

In W. Browne et al. eds. 2003. *Formal Approaches to Slavic Linguistics* 11.  
Ann Arbor: Michigan Slavic Publications.

## Nominative Objects and Case Locality<sup>1</sup>

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The standard view of Government-Binding Theory that Case checking is limited to Spec-head configurations (Chomsky 1986) is replaced in the Minimalist Program by the idea that Case checking is allowed under c-command (Chomsky 2000, 2001). This change accommodates the fact that Infl can license nominative Case on an object when the subject has lexical Case (e.g., dative or ergative) in languages such as Icelandic and Hindi:

- (1) Barninu batnaði veikin. [Icelandic]  
child-DAT recovered-from disease-NOM  
'The child recovered from the disease.' (Yip et al.1987, 223)
- (2) Raam-ne roTii khaayii thii. [Hindi]  
Ram-ERG bread-NOM.FEM eat(perf, fem) be(past,fem)  
'Ram had eaten bread.' (Mahajan 1990, 73)
- (3) Siitaa-ko laRke pasand the. [Hindi]  
Sita-DAT boys-NOM,MASC like be(past,masc.pl)  
'Sita likes the boys.' (Mahajan 1991 (7))

While this is a desirable advance in Case Theory, an important problem remains that is the focus of this paper: Case locality is much more restricted in some languages. Although closely related to Icelandic, Faroese bans nominative objects in such constructions:

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<sup>1</sup>I want to thank Ellen Brandner, Maria Gouskova, Hubert Haider, Kyle Johnson, Jóhannes G. Jónsson, John McCarthy, Halldór Sigurðsson, Carson Schütze, and Sten Vikner for discussion of the issues in this paper. I would also particularly like to thank Joan Maling and Dianne Jonas for providing crucial additional data from Icelandic and Faroese.

- (4) Mær líkar henda filmin. [Faroese]  
 me-DAT likes this film-ACC (\*nom)  
 'I like this film.' (Barnes 1986 (12))

Similarly, although Nez Perce has ergative subjects like Hindi does, it prohibits nominative objects:

- (5) Háama+nm péé+'wi+ye wewúkiye+ne. [Nez Perce]  
 man+ERG 3/3+shoot+ASP elk +OBJ (\*nom)  
 'The man shot an elk.' (Rude 1988 (30))

Why can Infl check nominative Case on objects in some languages but not others? What is the relevant Case locality principle and how does it differ cross-linguistically? There are at least three possible answers to this question:

*Hypothesis A:* Some languages limit Case licensing to Spec-head configurations; others license Case under c-command.

Hypothesis A is claimed to be correct for cross-linguistic differences in agreement locality by Samek-Lodovici 2000.

*Hypothesis B:* In some languages, V blocks Infl from licensing nominative Case on a postverbal argument.

Hypothesis B is expected under Relativized Minimality (Rizzi 1990), where a closer head governor blocks a further one. More generally, it is expected if a closer source is what can block a source-target relationship (McGinnis 1998).

*Hypothesis C:* In some languages, a closer DP can block a head from licensing Case on a further DP.

Hypothesis C is consistent with the view of Revised Relativized Minimality (Rizzi 2001) and of Chomsky (2000) that a potential target is what can block access to a further target.

We will see that the Case facts do not support Hypothesis A or B, but do provide strong support for some version of Hypothesis C. One piece of evidence against hypotheses A and B is that they predict that nominative licensing of VP-internal unaccusative subjects should be blocked in languages like Faroese and Nez Perce, but this prediction is incorrect. Hypothesis C makes the right

prediction for unaccusative constructions: nominative licensing into the VP is not blocked when there is no closer DP.

The question now is why a closer potential target can block a Case checking relationship, even when it is not eligible to be a real target, and what produces the observed cross-linguistic variation in when Case is blocked. The proposal here is that the presence of a closer potential target is undesirable because it interferes with the goal of a perfect 1-1 source-target ratio inside the checking domain.

(6) *Ideally, the checking domain of a source should contain only one potential target.*

For Case checking, the presence of any additional DP inside the Case checking domain of a head spoils this ideal 1-1 source-target ratio. However, the less like the real target an additional potential target is, the easier it is for a language to view it as a tolerable inert element of the domain. Because of this, Icelandic and Hindi tolerate an additional lexically Cased DP in the nominative Case checking domain, but not an additional structurally Cased DP. In contrast, Faroese and Nez Perce insist on absolutely perfect nominative checking domains with no additional DPs with any Case.

It is not possible to simply parameterize this checking domain requirement because when we look at a broader range of data from Icelandic and Faroese we find that both languages manifest both the stronger and weaker form of this domain requirement in different contexts. A simple and straightforward account of both the cross-linguistic variation and the language-internal variation is possible if the locality principles are formulated as violable constraints as in Optimality Theory (Prince and Smolensky 1993, see McCarthy 2001 for an overview).<sup>2</sup> Under this view, all languages try to maintain perfect 1-1 checking domains whenever they can do so without violating higher ranked constraints; but languages differ with respect to what constraints outrank the relevant locality constraints.

What, then, can conflict with and override the goal of maintaining perfect 1-1 Case checking domains? The answer is markedness. Languages avoid marked Cases, using the least marked Case that can be licensed in any construction.<sup>3</sup> In dative and ergative subject constructions where the object can potentially be

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<sup>2</sup>This work builds on previous work on Case in the OT framework in Woolford 2001a and 2001b.

