sorted out at the level of the C phase and not the v^* phase.

Non-finite domains, while lacking agreement, are cross-linguistically seen to license both NOM and ACC lexical subjects, while certain predicate domains may license NOM objects. Empirical facts point towards a strong correlation between NOM and a π -Probe, while simple [uD] Probes trigger ACC.

In the absence of ϕ -features on (C)-T, the A-Probe is either [uD] or a null expletive, containing [u π]. The main empirical claim here is that uninflected phasal domains permit NOM subjects only in languages with null expletives, which, when present in the derivation, guarantee a NOM Case value on their associate and specific semantico-pragmatic interpretations. PRO remains invisible regardless of whether it receives a Case value in the computational system, with the exceptions discussed. Its silence is linked to its intrinsic feature-al composition (i.e. lack of inherent intension and extension), rather than to lack of a Case checking. Furthermore, unless marked for quirky Case, A-Probed PRO is cross-linguistically valued as NOM.

Endnotes

* Acknowledgements forthcoming.

¹ A line of reasoning hugely indebted to the work of Marantz (1991/2000).

² Also, data **I alleged John to be a fool*. (Lasnik 2008: 34) would be predicted grammatical.

³ ‘Subject’ refers to the structurally highest DP argument that is ‘active’ (i.e., can act as a Goal).

⁴ The Romanian clausal gerund seen in (1a) cannot occur in argument positions as it derives from the Latin gerund so has exclusively verbal properties (see Miller 2000 for Latin).

⁵ Checked features are striked and traces are indicated via angled brackets. The following abbreviations are used: Agr: agreement, DFT: default, AUX: auxiliary, ASP: aspect, SBJ: subjunctive, INF: infinitive, GER: gerund, IMP: imperative, DES: desiderative, PRES: present, PRF: perfect, PRTC: participle, PST: past, AOR: aorist, FUT: future, COP: copula, CL: object pronominal clitic, SCL: subject pronominal clitic, SU: subject, OBJ: object, SG: singular, PL: plural, NOM: Nominative case, ACC: Accusative case, DAT: Dative case, GEN: Genitive Case, ABL: Ablative Case, INSTR: Instrumental, ABS: Absolutive Case, ERG: Ergative Case, REFL: reflexive, M: masculine, F: feminine, N: neuter, LOG: logophoric, OP: operator, π : person, #: number, g: gender, and PE: a preposition associated with Rom. <e> type direct objects (Cornilescu 2000a).

⁶ To avoid any confusion given that in Old Italian *lui* was also sometimes used for the NOM (e.g. in Dante’s work), Mensching (2000:208) points out in Footnote 6 that Boccaccio strictly distinguishes between *lui/lei* (ACC) and *egli/ella* (NOM) in the Decameron.

⁷ Nothing hinges on the exact label of the verbal head assigning Case to a VP internal DP; this can be *v*, the verbalizing head of Marantz (2001), *T_o* of Pesetsky and Torrego (2004a), *Tr* of Bowers (2002), *AGR-O* of Lasnik (2003), or *V* of Chomsky (2007, 2008). Crucially, it is a verbal head involved in the stacking of events which is lower than the theta-assigning head

responsible for the insertion of subjects (i.e. v^* in Chomsky 2007, 2008). Following Bowers (2002), I use Tr for the complement of v^* and assume it is a functional head. See Pesetsky and Torrego (2006) for why only functional heads may act as Probes and establish Agree.

⁸ For finite derivations with expletive *pro* checking EPP ([uD] on T) in Spec,TP, the DP Goal is phi-Probed twice: once by the expletive, once by T. Either way, NOM is expected.

⁹ For ABS as equivalent to NOM, see also Bittner and Hale (1996).

¹⁰ For recent proposals on the relationship between Case and agreement, see Baker 2008, 2012, Landau 2004, Legate 2008, Markman 2009, Schütze 1997, 2001, & Sigurðsson 2012.

