

# Case: Oblique, Inherent, Semantic, Quirky

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**abstract:** In the last several decades, a variety of terminology has been developed for describing case-marking patterns and uses of case-marking. Here I will review the related concepts of semantic, oblique and quirky/inherent case, discussing their development, and how they have been applied to describe case systems in various languages, with the sorts of problems that arise in trying to discriminate them from other kinds of case phenomena.

**keywords:** case, structural case, quirky case, inherent case, grammatical relation, core grammatical relation, adjunct, oblique

Prior to the 1970s, and well into them, both theoretical and descriptive studies of case tended to merely list the various cases found in a language with their names and discussions of how they were used, without attempting to classify cases into types, or to theorize about what kinds of underlying mechanisms might be responsible for different kinds of behavior. Blake (1977) illustrates this approach. But during the seventies and later, various broader classifications were developed and came to be widely used, and connected to theoretical proposals. For example Chomsky (1981, pp. 170-171) has a distinction between ‘structural’ and ‘inherent’ case, the former imposed by various structural conditions, and the latter by specific lexical items, while Blake (1994, pp. 124-124) has a division between ‘grammatical’ and ‘semantic’. Further terms and divisions have been introduced, such as ‘quirky’, but with little consistency between authors. In this chapter, we will consider cases and case uses that have been described as ‘semantic’, ‘lexical’, ‘inherent’, ‘oblique’ and ‘quirky’. These are plausibly opposed in some way to ‘structural’ case (exemplified by traditional nominative on subjects, and accusative on direct objects), although the nature of this opposition is also unclear, whether it involves genuinely distinct mechanisms (the standard generative view) or is merely a continuum of generality (as widely assumed in Construction Grammar, for example Barðdal (2008)). Indeed, the very notion of case is hazy around the edges (Spencer 2005, Spencer & Otaguro 2005).

Fundamental to these traditional classifications of cases are the standard classifications that are made of syntactic functions, especially those between ‘arguments’ and ‘adjuncts’, and within the arguments, ‘core (or term) arguments’ and ‘oblique arguments’, as employed in many different syntactic frameworks. We shall therefore begin in section 1 with a classification of relevant grammatical functions, together with a discussion of the nature of some of the differences between what are often called core syntactic cases and the others. Then we will examine in section 2 ‘classic’ semantic case, which marks the way in which an entity participates in the activity of its clause (adverbial), or how it is related to another entity (adnominal), together with what we will call ‘oblique’ uses in which cases that are used semantically are also used to mark arguments that don’t seem to bear a core grammatical relation. Then, in section 3, we consider the concepts ‘inherent’, ‘quirky’ and ‘lexical’ cases as developed by various authors, especially Woolford (2006), concluding that the divisions that have been made are questionable or of unclear empirical significance (so far). Section 4 is the conclusion.

Uses of case-morphology that we will not consider here, other than as

ingredients in certain examples, are to mark meanings such as definiteness, specificity and incomplete effect (Differential Object Marking, extensively discussed by Dalrymple & Nikolaeva (2011))), or the ‘partitive’ (Belletti 1988), and also concepts such as aspect or modality applying to the entire proposition (Butt 2006, pp. 146-159). Although clearly semantic, their function seems to be significantly different from that of the traditional semantic cases, which indicate the nature of the relationship of referent of the NP to the situation described by the predicate rather than discourse status (DOM) or properties of the containing clause (aspectual and modal case). They also tend to apply, often exclusively, to NPs in relations such as subject or object, replacing a structural case on a non-lexical basis, rendering them beyond the scope of this chapter.

## 1 Grammatical Functions and Case Classification

First, we consider the classification of grammatical functions, then the distinction between syntactic cases and the others, especially semantic case marking the role of adjuncts, which is probably the diachronic origin of the other non-structural/syntactic uses of case.

### 1.1 Classification of Grammatical Functions

Most accounts of grammatical structure recognize a distinction between ‘arguments’ and ‘adjuncts’, on the basis that the arguments get their semantic roles (also often called ‘theta roles’<sup>1</sup>) from a higher predicate, while the adjuncts in effect ‘supply their own’, typically implemented by treating them as functions that take as argument the meaning of the main predication.<sup>2</sup> Arguments are furthermore often obligatory, whereas adjuncts are always optional. Some example arguments are:

- (1) a. John predeceased \*(Mary) [obligatory argument NP]
- b. John put the baby \*(into the carseat) [obligatory argument PP]
- c. John sold his car (to a friend) [optional argument PP]
- d. John gave a stockpot (to Mary/the charity drive) [optional argument PP]

Evidence that the optional PP in (c) is an argument is the fact that there is a lexically-determined entailment that the friend becomes owner of the car, which

would not be present with other main verbs such as *show* or *describe*. With (d) there is the further phenomenon in the form of a meaning-shift to the effect that when the PP is omitted, a specific recipient is understood, which must be some kind of charitable collection rather than a random person who the subject happens to give something to.

Adjuncts are illustrated in (2)

- (2) a. John lost his wallet (in Chicago)
- b. John climbed into a lion enclosure (for fun)
- c. John entered Intensive Care (twenty minutes later)

They are always optional, their omission produces no hard-to-explain meaning shifts (other than the non-specification of whatever they specify), and there furthermore do not appear to be any entailments that appear to be lexically triggered by the main verb as opposed to the overall form of the construction. There are in many languages some fairly standard tests for argument vs. adjunct status, such as the *do so* test in English familiar from elementary syntax, but these often are not conceptually fully decisive. In the case of the *do so* test, for example, it might be the case that the items that it classes as adjuncts are actually just arguments that it is specified for taking optionally, analogous to the *to* and *with* optional arguments of *do it/something/what*. Nevertheless, relying on them usually seems to lead to sensible results.

Nominal arguments (NP/DP<sup>3</sup> and PP) can be further classified into ‘core’ or ‘term’, and ‘oblique’. Clausal arguments sometimes seem to fit into this system, as in Icelandic (Thráinsson 1979), and sometimes not, as in English and Dutch (Koster 1978). These and other kinds of arguments that don’t fit readily into the core and oblique categories, such as predicate nominals and adjectives, will be here called ‘complements’ (following the usage of the Lexical Functional Grammar ‘(X)COMP’ functions). Certain PPs, such as especially directionals, can also be put into this category (along the lines of PCOMPs in Lexical-Functional Grammar).

Andrews (2007) characterizes core arguments as ones whose behavior is similar to those traditionally analysed as subjects and direct objects in English and various other languages, while obliques behave in a way similar to PPs.

Although one would hope ultimately to have a more theoretically grounded view of this distinction, such a pragmatic, classificatory approach appears to be the best that can reliably be done at present. An example of the approach in practice

would be the argument of Miyagawa & Tsujioka (2004) that when Recipients marked with *ni* in Japanese appear before the Theme (marked with *o*) they are ‘objects’, in a ‘double object’ construction, but when they follow it, ‘obliques’ in a PP. The arguments are a combination of analogies of behavior of the pre-Theme *ni*-objects to Recipients in double object constructions in languages where this construction is overtly obvious, and similarities in behavior between the putative double object Recipients and core arguments in noncontroversial double object constructions. The arguments are convincing on a theory-independent basis, regardless of what one thinks of the proposed analysis in terms of Larsonian VP shells, which provides a reasonable formal framework for the analysis, but not a well-worked-out and solidly justified basis for predicting the phenomena from first principles. The main characteristics of core NPs include:

- (3) a. The possibility of semantic or grammatical role to be signalled by constituent order rather than marking.
- b. A tendency for the association to semantic roles for NPs bearing a core grammatical function to be more abstract and variable than those expressed by PPs or obliques.
- c. A tendency for marking of core NPs to vary depending on global properties of the clause such as tense, modality and complement type, while that of obliques tends to be invariant.
- d. A tendency for the core NPs but not the others to trigger ‘cross referencing’ (agreement or clitic-doubling, setting aside the issue of whether these should be distinguished).

Noun phrases in English, Bantu and many other languages with zero or very limited case-marking exhibit (a), while these and many other languages where there are a wide range of semantic roles associated with subject and object grammatical functions exhibit (b). (c) is exemplified by such phenomena as accusative subjects of infinitives in Latin, dative subjects of nonfinites in Warlpiri (Simpson 1991, Legate 2008a), or genitive of negation in Russian and Polish, while (d) is exemplified by cross-referencing in Bantu, Warlpiri, Romance, and many other languages.

Oblique arguments on the other hand have the appearance of adjuncts, with a marker, but the semantic role assignment is not always transparent, the choice of

adposition or case-marker is usually fixed (and never with a wide range of options), and they are sometimes obligatory:

- (4) a. Max depends \*(on Mary)  
b. John gave a kitten #(to Mary)

Observe that (b) with the recipient omitted is not ungrammatical as such, but pragmatically bizarre because omission of the Recipient shifts the meaning to imply that the Recipient is some kind of organized fund or drive of an essentially charitable nature, and such activities usually do not accept pet animals as donations.

The distinction between adjuncts and oblique arguments thus can depend on relatively subtle factors such as meaning-shifts when an argument is omitted, and is for this reason often problematic in lesser-known languages and in computational grammars, where it is often ignored, increasingly as a matter of principle rather than mere practice (Zaenen & Crouch 2009). Nevertheless it is of great theoretical and descriptive importance.

