DP Adjuncts: A Case Against the Case Filter?  

By scrutinising some syntactic and morphological case phenomena of adjuncts analysed as DPs, the aim of the present paper is to provide a uniform and universal syntactic treatment of the (structural) Case and (morphological) case features of nominal expressions in argument as well as nonargument positions, taking the framework of Government and Binding theory as a point of departure.

After presenting some cross-linguistic evidence which implies close links between the case-phenomena of adjuncts and arguments and critically evaluating relevant literature, I introduce the Government Licensing Hypothesis, a set of three closely interrelated universal principles that are posited to regulate the licensing of syntactic structures in general. In the course of elaborating on the technical implementation of this proposal, government is reconceptualised as feature-sharing which takes place in an extended m-command domain, and is conceived of as an inheritable capacity of heads, while structural Case assignment is defined on the basis of a second, government-related feature. In terms of the principles of Government Licensing, the interaction of the two basic features is accounted for in a way which enables us to reduce the Case Filter to these very principles, and thus also to apply it to both arguments and nonarguments.

As a result, the syntactic interpretation of (lexical or syntactic) case-marking processes of various sorts is guaranteed in a uniform way, positing morphological case-marking to be supervenient on or additional to a basic form of structural licensing. Correspondingly, a number of language-specific parameters and, to a lesser extent, lexical variation concerning the two basic features introduced...
herein and certain operations pertaining to them are postulated to account for the different Case-assigning and case-marking capacities of verbal heads as well as for the diversity of the case properties of nominal expressions across languages.

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0. **Introduction**

Adjoining certain adverbials as Determiner Phrases (DPs) is a widely used analytic device in the Government and Binding framework to account for sentences like the following ones:²

(1) a. \[
\begin{array}{l}
\text{IP} \\
\text{DP}
\end{array}
\begin{array}{l}
\text{She} \\
\text{yesterday}
\end{array}
\begin{array}{l}
\text{VP1} \\
\text{t}
\end{array}
\begin{array}{l}
\text{me}
\end{array}
\]

b. \[
\begin{array}{l}
\text{TopP} \\
\text{DP}
\end{array}
\begin{array}{l}
\text{The day she left me} \\
\text{I decided not to marry again}
\end{array}
\begin{array}{l}
\text{IP1} \\
\text{t}
\end{array}
\begin{array}{l}
\text{I}
\end{array}
\]

c. \[
\begin{array}{l}
\text{TopP} \\
\text{DP}
\end{array}
\begin{array}{l}
\text{Stamattina} \\
\text{this-morning}
\end{array}
\begin{array}{l}
\text{IP1} \\
\text{non} \\
\text{ho} \\
\text{potuto}
\end{array}
\begin{array}{l}
\text{get up-INF} \\
\text{I-ACC}
\end{array}
\]

`I couldn't get up this morning.'

The examples in (1), if considered to be appropriate S-structure representations, all raise the same fundamental issue: as the adjuncts printed in bold are presumed to be DPs, they might be supposed to receive (abstract) Case, but they apparently cannot be assigned structural Case under the conditions of standard GB Case-marking.³

Thus, the question arises (i) whether adjunct DPs are supposed to receive structural Case at all, and (ii) if they are, under what circumstances this is realised to satisfy the Case Filter when it is conceptualised as follows:

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² For the sake of brevity and clearer demonstration, sentences will not be fully analysed unless it serves the specific expository purposes, e.g. CPs (as well as the remainder of the left periphery) and the internal structure of VPs, IPs etc. are either not detailed, or their presence, though hypothesised, is not indicated at all. Numerically co-indexed segments belong to the same maximal projections.

³ First, they cannot be marked for the Nominative, as they occupy no [Spec, IP] position where I is [+finite]. Second, they seemingly cannot be marked for the Accusative, either, as there is no adjacent lexical head (V, P, C-parse) which could assign Case to them by means of government.
(2) **Case Filter**

a. Every phonetically realized NP must be assigned (abstract) Case.
   
   [Chomsky 1986b: 74]

b. Overt DPs must be assigned (abstract) Case.
   
   [Rephrased with regard to the DP-hypothesis following Haegeman 1994: 167, Cook & Newson 1996: 227]

Supposing that the Case Filter, as it is conceived above, does apply to adjunct DPs, its violation would concern some of the cornerstones of GB syntactic theory: if Caseless DPs are allowed to surface, it remains to be answered where exactly they can be overtly present in the S-structure without Case and what motivates the different treatment of those DPs which are supposed to receive Case and those which are not, especially in those cases when allegedly Caseless DPs surface with the same morphological markers (Accusative or Nominative morphemes) as their structurally Case-assigned counterparts appear in S-structure. Consequently, the challenge faced in (1) (with regard to (2)) may lead us into (at least) six different directions: (i) the notion of the Case Filter may be refined, i.e. its domain may be explicitly restricted to arguments, the consequences of which are to be shown in Section 1, or, applying a more radical approach, (ii) the Case Filter may also be abandoned, which calls for independent and radically different explanations of Case Assignment and A-movement. Alternatively, (iii) covert Case-markers may also be posited in order that the structures in (1) meet the requirements of a Case Filter applied to nonarguments as well, retaining the standard GB conditions of Case assignment, as it will be discussed in Section 2. (iv) Yet another possibility is to attribute some sort of inherent Case or Case-assigning capacity to the DPs in question or to some of their constituents, as it will be presented in Section 3, or (v) to postulate some kind of “default” case-marking procedure applying to them, as it will be discussed in Section 4. Finally, (vi) the conditions of Case assignments, particularly the notion of government may also be revised, the changing whereof may result in the adjuncts in (1) receiving Case without having

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4 In the present paper, the latter direction of research will be disregarded.
resort to either covert or inherent, DP-internal Case-assigners, as it will be put forward in Section 5.

Thus, after presenting the problem of DP adjuncts within the GB framework and evaluating the merits and drawbacks of a number of solutions hitherto proposed in the relevant literature, the present paper takes the problems arising in these analyses as a point of departure for proposing a revision of the notion and role of government in syntax with a view to providing a uniform and universal theoretical basis for accounting for structural Case assignment and morphological case-marking both on arguments and nonarguments, hence also making ground for further research. In addition, with regard to the far-reaching consequences which follow from some of the notions and mechanisms to be introduced or reinterpreted herein, the extensive analysis of which would nonetheless go beyond the scope of the present paper, an Appendix is provided which contains an account of the distribution of PRO on the assumptions to be presented as well as a summary of the case-related behaviour of different verbal heads and a possible account for Burzio’s Generalisation, also under the hypothesis to be put forward.

1. CASE AS AN ARGUMENT-FEATURE

In an attempt to clarify the relation between DP adjuncts and the Case Filter, one of the easiest and most widely used accounts appears to be the articulation of the Case Filter itself as follows:

(3) **Case Filter (restricted version)**

Overt argument DPs have to be assigned Case.

What is particularly tempting about this account is that the motivation for DP adjuncts receiving Case is apparently lacking from at least two interrelated perspectives. First, DP Adjuncts do not participate in A-movements, which are presumed to be Case-driven. Second, Case is often associated with the “visibility” of DPs for θ-marking. Chomsky (1986b: 94) assumes, following Joseph Aoun, that “an element is visible for θ-marking only if it is assigned Case.”5 In this light, adjuncts as constituents which

5 It may appear that in order to avoid some sort of circularity, we have to construe Chomsky’s Visibility Hypothesis as a derivationally posterior licensing, since θ-marking
are not subcategorised for by the verb do not have to be Case marked. For instance, in *work somewhere*, the DP *somewhere* (or any other element in its place which is analysed as a DP) does not have to receive Case.

