Burzio’s Generalization, Markedness, and Locality Constraints on Nominative Objects

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Abstract
Recent research on Burzio’s Generalization converges on a surprising conclusion: what blocks accusative Case in unaccusative constructions has nothing to do with the Case or theta assigning abilities of unaccusative verbs; instead an overriding principle requires sentences to have a nominative Case. Yet there is little consensus about how to formulate the relevant principle, or how to deal with the many counterexamples in the form of sentences with no nominative. It is argued here that the relevant principle is markedness: when there is a choice of licensed Cases for a DP, the grammar selects the less marked Case. There are counterexamples because markedness is violable and may be overridden by other constraints. Markedness accounts for the nominative Case on unaccusative subjects and on the objects of dative and ergative subject constructions. However, nominative checking on objects may be blocked even when the subject is not nominative, due to locality constraints on Case checking domains. The ideal Case checking domain contains only one

1 I would like to thank Artemis Alexiadou, Josef Bayer, Ellen Brandner, Miriam Butt, Hubert Haider, Kyle Johnson, Jóhannes G. Jónsson, Joan Maling, John McCarthy, Gereon Müller, Halldór Sigurðsson, Carson Schütze, Sten Vikner, and Dieter Wunderlich for many interesting questions and helpful comments on this work.
DP, but languages may tolerate deviations from this ideal. This work is relevant to an important issue in both syntax and phonology of whether it is a closer source or target that matters in situations where like blocks like. In the situations discussed here, a closer potential target (DP) blocks Case checking.

1. Introduction

Burzio (1986) asks why, if verbs assign accusative Case to their objects, a DP that remains inside the VP in unaccusative constructions cannot have accusative Case:

(1) All’improvviso è entrato un uomo dalla finestra.

'suddenly entered a man from the window'

(Belletti 1988 (17))

Noting that unaccusative verbs lack an external (agent) theta role, Burzio links the ability of a verb to assign accusative Case to its ability to assign an external (agent) theta role:

(2) Burzio’s Generalization: (Burzio 1986:178)

All and only the verbs that can assign a θ-role to the subject can assign accusative Case to an object. [subject = external subject (agent)]

Burzio’s generalization is intended to extend to passives as well as to dative subject constructions as in (3) (under the assumption that experiencer subjects are internal arguments).³

(3) Barninu batnáði veikin. [Icelandic]

child-DAT recovered-from disease-NOM (*ACC)

'The child recovered from the disease.'

(Yip, Maling, and Jackendoff 1987:223)


³Despite the influential idea of Belletti (1988) that unaccusative subjects get partitive Case, it is now generally agreed that they actually get nominative Case (e.g. Burzio 1986, 1994, 2000, Sigurðsson 1989, 1992, Brandner 1993, 1995, Chomsky 1995, Abraham 1996, Haider 2000, Mahajan 2000). There have been many proposals for exactly how nominative can be assigned to or checked on an object (see Harbert and Toribio 1991 for one survey of proposals). Within the Minimalist Program, this is possible because Infl c-commands the object, with the Spec-head relation now subsumed under c-command (Chomsky 1998).
Perhaps the most surprising result that emerges from this subsequent literature is a radical change in the view of the nature of the generalization. There is considerable consensus now that the problem has nothing to do with theta roles, nor with the ability of verbs to license accusative Case. Instead (and despite many obvious counterexamples), the generalization that much current work is attempting to explain is that the object gets nominative Case when there is no (nominative) subject (e.g. Yip, Maling and Jackendoff 1987, Brandner 1993, 1995, Laka 1993, 2000, Legendre et al. 1993, Burzio 1994, 2000, Jónsson 1994, 1996, Haider 2000, Schütze 1997, Nakamura 1997, 1999, Mahajan 2000, Woolford 2001).

(4) New Descriptive Generalization (replacing Burzio’s 1986):

The object gets nominative Case when there is no (nominative) subject

Both empirical and theoretical factors have lead to the popularity of this altered view of what the relevant generalization is. Work such as Haider 1985, 2000, Haegeman 1986, von Stechow 1990, and Woolford 1993, 1997 questions the hypothesized linkage of agent and accusative on empirical grounds, showing that the presence of an agent is neither necessary nor sufficient for accusative Case assignment. As Mahajan (2000) and others point out, the presence of an external/agent subject is no guarantee of an accusative object, since agentive ergative subjects in Hindi can occur with nominative objects.

(5) Raam-ne rotii khaayii thii. [Hindi]
Ram-ERG bread(fem)-NOM eat(perf,fem) be(past,fem)
‘Ram had eaten bread.’ (Mahajan 1990:73)

Such constructions are counterexamples to the original version of Burzio’s generalization (Mahajan 2000), but they are actually predicted under the new descriptive generalization (e.g. Legendre et al 1993, Nakamura 1997, Woolford 2001). On the theoretical front, there has been little success in the search for an explanation for the link between agents and accusative postulated in the original formulation of the generalization. In fact, some scholars express a doubt that there could be any such link. Laka 2000, for example, states that “it is not clear what principle of principles could derive BG, because there is no explicit connection between external θ-role assignment and Accusative Case assignment besides the very one stated by the generalization itself (p. 105).”

The one proposal of which I am aware builds the original version of Burzio’s

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1 These references represent work in three areas that has converged on this common generalization: work on Burzio’s Generalization, work on nominative objects in dative subjects constructions, and work on Case in ergative languages.
Generalization into syntax by postulating that a single head (little v) assigns both an external theta role and also licenses accusative Case, but not on the same argument (Chomsky 1995, Holmberg and Platzack 1995); however as noted just above and as we will see in much greater detail in the next section, the presence of an external argument is neither necessary nor sufficient for the licensing of accusative Case. In contrast, one can imagine many ways of deriving the new descriptive generalization from some other principle of grammar, and there are many proposals in the literature attempting to connecting the need for a nominative to the ECP, to a need to realize agreement, or check the features of Tense/AgrS (e.g. Sigurðsson 1989, Solá i Pujols 1992, Brandner 1993, 1995, Laka 1993, 2000, Burzio 1994, 2000, Schütze 1997, and Mahajan 2000).