The final kind of nominal argument that we will recognize, among the ‘complements’ as discussed above, are directional, locative and some other kinds of phrases that are shown to be non-adjuncts by obligatoriness:

- (5) a. John put the baby \*(in(to) the carseat/onto the bed)  
b. Joe sidled \*(off the podium/into the room)

The difference between these and obliques is that while the oblique markers do not appear to make a semantic contribution independently of the verb (they can’t normally be varied), the markers of the complements can be varied to make different semantic contributions, such as the exact spatial nature of the location or path involved, and therefore combine fully compositionally with the meanings of the verbs.

A general observation is that non-core nominal arguments have the general appearance and some of the behavior of the adjuncts, which gives them an apparently intermediate status and is responsible for many of the difficulties of deciding how to classify them in different languages. For some theoretical perspectives on obliques in various frameworks, see Gawron (1986), Neeleman (1997) and Andrews (2008).<sup>4</sup>

## 1.2 Syntactic vs Semantic case

The distinction between core arguments and adjuncts gives us a basis for one of the most widely recognized distinction between cases, that between ‘syntactic’ case (or ‘structural’), and what I will call ‘semantic case’ (noting that, as mentioned above, this is meant to exclude both DOM phenomena and using case-marking to signal aspects of higher structure such as polarity, mood or finite/nonfinite status). These notions need refinement or supplementation to accomodate the phenomena alluded to by the terms ‘inherent’, ‘oblique’ and ‘quirky’, but some kind of syntactic vs. semantic distinction seems to be fundamental.

Syntactic case marks core argument functions, while semantic case marks the semantic roles of adjuncts, and aspects of the semantic roles of complements (such as the directions ‘to’ and ‘from’), and the forms then tend to extend to mark non-core arguments, of which the ‘obliques’ are the ones hardest to distinguish from adjuncts, since they often lack obvious properties to mark them as different from arguments. For this reason, we will regard adjuncts, some complements such as directionals, and obliques as bearing semantic case.

We now consider two kinds of differences that often arise between syntactic and semantic case: variability vs. stability, and participation vs. non-participation in agreement. Both of these can also be seen as aspects of the differences between core and non-core NPs discussed above.

**Variability vs. Stability** Saibai (Australian; Comrie 1981, Goddard 1982) illustrates (3c), the tendency for semantic and oblique case to be less variable on the basis of the global environment than structural/syntactic. Saibai has the traditionally syntactic cases ergative and accusative, marked by clear affixes, along with an unmarked form which might plausibly be called ‘zero’, ‘nominative’ or ‘absolutive’, used when neither ergative (transitive subject) or accusative (direct object) markers appear, which is determined by the nature of the noun phrase as discussed in the references above and elsewhere.<sup>5</sup> There are also semantic cases (so-called in the descriptive literature, and in accord with the guidelines above) such as genitive, ablative and dative. But there is a wrinkle: in nonfinite verb constructions, subjects and objects that would normally be ergative, accusative or zero appear in one of the semantic cases, as determined by the specific nonfinite construction used, while arguments marked with a semantic case retain that case. In the following examples (6) we see arguments that would be expressed as ergative and zero case NPs in finite clauses instead appearing in

nonfinite ones in the dative (b, where both ergative and zero are affected) and ablative (c, where only the argument normally expressed by zero case can appear overtly), as determined by the matrix verb (Comrie 1981):

- (6) a. Garkoezin puy pathan  
 man-ERG tree.ZERO chopped  
 The man chopped down the tree (Saibai)
- b. Ngaw ubi garkoez-ipa puy-pa poethay-pa  
 my desire man-DAT tree-DAT chop-INF  
 I want the man to chop down the tree
- c. Ngay akanmepa puy-ngu poethay-le  
 I fear tree-ABL chop-AVERS  
 I am afraid to chop down the tree

In the second example, *garkoezipa* could also be interpreted as dual or plural, as we discuss briefly below.

Next, we see semantically case marked oblique arguments retaining their case in the same nonfinite constructions:

- (7) a. Ngath ngibepa minayoepathaman  
 I you.DAT believe  
 I believe you (Saibai)
- b. Ngaw ubi ngibepa garkoez-ingu akanmoey-pa  
 I want you.DAT man-ABL fear-INF  
 I want you to fear the man
- c. ngay ankanmepa ngibepa minayoepathanay-le  
 I fear you.DAT believe-AVERS  
 I am afraid to believe you

Unfortunately, Comrie doesn't provide similar examples with adjuncts rather than oblique arguments (assuming that the argument structures of the expressions meaning 'want' and 'fear' are essentially the same in Saibai as in English, a not entirely innocent assumption).

Japanese provides a somewhat different example; in this language, the nominative case-marker *ga* and the accusative *o* are obligatorily deleted before the topic marker *wa* (Kuno 1973, p. 335), while other markers such as *kara* and *e* cannot be deleted, and deletion of the dative *ni* is in general optional, subject to

conditions of predictability which appear to be essentially nonsyntactic in nature (Nagata 1994).

Further examples of stability versus variability from Lardil and Russian are discussed and analysed within the Minimalist Program by Richards (2007), the basic empirical observation being that ‘structural’ cases are prone to being over-written by various kinds of material in a way that semantic/oblique cases are not. An especially common version of this phenomenon is the common occurrence from Classical Greek and Latin of nonfinite subjects appearing in some case other than the nominative, most often accusative, as determined by the constructions. (Legate 2008a) discusses a similar case of the dative replacing absolutive (obligatorily) and ergative (optionally) in nonfinite constructions in Warlpiri. In the theory of what case really is presented by Pesetsky (2013), these might all be thought of as greater ‘robustness’ of semantic as opposed to syntactic cases, because, on this approach, the features commonly viewed as ‘case’ tend to pile up in layers, most of which are erased in the presence of others. Another commonly found class of examples are the ‘mixed ergative’ languages where, in some tense-aspect-mood-polarity (TAMP) combinations, the Agent is marked ergative and the Patient/Theme zero or accusative, while in others, the Agent is marked zero (essentially, nominative), and the Patient/Theme dative. Georgian (Harris 1981) provides a particularly complex example, presented concisely by Butt (2006:157). Such TAMP-driven case-replacements do not seem to occur with semantic case appearing on oblique arguments, directional complements or adjuncts, although TAMP markers can be attached after semantic case-markers, as in Kayardild (Evans 1995, Round 2012).

**Agreement vs. Non-agreement** Point (3b), the tendency for syntactic but not semantic case to trigger agreement, which we do not here distinguish from clitic-doubling, is illustrated by Warlpiri (Simpson 1991, Hale 1982), where the conventionally recognized syntactic cases are ergative, absolutive and dative (Simpson 1991, p. 193), while the semantic cases are allative, elative, comitative and locative, supplemented by so-called ‘derivational’ cases such as possessive, privative, proprietive and others, which function adnominally rather than adverbially (Simpson 1991, p. 58). For both kinds the boundary between cases markers and derivational morphology is not always clear, with Simpson reclassifying the traditional perlativ (motion through or along) from a case to a derivational affix. In this language, the arguments of most verbs are marked by a syntactic case, and verbs agree with them by marking on an ‘Aux’ constituent as

analysed classically by Hale (1973), and insightfully reanalysed by Legate (2008b). Below in (8a) we see that a dative recipient triggers agreement (this also occurs with related thematic roles such as ‘loser’), while in (b) by contrast we see that with an allative (semantic case) marking, this semantic role does not (this case-marking is very much the minority option; Hale 1982, p. 253; see also Simpson 1991, pp. 339-340):

- (8) a. Ngarrka-nkgu ka-rla kurdu-ku japu-japu kiji-rni  
 man-ERG PROG-3D child-DAT ball throw-NONPAST
- b. Ngarrka-nkgu ka kurdu-kurra japu-japu kiji-rni  
 man-ERG PROG child-ALL ball throw-NONPAST

The man is throwing the ball to the child. (Warlpiri)

It is unclear whether the difference in case-marking of the Recipient carries any meaning.

Modern Greek (Anagnostopoulou 2003, pp. 15-17) has a similar and better-studied contrast in the form of a ‘dative alternation’ between ‘indirect objects’ marked with the genitive case (which has fused with the dative in Ancient Greek, the genitive forms prevailing), and those marked with the preposition *se*. Genitive Recipients allow clitic doubling, prepositional ones don’t:

- (9) a. (Tu) édhosa tu Giáni to vivlío  
 Him(G) I gave the Gianis(G) the book(A)  
 I gave John the book. (Modern Greek)
- b. (\*Tu) édhosa to vivlío sto Giáni  
 Him(G) I gave the book(A) to-the Gianis(A)  
 I gave the book to John.

The semantics of the two constructions appear to be essentially the same, although there are complex syntactic differences, explored further in Anagnostopoulou (2005) and Georgala (2012). In this case the difference in behavior can be attributed to the difference between NP and PP, but, as is well-known, in Spanish and closely related languages such as Catalan, optional clitic doubling occurs with indirect objects that are arguably PP (Alsina 1996:166-169). So we have a complicated situation without any apparent easy solution.