<sup>3</sup>See Woolford 2001a, 2001b for discussion of the role of markedness in Case choice, including how this produces the effects described by Burzio's 1986 Generalization.

licensed for either nominative or accusative Case, nominative is preferable as the less marked Case, but using nominative means tolerating an imperfect checking domain. Icelandic and Hindi use the less marked Case, tolerating the imperfect checking domain, while Faroese and Nez Perce use a more marked Case in order to avoid the imperfect nominative checking domain. Yet, Icelandic will also avoid an imperfect checking domain when this can be done without resorting to the use of a more marked Case, while Faroese settles for a less than perfect domain in the passive.

How does Russian fit into this picture? Russian manifests both the dative-nominative pattern of Icelandic and the dative-accusative pattern seen in Faroese. It is argued here that Russian belongs in the same typological class as Icelandic, regardless of whether the dative is a grammatical 'subject' or not, and that the dative-accusative pattern results from one of two special situations.

The domain approach to locality proposed in this paper answers several theoretical questions for us. We now understand why a subject DP in Spec IP can block nominative licensing of an object even though it does not intervene between Infl and that object: intervention is not necessary since what matters is only whether the checking domain is free of extraneous DPs. This overcomes a problem in the Relativized Minimality approach (Rizzi 1990, 2001), while incorporating the insight of Relativized Minimality that an element that is somewhat like the real target, yet not suitable itself as a target (what Rizzi calls a potential target) may block a source-target relationship, because it ruins an otherwise perfect checking domain. We also now understand why Chomsky's (2000) insight, that what matters is a closer target and not a further one, is correct even when what is at issue is only a potential target: a further (potential) target is irrelevant because it need not be contained inside the relevant checking domain.

If the approach presented in this paper is correct, it has important additional theoretical consequences for Case theory and for locality theory. It provides strong support for the view that nominative is a Case (and not the absence of Case) and that the same head licenses nominative wherever it appears in the clause. It also provides support for the new view in the Minimalist Program (Chomsky 2000, 2001) that grammar does not make specific reference to Spec positions.

This paper is organized as follows. Sections 1 and 2 give a more detailed look at the data of Icelandic and Faroese. The proposed domain approach to Case locality is presented in section 3 and its application to the Icelandic and Faroese data is shown in sections 4 and 5. The typological predictions of this approach are

laid out in section 7 and the status of Russian in this typology is the topic of section 7. Section 8 deals with theoretical implications of this approach for Case theory and locality theory.

## 1. Icelandic Data

Icelandic allows an object to get nominative Case when the subject (higher argument) has lexical Case (dative or lexical accusative).<sup>4</sup>

- (7) Barninu batnaði veikin.  
child-DAT recovered-from disease-NOM  
'The child recovered from the disease.'  
(Yip, Maling, and Jackendoff 1987, 223)

- (8) Mig sækir syfja.  
me-ACC seeks-3sg sleepiness-NOM  
'I am/feel sleepy.'  
(Maling, personal communication)

But when the subject has structural Case, the object cannot be nominative. Structural accusative subjects block nominative objects in embedded ECM constructions, unlike dative subjects.

- (9) Ég hafði talið [Maríu vita svarið ].  
I had believed [Mary-ACC to-know the answer-ACC(\*nom)]  
(Jónsson 1996, 166)

- (10) Hann hafði talið [Jóni líka þessir sokkar ].<sup>5</sup>  
He had believed [John-DAT to-like these socks-NOM ]  
(Jónsson 1996, 170)

Even the trace of a raised nominative is sufficient to block nominative licensing on the object of the lower clause, in contrast to the trace of a raised dative which

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<sup>4</sup>Although it has been claimed (e.g. Andrews 1982:472) that nominative objects only appear with dative subjects, and this is assumed to be correct in Woolford 2001b based on the lack of examples of an accusative-nominative pattern in the Icelandic literature, Joan Maling has kindly provided the example in (8) which shows that nominative objects also occur in constructions with a lexical accusative subject. While there are several Icelandic verbs that take an accusative-accusative pattern, there is good evidence that such verbs have lexical accusative Case on both subject and object (Yip, Maling and Jackendoff 1987).

<sup>5</sup>Infl can license nominative Case on the object in such infinitival constructions, despite the absence of tense. There are said to be some Icelandic speakers who allow an accusative object with a dative subject in such ECM constructions in the passive (Sigurðsson 1993, Jónsson 1996, 170, Sigurðsson (personal communication)).

allows a nominative object in the embedded clause (for some speakers):

- (11)a. Hann virðist [ t elska hana ].  
He-NOM seems [ t to-love her-ACC (**\*nom**)]  
'He seems [ t to love her].' (Andrews 1982, 437)
- b. Barninu virðist [ t hafa batnað veikin ].  
child-DAT seems [ t to-have recovered-from disease-NOM]  
'The child seems [ t to have recovered from the disease].'  
(Andrews 1982, 464)

Thus we see the generalization we need to capture in Icelandic: the object can be nominative when the subject has lexical Case (or is a member of a chain with lexical Case), but not when it has structural Case (or is a member of a chain with structural Case).<sup>6</sup>

## 2. Faroese Data

Although closely related to Icelandic, Faroese bars nominative objects in all active constructions. Even if the subject is dative or lexical accusative, the object will be accusative in Faroese:

- (12) Mær líkar henda filmin.  
me-DAT likes this film-ACC (**\*nom**)  
'I like this film.' (Barnes 1986 (12))
- (13) Meg droymdi ein so sáran dreyim.  
me-ACC dreamt one such painful dream-ACC (**\*nom**)  
'I had such a bad dream.' (Eythórsson 2000 (12))

Nevertheless, Faroese does not limit nominative to Spec IP, as we see from the following unaccusative example where nominative is licensed inside the VP because no closer DP is present.

- (14) Tað eru komnir nakrir gestir í gjár.  
there are-PL come-PL some guests-NOM.PL yesterday  
'Some guests came yesterday.' (Jonas, pers.comm.)