Nevertheless, there are many exceptions to any principle requiring every sentence to have a nominative. Because of this, I have argued against any such “need-a-nominative” approach in previous work (Woolford 1993, 1997), attempting instead to produce a more empirically accurate principle to block accusative Case assignment. However, that line of research comes up against two serious obstacles. First, it seems impossible to formulate a principle with no counterexamples; and second, it is not clear why the grammar should restrict accusative licensing in this way. Several factors lead me to adopt the majority view that some version of the idea that sentences should have a nominative is correct. First, the existence of counterexamples is expected if the relevant principle holds only when it does not conflict with overriding principles, just as the economy constraints of Chomsky 1995 and the violable constraints of Optimality Theory (Prince and Smolensky 1993, McCarthy and Prince 1993, 1999) do. Second, the question of why checking nominative should have a special status over checking accusative is answered if the relevant principle is markedness: the selection of nominative over accusative follows simply from the fact that nominative is a less marked Case than accusative.

The instances in which markedness is violated are interesting because they reveal the effects of other constraints that can affect Case. This paper will focus on instances in which nominative objects are blocked in Icelandic and Faroese. Icelandic disallows nominative objects when the subject has structural Case, but allows nominative objects with lexically Cased subjects. Faroese prohibits nominative objects with both structurally and lexically Cased subjects, except in passives. These blocking effects are the result of locality constraints on Case which prohibit nominative checking when the checking domain contains a closer DP.4

The question of exactly how to formulate the required locality constraints on Case checking domains is relevant to the more general theoretical question

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4 For a discussion of other types of constraints that can override Case markedness, see Woolford 2001.
of what kinds of closer elements count in situations where “like blocks like”, as in relativized minimality situations in syntax (e.g. Rizzi 1990, McGinnis 1998) or where intervening elements block vowel harmony in phonology (e.g. Jensen 1974, Benua and Smolensky 2001)). Much of this literature converges on the idea that what can block the relation between a “source” and a “target” is another potential source and/or target. In many situations in syntax and phonology, the question is complicated by the fact that intervening elements often qualify simultaneously as potential sources and as potential targets, thus making it hard to determine whether blocking is due to a closer source or target. Case checking may be able to shed some new light on this problem because there is no such ambiguity: the source is a head and the target is a DP. The blocking effects that are the focus of this paper are due to a closer potential target.

The claim here is that an additional DP inside the Case checking domain of a head disturbs the ideal one-to-one relation between heads and DPs in such domains. The presence of an additional DP in a checking domain is worse if it has a Case of the same type as the head is checking. That is, a closer DP with structural Case is a worse disturbance inside a structural Case checking domain than is a closer DP with lexical Case.

This paper is organized as follows. Insights from the literature on Burzio’s Generalization upon which this paper builds are summarized in Section 2. Section 3 presents the proposal that Burzio’s Generalization effects follow from markedness and demonstrates it with relevant examples. Section 4 formulates the constraints on Case checking domains that can override markedness and demonstrates how these constraints account for the relevant data patterns of Icelandic and Faroese. Previous approaches to the question of why nominative objects are sometimes blocked are discussed in Section 5. These include a locality parameter (Spec-head vs. c-command), multiple Case checking, and Relativized Minimality. Broader theoretical implications of this work, differences between Case and agreement, and questions for future research are the topic of Section 6.

2 Review of the Literature: Progress to Date

This section outlines the main points of progress in recent research on Burzio’s Generalization. We first look at exceptions to the original generalization that have lead researchers to question the role of agents/external arguments in the generalization. We then look at two attempts to reformulate the generalization to improve its empirically accuracy. Finally we turn to the broad range of work that abandons the idea that the problem is about how to prevent unaccusative verbs from licensing accusative Case, and replaces it with the idea that an overriding grammatical principle forces nominative to appear on the object if it does not appear on the subject.
2.1 Questioning the Role of Agents

In the original formulation of Burzio’s Generalization, the subject or agent theta role plays a crucial role. ‘All and only the verbs that can assign a θ-role to the subject can assign accusative Case to an object’ (Burzio 1986:178). The generalization predicts that

(6) Predictions of Burzio (1986):
1. No verb without an agent subject can assign accusative Case.
2. Any verb with an agent subject can assign accusative Case.

The subsequent literature points out exceptions to both of these statements:

2.1.1 Verbs without Agents Can Sometimes Assign Accusative Case

Although Burzio’s generalization correctly predicts that verbs with one internal argument cannot assign accusative Case, several scholars independently note that verbs with two internal arguments can assign accusative Case to one of these arguments (Haider 1985, 2000; Haegeman 1986; von Stechow 1990; Woolford 1993, 1997). Constructions cited to demonstrate this include psych verbs with two internal arguments (an experiencer and a theme), as in (7), and double object passives, as in (8). We see in (7b) that the second object of a psych verb has accusative Case, because it can be replaced by an accusative clitic. We see in (8) that the first object is the accusative pronoun.

(7) a. Questo *preoccupa* Gianni. (Belletti and Rizzi 1988 (98b))
   this worries Gianni
   ‘This worries Gianni.’

    b. Questo *lo* preoccupa. (Belletti and Rizzi 1988 (97))
   this him(ACC) worries
   ‘This worries him.’

(8) The watch was given him for his birthday. (some speakers accept)

In this respect, Burzio’s generalization is too strong: verbs without an external argument can assign accusative Case, to a second object.

2.1.2 Not All Verbs with Agent Subjects Assign Accusative Case

The presence of an agent/external subject does not guarantee that a verb can assign accusative Case. In languages where the agent subjects of transitive verbs are marked with ergative Case, we often find that the transitive object

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5 Passives will generally be set aside in this paper because the complexity of passive constructions cross-linguistically (see Baker 1988, Bresnan and Moshi 1990, Woolford 1993, Goodall 1993) suggests that several additional factors may be operating in passives so that a full account of these complex passive patterns is beyond the scope of this paper.
cannot be accusative. Bok-Bennema (1991) takes the verb’s inability to assign accusative Case as a hallmark of ergative languages, and the fact that ergative languages often present counterexamples to Burzio’s Generalization is noted in Mahajan 2000 and Woolford 1997.

(9) Raam-ne rotii khaayii thii.
    Ram-ERG bread(fem)-NOM eat(perf,fem) be(past,fem)
    'Ram had eaten bread.' (Mahajan 1990:73)

In this respect, Burzio’s original generalization is also too strong. It predicts that all verbs with agent subjects should assign accusative Case.