In Warlpiri and Greek, there are syntactic phenomena indicating that dative objects are arguments (and in Warlpiri, that they are in fact direct objects (Simpson & Bresnan 1983)), but in many languages, convincing tests have not been found, and the status of dative Recipients is unclear. In Yidiny, for example (Dixon 1977, pp. 259-260), dative is used to mark recipients of verbs such as *give*, but any verb can be accompanied by a dative indicating the direction in which an action is oriented, therefore suggesting that it is an adjunct, and refined judgements of the kind available in English are not available, leaving the status of these datives as arguments or adjuncts unsettled. This provides a reason for treating together in the next section semantic cases and oblique cases that appear mark arguments, without there being clear arguments for those arguments bearing a core grammatical relation.

## **2 Semantic and ‘Oblique’ Case**

Semantic case is one of the few terms in this area in which there has been a reasonable degree of consistency of application, including across different frameworks, and it plausibly provides the diachronic origin of the cases and case-uses called oblique, inherent and quirky. An initial problem associated with it is distinguishing cases from derivational affixes on the one hand, and adpositions on the other, which is especially significant for semantic case due to the fact that the semantic cases play less of a role in syntactic phenomena than the other kinds. I will examine these problems in the first subsection. In the second, I will discuss the possibilities for classifying semantic cases, and in the last, the problem of even identifying the semantic cases of a language, a difficulty which emerges as an outcome of the phenomena discussed in the preceding sections. After discussing some general characteristics of semantic case, I will consider in turn the problem of distinguishing semantic cases from adpositions, the internal structures that sometimes appear with semantic cases expressing locational and directional concepts, and the uses of semantically case-marked NPs as arguments of verbs and adpositions.

### **2.1 Some General Characteristics of Semantic Case**

Aside from the characteristics discussed above of invariability, resistance to agreement, and a tendency to be the sole signal of a relatively limited number of

semantic roles, semantic cases have some further general characteristics to be discussed here, namely PP-like behavior, and ‘case-stacking’.

**PP-like Behavior of Semantic Case** Perhaps the most important is that semantically case-marked NPs often have syntactic functions equivalent to that of PPs, leading indeed to the widespread proposal that semantically case-marked nominals are in fact PPs with an empty P, reviewed for example by McFadden (2004). This applies both to languages with a rich inventory of case-forms traditionally called semantic, such as Finno-Ugric, Daghestan and Australian languages, and those such as German, Greek or Icelandic with smaller case-inventories, but with semantic use of some of the predominantly syntactic cases, such as accusative. In German, for example, accusative NPs of time share with PPs a marginal capacity to be extraposed to a position after the main verbs of subordinate clauses, which suggests that they are in fact PPs with an empty (McFadden 2004, pp. 57-58)

- (10) a. dass er im März seinen Bruder besucht hat  
that he in March his:A brother:A visited has.  
that he visited his brother in March. (March)
- b. \*dass er im März besucht hat seinen Bruder.
- c. ? dass er seinen Bruder besucht hat im März.
- d. ?dass er seinen Bruder besucht hat letzten Sonntag.  
that he his:A brother:A visited has last:A Sunday:A  
that he visited his brother last Sunday.

Such relatively specific syntactic arguments are reinforced by the general observation that, especially in languages with rich semantic case systems, semantically case-marked NPs frequently fill the general range of functions of PPs in languages with less or no case-marking, including adnominal modification of NPs, directional modifications of verbs involving motion, and many of the functions of PP adjuncts. This observation suggests that perhaps all semantically case-marked NPs occur in PPs with empty P. Many linguists however would not accept this for languages such as Warlpiri or Kayardild, which appear to lack adpositions, having only semantic case, supplemented with verbal particles (note that convincing evidence for a PP vs NP distinction in a language with no overt adpositions would be extremely interesting from the point of view of Universal

Grammar and the theory of language acquisition). A slightly different situation is provided by Japanese, where it has been argued that the nominative and accusative particles *ga* and *o* are case markers, most of the others (such as *kara* ‘from’) are P, while *ni* can be either (Miyagawa & Tsujioka 2004).

**Stacking of Semantic Case** Another striking feature of semantic case in certain languages is the possibility of ‘case-stacking’, or *Suffixaufnahme*, reviewed for Australian languages by Dench & Evans (1988), and in a variety of other languages where it occurs (usually but not quite always to a more limited extent than in Australia) in the papers in Plank (1995a). Two Australian examples are (Dench & Evans 1988:8):<sup>6</sup>

- (11) a. ba:ba-gu junuy-gundi-yu ju:ngu jala:ny jamay barway  
 father-ERG child-GEN-ERG say-FUT tongue(NOM) too big(NOM)  
 The child’s father will say “(your) mouth’s too big”. (Gumbaynggir)
- b. ngatha mapara-nma-rni kunta kartu-wu japurta-parri-yu  
 1SG.NNOM bring-PAST-HENCE water man-DAT beard-PROP-DAT  
 I brought water for the man with a beard. (Yingarta)

The phenomenon of case-stacking with the genitive as illustrated in (a) is relatively widespread, and was perhaps first noticed by Bopp in Classical Georgian (Plank 1995b, p. 3). Indeed, vestiges of it can be found in Indo-European languages. The possessive adjectives of Icelandic can for example be regarded as genitive pronominal forms with additional agreement with the possessum tacked on, as discussed in footnote 2 of Andrews (1976). See the papers in Plank (1995a) for further examples, Evans (1995) and Round (2012) for what might be the most complex example overall (Kayardild), and Richards (2007) for the somewhat more subdued but very interesting example of Lardil (related to Kayardild). In some languages, such as Warlpiri, inability to participate in case-stacking is a distinguishing feature of syntactic as opposed to semantic case (Simpson 1991, p. 241).<sup>7</sup>

There are a number of classifications of semantic cases that are often made, including adnominal vs. adverbial, and locational vs. nonlocational. Although the first is popular in the descriptive literature, it is unclear that there is anything theoretically substantial behind it, other than the consequences of the semantics of the case-markers. In Warlpiri, for example, the Propriative *kurlu* ‘having’ appears to be mostly used adnominally, but is freely used to express instrumental

function in intransitive clauses, where the ‘instrumental’, identical in form with the ergative, cannot be used (Hale 1982, pp. 277-278):

- (12) a. Ngarrka-ngku ka warlu paka-rni warlkurru(-kurlu)-rlu  
 man-ERG PRES firewood chop-NONPAST axe(-PROP)-ERG  
 The man is chopping firewood with an axe
- b. Purlka ka watiya-kurlu warru-wapa-mi  
 old man(ABS) PRES stick-PROP around-walk-NONPAST  
 The old man is walking around with a stick (Saibai)
- c.\*Purlka ka watiya-rlu warru-wapa-mi  
 old man(ABS) PRES stick-ERG around-walk-NONPAST

Furthermore, the locative, a traditional adverbial case, can also be used adnominally (Simpson 1991, p. 238):

- (13) Japanangka-rlu-rla-jinta lawu-rnu marlu-ku pirli-ngka-kuu  
 Japananga-ERG-3DAT-3DAT shoot-PAST kangaroo-DAT rock-LOC-DAT  
 wiri-ngka-ku  
 big-LOC-DAT  
 Japanangka shot at the kangaroo on the big rock (Warlpiri)

Here the dative object and the double 3DAT marking on the ‘Auxiliary’ suffixed to the first word (see Hale (1973) for discussion of this construction) express a modification of the verbal meaning where it is characterized as unsuccessful, and the last two words show case stacking with a locative attached to both components expressing the location of the kangaroo, followed by a dative in concord with it.

A more substantial division, which we will consider in a following section, is between locational and nonlocational semantic case. This emerges from the fact that in languages with extensive case systems, the locational cases often display a degree of internal structure, in a way that in fact starts to make it unclear what case really is supposed to be in the first place. Delimiting what case is in fact a general problem, which is especially severe for semantic case, to which we turn in the next subsection.

## 2.2 Delimiting Semantic Case

There are two delimitation problems for semantic case, the first, to distinguish it from derivational morphology, the second, to distinguish it from adpositions. We consider each in turn.

**Case vs. Derivational Morphology** The problem of distinguishing case from derivational morphology arises most strongly in relatively little known languages with mostly agglutinative morphology such as Australian, where there is furthermore relatively limited amounts of corpus material available, and elicitation is often problematic. Dench & Evans (1988:110-113) for example argue that many affixes have been misclassified as derivational formatives rather than case-markers, recognizing these main criteria for something to be a case:

- (14) a. It can apply to phrases  
 b. It is productive, with the compositional interpretation always available  
 c. It can appear on multiple members of a phrase (distribution)

Criteria (a) is somewhat challenged due to the existence of the well-known ‘bracketing paradoxes’ such as *transformational grammarian*, but such exceptions appear to be limited in scope; for example *a recent transformational grammarian* does not refer to a practitioner of recent transformational grammar. The applicability of case-markers to phrases is on the other hand essentially unlimited.<sup>8</sup> But this can be difficult to assess for less well-studied languages. Satisfying (b) on the other hand does not guarantee that an affix is a case-marker, because some derivational morphology is highly productive. But failure of either or both criteria to apply is generally accepted as evidence that an affix is derivational, while satisfying (c) on the other hand is generally now taken as convincing evidence that an affix is a case-marker, as in these examples of the ‘privative’ (without) and ‘proprietary’ (something had in possession) from Martuthunira (Dench & Evans 1988, p. 7):

- (15) a. apunmarni-wirriwa jirli-marta-wirriwa  
 shirt-PRIV sleeve-PROP-PRIV  
 [a person] without a shirt having sleeves (Martuthunira)
- b. apunmarni-marta jirli-wirriwa-marta  
 shirt-PROP sleeve-PRIV-PROP  
 [a person] with a shirt without sleeves

Unfortunately, in some languages, such as Turkish, (a, b) are satisfied for putative case-markers while (c) is not, but since affixes satisfying (c) don’t ever seem to fail (a), it seems correct to regard the three criteria as potential indicators of a genuine condition, that being a case-marker rather than a derivational affix.