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<sup>6</sup>The fact that the type of Case of the closer DP matters rules out a wide range of approaches to this problem, including not only Hypothesis A and B, but any approach that does not make reference to both the presence of the subject DP and its Case.

Faroese is like Icelandic in that a closer DP is what blocks Case checking of a further DP, with the difference between the two languages being what kind of Case on that closer DP matters. For Icelandic, only a closer structural Case blocks nominative checking, but for Faroese, any closer DP does (in active constructions).

However in Faroese *passives*, a closer dative DP does not block nominative checking of a further DP:

(15) Sigg-u blivu givnar trýggjar bøkur. [Faroese passive]  
Sigg-DAT were given three books-NOM (\*acc)  
'Sigga was given three books.' (Holmberg 1994, 47)

(16) Bóndanum varð seld ein kúgv.  
The farmer-DAT was sold a cow-NOM (Barnes 2001, 127)

Under the account developed below, this will follow from the fact that the passive morpheme absorbs accusative.

### 3. The Proposed Account

Under the proposed account, all languages try to maintain perfect checking domains, but they all also try to use the least marked Cases available. When these goals conflict, one must take priority.

#### 3.1 Checking domains

A perfect checking domain has a 1-1 relationship between source and target. For Case, this means that the checking domain of a head should contain only one DP. Any additional DP in a Case checking domain ruins the ideal 1-1 source-target ratio. The following constraint enforces this 1-1 ideal for Case checking domains:

(17) **1-1 DOMAIN: CASE**      *The Case checking domain of a head may contain only one DP.*

When it is not possible to maintain a totally perfect checking domain, a language may enforce a less strict 1-1 requirement that looks only at Cases of the same type (structural versus lexical):

(18) **1-1 DOMAIN: STRUCTURAL CASE**

*The Case checking domain of a head with a structural Case feature may contain only one structurally Cased DP.*

The reason that a DP in Spec IP can block nominative object checking even though it does not intervene between Infl and that nominative object is that it is an extra DP inside the checking domain. Intervention is irrelevant. A DP in Spec IP is necessarily inside the checking domain of Infl under the following natural assumption:

(19) *The boundaries of a checking domain are maximal projections.*

This rules out the possibility that the Case checking domain of Infl could stop at I', excluding a DP in Spec IP. Under this approach, there is no need to refer to (or define) 'closer' in order to capture the descriptive generalization that a closer DP can cause problems. A further DP never causes problems because it is outside the optimally sized checking domain.

A Case checking domain need only be large enough to include the head and the DP being checked. The nominative checking domain for a nominative object necessarily includes the VP, but the checking domain for a nominative in Spec IP can be smaller, excluding VP.

(20) Possible sizes of nominative Checking domains:

- (i) no domain at all (if no nominative is being checked)<sup>7</sup>
- (ii) domain includes the area between IP and VP, but not VP
- (iii) domain includes the entire clause (or more in ECM)

The best option is to use the smallest domain that still includes both the source and the target. Making a Case checking domain larger than necessary creates unnecessary violations of the 1-1 domain constraints by causing the domain to include extra DPs. Languages may choose not to have a nominative checking

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<sup>7</sup>The nominative feature of Infl may simply be deleted if it is not checked. There is no requirement that heads check their features.

domain at all if the alternative is to tolerate an imperfect domain containing an extra DP.<sup>8</sup>

### 3.2 Markedness

We come now to the question of why languages ever tolerate imperfect Case checking domains. They do so in order to achieve the goal of using a less marked Case. Given a choice between two licensed Cases, a language will use the less marked Case if possible. The relative markedness of the different Cases is expressed by a Case markedness hierarchy:

(21) Case Markedness Hierarchy:

nominative < accusative < dative

In many syntactic frameworks, it would be appropriate to formulate the principle we need in a very direct way that simply describes the work that needs to be done:

(22) Case Markedness Principle:

*Whenever there is a choice of licensed Cases on a DP,  
choose the least marked Case.*

In Optimality Theory (Prince and Smolensky 1993, Woolford 2001a), this work is done by a family of violable Case Markedness constraints with a fixed ranking:

(23) Case Markedness Constraints:

\*dative >> \*accusative >> \*nominative.

The CASE MARKEDNESS PRINCIPLE or \*ACCUSATIVE is what is responsible for the fact that unaccusative subjects do not get accusative Case (Burzio's 1986 Generalization), as shown in Woolford 2001a,b.<sup>9</sup> When no additional DP present in the sentence, nominative can be licensed on an unaccusative subject inside the

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<sup>8</sup>In the examples discussed below, the nominative checking domain will be indicated by underlining.

<sup>9</sup>There is widespread agreement in the Case literature that some principle causes nominative to be preferred over accusative, but little agreement as to what that principle is (see the discussion and references in Reuland 2000 and Woolford 2001b). The explanation argued for in Woolford 2001a, 2001b is simply markedness.

VP while maintaining a perfect Case checking domain. So nominative must be selected over accusative.<sup>10</sup>

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

In contrast, when a higher DP is present in the clause, nominative licensing to the object can be done with an imperfect Case checking domain. Thus it is the relative ranking of the domain constraints and the markedness constraint that produces the differing Case patterns in Icelandic and Faroese, as we will see in detail in the sections below.

### 3.3 Passive Absorbs Accusative

One additional constraint accounts for the fact that Faroese passives differ from Faroese actives. The relevant constraint is essentially developed in Baker (1988), who argues that only some languages require the passive morpheme to absorb accusative Case.

#### (25) PASSIVE ABSORBS ACCUSATIVE

The passive morpheme must absorb an accusative Case from the verb to which that morpheme attaches.