2.2 Reformulating the Generalization for Empirical Accuracy

In response to these exceptions to the original formulation of Burzio’s Generalization, Haider 1985 and Woolford 1993, 1997 attempt to reformulate the generalization to improve its empirical accuracy, while still maintaining the basic idea that unaccusative verbs must be prevented from assigning accusative Case. Both agree that whatever is responsible for Burzio’s generalization, it affects only one argument (as opposed to all internal arguments), and it has nothing to do with the thematic role of the subject. Under both reformulations, one of the verb’s arguments has to be denied structural accusative Case from that verb.

(10) If a verb has argument(s) needing structural case, one must get that case VP externally (Haider 1985).

(11) V cannot assign accusative Case to its highest argument without lexical Case (Woolford 1993, 1997).

The strength of these reformulations is their improved empirical coverage. They cover unaccusative constructions as well as constructions with lexically Cased subjects and/or objects. Moreover, they avoid incorrect predictions with respect to a range of constructions that are problematic for many of the alternative approaches that we will discuss below. Nevertheless, although these reformulations describe the generalization more accurately, they do not provide any intuitive explanation of why it should hold.

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An additional advantage of these reformulations is that they capture the fact that agent subjects cannot get accusative Case even if they are generated in a VP-internal position that would otherwise be eligible for accusative Case.
2.3 Replacing the Generalization

Once it is realized that the arguments that are denied accusative Case under Burzio’s Generalization typically surface with nominative Case, a very different way to approach the problem presents itself: reverse the assumptions concerning cause and effect. Instead of the original view that some principle blocks accusative Case licensing (and thus some other Case must occur instead), reverse it so what the relevant principle does is to force nominative to appear, with the consequence that accusative cannot. The majority of the attempts in the literature to account for the data covered by Burzio’s Generalization take some version of this latter approach. Let us briefly survey some of them.

Tsunoda (1981) proposes that there is a universal principle such that every clause has a nominative (or absolutive), because it is the least marked Case (although he notes that there are counterexamples). Other approaches try to tie the need for a nominative to some other principle of grammar. One approach to Case in unaccusative constructions starts with the assumption that all sentences need a subject. When there is no subject, as in unaccusative constructions, the object becomes the subject (either by a change in grammatical relations or (LF) Movement). Since subjects get nominative Case, this object-turned-subject will also (e.g. Perlmutter 1978; Abraham 1996). To extend that approach to constructions with dative and ergative subjects requires claiming that nominative objects are subjects at the level of representation where nominative Case is assigned. Another approach ties the need for a nominative Case to the EPP (Extended Projection Principle) which requires an external subject. This idea is proposed in various forms in Sigurðsson 1989, Solá i Pujols 1992, Burzio 2000, and Mahajan 2000. Because dative and ergative subjects can satisfy the original EPP, this approach essentially adds to the EPP the requirement that nominative must be checked. Along the same lines, Laka (1993, 2000) argues that in languages where Agr-S is active, (nominative-accusative languages) it must check all of its features, so that nominative must be checked.

Other approaches avoid the overly strong prediction that every sentence needs a nominative, since there are many known counterexamples. (For example, Icelandic allows sentences with one argument that takes the dative Case.) Brandner’s (1993, 1995) account requires nominative Case only when there is agreement (since sentences with a dative typically show no agreement). Harley (1995:214) formulates a Case assignment rule so that if one case feature is checked structurally in a clause, it is realized as Nominative/Absolutive. Yip, Maling, and Jackendoff (1987), Legendre et al. (1993), and Nakamura (1997, 1999).

1999) order the rules that assign Cases so that lexical Case assignment takes place first, followed by nominative and then accusative. Marantz (1992) also proposes an order in which Cases are assigned, depending on certain conditions such as the presence of another Case competitor.

A rather different approach to giving nominative priority over accusative is proposed by Haider (2000). He proposes that the effects of Burzio’s generalization are due to an economy principle: Minimize Licensing Checks. He argues that checking nominative Case on an object requires fewer checks than checking accusative Case, and thus using nominative Case is more economical than using the accusative. But as with any economy principle, there is no absolute requirement that nominative must always be checked.

The approach that I will argue for maintains the basic idea common to all of the proposals in this section, that some principle causes nominative Case to selected instead of accusative, when either Case could be licensed on an object. In addition, I take the view of Legendre et al. (1993), Haider (2000), and Nakamura (1997, 1999) that the relevant principle can be violated whenever it is necessary to obey some overriding principle. Finally, this approach incorporates the idea of Tsunoda (1981) that the reason for the priority of nominative is markedness: nominative is the least marked Case.

3 Proposal: BG Effects Stem From Markedness

The intuitive idea of this proposal is simple: if an object can be licensed for either nominative or accusative Case, it will surface with nominative, because the grammar prefers a less marked Case over a more marked Case (unless overriding constraints rule out the construction with nominative Case).

This simple idea could be integrated into the Minimalist Program (Chomsky 1995) by adding a ‘Least Marked Case’ constraint to the module of the grammar containing the violable constraints (e.g. economy constraints) which select the best of two (or more) otherwise legitimate versions of a sentence that remain after any inviolable constraints have applied. When there is a choice of licensed Cases for a DP, that Least Marked Case constraint would select the least marked of these Cases. To use that constraint, one would access the universal Case Markedness hierarchy:


(least marked) nominative < accusative < dative (most marked)

But, within Optimality Theory (Prince and Smolensky 1993, McCarthy and Prince 1993, 1999), notions such as „least” or „closest” are not to be incorporated into the formulation of constraints; instead they rather follow from the

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8 The latter two approaches allow the rule order to vary across languages.
architecture of the theory (see the discussion in McCarthy 2001, Sections 1.4.4 and 3.2.3). In addition, it is not necessary to consult the relevant hierarchy each time the constraints are used because the constraints are ranked in a universally fixed way determined by the relevant hierarchy. Thus within Optimality Theory, a series of simple violable Case markedness constraints in a fixed ranking does the job (Woolford 2001):

(13) Universally Ranked Violable Case Markedness Constraints
    *dative >> *accusative

Although markedness has effects on Case choice in many other situations (see Woolford 2001), the focus of this paper is on Burzio’s Generalization effects, where an DP inside the VP surfaces with nominative rather than accusative Case. Under this approach, Burzio’s Generalization reduces to:

(14) *accusative

To see how this works, let us first consider the effect of the constraint *accusative in unaccusative constructions such as (15) where the unaccusative subject remains inside the VP.