Nevertheless, there is abundant cross-linguistic evidence showing that morphological case marking does take place in nonargument positions too, which is thus left syntactically unaccounted for by the restricted conceptualisation of the Case Filter. First, let us turn to a few examples from Latin, German and Korean, three languages with rich inflectional morphology:

(4) a. Decem annos regnavit
ten year-Pl-Acc reign-PAST-IND-3Sg
‘(He/she) reigned for 10 years.’ (Wechsler and Lee 1996: 657)
b. Ich arbeite den ganzen Tag
I-NOM work-1Sg-PRES-IND the-Sg-m-Acc whole day
‘I work all day long.’
c. Ku namwu-un ttak han kyeycyel-i yeypp-ess-ta
this tree-Nom just one season-NOM pretty-PAST-DECL
‘The tree was pretty for just one season.’ (Kim and Sells: 6)

These examples show instances of case-marking on adjuncts which are morphologically realised *identically* with structural Case. In the Latin example (4a), a morphologically unambiguous Accusative DP appears as a temporal extent adverbial, and the non-prepositional temporal extent adverbial also appears in the Accusative in the German sentence (4b), while it is marked for the Nominative in the Korean example (4c).

This might still be no more than mere coincidence: the morphological

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6 Morphological case-marking is optional on Korean adjuncts. However, the Accusative marking is also optional on arguments (Maling 1989: 298). Following the generally applied custom of literature, this optionality will not be indicated with parentheses in the Korean examples.
case features appearing on these constituents may have nothing to do with Case as structural licensing. However, there is some cross-linguistic evidence which seems to suggest that the morphological marking on adverbials such as those presented in (4) does not merely coincide with the morphological realisation of structural Case in certain languages, but it is at least closely related to structural (abstract) Case assignment. An intriguing related phenomenon, also cited by Maling (1989: 297ff), can be observed in Mandarin Chinese, where, according to Li (1985: 56ff), certain adjoined adverbial DPs compete with the verbal complement for one single available structurally licensed Case position.\(^7\)\(^8\)

\[
(5) \text{ a. Ta nian le shu} \\
\text{he read ASP book} \\
\text{‘He read a book.’} \\
\text{b. Ta nian le sange xiaoshi} \\
\text{he read ASP three hours} \\
\text{‘He read for three hours.’}
\]

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7 Chinese, unfortunately, has no case morphology at all. However, when it comes to an adjunct which is in complementary distribution with the verbal complement, it is reasonable to presume that the adjunct competes for the same structurally licensed Acc Case that the overt internal argument would receive, but which is not assigned to the covert, implicit argument: this follows from the Case Filter concerning exclusively overt DPs. (The underlying assumption here, of course, is that the verb in question c-selects a DP complement, but may not s-select a durative.)

8 Thus, these adjoined adverbials can occur together with the complements only in two specific constructions, either with the help of the so-called BA-construction or by means of verbal reduplication (examples are credited to Maling 1989: 297):

(i) Ta ba shu nian le sange xiaoshi BA-construction
he BA book read ASP three hours
(ii) Ta nian shu nian le sange xiaoshi verbal reduplication
he read book read ASP three hours

[[i] and [ii]: ‘He read a book for three hours.’]

Likewise, Wechsler and Lee (1996: 653) also call our attention to the fact that Finnish verbs cannot take an Accusative complement once there is an adjunct marked for the Accusative:

(iii) \text{a. Maija luki kirja tunnin.} \\
Maija read book-Part hour-Acc \\
‘Maija was reading a book for an hour.’ \\
\text{b. Maija luki kirjan tunnin.} \\
Maija read book-Acc hour-Acc \\
‘Maija was reading a book for an hour.’
c. *Ta nian (le) shu sange xiaoshi  
he read ASP book three hours  
‘He read a book for three hours.’

An even more conspicuously close relation between case on adjuncts and on arguments can be observed in Korean, where the Acc–Nom alteration of complements as a result of passivisation is accompanied by the same alteration on the adjoined durative and frequency adverbials. Maling and Kim (1993) argue that these adverbials in Korean bear syntactic Case, i.e. structurally assigned Case licensing:

(6) a. Swuni-ka cip-ul pheynin-thul twu pen-ul chilhay-ess-ta  
Swuni-NOM house-Acc paint-Acc two times Acc brush-PAST-DECL  
‘Swuni painted the house twice.’

b. Cip-i Swuni-eyuyhay pheynin-thu-ka twu pen-i  
house-NOM Swuni-by paint-NOM two times-NOM  
chilhay-ess-ta  
brush-PASS-PAST-DECL  
‘The house was painted twice by Swuni.’ (Wechsler and Lee 1996: 635)

Furthermore, Maling, Jun and Kim (2001:327) observe that unaccusatives in Korean cannot take an adjunct with Accusative case morphology, which, along with the data presented in (6), also shows that, as Schütze (2001a: 227) remarks, the “case-assigning properties of the predicate are relevant to how the nonarguments are marked”, and “in addition to the tight relationship between a head such as V and its arguments, there is some other mechanism in the language that connects the case feature(s) of that head to all the elements in a fairly large domain around it (e.g., VP)” (226), although Schütze himself does not specify a mechanism to account for these phenomena.

Consequently, in light of these empirical observations, it seems reasonable to assume that the universal restriction of the Case Filter to
argument DPs, as it was proposed in (3), may not be sufficiently motivated, since, in some languages, adjunct DPs may compete with the internal argument for a structurally licensed (abstract) Case position, whereas in certain other languages, the processes which affect Case marking in the sense of structural licensing of arguments are closely and overtly related to processes affecting the morphological case-marking of non-arguments.

These observations thus render the assumption plausible that the Case Filter may be applied to nonarguments as well, making it clear that Case assignment has to be accounted for in adjunct positions. Moreover, if the domain of the Case Filter is not limited to arguments, it may not be reducible to the Visibility Condition, and hence eventually to the Theta Criterion. This may lead us to presume either that the Case subsystem functions as an entirely separate module within the faculty of language, and is consequently irreducible to any other principle, or that there is a need for providing a uniform basis of Case assignment, as it will be proposed in Section 5.

2. The Covert Governor Hypothesis

In an attempt to account for adjuncts surfacing (apparently) as DPs, it may still be supposed that these DPs in nonargument positions are actually licensed in the sentence-structure with the help of covert Case-assigners, presuming that these DPs receive structural Case while being embedded in an immediately adjoined phrase. It might thus be posited that there is a PP with a covert (either deleted (7a) or underlingly also empty (7b)) P-head governing and Case-marking the surfacing DP within the adjunct:

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9 In this light, what appear to be DP adjuncts would in fact occupy the specifier or the complement position of this immediately adjoined phrase. On the one hand, one might assume that the adverbial adjunct is underlingly an IP (AgrP), whose Spec position is occupied by the DP in question and there is a non-overt INFL which agrees with the non-argument DP. This would resemble a Small Clause construction, however, without a complement. One of the problems is that the inflections of small clauses are non-finite, but we would need a finite one for Case assignment. Under these assumptions, thus, the overt nominative Case is excluded as a possibility at first sight. This alone is highly problematic, especially as Nominative nonargument DPs do exist (for Korean examples consult, for instance Kim & Sells or Maling 1989), and this seems to be left partly unaccounted for in any form of the covert governor hypothesis. On the other hand, the more widespread version of this hypothesis which treats the DPs in question as complements of covert P-heads deserves some attention.
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\[(7) \ a. [IP_{DP} She_{i} [VP_{i} V_i left_{DP_{me}}] [PP_{in} on_{DP_{yesterday}}]] \\
\ b. [IP_{DP} She_{i} [VP_{i} V_i left_{DP_{me}}] [PP_{in} \text{ in}_{DP_{yesterday}}]]\]

The analysis in (7a), which assumes that deletion takes place in deriving the S-structure, appears to be rather unfavourable, since it is based on mere analogy, and the underlying governor never surfaces: *on yesterday is clearly ungrammatical, and it seems hardly possible to explain this under these assumptions. Moreover, it is remarkable that overt and non-overt PPs from this viewpoint would also be able to constitute syntactic and semantic ‘minimal pairs’:

\[(8) \ a. [PP_{in} \text{ in}_{PP_yesterday}] I\ drew\ quite\ a\ few\ X-bar\ trees. \\\n\ b. [PP_{in} \text{ in the last week}] I’ve\ been\ drawing\ a\ hell\ of\ a\ lot\ of\ X-bar\ trees.\]

This contrast goes to show that in some cases DPs containing apparently the same lexical heads may appear with either a covert or an overt governor, but with different respective meanings. However, it appears to be somewhat counterintuitive to presume that in (8a) there is any specific preposition underlyingly: on the one hand, if it were in, the motivation for the deletion in one case and the lack of deletion in the other