Comrie and Polinsky (1998, pp. 102-103) discuss some instances in the Caucasian language Tsez where it is unclear whether certain affixes are case markers or derivational morphology, due to the status of (a) being unclear for certain affixes.

**Case vs. Adpositions** The other identification problem for semantic cases is distinguishing them from adpositions, discussed at length in MacFadden (2004, pp. 52-81). Distribution over members of a noun phrase as in (15) above is widely accepted as evidence that an affix is a case-marker rather than an adposition; for example, MacFadden (2004, p. 67) cites these Finnish examples from Nikanne (1993, p. 78) as evidence against an adpositional account, using the same criterion as Dench and Evans in a different theoretical environment and language family and area:

- (16) a. suure-sta talo-sta  
big-ELAT house-ELAT  
big house (Finnish)
- b. \*suuri talo-sta  
big house-ELAT

However, in a syntactic framework that countenances lowering rules, it is difficult to exclude the possibility that case-markers are simply adpositions that have been lowered, perhaps sometimes in multiple copies, onto members of the NPs they semantically apply to. This problem is exacerbated by the facts already mentioned above that the functions of semantically case-marked NPs are often identical to those of prepositional phrases in languages that (are generally held to) lack semantic cases. and that in languages with both, semantically case-marked NPs often show the same distribution as PPs. And it furthermore does not solve this problem to point out that rich semantic case systems can (but don't always) coexist with surface-evident adpositions that don't distribute, as in these further examples from Finnish (Nikanne 1993):

- (17) a. suur-ta talo-a kohti  
big-PAR house-PAR toward  
toward the big house (Finnish)
- b. \*suur-ta kohti talo-a kohti

For it is possible for P's to take PP complements (*from under the tree*), and also that some P might undergo lowering and others not.

Another possible criterion for distinguishing cases from adpositions is that case markers often appear on both members of a coordinate structure, while prepositions do not have to. On this basis, Jaeggli (1982), extending Vergnaud (1974), argued that dative *à* in French was a case-marker, as opposed to a true preposition such as *sur*:

- (18) a. Ils se sont assis sur la table et les chaises  
They REFL are sat on the table and the chairs  
They sat on the table and the chairs (French)
- b. \*Ils ont parlé à Marie et le directeur  
They have spoken to Marie and the directors
- c. Ils ont parlé à Marie et au directeur  
They have spoken to Marie and to.the director  
They have spoken to Marie and the director

However, Anagnostopoulou (2005) shows that the criteria adduced by Jaeggli and others do not yield a fully satisfactory characterization of the difference between cases and inflection in the Romance languages.

A further problem for this criterion is posed by the problem of 'suspended affixation' in Turkish, whereby certain formatives conventionally treated as affixes appear only on the final member of a coordinate structure, including case-markers, as discussed by Kabak (2007, p. 207) and many others:<sup>9</sup>

- (19) yüksek okul-lar ve üniversite-ler-de  
high school-PL and university-PL-LOC  
at high-schools and universities (Turkish)

The traditional case markers including *-de* 'LOCative' are clearly different in their properties from traditional postpositions (although neither distribute), for example in that they undergo vowel harmony and other word-level phonological processes, but, nevertheless, they fail a standard criterion for being case-markers rather than adpositions.

The result is that although a descriptive distinction between case-markers and adpositions can be made in many languages, the nature of the theoretical basis for this distinction remains unclear, and especially problematic for languages that appear not to have adpositions, and therefore do not provide contrasting

behavior in the same language. Two recent, quite different, theoretical perspectives about the basic nature of case are provided by Pesetsky (2013) and Levin (2015). These both address the issue of how case is fundamentally different from adpositions, although they don't provide a practical manual for the analysis of difficult cases. We now consider an aspect of complex case systems that has some bearing on the issue of what exactly is a case.

### 2.3 Locational vs. Nonlocational Semantic Case

In many languages with complex case systems, there is a reasonably clear distinction between semantic cases whose core meanings are locational, and those that are not. In Finnish, for example (Kiparsky 2001, Nikanne 1993, Comrie & Polinsky 1998), it is standard to recognize four structural cases, nominative, accusative, genitive and partitive, and eleven semantic cases, 6 of which are often described as 'local', having arguably primary meanings that are composed of an 'in' vs. 'at/on' distinction, combined with the three standard basic directional notions of static location, movement to, and from from:

(20)		location	movement to	movement from
	in	inessive (- <i>ssa</i> )	illative (- <i>hVn</i> )	elative (- <i>sta</i> )
	at/on	adessive (- <i>lla</i> )	allative (- <i>lle</i> )	ablative (- <i>lta</i> )

The semantic systematicity is evident, and the forms are partially but not fully analysable into corresponding morphemes. The remaining semantic cases (comitative, instrumental, essive, inessive, abessive and translative) are not conventionally included in this system, although there are hints of relationships in both form and meaning. Abessive *-tta* for example expresses the absence of something (same as Privative in Australianist terminology), and shares a *ta* component with the elative and ablative (but also the partitive).

More spectacular examples are provided by Daghestan languages, which are often analysed as having several dozen cases. But these large inventories are always produced by morphologically transparent combinations of 'spatial orientation' formatives expressing notions such as 'in', 'at', 'under', etc. with directional notions ('from', 'to', 'at' and perhaps some others), sometimes with additional distinctions. Tsez (Comrie & Polinsky 1998) provides a particularly complex example at the overt morphological level, with seven orientations, four directionals (expanded from the basic three by adding a distinction between 'to' and 'toward'), plus a proximal/distal distinction, the latter being the morphologically marked category meaning 'over there', appearing in order

orientation(-distal)(-direction), e.g. *besuro-xo-r* ‘fish-AT-ALL’ (to the fish, nondistal; ALL homophonous with or identical to Dative), giving us 56 traditional local cases. Counting very conservatively, and adding the local cases to five nonlocal ones,<sup>10</sup> we then get a grand total of 61 cases, based on 15 overt formatives (noting that the dative and allatives share one formative, and that absolutive and proximal are signalled by null).

But is it reasonable to regard each of these 61 combinations as cases, and even more so the 126 combinations recognized in Comrie and Polinsky’s more liberal count? Comrie and Polinsky suggest (essentially following Kibrik (1991)) that it isn’t, and that, instead, only the nonlocal cases and the directionals, but not the others, should be counted as cases. By our counting, this gives relatively modest 11 cases, or 12 if we wish to consider the dative and allative as distinct, in spite of their being based on the same formative (Comrie and Polinsky’s more liberal counting policies yield 18).

Typological justification for such a treatment can be found in the properties of complex spatial expressions (Asbury 2008, Cinque & Rizzi 2008), in which formatives conventionally treated as cases often combine with items of a category with at least some nominal characteristics to produce expressions such as *to on top of* or *from under*. Turkish provides a familiar example of a common form. There are three arguably core syntactic cases, nominative, accusative and genitive, and three semantic cases, dative, ablative and locative, the dative functioning both as an allative and to mark Recipients and Causee Agents (Comrie 1974).

The dative along with the locative and ablative furthermore have the special property of occurring together with a class of locational nominals, called ‘secondary postpositions’ by Lewis, which express the same kinds of notions as are expressed by the localisations in Daghestan languages, including *alt* ‘underside’ *iç* ‘inside’ and many others (Lewis 1967, p. 90). So we have examples like these from Turkish:

- (21) a. Topu masa-nın alt-ın-a at-tı  
 ball table-GEN underside-its-DAT throw-PAST  
 He threw the ball (to) under the table. (Turkish; Lewis 1967)
- b. Araba-nın alt-ın-dan çık-tı  
 car-GEN underside-its-ABL emerge-PAST  
 He emerged from under the car. (Lewis 1967)

- c. Çanakkale iç-in-de vur-du-lar ben-i  
 Çanakkale in-its-LOC strike-PAST-PL me-ACC  
 They struck me (down) at Çanakkale. (folk song)

In the first two examples, the object of the ‘secondary postposition’ a.k.a. local nominal is in the genitive case, indicating its historical origin as a possessive construction; in all instances, the local nominal is followed by a possessive suffix cross-referencing its object, followed by the case marker. The cross-reference suffix always appears, whether or not the genitive appears on the object varies in a complex way.

In Turkish and similar languages, a category of local case or case uses can be defined by the ability to appear after local nominals, but the localization category expressed by the nominals would not be traditionally regarded as part of the case system. Such systems are plausibly the diachronic origin of the Daghestan systems, via morphological incorporation of the local noun, and it is at least typologically convenient to maintain the distinction between case and localization as originally proposed by Kibrik.