(14) All'improvviso è entrato un uomo dalla finestra.
    suddenly entered a man[NOM] from the window
    'Suddenly a man entered from the window.' (Belletti 1988 (17))

In such constructions, the VP-internal argument can be licensed for Case by either Infl (nominative) or V (accusative). Thus there are two possible versions of this sentence that satisfy the Case Filter, one with a nominative and one with an accusative:

(15) Competing Versions
    a. Suddenly entered a man-NOM from the window.
    b. Suddenly entered a man-ACC from the window. [violates *acc]

Markedness (*accusative) eliminates the (b) version, so that the version in (a) with nominative Case is what surfaces.

The situation is similar in dative subject constructions in Icelandic. The object can be licensed for either nominative Case (from Infl) or accusative Case (from V), just as in the unaccusative example above.

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9 The dative subject occupies the external subject position due to the EPP; Case no longer drives movement in the Minimalist Program (Chomsky 1998, 1999). Agreement is always with the nominative, but non-local agreement is subject to more stringent restrictions than Case is (see Section 6).
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(16) Barninu batnáði veikin. [Icelandic]
    child-DAT recovered-from disease-NOM (*ACC)
    'The child recovered from the disease.'
    (Yip, Maling, and Jackendoff 1987:223)

(17) Competing Versions
    a. child-DAT recovered-from disease-NOM
    b. child-DAT recovered-from disease-ACC [violates *acc]

In Icelandic, markedness makes the decision between these two otherwise legitimate versions of this sentence, rejecting the version with the more marked accusative and thus selecting the remaining version with a nominative object.10

Ergative subject constructions such as the one from Hindi below work in the same way. Either nominative or accusative Case can be licensed on the object, but markedness selects the version with nominative over the one with the more marked accusative object.11

(18) Raam-ne rotii khaayii thii. 
    Ram-ERG bread(fem)-NOM eat(perf,fem) be(past,fem) 
    'Ram had eaten bread.' (Mahajan 1990:73)

(19) Competing Versions
    a. Ram-ERG bread-NOM ...
    b. Ram-ERG bread-ACC ... [violates *accusative]

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10 ECM constructions show a similar pattern for most Icelandic speakers. Contrary to standard assumptions, nominative Case is available in infinitival complement clauses (Jónsson 1994, 1996, Taraldsen 1996, Schütze 1997) and it can surface on the object when the subject is dative (although some Icelandic speakers allow or prefer an accusative object in tenseless clauses with a dative subject (Sigurðsson 1993, Jónsson 1996)).

(i) Hann taldi [Jóni líka þessir sokkar].
    He believed John-DAT to-like these socks-NOM (Jónsson 1996)
    But when the ECM subject is accusative, it blocks a nominative object:
    (ii) Ég tel [stúdentana lesa bøkur].
    I believe the students-ACC to-read books-ACC (*NOM)

11 When the object is specific in Hindi, it does not surface with nominative Case; instead it is marked with the dative case morpheme -ko, which is often labeled accusative in this usage. This is just one of many types of counterexamples to the descriptive generalization that the object will be nominative whenever the subject is not. The existence of such counterexamples indicates that the principle that requires a nominative is violable, obeyed only when no other principles/constraints take precedence over it. See Woolford 2001 for a discussion of constraints that can take precedence over markedness in situations such as this, as well as in situations where lexically licensed Cases surface instead of less marked structural Cases.
Although markedness makes the decision in these instances, resulting in a nominative object, nominative objects are sometimes blocked due to overriding constraints.

4. Locality Constraints Blocking Nominative Objects

Although the generalization that the object is nominative when the subject is not often holds true, there are well-documented exceptions that have been noted by scholars working on the problem of nominative objects, especially in Icelandic and Faroese (e.g. Andrews 1982, Zaenen and Maling 1984, Barnes 1986, Collberg 1986, Sigurðsson 1989, 1992, 1993, Jónsson 1994, 1996, Taraldsen 1996, Schütze 1997). In Icelandic, dative subject constructions allow nominative objects, as in (a), as do constructions with a lexical accusative subject, as in (b):\

(20)a. Barðinu batnaði veikin. [Icelandic]
   child-DAT recovered-fromdisease-NOM (*ACC)
   ‘The child recovered from the disease.’
   (Yip, Maling, and Jackendoff 1987:223)

b. Mig søkir syfja.
   me-ACC seeks-3sg sleepiness-NOM
   ‘I am/feel sleepy.’ (Maling, personal communication)

But in constructions with a structurally Cased subject, as in ECM constructions where the subject gets structural accusative Case, the object cannot be nominative, as in (a) below. This contrasts with ECM constructions with a dative subject where the object can be nominative, as shown in (b).

(21) a. Ég hafði talið [Mariu vita svarið].
   I had believed [Mary-ACC to-know the answer-ACC(*NOM)]
   (Jónsson 1996:166)

12 Exceptions to this generalization in Icelandic have lexically Cased objects, as shown in Yip, Maling, and Jackendoff 1987.

(i) Drengina vantar mat.
   the boys-ACC lacks food-ACC(*NOM)
   ‘The boys lack food.’ (Andrews 1982:462)

German also allows nominative objects with both dative and lexical accusative subjects:

(ii) a. daß mir der Streit mißfällt
    that me-DAT the quarrel-NOM displeases

b. ... daß mich der Streit anödet
   that me-ACC the quarrel-NOM bores   (Bayer 2001)

13 Some Icelandic speakers allow an accusative object with a dative subject in such ECM constructions in the passive (Sigurðsson 1993, Jónsson 1996:170, Sigurðsson (personal communication)).
b. Hann hafði talið [Jóni lika þessir sokkar ].
    He had believed [John-DAT to-like these socks-NOM ]
    (Jónsson 1996:170)

Like Icelandic, Faroese also prohibits nominative objects when the subject has structural Case, as in ECM constructions (Barnes 1986:113), but Faroese differs from Icelandic in prohibiting nominative objects even when the subject has lexical Case (except in passives, as we will see below in section 4.4):

(22) Mær likar henda filmin.
    me-DAT likes this film-ACC (*NOM)
    'I like this film.' (Barnes 1986 (12))

The generalizations can be summarized as follows: Icelandic allows nominative objects when there is no structurally Cased subject, while Faroese prohibits nominative objects with any kind of subject (except in passives). The proposed theoretical approach to account for these patterns is presented in sections 4.1 and 4.2, and the analysis of these Icelandic and Faroese facts is presented in sections 4.3 and 4.4.