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10 Covert Preposition: 
no specific aspectual connotations (correlates with aoristos-like tenses)

Overt Preposition: 
prolonged duration (correlates with incomplete action)

Notwithstanding, though a limited number of English examples may be found (e.g. last year vs. in the last year), generalising such a distinction even within the English language seems to be ungrounded, being largely based on analogy. Especially since another difference between the two sentences in (8) which consists in the presence/absence of the determiner the may imply that Last week, or last, is in fact a D-head, rather than an NP headed by a zero determiner. This is an important observation inasmuch as it may suggest that last week is a lexicalised DP, which could lead us to suppose that it is lexicalised perhaps together with an inherent Case-feature (as under the DP-hypothesis, an NP or an N-head without the DP, which is primarily assumed to need Case, could not plausibly be inherently Case-marked). The inherent Case solution will, of course, also be shown to be problematic, since it could not be applied cross-linguistically, for instance, to account for the Korean and Chinese examples. Nevertheless, in this section we presume DPs to be inherently unmarked for Case. The consequences of proposing lexical Case-related features will be dealt with in some detail in Section 3, and for the time being, if we presume inherently Caseless DPs in both (8a) and (8b), their internal structure is not crucial at this point.
might be due to the interaction of lexically specified features, but on the other hand, to assume the underlying presence of other prepositions in this position seems rather arbitrary, as they never surface (*at (the?) last week, *on (the?) last week etc.).

Consequently, it is more plausible to accept the presence of any empty head as a governor in these cases: the analysis in (7b) is preferred to that in (7a). As Bresnan and Grimshaw (1978) argue, N-heads within the adjuncts under discussion may bear lexically assigned thematic features such as [Temporality] (e.g. week), [Place] (e.g. place), [Manner] (e.g. way), which, projected into the maximal projection (e.g. that way) can agree with the empty prepositional head which governs such a nominal maximal projection if this empty head also bears the same feature, and subsequently, following a rule posited for this specific purpose, the empty prepositional head is deleted – presumably after Case-marking the governed phrase.

However, as Larson (1985: 602) argues, hypothesising such a rule seems to be an expressly arbitrary choice, moreover, one having insufficient empirical ground: proving the earlier presence of a covert constituent (with remarkably limited distribution) deleted at S-structure would involve the application of rather ad hoc devices. Finally, it has also been pointed out that allowing the lexical assignment of such features less arbitrarily, i.e. not exclusively to Ns and Ps, but also to Vs etc. as well would have far-reaching consequences regarding phrase structure theory, since theoretically any YP in the configuration \([\text{XP} \chi^e \text{YP}]\) may share the distribution of another category YP (Larson 1985: 602). Even though some of the adjuncts discussed might be interpreted as DPs without NPs under the DP-hypothesis, this does not reduce the seriousness of the challenges such a generalisation (which would explain the possibility of Bresnan and Grimshaw’s specific rule) may pose.

Still, it might seem plausible to sustain what is herein referred to as the Covert Governor Hypothesis, rejecting though the proposal of deletion. Thus, empty prepositional heads would survive into the S-structure and LF. However, this assumption is equally problematic, as there is abundant

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11 Nonetheless, even operating with such features would not necessarily lead to the deletion of in in a certain context, although it may gain some theoretical justification under Bresnan and Grimshaw’s (1978) hypothesis of a lexical Case-assigning feature within the nominal expression (see below).
empirical evidence implying that the adjoined phrases hitherto discussed are DPs, and not PPs. In addition to the phenomena presented in Section 1, consider, for example, the following ‘minimal pair’:

(9) a. on Saturday
   b. *on yester_y

Given the above contrast, it seems rather implausible to conceive of an empty prepositional head which selects only specific lexemes as its complement. In conclusion, taking into account the lack of considerable theoretical gain and the presence of suggestive empirical counterevidence, the Covert Governor Hypothesis seemingly cannot account for the case-phenomena of surfacing adjunct DPs.\(^\text{12}\)

3. The Phrase-internal Case-Assignment Hypothesis

Having shown that the adjuncts in question are rather to be analysed as DPs also underlingly, and having reached the conclusion that (at least, under certain circumstances) there must be a way to account for them being assigned Case, but at the same time, realising that there is no adjacent Case-marker which would assign Case to them, it is reasonable to ask whether Case-assignment, at least in some languages and under particular circumstances, may take place within the DPs. This is the solution Larson (1985) argues for, presuming that in English, a set range of Noun heads (e.g. way) are lexically assigned an abstract [F] feature (under the DP hypothesis, percolating through the NP towards the DP), which in turn assigns Oblique Case to the maximal projection (e.g. that way).\(^\text{13}\) This feature itself, however, is not a Case feature: structural Case being regarded as the unmarked way of Case assignment, when a DP marked [+F] occupies a structural Case position, the [F] feature does not assign Oblique Case, and thus Case Clash is avoided.

However, Larson’s proposal seems to be a largely ad hoc solution,

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12 The rejection of accounts postulating covert constituents in which surfacing DP adjuncts would be embedded is not restricted to GB-related analyses. Bošković (2006: 530), for example, while explicitly arguing against Case assignment in favour of case-checking, also concludes after examining some characteristics of Serbo-Croatian DP adjuncts that the constituents in question are bare nominal structures.

13 McCawley (1988) also supports this hypothesis.
accounting for a very limited (and mostly language specific) set of data, while he does not clarify his position regarding the exact nature of Oblique Case, either. In all probability, it should surface as Accusative (the default case in English according to Schütze 2001b: 224), but this assumption seems to be refuted considering that Accusative and Oblique Case would be predicted to clash, or the latter should be overridden if the Oblique Case were assigned to a DP in a governed position – consider (9) again.

In English, the Noun day is presumed to be [+F], but then it is not clear why, under Larson’s assumptions, there is a Case Clash in *on yesterday, in which he considers yesterday to be headed by the same day head, while the [F] feature does not yield such a conflict in on Saturday. Complicating the situation further, Larson (1985: 613) remarks, relating to an even more restricted subgroup of adjoinable DPs which he presumes to bear a lexically assigned, invariant Oblique Case (not “only” [F]) and, consequently, to be incapable of occupying a structural Case position (e.g. when, then, here), that “the only lexically governed position in which they could occur without Case conflict would be a PP object position, where (presumably) Oblique Case is also assigned” [emphasis added]. This suggests that the various possible relations and interactions between the two Case systems Larson assumes, viz. the Structural (probably including inherent Case) and the lexically originated, Oblique Cases are rather ambiguous. Moreover, such a radical split in the mechanisms of Case assignment as the one proposed by Larson severely degrades the uniformity of the analyses of Case-related phenomena, one of the seemingly greatest merits of GB syntax.

Finally, Wechsler and Lee (1996) call our attention to an additional empirical observation which also weakens Larson’s theory, namely, that the modification of supposedly [-F] heads (e.g. vacation, in *Josh played football his vacation) systematically improves (widens the range of acceptable) bare DP adjuncts (e.g. John played football his entire vacation). Thus, all

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14 Empirically, this phenomenon bears peculiar resemblance to heavy NP-shift: in both cases, certain constituents (DPs) are licensed in a relatively “distant” position (compared to head-complement “distance”) only if they have an internal structure of a certain complexity. In Wechsler and Lee’s (1996) account, which extends the domain of Case assignment by a verbal head from the complement to nonarguments as well, this “distance” in the case of a DP adjunct would most probably arise from its being less closely related to the verbal head than a complement, although Wechsler and Lee do not explicitly tackle this issue in their theory, only provide the empirical observation. In other words, modified DPs can also be regarded as “stronger” phrases and accordingly may be licensed in “weaker” licensing relations.
things considered, what is herein referred to as the phrase-internal Case assignment hypothesis does not seem to account for the distribution and case-phenomena of DP adjuncts – not even in a language-specifically corroborated way.

4. Default case

As regards the source of morphological case-marking on adjuncts in certain languages, one of the remaining logical possibilities that arise is to attribute it to a mechanism which morphologically marks those DPs which have been left unmarked for case by other possible mechanisms of case-marking. In proposing such a mechanism in an attempt to account for a number of different, otherwise presumably unrelated phenomena (e.g. case in coordination environments, Hanging Topic Left Dislocation etc.), Schütze (2001b) draws a sharp distinction between Case as structural licensing and case as morphological marking, and relates default case only to the latter phenomenon, i.e. DPs are held to be unable to be licensed (assigned abstract Case) by default (208). This, of course, is necessary if the Case Filter is to be retained: allowing structural licensing by default would make the Case Filter vacuous.