When the passive morpheme absorbs the accusative Case that would have gone to the object, there is no longer a choice of Cases that can be licensed on that object and that object can only get nominative. With no choice, the language is forced to tolerate an imperfect nominative Case checking domain, as we see in the detailed analysis of Faroese in section 5.

Let us now see how these constraints, when ranked differently, predict the patterns of Icelandic and Faroese.

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<sup>10</sup>Although Belletti's 1988 proposal that unaccusative subjects that remain inside VP get partitive Case has been quite influential, there is now fairly general agreement in the literature that Burzio's 1986 original claim is correct, that unaccusative subjects that remain inside VP get nominative Case (see Woolford 2001b and the references cited therein).

#### 4. Icelandic Analysis

Our account needs to capture the fact that Icelandic allows a lexical Case such as dative inside the nominative checking domain, but not a structural Case such as accusative. These priorities are captured by the following constraint ranking:

(26) Icelandic constraint ranking:

1-1 DOMAIN: STRUCTURAL CASE >> \*ACCUSATIVE >> 1-1 DOMAIN: CASE

To demonstrate this, we will compare the way that the Case patterns that actually occur in Icelandic fare with respect to these constraints with the way that the best alternative Case patterns fare. The following tableau shows the competition between the two best candidate Case patterns for a sentence with a dative subject such as:

(27) Barninu batnaði veikin.  
child-DAT recovered-from disease-NOM  
'The child recovered from the disease.' (Yip, et al. 1987, 223)

The (winning) dative-nominative pattern shown below in (a) and the alternative (losing) dative-accusative Case pattern in (b) are the two best candidates in that both satisfy the Case filter and both maintain the lexically selected dative (which Icelandic requires). The nominative checking domain is indicated in candidate (a) by underlining. That checking domain necessarily contains both the dative and nominative DPs because its upper boundary is the maximal projection IP. In the dative-accusative pattern in (b), there is no nominative checking domain since no nominative is checked, but there is an accusative checking domain containing an accusative (and a trace of the dative).<sup>11</sup>

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<sup>11</sup>The (b) candidate in (28) would violate the 1-1 DOMAIN: CASE constraint with respect to the checking domain of V if the trace of the dative inside VP were treated as a dative. But traces inside VP are ignored by these Case checking domain constraints, which does not surprise us given the standard assumption that traces of NP movement are Caseless. Nevertheless, we will see below that traces in Spec IP have a different status.

(28)

Candidates:	1-1 DOMAIN: STR. CASE	*ACC	1-1 DOMAIN: CASE
☞ a. DP-dative DP-nom			*
b. DP-dative DP-acc		*!	

Since neither candidate has a domain with two structural Cases, neither violates the highest ranked constraint, 1-1 DOMAIN: STRUCTURAL CASE. Both candidates are then subjected to the next constraint, \*ACCUSATIVE, which eliminates the (b) pattern because it contains the more marked accusative. (This fatal violation of the constraint is indicated by \*!). This leaves only one candidate, (a), which is thus the winner. (The best candidate is indicated by the pointing hand: ☞). The fact that the (a) pattern has an extra DP inside the nominative checking domain, violating the lowest constraint, is tolerated because the decision as to the best candidate is made before this constraint is even consulted. This establishes that \*ACCUSATIVE is crucially ranked above 1-1 DOMAIN: CASE in Icelandic.

Now let us turn to constructions with a structural accusative subject. This account correctly predicts the that an accusative subject in an ECM construction does not occur with a nominative object, in contrast to what happens with a dative subject:

(29) Ég hafði talið [Maríu vita svarið ].  
I had believed [Mary-ACC to-know the answer-ACC (\*nom)]  
(Jónsson 1996, 166)

(30) Hann hafði talið [ Jóni líka þessir sokkar ].  
He had believed [ John-DAT to-like these socks-NOM ]  
(Jónsson 1996, 170)

That is, Icelandic will not tolerate a structurally Cased subject inside the nominative checking domain just to avoid an accusative object. In formal terms, the 1-1 DOMAIN: STRUCTURAL CASE constraint eliminates the (a) candidate with a nominative object before the \*ACCUSATIVE constraint has a chance to eliminate the (b) candidate because of the additional accusative.

(31) ECM construction

Candidates:	1-1 DOMAIN: STR. CASE	*ACC	1-1 DOMAIN: CASE
a....[Mary-acc ...answer-nom]	*!	*	*
☞b....[Mary-acc ... answer-acc]		**	

Since the highest ranked constraint eliminated all but one candidate, the two lower ranked constraints have no say in this competition.<sup>12</sup>

Having now seen how these constraints, ranked as they are, produce these Case patterns of Icelandic, let us turn to an interesting additional result that falls out automatically from this approach. In the following construction, there are two different possible sources of nominative Case for the object: the Infl of the upper clause or the Infl of the lower clause. Empirically, we can tell that it is the lower Infl that licenses the nominative on the embedded object from the fact that it is ungrammatical for the upper clause to show agreement with the nominative object of the lower clause, as we see in (32b).

(32)a. Mér fannst [henni leiðast þeir.]  
 me-DAT seemed-**3sg** [she-DAT be-bored they-NOM]  
 ‘I thought she was bored with them.’ (Taraldsen 1995 (39))

b. \*Mér fundust [henni leiðast þeir.]  
 me-DAT seemed-**3pl** [she-DAT be-bored they-NOM]  
 ‘I thought she was bored with them.’ (Taraldsen 1995 (40))

Yet we know that the Infl of the upper clause is capable of licensing nominative on the subject of the lower clause in ECM constructions because of examples such as the following where the matrix verb can agree with the nominative from the lower clause:

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<sup>12</sup>Because the next constraint, \*accusative, would have made the opposite decision, 1-1 domain: structural Case is crucially ranked above \*accusative in Icelandic. Note that it is also crucial here that if there is a VP-internal trace of the subject, it does not count as a second structurally Cased DP inside the accusative checking domain of the verb.