¹¹ ‘Agreement’ is used here to refer to ϕ -features and not object agreement that relates to the definiteness of the DP object (e.g. Hungarian, Bartos 1997, Coppock & Wechsler 2012, Farkas p.c., Slave, Rice 1989, Ndebele, Alboiu and Avery 2009). For example, in Hungarian, transitive verbs with specific objects use a paradigm that is distinct from that of transitive verbs with indefinite objects and intransitives; crucially, however, agreement is not with person and number (references cited above), so irrelevant here. I also discount head-marking languages of the Bantu and Iroquoian type, where object DPs are adjuncts (Baker 1996, 2008, Markman 2009).

¹² Note that under this division of labour, inflected infinitives in European Portuguese of the type in (i) from Raposo (1987: 86) would, in principle, qualify as ‘finite’.

- (i) Será difícil [eles aprovarem a proposta].
‘It will be difficult they to-approve-AGR the proposal.’

Terminology aside, the NOM subject in (i), *a proposta* ‘the proposal’, could be licensed by either agreement, the phase head, or both. See Ambar (2006) for phasal status of these infinitives.

¹³ These are T heads which lack inflection entirely throughout a particular paradigm. Cases of accidental gaps in an otherwise overt paradigm (e.g. English finite T) are not ϕ -featureless.

¹⁴ Various authors assume P to be external to CP but to have a role in activating Case-assigning properties of the infinitive Infl domain, properties intrinsically related to agreement (e.g. Haegeman 1985, Ledgeway 1998, Motapanyane 1995, Raposo 1989). This is untenable under the current approach which does not assume [u ϕ] on T in these CPs (see also Schütze 1997).

¹⁵ Absolute participial constructions typically show agreement in gender and number in Romance, on a par with participles in passives. Following Chomsky (2008), inflection on participles is simply an effect of agreement, with no significance in the syntactic computation. Consequently, ϕ -features (crucially, π) on (C)-T are not present; see also discussion for (6b).

¹⁶ With postverbal subjects, agreement is optional in some regional dialects. Preverbal subjects require agreement (see also Al-Balushi 2011 for Arabic): *Copiii vin/*vine mîine*.

¹⁷ A related argument can be made from the behavior of Russian numeral subjects. Bošković (2006) discusses agreement patterns of these nominals which can either be GEN(itive) (i.e., genitive of quantification) or NOM. While GEN subjects can occur with either a default singular or show plural agreement, if the numeral subject is NOM, agreement is obligatory.

- | | | | | | |
|-----|----|----------------|-----------|----------------------|-------|
| (i) | a. | Pjat' ètix | devušek | rabotali/rabotalo | tam. |
| | | five these.GEN | girls.GEN | worked.PL/SG | there |
| | b. | Èti pjat' | devušek | rabotali/ * rabotalo | tam. |
| | | these.NOM five | girls.GEN | worked.PL/SG | there |

The author argues against optional agreement and concludes that agreement forces NOM Case on both NOM and GEN numerals. In effect, ϕ -Probes trigger NOM values (pace Sigurðsson 2012).

¹⁸ Uriagereka (2006, 2008) also focuses on the relevance of π in relationship to Case. Note that under feature hierarchies as in Harley (1994) and (Ritter (1997), π is higher than, so can contain, # and gender. ϕ -completeness then is equivalent to containing the highest nominal feature, π .

¹⁹ Note that Manzini and Savoia (2008) put forth a non-feature-based theory where they equate NOM with D(efiniteness) and ACC with N projections in the sentential tree. While very different from the proposal here, there is common ground in that T and v are no longer the locus of these Case values and also, in that NOM presupposes some deictic property.

²⁰ For other references where Tense on T is a C attribute see also Dobrovie-Sorin (1994), Farkas (1992), Krapova (2001), Roberts and Roussou (2002), and Varlokosta (1994).

²¹ On the phasal status of DPs - which explains structural Case licensing in the Hungarian possessives - see Chomsky (2007, 2008), following Svenonius (2004), among others.

²² Note that argumental *pro* is referential and ϕ -complete (Chomsky 1981), so not an A-Probe.

²³ As a D category, null expletives are potentially also specified for [uCase]. Chomsky's (1995:288) standpoint is that expletives are Caseless nominals but Chomsky (2004), following Lasnik (1999), revises this assumption for *there*, so the issue is unclear, but not relevant.