4.1 Locality Constraints on Case Checking Domains

The intuitive idea of the proposal to be presented here is that all languages try to maintain perfect checking domains. In a perfect checking domain, there is only one potential target of checking present in the domain. In terms of Case checking domains, this means there should only be one DP inside the Case checking domain of any head. The presence of an additional DP disturbs the ideal one-to-one relationship between head (source) and DP (target). However, it is worse to have an additional DP with the same type of Case being checked in the domain. That is, it is worse to have an additional structural Case inside a structural Case checking domain. The difference between Icelandic and Faroese is that Faroese insists on absolutely perfect Case checking domains (whenever possible), while Icelandic allows somewhat imperfect structural Case checking domains containing an additional DP with non-structural Case.

In the proposed account, two violable constraints push Case checking domains toward this idea state, by prohibiting sentences exhibiting strong and weak deviations from it. The stronger of these constraints bars any kind of additional potential target (additional DP) inside a Case checking domain. The weaker constraint bars any additional DP with the structural Case inside a structural Case checking domain.
(23) Violable Constraints on Case Checking Domains

a. 1-1Domain:Case  A Case checking domain must have a 1-1 relationship between source (head) and target (DP).

Assign one violation mark (*) for each additional DP inside a Case checking domain (other than the DP whose Case is checked by the head).

b. 1-1Domain:Str.Case  A structural Case checking domain must have a 1-1 relationship between source (head) and target (structurally Cased DPs).

Assign one violation mark (*) for each additional DP with a structural Case feature.

To avoid having a defective checking domain, as in a nominative object construction, a language can simply eliminate the domain entirely. That is, a language can choose not to use nominative Case on the object in such constructions, selecting accusative Case instead. There is no requirement that Infl check its nominative feature; if a Case feature goes unchecked, it is simply deleted (Chomsky 1995).

However, there is a good reason that languages may tolerate a defective Case checking domain. Using nominative Case on an object is better than using accusative Case in terms of markedness. Whenever there is a choice of Cases to license on a particular DP, languages try to select the least marked of the alternatives. Each language must choose between the goals of using less marked Cases and maintaining perfect Case checking domains.

The problem of defective Case checking domains would be worse if it were not for the fact that a Case checking domain need only be large enough to include the head and the DP whose Case that head checks. That is the reason that only a closer DP can block Case checking: a further DP generally need not be considered to be inside the relevant domain. The question of the size of Case checking domains is the topic of section 4.2, to which we now turn.

4.2 Case Checking Domains: The Region Included

It is necessary to distinguish the maximum potential size of a Case checking domain from its actual size in a particular construction. For example, we know that in languages such as Icelandic which allow nominative objects, the Case checking domain of Infl can include the entire clause, as in (24a). However, Icelandic also has ordinary nominative-accusative sentences and here we want to say that the Case checking domain of Infl is smaller, not including the VP and the accusative object, as shown in (24b). Moreover, there is no Case
Checking domain at all when there is no Case checked by the head (and the head’s Case feature presumably deletes). We see this in the Icelandic pattern in (24c) with a lexical accusative subject and an accusative object. Here Infl has no Case checking domain at all.

(24) Example Case Checking Domains for Infl: (domain is underlined)
   a. Subject-DAT   Infl   V object-NOM
   b. Subject-NOM   Infl   V object-ACC
   c. Subject-ACC   Infl   V object-ACC (no nominative, no domain)

Making a Case checking domain larger than necessary just leads to unnecessary problems, because it may then include an additional DP not checked by that head, unnecessarily violating the constraints established above. Thus, in the candidates to be compared below, each candidate will be shown with the best sized domain for its purposes. (That is, I will ignore additional candidates with other sized domains that incur more constraint violations.)

However, the size of Case checking domains is not completely flexible. In addition to a certain maximum size,14 a Case checking domain must include the entire region between two maximal projections.

(25) A Case checking domain must include the entire region between two maximal projections.

Crucially, the Case checking domain of Infl cannot exclude Spec Infl, while including a nominative object inside VP.

(26) Impossible Case checking domain for Infl:
   Subject-DATIVE   Infl   V object-NOM

We are now ready to see how this approach predicts when nominative objects are and are not allowed in Icelandic and Faroese.

4.3 Icelandic

As established above, the generalization that we need to capture for Icelandic is that a nominative object can occur with a lexically Cased subject, but not with a structurally Cased subject. What this means is that Icelandic will tolerate violations of the weaker 1-1 Domain constraint, in order to use the less marked nominative on an object, rather than the more marked accusative. However,

---

14 Case checking domains cannot cross certain boundaries such as PP or DP. In addition, they are bounded above by the fact that the head must c-command everything in its domain (where c-command is redefined as in Chomsky 1998 to include the specifier of a head in addition to what is traditionally covered by c-command).
Icelandic will only go so far, and will not tolerate violations of the stronger domain constraint to this end.

Speaking in more formal terms, Icelandic ranks the weaker version of the domain constraint above the markedness constraint, but ranks the stronger version of the domain constraint below the markedness constraint. The pattern we observe in Icelandic is produced by the following constraint ranking:

(27) Constraint Ranking in Icelandic

1-1Domain:Str.Case >> *accusative >> 1-1Domain:Case

When there is a dative subject, Icelandic must choose between the following two patterns, which differ in the choice of object Case, as well as in terms of Case checking domains. The (a) variant has a nominative object, but an imperfect nominative checking domain, containing an extra dative DP. The (b) variant has no deviant checking domain, but it uses a more marked object Case, accusative. (The Case checking domain of Infl is underlined.)

(28) a. *Subject-DAT Infl V Object-NOM (violates 1-1Domain:Case)
    b. Subject-DAT Infl V Object-ACC (violates *accusative)

We know from examples such as the one below, that Icelandic elects to violate the stronger domain constraint, 1-1Domain:Case in order to obey the markedness constraint, *accusative. Thus these two constraints are crucially ranked.