However, in spite of its widespread recognition, the distinction between local and nonlocal semantic case is somewhat porous, as witnessed by the dual role of the dative in Turkish and Tsez. Furthermore, cases that function predominantly as local often have in addition idiomatic and other non-local uses. In Finnish, for example, the elative can mean ‘about’, ‘with regard to’, while illative comprises intended Recipients of communication:

- (22) Kirjoitan lehte-en täs-tä asia-sta  
 write.I.FUT paper-ILL this-EL business-EL  
 I’ll write to the paper about this business. (Finnish)

These are examples of the kind of usage that we are calling ‘oblique arguments’. Comrie and Polinsky observe that similar uses appear with localization plus case combinations in Daghestan languages, and as we will discuss further below, Haspelmath (1993, p74) reports that they are predominant in Lezgian, where, in spite of the rich historically local case system with the same general form of overt appearance as Tsez, these are now not much used to express locational and directional concepts, adpositions being the usual technique.

A final concern is that in the Daghestan languages, the rich putative case systems don’t seem to participate at all in distribution, appearing on the final N in the NP, which is the head. Modifiers however do often mark a greatly reduced ‘direct/oblique’ distinction, showing one form if the head shows a case affix,

another if it doesn't. This suggests the possibility of analyses where the putative cases are heads of different functional projections, realized morphologically as affixes on the head noun without any kind of syntactic movement. Regardless of what kind of classificatory scheme is adopted for these kinds of complex systems, they give evidence that traditional case categories involve a sometimes rather complex layering of structures above the nominal that they are marked on, similar to what is often expressed by prepositions and combinations of prepositions in languages with rudimentary or nonexistent case systems.

## 2.4 Oblique arguments

The final topic I want to consider is 'oblique arguments' of verbs and adpositions (those of nouns and adjectives could also in principle be considered, but won't be, due to relative lack of information). The main justification for putting them here is that that, as mentioned above, they are in many cases extremely difficult to distinguish from adjuncts with noncontroversial instances of semantic case.

**Oblique arguments of verbs** Oblique arguments of verbs are nominal phrases (NP/DP/PP) that seem to semantically function as arguments rather than adjuncts, but have the general appearance of adjuncts rather than of core arguments, and don't participate in the full behaviors shown by core arguments. We have already discussed some properties of oblique argument PPs in English. Some characteristic examples involving semantically case-marked NPs are the use of the Elative in Finnish with various verbs to express the 'object of enjoyment' (Lehtinen 1962, p. 120), while in Warlpiri, the locative can be used to specify a game that's being played (Simpson 1991, p. 195):

- (23) a. Nautikaa kesä-stä  
 Enjoy summer-EL  
 Enjoy the summer! (Finnish)
- b. Ngarrka-patu ka-lu karti-ngka manyu-karri-mi karru-ngka  
 man-PLUR PRES-3P card-LOC play-stand-NONPAST creek-LOC  
 The men are playing cards in the creek (Warlpiri)

We lack however the detailed information about optionality and meaning shifts to fully demonstrate that such semantically case-marked NPs were oblique arguments rather than adjuncts (and the existence of PRO-drop does not make it easier to get such evidence).

In these languages, the semantic cases are extensively used to mark adjuncts, but it is also possible for what appear to be historically semantic cases to lose many of their semantic functions, apparently serving primarily to express oblique arguments. These seems to have happened in Lezgian as described in Haspelmath (1993). Formally, Lezgian appears to have three syntactic cases (ergative, absolutive, genitive), plus a dative which Haspelmath classes as syntactic, but shows clear semantic functions as well, such as directional complement (towards) and temporal adjunct (Haspelmath 1993, p. 89):

- (24) a. Zun medinstitut.di-z fi-da  
 I(ABS) medical.school-DAT go-FUT  
 I'll go to Medical School (Lezgian)
- b. Čimi ɟ'aw.u-z weq'-er fad q'ra-da  
 hot time-DAT grass-PL quickly dry-FUT  
 In the hot time, the grass dries quickly

There are also 14 formally local cases, produced by combining 5 localization formatives with 3 directionals, with one combination, direction towards+the 'at' localization missing (replaced by the dative, as in (a) above).

However in a substantial discussion (pp. 91-104), Haspelmath observes that the presumably original local meanings have become rare (postpositions normally being used for these purposes), with the case combinations taking on a variety of additional meanings, or functioning to mark arguments of a variety of restricted semantic types, similarly to prepositions as we have discussed in English.

For example, the 'subrelative' case is formally the combination of the 'under' localization with the 'from' directional, and so ought to mean 'from under', but this is now normally expressed with a postposition, and the subrelative normally expresses a variety of meanings involving absence or motion from, topic of speech or thought, stimulus of emotion and other roles (Haspelmath 1993, pp. 96-98):

- (25) a. Anžax mähkem dustwil.i-w-aj čun dāwe-jr.i-kaj  
 only strong friendship-AD-EL [we(ABS) war-PL-SUB-EL  
 xü-z že-da  
 preserve-INF] can-FUT  
 Only strong friendship can protect us against wars (Lezgian)
- b. Ada Šafiga.di-n amal-r.i-k-aj jikir-zawa-j  
 he Šafiga-GEN prank-PL-SUB-EL think-IMPV-PAST  
 He thought about Šafiga's pranks

- c. Ajnise.di-z wiči-n apaj.a-k-aj q<sup>h</sup>el ĩwe-z  
 [Ajnize self-GEN father.in.law-SUB-EL anger come-INF]  
 bašlamiš-na  
 begin-AOR  
 Ajnise began to get angry with her father in law

These examples illustrate an additional nonlocal uses of an originally local case: the adelative *dustwil.i-w-aj* ('from at') in (a) is expressing the potential agent in combination with the infinitive plus *xun* construction that expresses ability (p 91). The dative in (c) is also normal for expression of the experiencer of an emotion. For further discussion of Lezgian and some other systems, see van Reimsdijk (2012).

A major issue that arises with the obliques is whether there is any significant distinction between these and the 'irregularly' case marked NPs we will be considering below (the case marking called 'lexical', 'inherent' or 'quirky', depending on the theoretical framework and empirical details). Arguably, the obliques can best be defined negatively: they do not show enough similarity in their behavior to noncontroversial subjects or objects to be regarded as unusually marked versions of these things. But their nature remains obscure, and the theoretical treatments unenlightening.

**Oblique cases with adpositions** The other use of case that we are classing as 'oblique' is on NPs governed by an adposition, when these are present. In Turkish, postpositions govern all of the six cases except for the accusative (which also expresses specificity of the object (Enç 1991)) and the locative, on a basis that does not seem to be in general semantically transparent. For example *içeri* 'inside' governs the ablative, but can be used to designate motion into the space denoted by the ablative NP (Lewis 1967, p. 89):

- (26) bir antikacı-dan içeri gir-di-k  
 an antique.dealer's-ABL inside went-PAST-1PL  
 We went inside an antique-dealer's shop. (Turkish)

But it can't be excluded that an extended semantic analysis might reveal some tendencies.

In Lezgian, most postpositions appear to govern the genitive, but also absolute, dative, superrelative and inelative, and to a lesser extent possessive and superessive. There is very little evidence of any kind of semantic compositionality, but *t'uz* 'along' is said takes an elative argument of any

localization (Haspelmath 1993, p. 228); only ‘in’ and ‘on’ localizations are illustrated:

- (27) a. küče.d-an t’uz fi-zwa-j dişeli  
 [street-(II)E: along go-IMPFV-PTP] woman  
 a woman who is walking along the street. (Lezgian)
- b. Çaqal çil.e-l-aj t’uz jarği âa-na  
 jackal ground-SUP-EL along long become-AOR  
 The jackal stretched out along the ground.

The postpositions are almost all either borrowings, or transparently derived from adverbs, nouns and verbs. Those derived from nouns (especially locationals) frequently appear in multiple case forms, without much semantic transparency. A lack of semantic transparency combined with a considerable amount of hard-to-explain variation seems to be characteristic of case-government by adpositions, although some languages do show significant tendencies. In Ancient Greek and Modern German, for example, there is a noticeable tendency for the dative to be associated with static position, the accusative with motion towards, and in Greek, for the genitive to be associated with motion from:

- (28) a. im (< in dem) Haus  
 in.the(DAT) House  
 in the house (German)
- b. ins (< in das) Haus  
 in.the(ACC) house  
 into the house
- (29) a. para ne:o:n aponoste:sein  
 beside ships(GEN) to.return  
 to return from the ships (Ancient Greek)
- b. para Priamoio thure:sin  
 beside Priam(GEN) gates(DAT)  
 beside Priam’s gates
- c. trepsa:s par potamon  
 returning beside river(ACC)  
 returning to the riverbank

(Goodwin & Gulick 1930, p. 259)

However, *para* appears to be the only preposition for which a full paradigm can be produced. For the ‘in’ system, for example, we have *ek(s)+GEN* ‘out of’, *en+DAT* ‘in’ (static location), and *eis+ACC* ‘to, into’.

In contrast to Daghestan languages, one notes that the directional component is located in a structurally lower position than the local one (a feature of the NP that is an oblique object of the preposition expressing the localization). A possible reason for this might be the diachronic one that the Greek prepositions are largely derived from verbal particles. German is similar; for an extensive analysis see van Reimsdijk & Huijbregts (2007).