²⁴ Note that Chomsky (2008:146) does not rule out Spec as Probe in "special cases" and Chomsky (2004: 114) takes expletive *there* to be "a simple head, not formed by Merge".

²⁵ Legate (1999) provides evidence against a null expletive in Irish.

²⁶ For further arguments for null expletive *pro* in Minimalism, see Cardinaletti (2004), Rezac (2004), Rizzi and Shlonski (2005), and Torrego (1998), among others.

²⁷ When *pro* is part of the lexical array, inserting it into the derivation has theoretical precedence over subject dislocation to Spec,TP since any lexical item present in the numeration must make it to LF as part of general conditions of Inclusiveness and Recoverability Uriagereka (2002).

²⁸ 'Specificity' here refers to definite DPs or indefinite DPs with a referential, partitive, or a generic collective reading (see de Hoop 1996). For some data, see (i) from Alboiu (2000:32):

(i) a. Prietena mea a obținut o bursă în Franța.

-
- friend.F.SG-the my AUX.3PL obtained a fellowship in France
 ‘My friend got a fellowship in France.’ [definite DP]
- b. O prietenă de-a mea e lingvistă.
 a friend.F.SG of-GEN.F my is linguist.F.SG
 ‘A friend of mine is a linguist.’ [referential indefinite DP]
- c. Doi pești sunt negri (, al treilea e roșu).
 two fish are black (, the third is red)
 ‘Two fish are black (the third is red).’ [partitive indefinite DP]

This specificity requirement holds for both unergative and unaccusative preverbal subjects in Romanian, as illustrated in (iia) and (iib), respectively.

- (ii) a. (*Cinci pisici) au mîncat (cinci pisici).
 (five cats) AUX.3PL eaten (five cats)
 ‘Five cats have eaten.’
- b. (*Cinci pisici) au plecat (cinci pisici).
 (five cats) AUX.3PL left (five cats)
 ‘Five cats have left.’

A preverbal subject would be licit in the above examples only if this DP could be understood partitively (i.e., as specific); in this case, there would be a set of known cats, out of which five are involved in the above predications. Unless the DP is somehow topical/‘anchored’ in the discourse (or contrastively focused – not shown here), it cannot appear preverbally. For similar observations on Romanian, see Cornilescu (1997, 2000b) and Dobrovie-Sorin (1994), a.o.

²⁹ This is further reinforced by the data in (i), discussed in Alboiu (2002:76), assuming Condition C to be operative at LF. See also Zubizarreta (1998), for Spanish.

-
- (i) a. Azi [profesorul lui Victor_i] l_i-a lăudat
today teacher-the his Victor CL.3SGM.ACC-AUX.3SG praised
‘Victor_i’s teacher praised him_i today.’
- b. * Azi l_i-a lăudat [profesorul lui Victor_i].
today CL.3SGM.ACC-AUX.3SG praised teacher-the his Victor

³⁰ Note that preverbal subjects are ruled out in Romanian infinitives; see (i):

- (i) [CP Pentru (*tu) a avea tu liniște], plecă.
[CP For (*2.SG.NOM) INF have 2.SG.NOM quiet] leave.PST.3SG
‘S/he left so that you can have peace of mind.’

³¹ Note that there is no problem with assuming that semantic and pragmatic factors can drive the derivation as long as these properties have grammaticized. Chomsky’s (2004) OCC feature is semantic in nature as are features such as Topic and Focus. In any case, in languages where preverbal subjects are semantico-pragmatically constrained, the EPP requirement must be assumed to check independently of these DPs. It is beyond the scope of this paper to explain why certain languages but not others resort to null expletives, but crucially, one must assume a split between the formative in Spec,TP and preposed subjects in languages such as Romanian. One direction might be to explore Cardinaletti’s (2004) two-fold split of preverbal subject positions into a position hosting the subject of predication (i.e., the ‘notional’ subject) and a purely formal position hosting the grammatical subject. Perhaps natural languages have the option of separating these positions or not. More specifically, a language like Romanian would allow for both positions, with *pro* occupying the EPP position and semantically relevant preverbal DP subjects occupying the subject of predication position. In the absence of a notional subject, the latter position would not project. But, crucially Spec,TP could always host expletive *pro*.