On these assumptions, DP adjuncts may appear to be possible targets of default case marking. Nevertheless, default case marking in itself certainly cannot account for those phenomena (presented in Section 1) which imply that DP adjuncts bear a close relation to argument DPs in terms of case properties. Even more trivially, this approach cannot account for the diversity of case morphology on these adjuncts, either, which in fact

Furthermore, McCawley (1988: 588) remarks that determiners also have an impact on the acceptability of these adjuncts, as his examples show:

(i) I talked to Lucy that evening.
(ii) *I talked to Lucy an evening.
(iii) I talked to Lucy one evening.

This, again, implies that there is more to their acceptability than the presence or absence of certain features in the Noun heads. In descriptive terms, the [+determinate] D head may be regarded as a “stronger” head whose projection, again, could be licensed in the structure even by means of a “weaker” licensing process (the “strong” one still conceived as government and Case assignment by a V-head). This bears some resemblance to an “inverse” phenomenon: a “stronger” (i.e. [+V]) C-head (in English, for) may govern “weaker” [-finite] IPs, while “weaker” (i.e. [-V]) C-heads (in English, that, if) may govern only “stronger” [+finite] IPs.

15 Of course, arguing for a default always concerns otherwise unrelated phenomena.
leaves us without a clear default. Thus, instances in which the adjuncts in question are marked for an allegedly non-default case, e.g. (4b), where the DP adjunct in the German sentence is in the Accusative, while Schütze (2001b: 224) argues for the Nominative being the default case in German, remain without any explanation.

Moreover, by stipulating that structural licensing is neither a sufficient nor a necessary condition of morphological case marking, Schütze (2001b: 230) argues that morphological case has no truly syntactic function at all. Although it may have some semantic function, the nature of interaction between semantics and morphology (without syntax intervening?) is not discussed by Schütze, and the issue seems difficult to address at all in Schütze’s account. This renders morphological case, and especially default case rather uneconomical, calling for an approach which might conceive of it as an economical, strongly motivated (and most probably, at least to some extent, truly syntactic) phenomenon.

5. The Government Licensing Hypothesis

In light of the expressly limited explanatory power of the above assumptions regarding DP adjuncts, I will propose in this section a revised concept of government, also reinterpreting the role it plays in accounting for grammaticality as well as its relation to the conceptualisation of the Case Filter, with the principle aim of providing a point of departure for a uniform treatment of Case assignment (in the sense of structural licensing) and (morphological) case marking on arguments as well as nonarguments.

5.1 Government as feature-sharing

In the account to be presented, government is defined on the basis of two different aspects: in terms of positional relations and in terms of feature sharing, the first aspect being a necessary condition for the second one. First, as regards positional relations, government is herein based on the concept of m-command. However, I extend the notion of m-command to the highest segment of the maximal projection of the governing head. Thus,
any given X head m-commands, and provided that it is a governing head, may also govern its adjuncts as well as its complement and specifier (and their respective specifiers), facilitating an analysis of the case properties of DP adjuncts which is based on structural licensing (Case-assignment).

Second, I will have recourse to two binary features, namely [αgovernment] (henceforth [αgovt], for the sake of brevity) and [αactivity] (henceforth [αactive]), in reanalysing government and structural Case assignment as a process of feature sharing. In the first place, heads marked for [+govt] are governing heads in a broad sense: for instance, they may govern traces, and bearing the [+govt] feature is also a necessary, but not a sufficient condition of assigning structural Case by means of government. On these assumptions, government itself consists in a [+govt] head a sharing its [+govt] feature with the Specifier of β, a constituent m-commanded by a. – The reason why it is posited that government concerns the specifier of the governed constituent (and not the constituent as a maximal projection, or its head directly) follows from the postulated percolational properties of the [+govt] feature.

Phrase-internally, [+govt] is posited to spread freely from the head (X) to its complement (ZP) as well as between the specifier (YP) and the head (X) (in the “broad channels”, as represented in figure (10)). Accordingly, it is crucial to point out that this entails the possibility of the [+govt] feature spreading also from a specifier to its [-govt] head, not only in the opposite direction (from a [+govt] head to its specifier); thus, when a phrase (XP) is governed by an external head (W), i.e. its specifier (YP) receives [+govt], the feature in question may automatically percolate to the head of the phrase (X). However, this percolation can be blocked under particular circumstances, to which I will return in the next subsection. At the same time, as governing a constituent entails governing its specifier, [+govt] also percolates across phrases by definition (from an external governing head to the specifier of the phrase it governs). Consequently, since it is [+govt] that enables a head bearing it to govern, whenever a [-govt] head receives [+govt], it becomes a governing head itself: the capacity of government can be inherited.
The second feature which is central to the notion of government and its relation to structural Case assignment, [+active], is conceived to be directly responsible for the capacity of any given [+govt] head marked positively for it to assign Case to constituents which it governs. The [+active] marking of a head is, as opposed to its possible [+govt] marking, not inheritable, although it can be transmitted to a governed constituent, thereby rendering the governor head [-active].

For the sake of clearer demonstration, I will use a simplified phrase typology in the rest of the paper, referring to phrases whose head is marked for [+govt] as GovPs (with a “strong”, Gov head), while phrases headed by a [-govt] head (a “weak”, Null head) will be termed NullPs. Of course, considering the possibility of inheriting governing capacity, inherent NullPs may become GovPs by inheritance.

5.2 Government Licensing

The mechanisms introduced in the present paper for the implementation of government and government-related phenomena, while accounting for empirical observations, seem to follow certain interrelated general tendencies which I propose to grasp in a set of universal principles. These principles, to be termed the principles of Government Licensing, are posited to constitute a cornerstone of universal grammar in requiring the tree-structure to be licensed phrase by phrase, basically following a bottom-up direction.\footnote{More precisely, the initial step is the licensing of the VP itself. Thus, VP-internal phrases will constitute an exception: they can (and in many cases are left to) be licensed after the}
The three postulated principles guiding this process are articulated as follows:

(11) **Government Licensing**

(i) No phrase can be licensed in the syntactic structure without its head being able to govern.

(ii) Inherently governing heads are licensed by defying external government.

(iii) CPs are inherently licensed.

Principle (i) entails that a NullP (an originally “weaker” head) cannot be licensed unless its head receives [+govt] from a dominating GovP and thus becomes a Gov head itself, projecting a GovP, whereas Principle (ii) avoids that inherently Gov (“stronger”) heads may be licensed by default (by a “weaker” licensing process, Principle (i)). Concomitantly, inherently weak(er) heads are required to undergo a **weaker licensing** procedure, whereas inherently strong(er) heads need **stronger licensing**.

Principle (iii) is postulated since if CPs were NullPs, they could not receive a [+govt] feature in matrix clauses, or if they were GovPs, they could defy no external government in that position, as it will be shown in the following subsection.\(^{18}\)

---

\(^{18}\) VP itself has been licensed. Correspondingly, the C- and I-domains are then postulated to be licensed step-by-step (phrase-by-phrase), simultaneously with VP-internal structure. Licensing, therefore, it posited to take place in two parallel phases. (The division of a process of syntactic interpretation into two separate phases is, per se, in line with other analyses supposing separate CP- and VP-phases, e.g. Chomsky (2001).)

The central role of the VP in determining the semantic relations within the syntactic structure might be held to account for the supposition that its embedded constituents are presumed to undergo a “safer,” i.e. isolated syntactic interpretation by first allowing the VP (the V-head) to be licensed, which in turn would lead to their (if necessary, partly parallel) licensing, independently of the higher domains, as we shall see in Section 5.4. and 5.5. Thus, a closer correspondence of syntactic and semantic structure may be attained (in comparison with a potential single-phase derivation in which constituents embedded in the VP may also more directly participate), which can be considered as computationally economic in the cognitive system that is presumed to be optimised for interfaces.
5.1 Clash of government

In accordance with the definition of government herein proposed, it is clear that the specifier of externally governed GovPs (i.e. GovPs dominated by another GovP) is governed by two heads at the same time, and thus receives [+govt] feature from two directions: for instance, in (10), assuming that both X and W are [+govt] heads, YP is “bilaterally governed.” In other words, the lower [+govt] head attempts to defy the external government of its specifier, which results in a clash of government. In terms of Principle (ii) of Government Licensing, it is this clash that licenses the phrase projected by the lower governing head.