- (33) Mér hafa sýnst [mennirnir vera gagnrýndir ómaklega].  
 me-DAT have seemed [the men-NOM to-be criticized unjustly]  
 ‘It has seemed to me that the men are unjustly criticized.’  
 (Jónsson 1996, 171)

Since we have seen that Icelandic tolerates a dative inside the nominative checking domain, should we expect the nominative from the upper clause to be able to license the object in the lower clause? We might if there were a simple parameter setting in Icelandic to allow lexical Case in nominative checking domains. However, the second dative in the domain makes a crucial difference. We get that correct prediction from the violable constraints established above. The second dative in the nominative checking domain of the matrix Infl in the (a) candidate in the tableau below makes it violate the 1-1 DOMAIN: CASE constraint twice, whereas this constraint is only violated once by the (b) candidate in which the embedded Infl checks the object’s nominative Case. Thus the (b) candidate wins.

(34)

Candidates:	1-1 DOMAIN: STR. CASE	*AC C	1-1 DOMAIN: CASE
a. DP-dat I [DP-dat DP-nom]			**!
b. DP-dat [DP-dat I DP-nom]			*
c. DP-dat [DP-dat DP-acc]		*!	

Under this account we see that Icelandic does not simply ignore datives inside nominative checking domains, but rather only tolerates a dative when it is necessary to do so in order to satisfy a higher ranked constraint. In this example, it is necessary to tolerate one dative (in the lower clause) in order to use a nominative (rather than an accusative as in (c)). But there is no advantage to tolerating the second dative that would be required if the matrix Infl did the checking as in (a).<sup>13</sup>

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<sup>13</sup>Taraldsen 1995, Schütze 1997, and Chomsky 2000 discuss the problem of why agreement with the upper Infl is blocked in examples like (32b) and conclude that the intervening dative creates a minimality violation. However, an intervening dative does not block nominative licensing in examples such as the following discussed by Holmberg (2001).

Let us now turn to Raising constructions, which provide information about how traces are treated by the domain constraints. The trace of a raised dative allows a nominative object, as shown in (35a), but the trace of a raised DP that gets nominative Case in its raised position does not, as in (35b).

- (35)a. Barninu virðist [ t hafa batnað veikin.  
 child-DAT seems to-have recovered-from disease-NOM  
 ‘The child seems [ t to have recovered from the disease].’  
 (Andrews 1982, 464)
- b. Hann virðist [ t elska hana ].  
 He-NOM seems to-love her-ACC (\*nom)  
 ‘He seems [t to love her].’ (Andrews 1982, 436)

Thus we see that domain constraints treat the trace of the raised DP as if it has the Case licensed on that chain. The weaker domain constraint tolerates the dative trace in (35a) below, but is violated by the presence of the nominative trace in Spec IP in (35b).

(36) Raising Construction

Candidates:	1-1 DOMAIN: STR. CASE	*ACC	1-1 domain: Case
a. DP-nom ... [ t <u>DP-nom</u> ]	*!		*
b. DP-nom ... [ t DP-acc ]		*	

For (35b), the candidate pattern with a nominative object in (a) shown below is

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- (i) Það hafa einhverjum strákur verið gefnar gjafir.  
 there have-pl some boy-DAT been given presents-NOM  
 ‘Some boy has been given presents.’

One might explain away this counterexample by arguing that an intervening dative within the same clause would not count because of the MP assumption that the subject and object of the same clause are defined as equidistant and thus neither counts as closer to a licensing head within that clause: but, while that approach works for Icelandic, it could not be extended to Faroese where a dative subject *does* block a nominative object within the same clause. Nevertheless the intuition is correct that the problem in (32b) stems from the presence of the dative subject of the embedded clause. In the account presented here, we see why only this dative and not other datives that make a difference for nominative licensing: it is because tolerating other datives leads to a payoff in markedness, whereas there is no benefit to be had from tolerating this dative inside the checking domain of the upper Infl.

rejected due to the presence of the nominative trace inside the nominative licensing domain in the lower clause. That leaves the (b) candidate pattern with the accusative object as the winner. An important fact about how these domain constraints treat traces involves an asymmetry between traces in Spec IP and traces inside VP. In the examples above, there is presumably an additional trace of the raised subject in its base position inside VP. Yet, this trace is ignored when the checking domain of V is evaluated. If it were not ignored, then the (b) candidate would also violate the 1-1 DOMAIN: STRUCTURAL CASE constraint because of the nominative inside the checking domain of V. This would produce in a tie between candidates (a) and (b) that would then be broken by the next lower constraint, \*ACCUSATIVE, resulting in (a) as the winner rather than (b). We thus see that there is a crucial contrast in the way that traces in Spec IP are treated by the domain constraints and the way that traces inside VP are treated. Traces in Spec IP act as if they have the Case of their chain whereas traces inside VP behave as if they have no Case. Although there is strong empirical evidence for this contrast, we will not be fully satisfied until we understand the theoretical basis of this contrast. I will briefly discuss two possible explanations for this asymmetry, but will leave the question open for now.

This question of why traces in VP are ignored when evaluating the accusative checking domain of V arises only under the assumption that V checks the Case of both dative and accusative object and does so within in the same maximal projection. If there are actually different Case checking domains within VP, separated by maximal projections through which V raises, then the problem is solved because different domains are involved. A variant of this situation would involve different heads checking the Case of a dative object and an accusative object, again in different domains.