(29) Barninu batnð veikin. [Icelandic]
    child-DAT recovered-from disease-NOM (*ACC)
    'The child recovered from the disease.'
    (Yip, Maling, and Jackendoff 1987: 223)

The same point is made in the tableau below, which shows how each of the two candidate constructions fare under each of the constraints. The highest ranked constraint, the weaker checking domain constraint, has no effect on either of these candidates because neither has a structural Case checking domain containing an extra structurally Cased DP. The next constraint, the markedness constraint *accusative makes the decision in this instance.
(30) Icelandic dative subject construction

<table>
<thead>
<tr>
<th>Candidates:</th>
<th>1-1Domain:</th>
<th>*acc</th>
<th>1-1Domain:</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image1" alt="DP-dative Infl V DP-nom" /></td>
<td>Str.Case</td>
<td>*</td>
<td>Case</td>
</tr>
<tr>
<td><img src="image2" alt="DP-dative Infl V DP-acc" /></td>
<td></td>
<td>*</td>
<td></td>
</tr>
</tbody>
</table>

The game is over at this point since only one candidate, the best candidate remains. The lowest ranked constraint, the strong version of the domain constraint, never gets a chance to apply or to have any effect on the outcome.

When the subject has structural Case, such as in ECM constructions, Icelandic must choose between the following two candidate constructions. The (a) candidate has a nominative object, which is unmarked, but it has an imperfect nominative Case checking domain containing another DP with structural Case. The (b) candidate has a more marked object Case, but avoids any imperfect checking domains. The (a) candidate violates the weaker version of the domain constraint, while the (b) candidate violates the markedness constraint *accusative (more times than the (a) candidate).

(31) a.  **Subject-ACC Infl V Object-NOM** (violates 1-1Domain:Str.Case)

    b. *Subject-ACC Infl V Object-ACC  (violates *accusative)

The fact that Icelandic selects the (b) candidate and uses an accusative object in such ECM constructions indicates that Icelandic is willing to violate the markedness constraint in order to obey the weaker version of the checking domain constraint. Thus these constraints are also crucially ranked. The following tableau shows how each candidate fares under the three constraints:

(32) Icelandic accusative subject ECM construction

<table>
<thead>
<tr>
<th>Candidates:</th>
<th>1-1Domain:</th>
<th>*acc</th>
<th>1-1Domain:</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image3" alt="DP-acc Infl V DP-nom" /></td>
<td>Str.Case</td>
<td>*</td>
<td>Case</td>
</tr>
<tr>
<td><img src="image4" alt="DP-acc Infl V DP-acc" /></td>
<td></td>
<td>*</td>
<td></td>
</tr>
</tbody>
</table>
In the accusative subject ECM construction, the weaker version of the domain constraint makes the decision. The (a) candidate contains an additional structurally Cased DP (the accusative subject) inside the Case checking domain of Infl, so the (a) candidate is rejected in favor of the (b) candidate that lacks this flaw.\(^\text{15}\)

Let us now turn to Faroese, a language that is closely related to Icelandic, but behaves differently with respect to nominative objects.

### 4.4 Faroese

Faroese differs from Icelandic in disallowing nominative objects in dative subject constructions. Instead, the object is accusative (Barnes 1986, Taraldsen 1996). \(^\text{16}\)

\[(33)\]
\[
\text{Mær likar henda filmin.}  \\
\text{me-DAT likes this film-ACC}  \\
'I like this film'. \quad \text{(Barnes 1986 (12))}
\]

Why doesn’t markedness require a nominative object instead? Unlike Icelandic, Faroese insists on maintaining absolutely ideal Case checking domains, even if it means using less marked Cases. This results from ranking the strong version of the checking domain constraint above *accusative. The strong version of the domain constraint, 1-1Domain:Case, prohibits any additional DP inside the Case checking domain of Infl, regardless of its Case.

\[(34)\]  Constraint Ranking in Faroese: 1-1Domain:Case >> *accusative

When there is a dative subject, Faroese has to choose between the same candidates that Icelandic does, but because of its different constraint ranking, Faroese makes a different choice. Whereas Icelandic chooses the (a) candidate in order to avoid using a marked Case, Faroese chooses the (b) candidate to avoid an imperfect nominative checking domain.

\[(35)\]
\[
\begin{align*}
\text{a. } &\text{*me-DAT Infl likes this film-NOM [violates 1-1Domain:Case]} \\
\text{b. } &\text{me-DAT Infl likes this film-ACC [violates *accusative]}
\end{align*}
\]

The following tableau shows how these candidates fare under these constraints.\(^\text{17}\)

\[^{15}\text{See Woolford 2003 for a slightly more extensive discussion of the analysis of Icelandic, including a discussion of the status of traces and accusative checking domains.}\]

\[^{16}\text{There is no reason to think that the object Case in Faroese is anything other than ordinary structural accusative Case. It does not depend on the particular verb, nor does it depend on the semantic features of the object.}\]
(36) active construction in Faroese

<table>
<thead>
<tr>
<th>Candidates:</th>
<th>1-1Domain: Case</th>
<th>*acc</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. DP-dative Infl V DP-nom</td>
<td>*!</td>
<td></td>
</tr>
<tr>
<td>b. CP DP-dative Infl V DP-acc</td>
<td></td>
<td>*</td>
</tr>
</tbody>
</table>

In candidate (a), the presence of even this dative subject is intolerable inside the nominative checking domain of Infl because it violates 1-1Domain:Case. Faroese avoids this violation by not using a nominative object, thus removing the nominative checking domain in this construction. The alternative in (b) of using an accusative object is thus preferred, even though it involves a more marked Case, violating *accusative.

Up to this point, we have seen good evidence that the markedness constraint, *accusative is a violable constraint, but one might have the impression that the constraints on Case checking domains could simply be parameterized variants of an overriding inviolable domain restriction, with the strong variant active in Faroese and the weak variant active in Icelandic. However, when we look at passives in Faroese, we see evidence that the domain constraints can be violated even in Faroese, if there is no choice but to do so. In contrast to the active dative subject construction we just examined, passive constructions with dative subjects in Faroese take nominative objects (Holmberg 1994).

(37) a. Siggu dámar bókina. [active]
    Sigga-DAT likes the-book-acc (*NOM)
    'Sigga likes the book.'

    b. Siggu blivu givnar tríggjar bøkur. [passive]
    Suggu-DAT were given three books-NOM
    'Sigga was given three books.' (Holmberg 1994:47)

Why should there be this difference in the Case patterns of active and passive dative subject constructions? Although one might conclude that the answer must involve some structural difference (as suggested by Ellen Brandner), I will

17 The 1-1Domain:Str.Case constraint can be ranked anywhere with no empirical difference for this data, because every sentence that violates this weak version of the domain constraint also violates the strong version, 1-1Domain:Case.
suggest a much simpler answer here. The passive morpheme absorbs the accusative Case that would otherwise be available to the object (Baker 1988), and thus the only choice left for an object Case is nominative. This is the best choice because it is the only choice left, even though that makes the construction have an imperfect nominative checking domain, violating the 1-1Domain:Case. The fact that this domain constraint can be violated in Faroese supports the view that the locality constraints on Case checking domains belong in the portion of the grammar containing the violable constraints.