With regard to the [αactive] feature of the two GovPs in question, it is of primary importance to distinguish between two major subcases of clash of government on the basis of whether there is a [αactive] head involved in the process or not. When both of the Gov (i.e. [+govt]) heads are [–active], we will speak about a weak clash of government taking place in the relevant specifier position:

\[
(12) \quad \text{Gov'} \quad \text{Gov} \quad \text{YP} \quad \text{Gov'}
\]

\[
\text{Gov} \quad \frac{[+\text{govt}]}{[–\text{active}]} \quad \text{GovP} \quad \text{YP} \quad \text{Gov'}
\]

\[
\text{Weak clash of govt.} \quad [+\text{govt}] \quad [–\text{active}]
\]

On the other hand, when a GovP dominating another GovP has a [αactive] head, a so-called strong clash of government occurs: it is only in this case that the head of the dominating phrase is deactivated, as it passes the [αactive] feature down to the specifier. However, the bilaterally governed position being a syntactically unstable position in itself (for which some certainly they also have to be c-selected by a head. This seems to avoid the possibility of “parasitic CPs/C-heads” in the structure.
reasons will be elaborated on in the next subsection), the [+active], Case-
marking feature can have no effect on it. Thus, the phrase occupying the
site of strong clash moves out of this position, while the [+active] feature
also leaves the site of clash. Nevertheless, it cannot attach to the moved
phrase in the syntactically unstable position, hence it cannot move with it,
but it cannot stay in situ, either, conceived as a bound feature: since there
is no other choice left, it percolates to the constituent to which it is most
closely related: the “lower” head. This way, the head of the dominated
GovP becomes [+active], therefore a strong clash of government always
yields activation of the lower Gov head, whereas the higher Gov head is
deactivated. As a result, the lower head is enabled to reject the external
government of its specifier by the higher head, establishing the specifier
as a unilaterally governed, syntactically stable – yet, by now, empty –
position.  

---

19 In my account, among DPs, only PRO can occupy a site of weak clash of government. For
details, see Appendix 1.  
20 It might seem an excessively ad hoc choice that strong clash of government is defined in
terms of the higher Gov head being [+active] and the lower Gov head being [-active], since
there is a logical possibility of the inverse situation, or of both of the heads being [+active].
However, it is of utmost interest that in my account, no such arrangements seem to arise
empirically. (Although both heads may be [+active], this is observed exclusively after the
licensing process has taken place, as in the case of the I- and V-heads in the matrix clause of
(21).)  

Nevertheless, similar, somewhat surprising phenomena also occur in standard GB analy-
yses: in English, for example, the prepositional complementiser for, which is able to assign
Case to the specifier of its complement, always selects a non-finite IP with an overtly occupied
specifier, which is thus unable to, assign Case to its specifier. This seems as if the compen-
tiser had already expected that the c-selected constituent needed an external Case-assigner
(N.B. it never selects a non-finite IP with a PRO in its specifier!): even if the c-selectional pr-
nerties of a head are lexically determined, and we conceive of the lexicon as a storage of
arbitrary features, it appears implausible to assume that the relevant lexical entries contain
features whose constellation only coincidentally avoids, in the given instance, Case clash, for
example. This is clearly one of the instances in which empirical possibilities, for some reason,
constitute only a subcase of logical possibilities entailed in the system. Unfortunately, this
is also true of my present account. However, by providing a more uniform approach to a
number of phenomena in terms of the above proposed two features, I hope to offer at least a
clearer basis for investigating phenomena which conspicuously show some sort of (prelexi-
cally?) systemic character that is not grasped by GB syntactic theory. cf. Note 14.
The site of a strong clash of government, accordingly, is considered to be a Caseless position, thus triggering (for the time being, still indirectly, through the Case Filter) A-movement,\(^{21}\) while weak clashes of government will play a crucial role in accounting for the distribution of PRO.\(^ {22}\)

At the same time, it is to be underscored that in the present account, by having recourse to government licensing as the ultimate motivation for

\(^{21}\) The term A(rgument)-movement is used throughout the present paper in its stricter sense, i.e. it is regarded as a phenomenon involving only arguments, although Chomsky (1986a: 79) argues that head-movement has very similar properties to, and consequently should also be considered as, A-movement.

\(^{22}\) For the detailed consequences of weak clashes of government regarding A-movement, see Appendix 1. This type of clash seems to be relevant exclusively to the distribution of PRO.
certain processes and determining the mechanisms of related licensing procedures in a way that the specifier position is always involved, it has to be presumed that this position is obligatorily occupied, either overtly or covertly, in order for the relevant processes to take place. However, this apparent theoretical drawback also has an immediately concomitant theoretical gain: the Extended Projection Principle can be derived from the requirements of the (first two) principles of Government Licensing. Moreover, the EPP may independently be conceived to hold of all lexical projections, and the specifier of IPs is likewise always occupied when it comes to licensing the IP in question. CPs, being inherently licensed, do not need an obligatorily occupied specifier position, and the other constituents of the left periphery (TopP, FocP) are often independently considered to be present in the structure only when their specifier is occupied. Thus the theoretical loss is far less than it appeared to be.

5.2 Government Licensing and the Case Filter

Proposing that DPs are GovPs projected by inherently [-active; +govt] heads, it follows directly from Principle (ii) of Government Licensing that they must be licensed by means of a clash of government taking place in their specifier. For overt DPs, licensing always entails a strong clash of government, i.e. they have to be governed by a [+active] head. Consequently, the requirement of licensing overt DPs, accounted for by the Case Filter, is reduced to a subcase of Principle (ii):

(14) Case Filter (in terms of the Government Licensing Hypothesis)

Overt DPs must be licensed (activated).

Whether the [+active; +govt] feature matrix of a D-head is morphologically represented as case marking is presumed to be a question of parametric variation. By the same token, it is parametric whether and under what circumstances this morphological marking, if

23 In representing the feature matrix containing these two features, I will indicate them in order of relevance to the topics specifically discussed. Thus, their ordering may vary within the present paper, but there is no theoretical assumption underlying these alterations.
24 It is not entirely unambiguous (on standard GB assumptions, either) why only overt DPs need a stronger form of licensing, cf. Appendix 1. Here it may simply be assumed that in accordance with the principles of Government Licensing, overt DPs are “stronger” than non-overt DPs: PRO is an exceptional DP, and may be presumed to have an inherently [-active; –govt] Null head.
present, percolates to the NPs (NullPs projected by an inherently [active; –govt] head) that are embedded in the activated, i.e. structurally licensed, syntactically Case marked DP or to the constituent occupying the specifier position of the DP in question.\(^{25}\)

Note that by defining government in terms of an extended m-commanding relation, adjuncts of a GovPs projected by a [+active; +govt] head may also be activated. As a result, the Case Filter as defined within the present framework is not restricted to argument positions, allowing for a uniform analysis of Case assigned to arguments and nonarguments.

Since strong clash of government was assumed to be a Caseless position at the end of the previous subsection, now, having reanalysed the Case Filter, it is reasonable to revise \textit{A-movement} as well. It has already been claimed that it is triggered by a strong clash of government, however, in a more precise and explanatory wording, it is considered to be motivated by a \textit{drive for being unilaterally governed}. As we have seen, during the process of activation, there is a moment when the site of clash is bilaterally governed, and an additional feature, [+active] is also “forced” into the syntactically unstable position, eventually triggering movement: by the time a stable, unilaterally governed position is established by the activated head, the constituent originally occupying the position will have moved out.