A more radical possibility involves the EPP and the PF interface. Imagine that traces can be deleted at the PF interface unless they play some crucial role there. Traces in theta positions are crucial at LF for semantic interpretation, but they could be deleted at the PF interface. Now consider the possibility that the EPP (Extended Projection Principle) that requires Spec IP to be filled is checked at the PF interface and that the PF interface is also where the decisions about which Cases to use are made. Then we would expect the result we get, that traces in Spec IP which satisfy the EPP could not be deleted and thus would count in evaluating Case checking domain constraints, whereas traces inside VP could be deleted at PF and thus would be ignored by these domain constraints. If this approach is on the right track, we may find that a similar account works for other kinds of subject-object asymmetries involving traces.

## 5. Faroese Analysis

Although closely related to Icelandic, Faroese differs from Icelandic in barring nominative objects in all active constructions:<sup>14</sup>

(37) Mær líkar henda filmin.  
me-DAT likes this film-ACC (**\*nom**)  
'I like this film.' (Barnes 1986 (12))

(38) Meg droymdi ein so sáran dreym.  
me-ACC dreamt one such painful dream-ACC (**\*nom**)  
'I had such a bad dream.' (Eythórsson 2000 (12))

This pattern results from the same constraints we saw in Icelandic, just ranked differently in Faroese. In Faroese, it is more important to avoid imperfect Case checking domains (with a dative inside a nominative domain) than it is to avoid using the more marked accusative Case. This constraint priority is expressed by ranking the stricter domain constraint above \*ACCUSATIVE.

(39) Faroese ranking: 1-1 DOMAIN: CASE >> \*ACCUSATIVE

Since the weaker domain constraint is always violated whenever the stronger one is, these constraints are in a stringency relationship and it makes no empirical difference here where the weaker constraint is ranked.

What Faroese does to avoid imperfect nominative checking domains is simply not to have a nominative checking domain when that domain would be imperfect. As we see in the tableau below, the (a) candidate with a nominative object is rejected due to the extra Case inside the nominative checking domain.

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<sup>14</sup>To account for this difference, Sigurðsson (in press) proposes that dative subjects in Faroese (but not Icelandic) also get nominative Case, making nominative unavailable to the object. Faroese is said to parallel Korean which can have what looks like the nominative Case morpheme attached to a dative subject:

(i) Swunhi-eykey-ka Yenghi-ka cohta.  
S. -dative-nom Y. -nom likes  
Swunhi likes Yenghi. (Schütze 1996 (1c))

One problem with using this Korean construction as a model for Faroese is that the Korean construction does not have an accusative object. Schütze (1996) analyzes this use of the *-ka* morpheme attached to the dative as a focus marker.

(40)

Candidates:	1-1 DOMAIN: CASE	*ACC
a. <u>DP-dative DP-nom</u>	*!	
☞ b. <u>DP-dative DP-acc</u>		*

Nevertheless, in the passive Faroese will tolerate an imperfect nominative checking domain. In the following passive example, we see a dative inside the nominative checking domain:

(41) Sigg-u blivu givnar trýggjar bøkur. [passive]  
 Sigg-DAT were given three books-NOM  
 ‘Sigga was given three books.’ (Holmberg 1994, 47)

Why don't we see a dative-accusative pattern in the passive as in the active? The reason is that the dative-accusative pattern does not allow the passive morpheme to absorb accusative Case. The priority of the passive morpheme's need for accusative is expressed by ranking the constraint we have called simply 'PASSIVE ABSORBS ACCUSATIVE' above both domain constraints:

(42) Faroese ranking:

PASSIVE ABSORBS ACC >> 1-1 DOMAIN: CASE >> \*ACC

(43) Faroese passive

Candidates:	PASSIVE ABSORBS ACC	1-1 DOMAIN: CASE	*ACC
☞ a. <u>DP-dative DP-nom</u>		*	
b. <u>DP-dative DP-acc</u>	*!		*

In the dative-nominative pattern in (a), passive has absorbed the accusative Case that appears on the second object in the active, so nominative is the only choice

for that object. The dative-accusative pattern in (b) is rejected because the passive did not absorb that accusative, which remains on that object.<sup>15</sup>

Now that we have seen how the Case patterns of Icelandic and Faroese are derived under this analysis, let us look at the typological predictions of this approach and where Russian fits into this scheme.

## 6. Typological Predictions

What other types of Case patterns does this approach predict? Any pattern produced by a logically possible ranking of these constraints should exist. However, there are only three different ways to rank the three constraints that affect active constructions (the two domain constraints and \*ACCUSATIVE) that make an empirical difference, because the weaker domain constraint has no effect if it is ranked below the stronger one. Thus \*ACCUSATIVE can be ranked above, between, or below the two domain constraints.<sup>16</sup> If \*ACCUSATIVE is ranked between the two domain constraints, it produces the Icelandic pattern, whereas if \*ACCUSATIVE is ranked below both domain constraints, it produces the Faroese pattern:

(44) Predicted Types by Possible Constraint Ranking:

1. Icelandic:

1-1 DOMAIN: STR. CASE >> \*ACC >> 1-1 DOMAIN: CASE

2. Faroese:

1-1 DOMAIN: STR. CASE >> 1-1 DOMAIN: CASE >> \*ACC

3. ?:

\*ACC >> 1-1 DOMAIN: STR. CASE >> 1-1 DOMAIN: CASE

The third ranking with \*ACCUSATIVE above the two domain constraints would allow a nominative object whenever nominative is not checked on the subject, even with a structural accusative subject in an ECM construction. Since true ECM

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<sup>15</sup>See Haider (2001) for an alternate account of why Faroese lacks the nominative objects seen in Icelandic that makes use of differing sized accusative Case checking domains. Under that account, objects get nominative only when they cannot get accusative.