Conversely, languages such as English, which show no semantic restrictions on the DP in Spec,TP would *not* be assumed to distinguish between these two preverbal subject positions. A unique A-related position, i.e., Spec,TP, could perhaps also explain why some languages have to resort to more feature-ally specified expletives, like English *there*, instead. Note that such structural cross-linguistic asymmetries are mirrored elsewhere in the computational system. For instance, Pylkkänen (2008) argues that Japanese distinguishes between Spec,VoiceP and Spec,CauseP in the predicational domain, while English collapses these two positions. Note further that Rizzi and Shlonski (2005:13) also view expletives as formal devices required by “discourse conditions” or “communicative intentions” and Tomić (2006) argues for null expletives as a property of languages that are structurally pragmatically oriented.

³² Empirical evidence for its lack of phi-features comes from the fact that expletive *pro* can co-exist with post-verbal subjects in any person (e.g. (1a), for 1st person, (8a), for 2nd).

³³ Following Cardinaletti (1997), I take German *es* and Icelandic *það* to be generated in Spec,TP (IP) and moved to Spec,CP given that these do not invert with finite verbs (see also Sigurðsson 2008). Note also that any expletive assumed to be deictic (e.g. *there*, Kayne 2008), must bear a π feature, as person is a prerequisite for deixis (Bianchi 2008).

³⁴ A reviewer wonders about the Case value of *three men* in (i).

(i) I believed [there to be three men in the room].

I take its value to be ACC, as is typically assumed. This is ECM, so structural ACC is made available via [uD] discharged by matrix v*.

³⁵ I assume that LHM, as well as the presence of P with infinitives, is due to the syntactic relationship between C and its proxy head. This is either triggered by properties of C (see Roberts and Roussou 2002, Pesetsky and Torrego 2001, 2004a), or could be seen as a need of T

to access features of the phase head (e.g., ‘tense anchoring’, as in Ledgeway 1998, Poletto 2000, Varlokosta 1994 or A-related features, as in Belletti 1990, Rizzi 1982, Watanabe 1996).

³⁶ Absolute participial constructions can be viewed as a sub-type of the gerund construction, where a *be*-GER is replaced by a null Asp head: (ia), is semantically equivalent to (ib).

- | | | | | | |
|-------|-----------------------|--------------------|---------|------------------|--------------------|
| (i)a. | [_{CP} Odată | (fata / ea) | Ø | deșteptată | (fata / ea)], ... |
| | _{CP} once | (girl-the.NOM/she) | ASP | awoke. PRTC.FSG, | (girl-the.NOM/she) |
| b. | [_{CP} Fiind | (fata / ea) | <fiind> | deșteptată | (fata / ea)], ... |
| | _{CP} be-GER | (girl-the.NOM/she) | ASP | awoke. PRTC.FSG, | (girl-the.NOM/she) |

I assume that the unaccusative vP in (ia) is selected by a null Aspectual head which lacks the GER specification. Consequently, no head movement to C can ensue and a stative adverb is inserted for semantic clause-typing, as seen for infinitives. Case-licensing is not affected.

³⁷ Pires (2001) argues these are TP domains but Reuland (1983) shows they can extrapose, allow *wh*-extraction and permit epistemic adverbs, all of which point toward a C domain and CP status.

³⁸ *-ing* as a C head is far from new, as illustrated by some of Abney’s (1987) structures.

³⁹ Abney (1987) argues for verb raising to *-ing*. Standard raising tests do not support this, see (i):

- | | | |
|-----|----|---|
| (i) | a. | [Him not being (*not) what we had hoped for] did not matter. |
| | b. | [Her never being (*never) late again] made a huge difference. |

⁴⁰ For other DP related properties of gerunds, see McCawley (1988) and Pires (2007).

⁴¹ This view is in line with Chomsky’s (2008) analysis of gerunds as containing a [_D V-*ing*] head moving to C and yielding a C/D head, with either C or D projecting (see also Hiraiwa 2005). However, in our analysis, a category neutral *-ing* merges directly in C and is selected by D.