In Government-Binding Theory and Minimalism, the nature of the relationship between adpositions and the cases they govern has not attracted a great deal of attention, but has been important in that the adpositions are generally taken to allow their complements to pass the Case Filter by assigning them a Case. A possibly correlated empirical fact is that the adposition and its assigned case rarely seem to retain their semantic compositionality, but show a strong tendency to come to be interpreted jointly as idioms.

### 3 Inherent, Quirky, and Lexical Case

We now turn to the three terms ‘Inherent’, ‘Quirky’, and ‘Lexical Case’, whose usage in the history of generative grammar has unfortunately been rather varied and inconsistent. Their essential characteristic as opposed to obliques is that they show some evidence of bearing one of the standard grammatical relations, or theoretical implementations thereof. In the first subsection we will examine some work in the 1980s, where the terms were introduced, but no real attempt was made to distinguish them. Then we will consider the issue of ‘idiosyncrasy’, which was also frequently referred in the 80s, but is clearly only partially correct. Finally, we will consider the attempted distinctions of Woolford (2006) between ‘inherent’ and ‘lexical’, and another of somewhat unclear origin between (merely) ‘inherent’ and ‘quirky’, arguing that the first doesn’t work out, and that the second is not easy to apply empirically and rejected by some major investigators, leaving us in a confused situation.

### 3.1 The 1980s

An early use of the term ‘inherent case’ is found in Chomsky (1981:170), where the term ‘inherently’ Case-marked is applied to NPs bearing a case determined lexically by their [–N] governor, and NPs are regarded as ‘structurally’ Case-marked if their case is determined by their appearance in one of the following structural configurations:

- (30) a. nominative if AGR  
b. objective if governed by V with the subcategorization feature [– N] (i.e. transitive)  
c. oblique if governed by P (this is tentatively revised later, on p 292ff)  
d. genitive in the configuration [NP–  $\bar{X}$ ]

Specific examples of inherent case are not discussed in detail, although the oblique arguments discussed in subsection 2.4 above would presumably be included, as well as the situation well-known from German, Latin, Classical Greek, and, by that time, Icelandic, where apparent objects of certain verbs appear in relatively unpredictable cases such as genitive or dative, and even nominative, instead of the expected accusative, and strongly arguable subjects in the dative, accusative and genitive as well as the expected nominative.

The term ‘quirky’ on the other hand, originator unknown, first seems to appear in Levin (1981) and Levin and Simpson (1981, p. 185), in discussion of Icelandic, defined in the latter as the displacement of structural case-marking by non-NOM marking on subjects, and non-ACC marking on objects. The novel feature of Icelandic, as first presented in Andrews (1976), was ‘oblique subjects’, whereby NPs in cases other than the nominative passed a significant number of syntactic tests for subjecthood. One of the earliest and strongest arguments for non-nominative subjects, with variants in many other languages, is that in infinitives marked by *að*, they can and indeed must be omitted:<sup>11</sup>

- (31) a. Siggu vantaði í tímanum  
Sigga(ACC) was missing in class  
Sigga was absent from class. (Icelandic)  
b. Sigga vonast til að vanta ekki í tímanum  
Sigga(NOM) hopes toward to be missing not in class  
Sigga hopes not to be absent from class.

At about the same time, non-nominative subjects were also discovered independently in South Asian languages (Verma 1976), and have remained a lively topic of investigation ever since.<sup>12</sup>

But Icelandic remains unique in the sheer number of arguments to the effect that the non-nominative ‘putative subjects’ really are subjects; Andrews had 4, Zaenen et al. (1985) increased the total to 8, and the total known to Andrews (2001, p. 89), drawing on many previous authors, was 13. Icelandic also provides an unusual, although much smaller, number of arguments that there are non-accusative objects. The most evident one, applying to genitive and dative apparent objects, is that they can be passivized as in (b) below, preserving the dative case from the active (a), with the putative dative subject promoted from object then subject to obligatory omission in the *að*-infinitive (c):

- (32) a. Sigga bjargaði krökku-num  
 Sigga rescued kids-the(DAT)  
 Sigga rescued the kids (Icelandic)
- b. krökku-num var bjargað  
 kids-the(DAT) was(3SG) rescued(NONAGR)  
 the kids were rescued
- c. krakkar-nir vonast til að vera bjargað  
 kids-the(NOM) hope toward to be rescued  
 the kids hope to be rescued

Two further arguments for the objecthood of nonaccusative apparent objects are provided by ‘middle’ verb formation (Thráinsson 2007, p. 293ff), where they become nominative, and the word-order phenomenon of ‘Object Shift’, reviewed in Thráinsson (2007, p. 64ff), which also shows that there are nominative objects (appearing with two-argument verbs where the subject is dative).

Icelandic thus provides the richest example of ‘quirky’ case in the sense of Levin and Simpson, as ‘noncanonical’ case applied to NPs which arguably have a conventional grammatical relation such as subject or object (as well as ‘second’ or ‘indirect’ object, depending on details of analysis), where it is not plausible to resolve the system into a simple opposition such as two classes of transitive verbs with different structural case-marking patterns, but the specific case needs to be specified by lexical items for the specific argument NP that it appears on.<sup>13</sup> This is a subtype of Chomsky’s ‘inherent’, which lacks the restriction to grammatical relation bearers (however formalized, including of course a period of residence in

the specifier of an appropriate functional category), and so does not include the ‘oblique’ NPs of the previous section.

German bears a superficial resemblance to Icelandic, in that there are some potential non-nominative subjects, and also verbs that take apparent objects in the genitive or dative case, as well as double objects in various combinations. But the potential non-nominative subjects fail to pass subject tests in a convincing way for most speakers (Zaenen et al. 1985:477-478, Sigurðsson 2002:692-695):

- (33) a. Sie haben ihm/\*ihn geholfen  
They have him(DAT/ACC) helped  
They helped him (German)
- b. Ihm wurde geholfen  
him(DAT) became helped  
He was helped
- c. \*Ihm/Er hofft geholfen zu werden  
He(DAT/ACC) hopes to be helped  
He hopes to be helped

Although the majority view appears to be that German differs from Icelandic in this respect, it is important to note that Eythórsson & Barðdal (2005) find some evidence that German can also have non-nominative subjects, suggesting at least that the difference between the two languages is not quite as solid as originally thought.

German also appears to lack straightforward tests for the objecthood of genitive and dative putative objects. But McFadden (2004) and Georgala (2012) discuss various restrictions on ditransitives that indicate that German does have non-accusative objects.

Ancient Greek is another language with only nominative subjects (except in various nonfinite constructions with accusative or genitive subjects), but dative and genitive objects that are arguably objects because they are subject to passive, becoming nominative (Feldman 1978, Smyth 1966, pp 397-398).<sup>14</sup>

Although the term ‘quirky’ has persisted in the literature, its use was not at all universal. Andrews (1976, 1982) called them ‘irregular’, Zaenen et al. (1985) mostly called them ‘idiosyncratic’ or ‘lexical’, not introducing the term ‘quirky’ until applying it to German, while Jónsson (1996) called them ‘inherent’.

Thráinsson (2007:181) introduces many of these terms without attempting to prescribe how any of them should be used.

## 3.2 Idiosyncrasy

In the 1980s it was generally assumed that unpredictability ('idiosyncrasy', 'irregularity') was a major characteristic of the 'quirky' NPs, even though early work did recognize a number of regularities connecting semantics to the choice of cases. But it was eventually realized that many of the appearance of quirky case NP could not be reasonably described as unpredictable at all, especially if we acknowledge partial predictability, that is the exclusion of certain options. For example, Experiencers (participants who are characterized as knowing something, including that they feel something), are never genitive.

Perhaps the most important example of full predictability of 'quirky' case in Icelandic is dative case on Recipients in ditransitives. Van Valin (1991) observed that dative always appears on the first object (Recipient) of a double object construction when the second object (Theme) is accusative, while Jónsson (2000) strengthened this claim by observing that Recipients in all double object constructions are dative: Icelandic differs for example from Modern Greek (Anagnostopoulou 2003, p. 10) in lacking double accusative verbs where the first object is a Recipient.

Subsequent work, such as Barðdal (2008, 2011b) has shown a reasonable amount of semantically predictable usage, and some productivity, with dative subjects and objects. For example, transitive verbs borrowed into Icelandic from other languages adopt the NOM-ACC and NOM-DAT patterns in approximately the same proportions as are currently extant in the language, in accord with their semantic classification. Jónsson & Eythórsson (2011) furthermore found a small amount of productivity for certain accusative subject constructions, but none for genitive objects (and none has ever been found for genitive subjects either, which appear to occur with only three verbs).

The cases originally labelled 'irregular', 'quirky', etc. indeed run the range from fully predictable (given the meaning) to truly idiosyncratic, with no reported effects at all on the phenomena of case-preservation and the disruptions to agreement discussed by Andrews (1982) and Sigurðsson (2002).<sup>15</sup>

As a result, if we take irregularity as the definition of 'quirkiness', there is no binary distinction to be made between structural and quirky case. Barðdal (2011a) argues on this basis that there in fact isn't. However, most investigators still want to make some kind of distinction in this area. The two that we will consider next are between a concept of structural case, and what might be called 'structurally determined inherent case', and then 'quirky case' vs. 'inherent case'.