\section*{5.5 Some Case Typology}

\subsection*{5.5.1 Accusative as “pure structural licensing”}

Inasmuch as syntactic Case assignment is conceived of as licensing in the form of activation, [+active; +govt] heads are held to be Case assigners. Since most verbal heads,\(^{26}\) when activated, are such heads, and they can license their DP-complements, it is assumed that it is the \textbf{Accusative} Case for which activation per se suffices. Thus, this syntactic Case is regarded as the most basic one, i.e. “pure structural licensing,” and in terms of the features on the assignor required for assigning other Cases, this is the most

\(^{25}\) One of the related phenomena which definitely deserve mentioning is of-insertion. The present account also predicts that, since NPs are inherently NullPs projected by a [-govt; –active] head, they cannot assign Case, as they cannot be activated, and only become governors by inheritance, necessitating a PP complement (with an active, governing head) for a thematic structure that could be syntactically realised by a DP complement in a VP.

\(^{26}\) For a typological summary of the governing and Case-assigning capacities as well as the thematic structure of verbal heads, see Appendix 2.
unmarked Case, resulting from the relatively lowest number of features involved, as we shall see.

Let us take a transitive verb assigning Case to its complement, for instance:

(15) [I eat the cake]

\[
\begin{array}{c}
\text{Gov’} = V' \\
\text{Gov} = V \\
\text{GovP} = \text{DP} \\
\text{ [+govt]} \\
\text{ [+active]}
\end{array}
\]

As we can see in (15), the [+active; +govt] verb\(^{27}\) is deactivated through a clash of government with the governed D-head, which in turn is activated, i.e. is assigned Case in this process.

5.5.2 NominaTivE

For assigning NominaTivE Case, on the other hand, it is also a necessary, but not a sufficient condition to be a [+active; +govt] head: all I-heads are postulated to be inherently active governing heads, but only [+finite] heads are capable of assigning NominaTivE. Since the specifier of the IPs are predicted to be sites of weak clash of government, as C-or V-heads selecting them are theoretically implied to be always inherently [+govt],\(^{28}\) there need to be some extra mechanism by

---

\(^{27}\) For clearer demonstration, the process of the verb being activated previously is not shown in this figure. (The transitive V-head, inherently [-active; +govt] is activated through a strong clash of government with the I-head, which is inherently [+active; +govt]).

\(^{28}\) Theoretically, principles (i) and (iii) of the Government Licensing hypothesis predict that all C-heads are governing heads. V-heads also need to be [+govt] to account for their capacity of assigning Case, even if to nonarguments: as it has been underscored, Case assignment as structural licensing is postulated to affect nonargument DPs as well. See also Appendix 2. As for the possibility of a [+active] C-head (in English, for) governing a [+finite] I-head, it is to be pointed out again that such an arrangement does not seem to have been observed empirically. Another question which might arise is whether a [+active] C-head and a [+active] I-head do not constitute an arrangement which has hitherto been claimed to be nonexistent. This apparent problem is immediately settled recalling that (with the single exception of the VP, the
which I-heads successfully reject the external government of their respective specifiers. This mechanism is the fact of bearing the [+finite] feature itself, which serves to reject rightward government coming from the external governor. As external government is rejected, the specifier becomes unilaterally governed, providing no motivation for further movement: the constituent moved to IP, Spec is settled and assigned Nominative. Nevertheless, it also has to be presumed that the [+finite] feature reactivates the I-head to which it belongs, since the I-head is deactivated when activating the (intransitive, unaccusative or transitive) verb, as it can be seen in the following figure.\footnote{The movement of a covert finite I-morpheme, although it may be presumed, is not represented in the figure, and for the sake of clearer demonstration, it will be likewise omitted from all the other representations throughout the present paper.}
I laugh

GovP = CP

Gov' = C'

Gov = C

[+govt]  GovP = IP

[-active]  I

Gov' = I'

Nom-assignment  Gov = I  GovP = VP

[+finite]  [+govt]  t_j

Re-activation  Gov = V

[+active]

laugh

Site of previous strong
(V-activating/I-eactivating)

<table>
<thead>
<tr>
<th>Assigned Case</th>
<th>Relevant features of the assignor head</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acc</td>
<td>[+govt]  [+active]  [+finite]</td>
</tr>
<tr>
<td>Nom</td>
<td>[+govt]  [+active]  [+]possessive]</td>
</tr>
<tr>
<td>Gen</td>
<td>[+]possessive]</td>
</tr>
</tbody>
</table>

clash of government

5.5.3 Genitive

Assigning the Genitive may be conceived of similarly to the assignment of Nominative: this Case is assigned by a [+active; +govt] D-head which has an additional feature, namely [+possessive]. This feature can be considered even more marked than [+finite], since it is able to “fix” a DP in a site of strong
clash of government while the head receives activation, not only afterwards. In other words, the [+possessive] feature may be assigned by a Gov head without being [+active], however, being [+active] is necessary for structurally licensing both the DP projected by the [+possessive] head and the DP to be marked for the Genitive. Thus, even the Genitive is “based on” (i.e. is supervenient on / additional to) the Accusative as a necessary condition of Case assignment.30

\[(17) \text{[I eat Jane’s cake]}\]

\[
\begin{array}{c}
\text{Gov’ = V’} \\
\text{Gov = V} \\
\text{GovP = DP} \\
\text{[+govt]} \\
\text{[–active]} \\
\text{DP = GovP} \\
\text{eat} \\
\text{Jane} \\
\text{Gov’ = D’} \\
\end{array}
\]

\[
\begin{array}{c}
\text{GEN-assignment} \\
\text{Gov = D} \\
\text{NullP = NP} \\
\text{[+determinate]} \\
\text{[+possessive]} \\
\text{cake} \\
\end{array}
\]

Site of strong (D-activating, V-deactivating) 
clash of govt.

5.4 CASE TYPOLOGY AND PARAMETRICAL VARIATION

The features relevant to the mechanisms of Case marking proposed in the previous subsection are summarised in the following table:31

\[(18)\]

Nevertheless, it is to be underscored that the processes presented above are not supposed to be necessarily implemented in exactly the same way in every language: there is ample room for parametric variation. For instance,

---

30 For instance, in German, the Genitive DP adjunct eines Tages (‘some day, one day’) is accordingly predicted to be licensed only if it is activated.
31 This typology is, of course, not meant to be exhaustive. Rather, it is intended to demonstrate the general workings of the framework proposed herein.
default case (e.g. whether it is Acc or Nom, or perhaps something else) may vary from language to language (as proposed in Schütze 2001b) – what is herein postulated to be invariable is the way morphological default case is interpreted syntactically, i.e. that it can be assigned only to structurally licensed positions.

The same consequences hold for what is termed as semantic (morphological) case (for instance, in Greek, in Hungarian, and in some cases, in German, too), i.e. morphological case-marking dependent on the intended meaning of the adjunct: even if it has a non-syntactic source, it must be interpreted (structurally licensed) within syntax, in accordance with the principles of government licensing and the mechanisms postulated to fulfil the requirements of licensing.32 This treatment of morphological case as strictly dependent on structural licensing has the advantage of providing a uniform syntactic interface between semantics and morphology.33

Consequently, it is going to be a matter of syntactic parameters, for example, whether an unaccusative verb can license an Accusative adjunct or not. In Korean, this is not possible, implying that the domain of the feature [+active] (on the unaccusative verb, in this case) may be parametrically restricted to arguments, while in German, the same construction is perfectly grammatical, suggesting that [+active] can be transmitted freely in the extended m-commanded domain.34

(19) Ich **bin** DP **einen** ganzen Tag geflogen.

I-NOM Aux-PERF (be) one-Acc whole day fly-PastPart

‘I was flying for a whole day.’

32 Discourse-factors may also contribute to morphological case-marking through syntax, as semantics does. For example, as it is noted by Maling (1989), among others, overt Acc-marking in Korean is more frequently observed on focussed or topicalised constituents than on discourse-neutral ones. Nevertheless, it is posited here that these additional meanings can only arise in morphology through syntax, in licensed positions – it is to be recalled that, in general, parametrically, as well as specifically in Korean, overt Acc-marking is optional on arguments, too, but this does not go to show that arguments are not assigned Case when they are not morphologically marked. It is herein presumed that discourse-new, morphologically marked constituents simply bear additional (discourse-)features which can motivate a morphological marking process that otherwise might be uneconomical.

33 Thus, the present paper takes the stance of Woolford (2006: 116) in sharing her view that “all Case licensing is technically structural, in the sense that all Case licensing is done by heads in a local structural configuration.” This is a nontrivial supposition, as it was made clear with respect to Schütze’s (2001b) converse proposal discussed in Section 4.