⁴² Evidence for CP-internal ACC Case assignment/checking comes from the inability of these ACC subjects to passivize (i.e. move to Spec,TP of the main clause) discussed in Cornilescu (2003:439). Compare (ia), containing a small clause participial, with (ib), containing a gerund.

- (i) a. He_i was found [_{SC} t_i dead / sleeping].
b. *He_i was regretted [_{CP} t_i leaving].

⁴³ Given the inherently indefinite nature of ACC-ing CGs (Portner 2002), I do not assume a phi-feature on the D head. Moreover, D, being indefinite, is non-phasal and so lacks any Case-licensing properties. Conversely, with POSS-ing gerunds, D is definite and presuppositional (Portner 1992), hence phasal and thus capable of checking (and valuing) Case. However, I do not discuss POSS-ing gerunds here as these do not expand to a CP domain (for discussion see Abney 1987, Chomsky 1981, Emonds 1970, Horn 1975, Moulton 2004, Pires 2001, Reuland 1983, among others). Given that sentences like *His eating all the cake bothered Mary* are felicitous in English, one must assume at least a v*P layer in POSS-ing gerunds (i.e., there is an external agentive argument, [D, φ:3SG.M, uCase:GEN], as well as an ACC object, *all the cake*, so the v* phasal layer is a must). Since this v*P layer fails to project to C (see cited literature), there cannot be an ACC or NOM subject. Rather, the subject has its [uCase] feature checked at the D phasal level and receives the inherent GEN/POSS value that phasal D heads bestow in English.

⁴⁴ I assume a similar explanation for Case variation in Latin gerunds. While subjects are mainly lexicalized as ACC, the postverbal subject in (10) is, unsurprisingly, NOM.

⁴⁵ Note that in standard modern Italian lexical subjects in uninflected CPs are restricted to Aux-to-Comp (LHM) constructions (Belletti 1990, Rizzi 1982), with preverbal subjects ruled out. This suggests different diachronic structures. Specifically, the left periphery in modern Italian non-finite CPs must have less available XP positions than in Old Italian and a single C head.

⁴⁶ I do not discuss cases where PRO bears the Case of its controller as, presumably, some Case transmission mechanism is at stake here, implementable in a variety of ways (e.g. Hornstein 1999, Landau 1999, 2008, Pires 2007, inter alia).

⁴⁷ See, for example, the impossibility to co-index *Dan* and *him* in *Dan_i saw him_{j/*i} in the car*; see also Baker (2008:31) for the relationship between referential indexing and phi-features.

⁴⁸ See also Sigurðsson (2008). See Chierchia (1989) for *de se* readings in OC.

⁴⁹ I follow Sigurðsson (2008) and assume that variable intension is what prevents PRO lexicalization, whether controlled or logophoric. Legate (2008: 86) revisits data from Freidin and Sprouse (1991) which shows that even a quirky Dative subject PRO cannot be lexicalized in Icelandic. Schütze (1997) also suggests that PRO's silence is semantic rather than syntactic.

⁵⁰ Note that the same logic carries over to the AG data.

⁵¹ NOM for PRO was (to the best of my knowledge) first proposed by Sigurðsson (1991).

⁵² See also Manzini and Roussou (2000). For an alternate view, see Landau (1999, 2001, 2004, 2008). Given that Landau's analysis relies on the presence of [u ϕ] in infinitives, his is not a viable option under the current analysis where these features are missing on non-finite C.

⁵³ See Baltin and Barrett (2002) for a similar claim in work in progress.

⁵⁴ Lasnik (1999) also proposes deletion must occur for convergence even if feature are not checked.

⁵⁵ Crucially, this also explains why, contrary to A-bar movement, A-movement operations are prohibited outside of their phasal domain (see Chomsky 2000 et seq.).

⁵⁶ Since agreement that is not syntactically valued surfaces as a default 3SG, one might wonder why something equivalent does not exist for Case. A tentative response would be that 3 person and SG are *universal* defaults while no such equivalents exist for Case.

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