<sup>16</sup>We are considering here only those languages that preserve lexical Case on the surface, in contrast to languages like English that do not. The preservation of lexical Case is insured by a high ranking faithfulness constraint, as discussed in Woolford 2001a.

constructions are rare, it is not known at this point whether such a language actually exists.<sup>17</sup>

Types that are predicted not to occur (because no ranking will produce them) include a language where only accusative subjects but not dative subjects allow nominative objects. Similarly, no language should allow nominative objects with structurally Cased subjects if it does not also allow them with lexically Cased subjects.

For passives, the prediction is that passives will either behave like actives with respect to the possibility of nominative objects, or they will allow a nominative object even if the active does not, as in Faroese, because of a high ranking of PASSIVE ABSORBS CASE.

## 7. The Status of Russian

The question we turn to now is how a language such as Russian fits into this typological schema, given that Russian has both the dative-nominative pattern found in Icelandic as well as the dative-accusative pattern found in Faroese:

(45) Dative-nominative pattern

Borisu nravjatsja takie rubaški.  
Boris/DAT like/3pl such shirts/NOM.PL  
'Boris likes such shirts.' (Moore and Perlmutter 2000)

(46) Dative-accusative pattern

a. Borisu žal' svoju sem'ju.  
Boris/DAT sorry self's family/ACC (Moore and Perlmutter 2000)

b. Kuda nam bylo postavit' ètot jaščik?  
whither us/DAT was put/inf this box/ACC  
'Where should we have put this box?' (Komar 1999)

Does Russian fall into the typological category of Icelandic or Faroese? The answer appears to be that Russian belongs in the same category as Icelandic. That is, unless other factors intervene, given a choice between a nominative or an accusative object in a dative 'subject' construction, Russian will choose

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<sup>17</sup>In fact, unless Infl is limited to licensing only one nominative, such a language would also allow a nominative object in clauses with a nominative subject.

nominative.<sup>18</sup> What, then, is the source of the dative-accusative patterns? The dative-accusative constructions that are associated only with particular verbs involve a lexical accusative. But the dative-accusative patterns that are always associated with particular constructions, regardless of which verb is involved, involve a structural accusative. In those constructions, the object gets structural accusative instead of nominative either because nominative Case is unavailable in the construction, or because the nominative is assigned to a hidden PRO (see Sigurðsson 2002). I will leave the question of the exact analysis of such Russian constructions open here.

## **8. Theoretical Implications and Related Issues**

If the Case checking domain approach to Case locality proposed in this paper is right, there are important theoretical implications for both Case theory and locality theory. In this section, we will discuss four such issues. First, we see that this approach provides crucial evidence against the idea that nominative is the absence of Case. We then turn to three issues involving locality: What role do closer heads play in Case locality? How and why are locality effects in agreement and clitics different? And finally, does this approach extend to the locality of movement?

### *8.1 Nominative is a Case*

One of the ways that scholars have tried to account for the unmarked behavior of nominative Case is to appeal to Jakobson's 1936 claim that nominative is not a Case, but rather the absence of Case (Andrews 1982, Falk 1991, Taraldsen 1996). However, the fact that nominative Case licensing by Infl can be blocked by locality restrictions provides evidence for the existence of a licensing relationship between Infl and nominative. If nominative were not a Case, then it would be immune to Case locality considerations.

A similar argument can be made against the idea that nominative objects are licensed by a different, lower head than Infl (Alexiadou 2000). If nominative objects were licensed by a lower head, it would be hard to imagine how a DP in Spec IP could block such a licensing relationship. Instead, this paper provides

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<sup>18</sup>Note that it does not matter for our purposes here whether the dative is in the external subject position, Spec IP: all that matters in applying the Case locality domain constraints is whether the dative is structurally higher than the second argument. Thus the Case issues discussed here are orthogonal to the extensive discussion in the literature on the Russian dative 'subject' construction concerning the grammatical relation and/or exact syntactic position of such datives (e.g., Greenberg and Franks 1991, Komar 1999, Moore and Perlmutter 2000, Schoorlemmer 1994, and Sigurðsson 2002).

evidence for the more standard view taken in the Minimalist Program (Chomsky 2000) and elsewhere that nominative is licensed by the same head regardless of where it appears in the clause.

### *8.2 Intervening Heads and Case Locality*

In the analysis of the Case locality effects that are the focus of this paper, there has been no need to appeal to the idea from the original version of Relativized Minimality (Rizzi 1990) that a closer head blocks Case licensing by a further head. In fact, it appears that V never blocks Infl from licensing nominative Case into the VP in any language, given Burzio's 1986 observation that unaccusative subjects get nominative Case (not accusative) even when they remain inside VP. This is consistent with the revised formulation of Relativized Minimality (Rizzi 2001) where only a closer potential target can block a source-target relationship.<sup>19</sup>

Nevertheless, there does seem to be some evidence that a closer head can block a further head in some situations. For example, prepositions may block Case licensing inside PP by a further head. I know of no language where Infl can license nominative Case inside a PP in a dative subject construction. However, it is difficult to tell whether this is due to the blocking effect of P itself, or of the maximal projection PP under other locality restrictions, such as Chomsky's (2000) phases. A second possible example of blocking by a closer head appears in an interesting paper presented at this conference arguing that Neg blocks both nominative and accusative licensing into VP in the Russian genitive of negation (Kim 2002).<sup>20</sup> If there are instances in which a closer head blocks Case licensing by a further head, then we need to address the question of why V never blocks Case licensing by Infl.

### *8.3 Agreement and Clitic Locality*

The Case locality facts discussed in this paper do not require Case to drive movement, nor do they require grammatical principles to make any reference to the Spec position. This is consistent with the view in Chomsky 2000, 2001 that Case checking is always allowed under c-command and that specific reference to Spec positions should be ruled out in principle. Yet, there is a considerable body

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<sup>19</sup>Still assuming that heads are what blocks Case licensing, Rizzi (2001) suggests that the head is the target in Case licensing. While that view is consistent with an earlier version of the Minimalist Program in which Case feature raise from a DP up to a head for checking (Chomsky 1995), it is not consistent with the more recent version of the Minimalist Program (Chomsky 2000) which eliminates such covert feature raising.