4.5 Typology

We have now seen that ranking the same constraints in different ways in different languages can produce at least two different Case patterns, the one that we see in Icelandic and the one in Faroese. The question now is whether other logically possible rankings of these constraints produce any other types of patterns, which would be predicted to occur in some languages. In addition, we want to know what kinds of patterns are predicted not to occur, because no possible ranking of these constraints can produce them.

Let us first look only at active constructions, and consider what range of Case patterns is produced if we rank the three constraints, *accusative, 1-1Domain:Case, and 1-1Domain:Structural Case, in every possible way. The result is only three empirically different patterns, despite the fact that there are six different logically possible rankings of these three constraints. The reason that all six rankings do not produce different empirical results is that when the weaker checking domain constraint is ranked below the stronger, the weaker constraint has no effect at all. That is because any sentence that violates the weaker constraint also violates the stronger constraint. Thus we need only consider rankings in which the weaker domain constraint is ranked higher than the stronger domain constraint. That gives us only 3 rankings to consider, which differ only in the ranking of *accusative, as lowest, middle, or highest constraint of the three:

(38) Predicted typological patterns for active constructions:

1. 1-1Domain:Str. Case >> 1-1Domain:Case >> *accusative
   Pattern: no nominative objects with any kind of subject

2. 1-1Domain:Str. Case >> *accusative >> 1-1Domain:Case
   Pattern: nominative objects with non-structurally Cased subjects, but not with structurally Cased subjects

---

18 The requirement that the passive morpheme absorbs accusative is also violable. See Sobin 1985, Baker 1988, Goodall 1993, and Woolford 1993.
3. *accusative >> 1-1Domain:Str. Case >> 1-1Domain:Case

Pattern: nominative objects with any kind of subject

The first pattern is what we see in Faroese active constructions: no nominative object with any kind of subject. The second pattern is what we see in Icelandic: nominative objects are possible except when there is a subject with structural Case. The third pattern we have not yet seen. That kind of language is predicted to allow nominative objects even in ECM constructions with structural accusative subjects. I know of no such language, but since ECM constructions are not that common across languages, this may not necessarily mean that this pattern is impossible. If it does not occur in any language, it may indicate that additional factors not considered here rule it out.

In contrast, there is another pattern that this approach (with these particular constraints, formulated as they are) predicts should never occur. There should be no language that allows nominative objects in the presence of a subject with structural Case, but not in the presence of a subject with non-structural Case. To my knowledge, no such language occurs.

With respect to what additional types are predicted when we consider passive constructions as well, the only prediction is that there could be a language like Faroese that also disallows nominative objects in the passive.

Let us now examine some alternative approaches in the literature to the problem of why nominative objects are sometimes blocked.

5 Other Approaches to Blocking Nominative objects.

In this section, we examine alternative three proposals to deal with the problem of why nominative objects are sometimes disallowed. These include a locality parameter, an approach in which some DPs get two Cases, and Relativized Minimality.

5.1 A Case Checking Locality Parameter: Spec-Head vs. c-command

Another way to try to capture the fact that some languages do not allow nominative objects would be to propose a parameter restricting nominative Case checking to Spec Infl in some languages. Versions of such a nominative Case parameter have been proposed by various scholars, including Sportiche (1988), Hoekstra and Mulder (1990), Masullo (1992).

Although ergative languages will not be discussed in this paper, the prediction is that the same sorts of Case patterns should exist among ergative languages. Hindi is an ergative language that allows nominative objects, as we saw above, whereas Nez Perce is a language that does not (Woolford 1997).

These scholars proposed this parameter to account for rather different data than is being discussed here. Hoekstra and Mulder (1990) use this parameter to derive the fact that in English, there
(39)  Parameter of Nominative Case Checking:

All languages allow nominative checking in a Spec-head relationship, but there is a parameter setting with respect to whether a language will also allow nominative Case checking by c-command (government).

But setting a parameter for a language as a whole does not capture the fact that some Icelandic and Faroese constructions allow nominative objects and others block them. Recall that Icelandic allows nominative objects with lexically Cased subjects but not with structurally Cased subjects. And Faroese allows nominative objects in passives but not in actives. Moreover, this parameter makes an apparently incorrect prediction: there should be languages in which the Case of an unaccusative subject depends on its position. That is, if an unaccusative subject remains in the VP, it would get accusative Case, whereas if it moved to Spec IP, it would get nominative. The prediction that unaccusative subjects do get accusative Case in some languages would be an exception to the core observation that motivated Burzio’s Generalization: unaccusative subjects cannot be accusative. I know of no such languages.

5.2 Multiple Case Checking

A very different approach to the question of why nominative objects are not always possible involves multiple Case checking. In order to maintain the idea that nominative Case is always available to the object unless it is checked by the subject, Schütze (1997) proposes that in ECM constructions with an accusative subject, the accusative subject also gets nominative Case (although you cannot see that Case, and it does not trigger agreement). That is meant to explain why ECM constructions with structural accusative subjects do not have nominative objects in Icelandic. To explain why ECM constructions with a dative subject do allow a nominative object in Icelandic (as we saw above in section 4), he suggests that dative subjects cannot also get nominative Case, because structural and lexical Case are incompatible on a single DP (because one requires agreement and one is incompatible with agreement).

The main problem with this proposal is that it is difficult to see how to extend it beyond the data Schütze discusses. Faroese dative subjects (which insertions are restricted to verbs that do not take external subjects, whereas there is no such restriction in Dutch. Dumitrescu and Masullo 1996 use this parameter to distinguish languages that do and do not allow non-nominative subjects. Thus because of the presence of dative subjects, both Icelandic and Faroese would set the parameter to allow nominative checking by c-command/government; thus the parameter would not account for differences between these languages with respect to when objects can be nominative.

One can find instances of passives where all VP-internal arguments remain accusative, but passives have additional complexities which will not be addressed here.
also do not agree) would have to be claimed to be able to also get nominative Case, in order to account for the lack of nominative objects. Moreover, that solution would not extend to Faroese passives, where nominative objects are allowed with dative subjects.