### 3.3 Structurally Determined ‘Inherent’ Case

Woolford (2006) proposed that in addition to the standard categories of structural case (nominative and accusative) induced by structural configurations, and lexical case imposed by selection from lexical heads, there is a third category of ‘inherent’ case, using this term differently than many other investigators, both previously and subsequently. This new category of case is distinguished from structural case by being associated with certain semantic (‘theta’) roles, and from lexical case by being more regular, due to these roles being relatively general, and associated with certain covert structural configurations, specifically, spending some derivational time in the specifier position of a light verb. The proposed inherent cases are ergative, associated with the ‘little v’ projection associated with external arguments (Agents), and dative, associated with a second flavour of ‘little v’, now commonly called ‘Appl’, associated with Goals. Theoretically, inherent case can be thought of as case assigned in the manner of lexical case, but by functional heads rather than full lexical items. It might be interesting to think about possible relations between this analysis, which relies on VP-shells (Larson 1988), and that of van Valin (1991) in Role and Reference grammar, where dative (in Icelandic) is the default case for core arguments that are neither ‘Actor’ (approximately, external argument) nor ‘Undergoer’ (approximately, Patient/Theme complement of main verb).

In the Minimalist Program, the major competitor to Woolford’s classification is provided by the ‘dependent case model’ of Marantz (1991),<sup>16</sup> recently employed for example by Levin (2015). On this account, the main divisions are between default, dependent, and lexical/oblique case. Lexical/oblique is assigned by specific lexical items in the same way as in Woolford’s, but dependent case is viewed as a kind of structural case, assigned on the basis of their being another NP (a ‘case competitor’) in a suitable local domain, while unmarked case is what appears if nothing else does, by virtue of appearing within a certain kind of constituent (genitive for inside an NP, nominative/absolute for being inside an S, for example). The main substantive division is how ergative, accusative and dative are classified. For Woolford, accusative is structural, and so classified with nominative, while ergative and dative are inherent. But in the dependent model, accusative and ergative are dependent, and so structural, likewise dative. So the classificatory issue is whether accusative classes with nominative/absolute, or with ergative and dative.

Woolford’s classification also differs substantially from the descriptivist one into grammatical and semantic, in that ergative would normally be classed as

grammatical as would also, in many cases, dative, whereas this classification puts them both in the same category, inherent, grouped with lexical rather than structural. She offers a number of putative ‘reliable diagnostics’, of which I suggest that the most important are case preservation under movement, and ‘theta-relatedness’ (she also discusses and dismisses regularity, consistently with Barðdal’s dismissal of this). Since dependent and unmarked case are conceptually structural, they are beyond the scope of this discussion. Therefore our main concern will be whether Woolford’s notion of inherent case as distinct from accusative holds up. We will see that case-preservation seems to have at least some viability, while ‘theta relatedness’, in spite of its initial plausibility, does not. We will finally discuss a different form of argument from Legate (2008a).

**Case-Preservation** This is a standard name for the phenomenon that noncontroversial structural case (nominative, accusative and absolutive) never seems to be preserved under A-movement.<sup>17</sup> We have already seen case preservation for certain dative objects in Icelandic, and this in fact applies to all, including ones that Woolford would classify as inherent:

- (34) Maríu var skilað þessari bók  
 Mary(DAT) was returned this book(DAT)  
 This book was returned to Mary. (Icelandic)

An important qualification is that while case-preservation does indicate that an instance of case-marking is inherent or lexical, Woolford does not hold that the failure of case-preservation indicates that a case is necessarily structural, citing its failure in Japanese (pp 119-120).<sup>18</sup> But Eythórsson et al. (2012) take the position that fluctuation of case-preservation in Faroese and certain dialects of Norwegian indicate that some datives are inherent, others structural.

For ergative, a standard example of case-preservation is Tongan (Chung 1978, Snider 2003), where there is apparent raising from complement to matrix subject position with certain verbs, the case of raised NPs being determined by that of their role in the complement:

- (35) a. 'E lava 'a e pepe 'o lea  
 Uns can ABS ART baby COMP talk  
 That baby can talk (Samoan; Chung 1978, p. 145)

- b. 'Oku lava 'e he tangata ko 'ená 'o langa 'a e  
 PROG can ERG ART man PRED that COMP build ABS ART  
 fale lelei  
 house good  
 That man can build good houses (Chung 1978, p. 146)

By contrast, I am aware of no cases where a nominative or an accusative are arguably preserved under Raising or Passive.

A 'near miss' is provided by the 'New Passive' construction in Icelandic, as discussed by Maling & Sigurjónsdóttir (2002) and subsequent literature. In the traditional passive, an accusative object becomes nominative, and moves into subject position obligatorily if definite, optional otherwise, whereas the 'New Passive', which appears to have begun appearing in the mid 20th century, the object remains accusative and also in object position:

- (36) a. Ég var barinn.  
 I.NOM was beaten(MASC)  
 I(male) was beaten (Icelandic Traditional Passive)
- b. Það var barið mig.  
 It was beaten me(ACC)  
 I was beaten (Icelandic New Passive)

Maling and Sigurjónsdóttir argue that this is not a passive, but an 'autonomous construction' with an unexpressed generic PRO subject, while for example Eythórsson (2008) argues that it really is a passive; whichever of these views is true, the relevant point here is that the patient remains in object position, and therefore presumably never becomes a subject, so that there is no manifestation of a case-preservation effect to show that the accusative here is not structural. But things do not go so well for the next test, theta-relatedness.

**Theta-relatedness** This criterion says that a position marked with non-structural case must bear a semantic (theta) role to its local predicate. This predicts that subject-raising will not be possible into ergative, dative or lexically case-marked positions. Convincing examples involving dative are not known to me, but raising into ergative and PP-internal positions appear to exist; due to the unclarity surrounding the relations between oblique case-marked NPs and PPs, this latter should probably be accepted as problematic for theta-relatedness. A thoroughly justified case of raising into an ergative position is provided by Rezac et al. (2014). They show clearly that the Basque predicate *behar* 'must'

allows raising from its complement to its subject position, but, when it does so, imposes ergative case on the raised subject, without assigning a semantic role to it.<sup>19</sup> Indeed, long before this, Chung (1978:157-169) argues that the Samoan verb *mafai* ‘can’ involves raising, and imposes ergative on the raised subject. She does not produce the kinds of arguments from idiom chunks, expletives and quantifier scope that are now regarded as conclusive for raising (to a non-theta position), but the ‘-*Cia* insertion’ argument in pp. 162-164 is highly suggestive (but see the discussion of the ‘long form’ in Mosel and Hovdhaugen (1992, pp. 741-763), and the references to numerous works by Kenneth Cook given there). There is also an interesting comparison with 19th century Samoan (p. 165).

Another problem is provided by the argument of McCloskey (1983) that Modern Irish has raising of subjects into prepositional object position.<sup>20</sup> An example (p. 465) is:

- (37) Is dóiche daobhtha go mór ruaig dhearg ionnsuighthe  
 COP likely(COMPR) to-them greatly rush red attack(GEN)  
 a thabhairt ar Thír Chonaill  
 give(NONFIN) on Donegal  
 They are far more likely to launch a ferocious attack on Donegal. (Irish)

The subject of the embedded clause is expressed overtly as the incorporated prepositional object *do* in the word *daobhtha*; the semantics of the matrix predicate make it unlikely that the prepositional object gets a semantic role from this predicate, while the matrix adverb *go mór* intervening between the PP and the body of the complement clause indicate that these are distinct constituents, arguing for raising. McCloskey gives other examples involving scope and idiom chunks, but not combined with discontinuity, so there is a potential chink in the argument that controllers without theta roles from their higher position can only bear structural case-marking. Nevertheless, the semantics of the example (37) makes this proposed restriction implausible. Therefore, theta-relatedness cannot be sustained as an argument that ergative is an inherent case.

**Case ‘Robustness’** Another sort of argument to the effect that ergative is inherent is provided by Legate (2008a). She observes that in certain nonfinite complements, overt subjects that would normally be absolutive must be dative, while those that would normally be ergative can either be ergative or dative, which she attributes to the difference between structural and inherent case as

presented by Woolford. But we saw above in Saibai, example (7), that ergative and accusative, on subject and object, but not dative, fare alike in nonfinite constructions in being replaced by a case determined by the nature of the construction. This behavior, which might be called ‘case robustness’ (against displacement by other cases associated with a syntactic environment) is consistent with the traditional structural/semantic case distinction, or with the dependent case model, but not with Woolford’s.

### 3.4 Inherent vs. Quirky

Our final distinction will be one that is sometimes made between ‘inherent’ and ‘quirky’, which is conceptually clear in any approach to syntax that depends on standard GB Case Theory to control access to major syntactic positions, but with complex and unclear detailed empirical consequences. On this account, ‘inherent’ case is defined by Chomsky (1981), as discussed above, as a case assigned to an NP on the basis of bearing a specific semantic (thematic) role to a specific predicate. ‘Quirky’ case on the other hand, according to Schütze (1993), had not been defined at all except by Levin & Simpson (1981), as a case that displaces the regular case on the bearer of a grammatical relation, and it seems to be evident that people used the term in a variety of ways (mostly, but not always, as a convenient way to refer to the phenomena of Icelandic) without either defining it themselves, nor carefully following Levin and Simpson’s definition. ‘Inherent’ and ‘Quirky’ are therefore concepts with potentially overlapping extensions, a theoretically undesirable situation.