34 For some details regarding Case-assignor unaccusatives, see Appendix 2.
Similarly, it might be assumed that some verbs in some languages (for example, transitives, but not unaccusatives, in Korean and probably most of the verbs in English) inherently bear multiple [-active] features that are activated simultaneously when a strong clash of government takes place, allowing for parametric (and to a lesser extent, lexical) variation on the basis of the number of [+active] features available to the activated head after activation. This could also explain the capacity of verbal heads to license both an Acc complement and an Acc adjunct at the same time, which can be referred to as bidirectional Case-assignment (see (1) and (6a)), while in Chinese, this may be impossible because (at least certain) verbs cannot be multiply marked for [aactive] (unidirectional Case-assignment), see (5). This parameter thus concerns the number of directions in which a particular feature can be transmitted.

Regarding the passivised counterpart of (6a), i.e. (6b), the case-marking on the adjunct can partly be explained by presuming that the distinctive feature of the Nominative, i.e. the [+finite] feature, spreads freely in Korean rightwards, as the possible direction of spreading is also one of the most plausibly parametrised properties of features. A similar argument is put forward by Maling, Jun and Kim (2001), too, and it is easy to be sustained under the Government Licensing Hypothesis as well, by presuming that passivisation does not deactivate the verb completely. As it is postulated to bear multiple [+active] features in Korean, it can be assumed by the same token that active (i.e. not passivised) verbs (excluding unaccusatives) in that language use a “stronger” Accusative, which consists in attempting to transmit another [+active] feature to a constituent even after it has been activated: this floating feature, if it cannot be taken up by the constituent towards which it is directed, may impede the [+finite] feature from reaching such a constituent.

When the verb in question is passivised, however, it may be posited to

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35 There is, of course, considerable room for lexical variation. However, the unmarked licensing properties of lexical heads may well be language-specific.

36 Such an account would independently be supported by empirical observations which suggest that in some languages, for instance in Japanese, ditransitivity reduces to transitivity, while transitivity to intransitivity in the course of passivisation (Woolford 2006: 120).

37 Hiraiwa’s (2001) Multiple Agree analysis of the case phenomena of conjunctions is, to a certain degree, similar to the account put forward herein, inasmuch as he proposes that a V/I may enter into a simultaneous Agree relation with both DP conjuncts embedded in the hierarchic conjunction phrase.
lose only some of its capacity to transmit [+active] features:³⁸ thus it cannot initiate multiple activation, and is capable of providing only the basic licensing, “weaker” Acc, which can easily be complemented to Nom by the now freely spreading [+finite] feature.³⁹ Thus a sort of valency-theory could be elaborated on the basis of the Government Licencing Hypothesis, the detailed discussion of which, however, goes beyond the scope of the present paper.

The above mentioned, possible parameters are of course not meant to constitute an exhaustive list: they only serve to show that under the Government Licensing Hypothesis, it seems possible to account for an extensive set of cross-linguistic empirical observations regarding the case phenomena of DP adjuncts and arguments by parametrising the properties of the two basic features and their related mechanisms postulated within this framework.

³⁸ See Note 36.
³⁹ Unfortunately, there are some German data which cannot be so readily explained by such an extended “valency”-conceptualisation of verbal government and Case-assignment properties, which is otherwise in line with the Government Licensing Hypothesis. Problematic data involve passivised intransitives appearing with a DP adjunct in the Accusative:

(i) Gestern wurde (es) der ganzen Tag getanzt.
   Yesterday AUX-Pass it the-m-Sg-Acc whole day dance-PastPart
(ii) ?% „Den ganze Tag wurde getanzt.
   the-m-Sg-Acc whole day AUX-Pass dance-PastPart

[(i) and (ii): ‘Yesterday, people were dancing all day long.’]

These sentences are also puzzling from other perspectives as well. First, there is no, or in (i), no obligatory overt subject present, even though one of the two native speaker informants with whom I checked these data considered (i) better if the pleonastic subject is not omitted, but the other version was still entirely acceptable for her, not even verging on marginality. Sentence (ii), although not accepted by the same informant, was considered utterly grammatical by my other informant (who reinforced that the grammatical subject is not present in the sentence, i.e. it is not den ganzen Tag). These data are surprising inasmuch as German is not a pro-drop language.

Although it can be presumed that in German, some degree of being marked for [+active] is preserved even in passivised intransitives, it is a less plausible assumption, albeit it may also be presumed that at least in the exceptional lack of an overt subject, the [+active] feature of the I-heads, which is thus “left over,” can be directed towards the V-head, which has nothing else to license but an adjunct.

(In (i), the DP Gestern is also problematic, but it does not constitute a different problem from that of den ganzen Tag.)
6. Conclusions

In this paper, after the presentation of empirical evidence suggesting close links between the case phenomena of arguments and nonarguments and the critical review of a number of different approaches which elaborated on the relations between morphological case-marking and structural Case assignment on adjuncts and arguments, a uniform and universal syntactic treatment of case-phenomena has been proposed. Government has been conceptualised as feature-sharing which takes place in an extended m-command domain, and is conceived of as an inheritable capacity of heads, while structural Case assignment has been defined on the basis of a second, government-related feature. By introducing three, closely interrelated, basic principles which have together been referred to as the principles of Government Licensing, the interaction of the two crucial features has been accounted for in a way which has enabled us to reduce the Case Filter to these very principles, and thus also to apply it to both arguments and nonarguments. In other words, instead of restricting it to arguments or abandoning it completely, it has been retained as an important functional aspect of the organic system constituted by feature- interactions. Consequently, the syntactic interpretation of case-marking processes of various sorts has been guaranteed in a uniform way, rendering structural licensing indispensable for morphological case-marking (i.e. interpreting the latter as supervenient on or additional to the former), whereas a number of language specific parameters and, to a lesser extent, lexical variation concerning the two basic features introduced herein and certain operations pertaining to them have been posited to account for the different Case-assigning and case-marking capacities of verbal heads as well as for the diversity of the case properties of nominal expressions across languages.
MRÁZ ATTILA: DP ADJUNCTS: A CASE AGAINST THE CASE FILTER?

REFERENCES


Appendix 1

PRO and the Government Licensing Hypothesis

In this section, I shall briefly present an account of the distribution of PRO under the Government Licensing Hypothesis, which might first have seemed problematic in an approach that invariably requires phrases to govern and to be governed.

In the present framework, PRO (base-generated in VP, Spec) moves to Spec, IP, where it is presumed to receive Null Case (as advocated by Chomsky and Lasnik [1995]), a weak form of structural licensing, from a [-finite] I-head. The weakness of this “Case” is represented in part by the assumption that it is assigned by a [-active] I-head, since, due to the bottom-up nature of the licensing process, by the time the I-head has to license its specifier, it has already been deactivated in a strong clash of government with the VP, and the [-finite] feature, contrarily to the [+finite] feature, cannot reactivate the head bearing it.

However, the logical possibility of reactivation as a result of a strong clash of government between the dominating CP and the dominated IP is still to be considered. Interestingly enough, for, the only C-head in English which could provoke such a clash, being [+active; +govt], as opposed to other C-heads in the same language that are [-active; +govt] (inherently licensed governing inactive heads), never selects an IP whose specifier should be occupied by PRO: PRO, to laugh… is grammatical, as opposed to *for PRO, to laugh…. (Similarly, [+active; +govt] verbs never select such IPs, either: I, want € PRO, to laugh is grammatical, as opposed to *I, want for PRO, to laugh.)40 Thus PRO always occupies a site of weak clash of government, a syntactically unstable position, in which it is “fixed” only by the [-finite] feature of the I-head:

40 For a discussion of similar and related phenomena, see Martin (2001).
(20) Weak clash of government and PRO

\[
\text{Gov}' = C' \\
\text{Gov} = C \\
\text{[+govt]} \\
\text{[-active]}
\]

\[
\text{GovP = IP} \\
\text{PRO'} \quad \text{Gov}' = I'
\]

Weak clash of gov.

\[
\text{Gov} = I \\
\text{GovP = VP} \\
\text{[--finite]} \\
\text{[+govt]} \\
\text{[-active]}
\]

\[
\text{Gov} = V \\
\text{GovP = VP} \\
\text{[+govt]} \\
\text{[+active]}
\]

Site of previous clash of government

Inconsequence, Null Case can license A-movement, but it cannot license overt DPs, which would need a unilaterally governed, stable position. Accordingly, whenever a possible Null Case position (i.e. the site a weak clash of government between a [-finite] I-head and a C-head) is externally governed by a [+active] C-head, Null Case is overridden by “true” structural Case, since the assignor of Null Case is postulated to be [-active], and as a result, this form of licensing is weaker than the Accusative which is presumed to be the basic Case.