5.3 Deriving Case Locality From Relativized Minimality

A third alternative way to try block nominative checking on objects would be to make use of the idea that a closer head (rather than a closer DP) can block Case checking. Under Rizzi’s (1990) Relativized Minimality principle, a closer potential governor blocks a further governor. This explains, according to Rizzi, why V cannot assign Case inside a PP; P is a closer governor of the object of the preposition than V is. An additional consequence discussed by Hoekstra and Mulder (1990) is that Infl should be blocked from checking nominative Case on a DP inside VP because of the presence of V, a closer governor. They note that this problem disappears if V raises to Infl so that the two heads are equally close, so that the prediction is that only languages with V raising should allow nominative checking by government (c-command).

However, Hoekstra and Mulder 1990 point out (based on the behavior of French) that while V raising may be necessary before nominative checking into VP is possible, it is not sufficient. We can make the same point based on Icelandic and Faroese. We know V raises in Icelandic, so nominative objects should be possible in that language; but that does not explain why they are blocked when there is a lexical accusative subject. For Faroese, V Raising is optional according to Holmberg 1994, so nominative objects ought to be optional; yet we have seen that they are prohibited in active constructions, although they do occur in passives. Thus Relativized Minimality does not cover the Case locality effects that are discussed in this paper.

Interestingly, Relativized Minimality tries to unify what may be two rather different sorts of blocking effects. Relativized Minimality is intended to unify blocking in head government (e.g. Case) relationships with blocking in antecedent government (e.g. movement, binding) relationships. Calling both relationships government (standard in ECP work at the time) makes that unification seem very reasonable, but it may be better to separate these types of blocking effects and understand how their properties differ. In antecedent government relationships, the ‘governor’ is the target of the movement or binding relationship, whereas in head government relationships such as Case checking, the governor is the source. Seen in this light, Relativized Minimality is trying to unify the blocking effect of a closer source in one kind of relationship with the blocking effect of a closer target in another kind of relationship. What is being argued for in this paper is essentially that what Rizzi says about antecedent government (movement and binding relationships) is also right for head government (Case checking): a closer potential target can block all such relationships.
6 Theoretical Implications, Questions for Future Research

Reducing Burzio’s Generalization to markedness solves many of the empirical and theoretical problems associated with the original formulation of that generalization. Removing the hypothesized link between an external theta role and accusative Case removes the exception posed by ergative languages (where verbs with agents don’t take accusative objects) and psych verb constructions (where verbs without agents do take accusative objects) and it removes the need for the theory to link agents and accusatives in some way. Moreover, it allows the theory to capture the broader generalization that sentences often seem to require a nominative Case, providing an answer to why nominative should be special in this regard in comparison to other more marked Cases.

The exceptions discussed in this paper are argued to be the result of locality restrictions on nominative Case licensing. The solution proposed here has implications for the general topic of locality in syntax and phonology. In particular, it is relevant to the question of whether, in situations where ‘like blocks like’, it is an intervening potential source or target that blocks source-target relationships. Case licensing may provide a special insight into this issue because it always clear whether an intervening element is a potential source or target, unlike many other locality situations (e.g. movement, vowel harmony) where an intervening element could qualify as both a potential source or a potential target (e.g. see Rizzi 1990 and McGinnis 1998 on the issue of whether it is an intervening source or target that blocks Wh Movement). In Case licensing, the source is a head and the target is a DP. Rizzi (1990) discusses instances where a potential source (head) blocks Case checking, and we now see from the results of the present paper that a potential target (DP) can also block Case checking. This suggests that in any similar situation, we may expect to find blocking effects from either a potential source or a potential target.

We now see that a blocking element need not actually intervene between the source (head) and target (DP), contra the prediction of the formulation of Relativized Minimality in Rizzi 1990. A DP in Spec IP is sufficient to block Infl from licensing Case on an object, even though Spec IP does not intervene between the head and the object. Thus the proper approach must not define a potential blocker as intervening element. This problem is avoided if potential blockers are defined simply as elements that lie anywhere within the relevant domain.

An important question for future research is to what extent locality restrictions involving different phenomena in syntax and phonology (e.g. Wh Movement, NP Movement, Binding, Case licensing, agreement, vowel harmony) are the same. This work unifies Case checking with the antecedent government relationships discussed in Rizzi 1990 in the sense that a potential target can block the relationship. It will be interesting to see whether in movement and binding, as claimed here for Case, a potential target is more
likely to be a blocker if it shares some property with the real target. It will also be interesting to see whether the effect of the same potential target in the same context with differ across languages, depending on the relative ranking of the checking domain constraints with respect to other constraints with which they conflict.

One might expect agreement to be the most likely phenomenon to parallel Case checking, especially given the often observed parallels between nominative Case and subject agreement. However recent work indicates that agreement with nominatives inside VP may be subject to additional locality conditions. In Icelandic, for example, we have seen that nominative Case can be licensed on the object when the subject is dative, but agreement with nominative objects is more restricted according to Sigurðsson 1996. In general, recent work on agreement (summarized in Samek-Lodovici 2000) indicates that subject agreement is often more restricted when the subject remains inside VP.

7 Conclusions

There is a clear consensus in the recent literature that Burzio’s Generalization effects follow from a principle of grammar that requires sentences to have a nominative Case, but there has been little consensus on how to formulate that principle and little attention paid to the large number of exceptions. The approach argued for here involves markedness: whenever an object could be licensed for either nominative or accusative Case, markedness favors nominative because it is the least marked Case. There are many exceptions because markedness belongs with the violable constraints that are only obeyed when other constraints do not take precedence over them.

This paper focuses on exceptions where nominative licensing to the object is blocked due to constraints on Case checking domains. Ideally there is a one-to-one relation between a head and the DP whose Case that head checks. Any additional DPs inside the Case checking domain disturb this one-to-one relationship, and languages vary as to what sorts of deviations from the ideal domain they tolerate. Faroese insists on maintaining ideal Case checking domains in active clauses, but allows violations in passives in order to allow the passive morpheme to absorb accusative Case. Icelandic tolerates an additional DP in a structural Case checking domain as long as that additional DP does not also have structural Case.

This work is relevant to the general question of whether situations in which ‘like blocks like’ involve blocking by a closer potential source or target, or both. The Case blocking phenomena discussed here all involve a closer potential target (DP).
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