However the organization of Case Theory suggests a way to allocate the functions. In some languages, such as German and Dutch, the ‘irregularly’ case-marked NPs don’t seem to have access to subject properties, while in Icelandic they do. A possible explanation, in early GB Case Theory, is that movement into subject position is motivated by the need to acquire Case, which an inherently case-marked NP would already have, and therefore not move. So a possible proposal, endorsed by Haegeman (1991:174-175),<sup>21</sup> is that in German, the genitive and dative objects are inherently case-marked, and therefore do not have to move to subject position to get nominative case in the passive (unlike accusative objects, which lose their accusative case under Burzio’s Generalization).

But Icelandic is clearly different, and one possible account, suggested by Belletti (1988:25-26) and Cowper (1988), is that in addition to inherent case, Icelandic quirky NPs also have structural case. This proposal is worked up in detail by

Jónsson (1996), who does not however use the term ‘quirky case’, but calls it ‘inherent’ (but does talk about ‘quirky subjects’, meaning subjects that don’t show the usual subject case (nominative) but do have a significant number of subject properties, a usage that is also found elsewhere, such as Preminger (2011). This is characterized as the ‘orthodox view’ by McFadden (2004:9), who opposes it, without giving detailed references (McGinnis (1998) seems highly relevant).

A feature of Minimalism is however the introduction of ‘light verbs’ over the main verb, including ‘vP’ for introducing the external argument, and ‘ApplP’ (Applicative Phrase) for at least some of the traditional ‘indirect objects’. Therefore, simple inability to occupy passive subject position is not necessarily an indication that an NP’s case-marking isn’t quirky. So Georgala (2012, pp. 72-77) argues that in German, the dative Recipients in sentences like (a) below are quirky (having both an inherent dative case assigned by the verb, and an uninterpretable feature that needs to be checked by [Spec, Appl], while in pp 130-134, she argues that in Greek, genitive DP Recipients are only inherent, not quirky. One of the two pieces of evidence is that quantifiers can float off dative Recipients in German, but not off the genitive ones in Greek, in spite of superficial similarities such as word order and the fact that neither of these can become subject in the passive (not demonstrated here), while they can float off accusative Recipients in both languages:

- (38) a. Der Hiwi hat [den Studenten]<sub>i</sub> allen<sub>i</sub> einen alten Test ausgeteilt  
 the TA has [the students(D)] all an old test distributed  
 The TA has distributed an old test to all the students (German;  
 Georgala 2012, p 74)
- b. \*Édhosa ton peláton ólon proinó  
 I.gave the customers(G) all(G) breakfast  
 I gave the customers all breakfast (Greek; Georgala 2012, p. 132;  
 would be good with the quantifier ‘ólon’ omitted or not floated)
- c. Servíra tous pelátus ólus proinó  
 I.gave the customers(A) all(A) breakfast  
 I gave the customers all breakfast (Greek; Georgala 2012, p. 132;  
 would be good with the quantifier ‘ólon’ omitted or not floated)

Georgala does not integrate Icelandic into the analysis, so no account is given of why Icelandic can passivize dative Recipients while German cannot. The earlier

Anagnostopoulou (2003) does deal with German, along with Icelandic, Greek and other languages, but in a different framework, where case is not involved in controlling movement, and the inherent+structural concept of quirky case is not used.

Were it not for datives, we would probably have a reasonably clear division into ‘structurally’ and ‘inherently’ case-marked NPs, displaying some of properties of NPs bearing standard grammatical relations, although not necessarily all of them, versus the rather different ‘obliques’, but the datives present a bewilderingly complex array of phenomena that have not yet been satisfactorily resolved.

## 4 Conclusion

In this chapter I have surveyed a class of case-uses that perhaps ultimately originated in the use of case-formatives to code the semantic roles of adjuncts and directional complements, such as the place or time when something happens, the place to or from which something is going, or the reasons for which someone does something. Some of these semantically transparent uses can become captured by verbs as oblique arguments where the role of the argument appears to be conveyed by the verb and the case-marker jointly, and these sometimes seem to take on further properties of core arguments to become ‘quirky’ or ‘inherently’ case-marked.

Amongst the major unresolved issues, beyond but also related to the problem of the datives, is the nature of oblique arguments and their relationship to adjuncts and adpositional phrases, and what kind of syntactic representation is appropriate for the inherent/quirky cases. Barðdal (2008) for example has a simple one-level representation with a case-feature for all case-marked NP, while Andrews (1982) has a two-level representation for the quirky/inherent ones, which can be regarded as adapted into early Minimalism by Jónsson (1996). This is among the options considered for the dative by Preminger (2011:104ff), but not found to be necessary for the languages and hypotheses he is considering. But the literature cited there does not appear to have much to say about the minimal effects on agreement of the dative case in Warlpiri, nor on the properties of gender-number-case agreement (as opposed to finite verb agreement) in Icelandic. If the proposals for a ‘KP’ by Levin (2015) are accepted, then the difference between quirky and nonquirky would have to be a difference in transparency to feature transmission between the DP and KP levels. To truly substantiate such a view, it would also be necessary to demonstrate that the

striking nonagreement effects associated with quirky subjects are more than just a diachronic reflex of their historical origin as nonsubjects.

But the fundamental nature of ‘obliqueness’ remains unexplained. Noting that they appear at the bottom of various hierarchies, such as the case-hierarchy of Moravcsik (1974) and its later adaptations such as Boboljik (2008), it would be humorous and a bit cynical, but not entirely wrong to say that oblique cases are characterized by nothing more than a tendency not to exhibit most of the properties that make syntax interesting, but don’t even have the decency to fail to exhibit them at all.

## Notes

<sup>1</sup>It is unclear whether the term ‘theta role’ is meant as a synonym for ‘semantic role’, or to refer to something different, and, if so, exactly what. Some interesting discussion, which indicates that this is a live issue, can be found at <http://facultyoflanguage.blogspot.com.au/2015/09/what-are-theta-roles-for.html>.

<sup>2</sup>The original treatment of Montague (1970, pp. 211-213, 1974, p. 250)).

<sup>3</sup>We won’t take any position here on whether the DP hypothesis of Abney (1987) is correct.

<sup>4</sup>Although these focus on PP, the similarities between PPs and semantically case-marked NP are such that the ideas clearly apply to both.

<sup>5</sup>The quick summary is that common nouns mark ergative as opposed to (absolutive) zero, proper names accusative as opposed to (nominative) zero, singular personal pronouns ergative, accusative and zero, while plurally marked nominals don’t distinguish the syntactic cases at all (and semantically marked nominals don’t mark plurality).

<sup>6</sup>The ‘privative’ case in Australian languages, illustrated in (b), and its ‘privative’ counterpart, meaning ‘without’, seems to be an areal characteristic of Australia, but rare elsewhere.

<sup>7</sup>With the dative usually rejecting further case-marking, but accepting it in a few instances where it is functioning semantically (Simpson 1991, pp. 250-251).

<sup>8</sup>An observational exception is that the possessive phrasal affix ‘s in English can’t be applied to NPs modified by nonrestrictive relative clauses, but this is arguably due to the phonology rather than the morphology and syntax.

<sup>9</sup>For examples involving more complex conjuncts, see Broadwell (2008).

<sup>10</sup>Ignoring the two equatives, and identifying the genitives as allomorphs.

<sup>11</sup>For a valid argument, it is essential that the omission be different from any prevalent pro-drop/anaphoric ellipsis phenomena in the language, either possible when pro-drop is generally impossible or restricted to subjects, or obligatory when it is at most optional.

<sup>12</sup>For some relatively recent collections of studies, see Aikhenvald et al. (2001), Bhaskararao & Subbarao (2004), and Kishimoto (2014).

<sup>13</sup>As noted by Thráinsson (2007:167), various patterns and tendencies can be discerned, but no real system seems to work out.

<sup>14</sup>I suggest that a possible explanation for the failure of case-preservation in Ancient Greek is that its passives are historically derived from middles, where the surviving argument would be the nominative subject.

<sup>15</sup>Except, possibly for some instances of agreement of verbs with dative subjects reported for Faroese by Jónsson & Eythórsson (2005) and, more marginally, for Icelandic by Árnadóttir & Sigurðsson (2008). But it is not clear that dative differs from accusative (or genitive) in this respect.

<sup>16</sup>Drawing heavily from earlier proposals such as Yip et al. (1987).

<sup>17</sup>Movement into a grammatical position such as subject or direct object, where a semantic role can in principle be assigned by a lexical item, but is not necessarily assigned in any given instance.

<sup>18</sup>Ancient Greek provides another example

<sup>19</sup>They also demonstrate a failure of case preservation with subject-raising of perception complements.

<sup>20</sup>Later reanalyzed by Postal (1986) and Stowell (1989), but not in ways that affect the present discussion, other than that Stowell claims that the apparent prepositions are functioning as inherent

case-markers.

<sup>21</sup>Attributed to Haider (1984), although I find it difficult to work out exactly where he says it.

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