<sup>20</sup>The idea that either an intervening source or an intervening target can block source-target relations appears in early work on locality in phonology such as Jensen 1974.

of data that is generally thought to show that agreement and clitics checking is only possible in a Spec-head configuration in some languages. A well-known instance involves participle agreement in French, where agreement is possible when the object has moved out of the VP, but prohibited when the overt argument remains in postverbal position:

(47) a. Paul a repeint les chaises.  
Paul has repainted the chairs

b.\*Paul a repeintes les chaises.  
Paul has repainted-AGR the chairs (Kayne 1989 (1))

(48) Paul les a repeintes.  
Paul them has repainted-AGR (Kayne 1989 (2))

The standard view, following Kayne (1989), is that these facts show that an argument must move to (or through) the appropriate Spec position in order to establish the necessary Spec-head relation for agreement checking. An extensive survey of similar facts involving both agreement and clitics appears in Samek-Lodovici 2000 who concludes that although languages differ, some require arguments to be in a Spec position before agreement or clitic doubling can occur.

Are agreement and clitic locality really different from Case in this respect? Given the lack of any evidence that Case is ever specifically restricted to Spec position, does this restriction really hold of agreement and clitics, or is there an alternative way of viewing this very real empirical restriction on the agreement and clitics in some languages? One possibility is suggested by Kayne (1994): a clitic or agreement cannot c-command an overt argument that it doubles. Sieh (2002) argues that a clitic that doubles and c-commands an overt DP creates a Principle C violation. This suggests that clitics and agreement never require a Spec-head configuration for checking.

This brings us to a more general question: to what extent are Case, clitics and agreement subject to the same locality restrictions? We have already seen that agreement and clitics are subject to at least one type of restriction that does not hold of Case. But there is also evidence that locality restrictions differ for clitics versus agreement. For example, clitics often double arguments inside PPs, but agreement across a PP boundary appears to be ruled out, just as Case licensing is. Thus it appears that while the locality restrictions on Case, agreement, and clitics do overlap, they are not identical.

#### 8.4 Movement Locality

The proposed domain approach should extend to locality involving movement. For example, Wh-Island effects that are accounted for by the presence of an intervening potential target under revised Relativized Minimality (Rizzi 2001), or by the existence of a shorter path under the Minimalist Program (Chomsky 2000), follow under this domain approach from the presence of an additional potential target inside the domain, which spoils the desired perfect one-to-one ratio between source and target. We see this in the examples below. In (a), the Wh checking domain has a perfect 1-1 source-target ratio since it contains nothing other than the Wh and the trace. In (b), however, the domain contains an additional Wh (and trace).

(49) a. What did you realize that Bill saw t?

b. \*What did you realize who t saw t?

Because all three approaches work equally well for movement, movement may not be the best arena for testing approaches to locality. Case has distinct advantages as such a testing ground. It is more difficult to find a theory of locality that works for Case data due to the fact that an additional DP can block Case licensing even if it does not actually intervene between the source and intended target. As we have seen this situation is captured by a domain approach, but not by intervention approaches. A further advantage of Case as a testing ground for theories of locality is that it is easy to determine whether an intervening element is a source or a target because sources are heads and targets have different syntactic categories (heads versus phrases). But in movement situations, the source and target are necessarily of the same category. In the head movement example below, where both the source and target are heads, one can take the view that the intervening head in the (b) example is either a closer source (McGinnis 1998) or a closer potential target (Rizzi 2001).

(50) a. Could he t have won?

b. \*Have he could t won?

This ambiguity makes it difficult to address the important theoretical question of whether it is a closer source or a closer target that can block source-target relationships. Thus Case locality is the better testing ground because it lacks this ambiguity as to source and target.

## 9. Conclusions

Languages differ in whether and where they allow nominative objects. I argue that this is not because some languages limit Case checking to Spec-head configurations, nor because V (a closer head) blocks such checking under Relativized Minimality (Rizzi 1990). Instead, it is because languages differ in terms of what kind(s) of deviations they will tolerate from an ideal Case checking domain. An ideal checking domain has a 1-1 ratio between source and target. Any additional (potential) target interferes with this ideal. Some languages (e.g. Icelandic, Hindi, Russian) will tolerate an additional lexically Cased DP inside a nominative checking domain, but other languages (e.g. Faroese and Nez Perce) will not. However, no simple parameter setting can capture these facts because of differences from construction to construction within a language. Instead, the Case facts indicate that the Case locality principles are violable ranked constraints as in Optimality Theory (Prince and Smolensky 1993).

Any additional DP inside a Case checking domain is an additional potential target, even if its Case does not match that of the head of that domain, and even if it does not intervene between the head and the intended target. This generalization follows naturally if we analyze Case locality effects in terms of the perfection of checking domains, while it creates difficulties for analyses in terms of the shortest path between source and target (Chomsky 2000) or the absence of an intervening potential target (Rizzi 2001). This checking domain approach to locality also extends to movement, where it works as well as the standard approaches.

No language limits Case checking to Spec-head configurations, supporting Chomsky's (2001) view that grammatical principles never make specific reference to Spec positions. Nominative must be a Case like any other (contra the view that nominative is the absence of Case) and Infl checks nominative anywhere it occurs within the clause (contra the view that a lower head checks nominative objects). Finally, V, as a closer head, never blocks nominative Case checking, contra the predictions of Relativized Minimality (Rizzi 1990).

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