More precisely, the word “Case” in the name “Null Case” is to be understood metaphorically, reflecting a tradition in which structural licensing and the (abstract) Case of DPs were considered identical. Nevertheless, reducing the Case Filter to more basic principles and mechanisms of licensing has allowed us to differentiate between different degrees of licensing in a hopefully more subtle manner, avoiding the questions, for example, why only overt DPs need licensing, or if covert DPs also need to be licensed, why the Case Filter cannot account for this in its traditional conceptualisation.

Finally, let the analysis of a fully spelled out sentence structure including PRO be presented for the sake of clearer demonstration.\(^{41}\)

---

41 The movement of a covert finite I-morpheme, although it may be presumed, is not represented in the figure, as it is omitted from all the other representations as well throughout the present paper.
(21) PRO: $I_k \text{want} \ PRO_k \text{to laugh.}$

GovP = CP
\[
\begin{array}{c}
\text{Gov' = C'} \\
\end{array}
\]
Gov = C

[+govt] GovP = IP

[-active] 

\[
\begin{array}{c}
I_k \\
\end{array}
\]
Gov' = I'

Nom-assignment
Gov = I GovP = VP

[+finite]

[+govt] t_j Gov' = V'

Re-activation
Gov = V GovP = CP

[+govt]

[+active] 

want

Gov = C

[+govt] GovP = IP

[-active] 

\[
\begin{array}{c}
\text{PRO_i} \\
\end{array}
\]
Gov' = I'

Weak

(NULL-assignment) clash of govt.
Gov = I GovP = VP

[+govt] t_i Gov' = V'

[-active] 

to Gov = V

[+govt]

[+active] 

laugh

Sites of strong (V-activating/I-deactivating) clash of government
APPENDIX 2

THE THEMATIC STRUCTURE
OF VERBAL HEADS AND THEIR GOVERNING CAPACITIES

In this section, a summary of the thematic structures and governing as well as Case-assigning capacities of the different verbal heads will be provided. The demonstrative analyses to be shown will also cast light upon the possibility of relating Burzio’s generalisation to the Government Licensing Hypothesis proposed in the present paper.

<table>
<thead>
<tr>
<th></th>
<th>No. of θ-roles</th>
<th>Inherent governing capacities</th>
<th>Later activation</th>
</tr>
</thead>
<tbody>
<tr>
<td>“weather”</td>
<td>0</td>
<td>–</td>
<td></td>
</tr>
<tr>
<td>Unaccusative</td>
<td>1</td>
<td>+</td>
<td></td>
</tr>
<tr>
<td>Intransitive</td>
<td>1</td>
<td>+</td>
<td></td>
</tr>
<tr>
<td>Transitive</td>
<td>2</td>
<td>+</td>
<td></td>
</tr>
</tbody>
</table>

(22)

Since transitive verbal heads have an occupied specifier position due to their thematic structure, they can be activated and thereby enabled to assign Case to their DP complements without any further mechanism to be introduced:

(23) Transitive verb assigning Case: [t eat the cake]

Gov’ = V’
Gov=V
GovP = DP
[+govt]  e  Gov’ = D’
[-active] eaten
Gov = D  NullP = NP
[+determinate]  cake

Site of previous strong
(D-activating, V-deactivating) [+active]
clash of govt.
the  Acc
More interestingly, however, it follows from the principles of Government Licensing that even intransitive verbs may assign Case to their complements. Although this theoretical assumption may seem to have no empirical consequences (i.e. it may appear to overgenerate), since these verbs do not subcategorise for a complement, Rothstein (1992: 130) claims that there are instances which exploit this possibility, for example: They laughed their way out of the quarrel, analysed as follows:

(24) Intransitive verb (enabled to assign Case!): [I laugh (their way out of the quarrel)]

\[
\begin{array}{c}
\text{Gov'} = I' \\
\text{Gov} = I \quad \text{GovP = VP} \\
[+govt] \\
[-active] \\
\text{t,} \\
\text{Gov' = V'} \\
\text{Gov = V} \quad (\text{GovP = DP}) \\
[+govt] \\
[+active] \\
\triangle \\
\text{laugh} \\
\end{array}
\]

Site of previous strong clash of govt.; the subject moves upwards immediately (no Case position!)

As Rothstein observes, this phenomenon is considered surprising in part because in conceiving of the Case assigning capacities of intransitive verbs, we usually rely on Chomsky’s wording of Burzio’s generalisation, which, being (somewhat ambiguously) restricted to transitives and unaccusatives, does not entail this possibility, although Burzio’s original concept did so.\textsuperscript{42}

\textsuperscript{42} It is also to be underscored that the original version is biconditional, as opposed to Chomsky’s conditional version. The consequences of this change, however, will be direg-

Mráz Attila: DP Adjuncts: A Case Against the Case Filter?
(25) **Burzio’s generalisation**

a. *(modified version, Chomsky 1986b: 139)*

A verb (with an object) Case-marks its object
if and only if it θ-marks its subject.

b. *(original version, Burzio 1986: 185)*

\[ \theta_S \leftrightarrow \text{A} \]

[where \( \theta_S \) stands for the θ-role assigned to the Subject, A for Case-assignment]

The Government Licensing analysis of the **unaccusatives** without the insertion of a pleonastic subject also complies with Burzio’s Generalisation: since the specifier of the VP must be occupied to license the verb through a strong clash of government, the complement of the verb moves to the specifier, where further movement is triggered by the clash, as it has been discussed.

(26) a. Unaccusative without a pleonastic subject: \([t’{} arrive t]\)

\[
\begin{array}{c}
\text{Gov’} = I’ \\
\text{Gov} = I \\
[+\text{govt}] \\
[+\text{active}] \\
\quad \quad t_i’ \\
\quad \quad \quad \text{Gov’} = V’ \\
\quad \quad \quad \quad \text{Gov} = V \\
\quad \quad \quad \quad \quad [+\text{govt}] \\
\quad \quad \quad \quad \quad [-\text{active}] \\
\quad \quad \quad \quad \quad arrive \\
\quad \quad \quad \quad \quad \quad \quad \quad t_i \\
\quad \quad \quad \quad \quad \quad \quad \quad \quad \text{GovP} = \text{DP} \\
\end{array}
\]

**Site of ensuing strong**

(V-activating, I-deactivating) \quad DP moves into Spec

**clash of govt.** \quad to enable the VP to be licensed

ded for the time being.
It is important to point out again that as soon as the verb is activated, it is presumed under the Government Licencing Hypothesis to be able to assign Acc, although not to the emptied complement position, but to an adjunct (see (19), for example).

As regards unaccusatives with a pleonastic subject, the specifier where the V-activating strong clash of government takes place is occupied, and thus the verb is licensed to assign Case without its complement having to move. Consequently, it can assign Case to the complement itself, as expected:

b. Unaccusative with a pleonastic subject: [t arrive John]

```
 Gov' = I'
    ┆
  Gov = I  GovP = VP
   ┆ [+govt]
  [-active]
   ┆ t,
      ┆
  Gov' = V'
    ┆
  Gov = V  GovP = DP
   ┆ [+govt]
  [+active]  John
       arrive
```

The activated verb can assign Acc to its complement.

A pleonastic subject (there) is inserted to enable strong (V-activating, I-deactivating) clash of govt., but it moves upwards immediately (no Case position!)

Last but not least, “weather”-verbs, being inherently [-govt; -active] heads, cannot be activated, but are licensed by becoming [+govt]. However, since the external governor (the I-head) needs an occupied specifier position in the externally governed phrase (VP) so as to govern it, the pleonastic subject is correctly predicted to be inserted: