Nominative as *no case at all*: an argument from raising-to-accusative in Sakha*

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1. Introduction

In many contemporary approaches to the morphosyntax of case, one finds either explicit or implicit references to unmarked structural cases like nominative being *assigned*.[1] For example:

> "For the Case/agreement systems, the uninterpretable features are φ-features of the probe and structural Case of the goal N. [...] Structural Case is not a feature of the probes (T, *v*), but it is **assigned a value** under agreement [...] The value assigned depends on the probe: **nominative for T**, accusative for *v*."
>
> [*Chomsky 2001:6,* emphasis added]

We refer to this as a *positively-specified* view of, e.g., nominative case; on this view, nominative only arises as the result of some "action" taken by the grammar (per Chomsky 2000, 2001, for example, the action in question is φ-feature agreement).

In this paper, we present a novel argument, based on raising-to-accusative constructions in Sakha (Turkic), against this positively-specified view of unmarked case (in particular, of nominative). Instead, we argue, the proper grammatical representation of unmarked cases is as the outright absence of any otherwise assigned case values on the noun phrase.

2. The central question

Like other Turkic languages, Sakha has a construction in which the subject of an embedded clause raises to a position where it can receive accusative case (cf. Kornfilt 1977, Moore 1998, on Turkish). A couple of representative examples are given in (1–2):

(1) min **ehigi$_1$-ni** [$_{\overline{C}}$ **t$_1$** bügün kyaj-yax-xyt dien] erem-mit-im (Sakha)
I **you-ACC** today win-FUT-2pl.SUBJ that hope-PAST-1sg.SUBJ
'I hoped you would win today.'

(2) ehigi **bihigi$_1$-ni** [$_{\overline{C}}$ **t$_1$** kyajtar-dy-byt dien] xomoj-du-gut
you **we-ACC** lose-PAST-1pl.SUBJ that become.sad-PAST-2pl.SUBJ
'Y'all were disappointed that we lost.'

[*Vinokurova 2005:369; annotations added following Baker & Vinokurova 2010*]

As Baker & Vinokurova (2010) show, raising-to-accusative in Sakha differs from Turkish and its other Turkic counterparts (that we know of) in at least two key ways. First, they show that it behaves

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[1]Here and throughout, we use the term 'unmarked case' to refer to cases like nominative and absolutive—and, potentially, genitive as well (see Marantz 1991). While these cases *tend* to be less marked in the morpho-phonological sense as well, nothing in the account hinges on this, and indeed there are languages where this general morpho-phonological tendency is not adhered to (see Polinsky & Preminger 2014 for a recent review).

as syntactic movement per se with respect to binding and NPI-licensing (cf. the behavior of control or copy-raising). Second, they show that accusative in Sakha can only be analyzed as *dependent case* (Bittner & Hale 1996, Marantz 1991, Yip, Maling & Jackendoff 1987). We will not review the arguments for these conclusions here (see Baker & Vinokurova 2010:599–624).

Baker & Vinokurova's account involves a positively-specified view of nominative case (in particular, that it is assigned under agreement with a functional head)—precisely the kind of approach we will argue against here. In this respect, it is crucial to note that Levin & Preminger (2015) have recently shown that the case system of Sakha can be accounted for within an entirely configurational model of case assignment, where nominative is no longer *assigned*, and thus, no longer positively specified. We therefore tentatively adopt Levin & Preminger's account, which we discuss in more detail below.

The aspects of (1–2) that we would like to focus on are as follows. First, note that the embedded verb in each examples agrees with the raised subject.[2] Second, the kind of agreement shown by the embedded verb in this construction is an exception to an otherwise entirely robust generalization about case and agreement in Sakha: the noun phrase that controls agreement on the Sakha verb surfaces as nominative. The latter is by no means unique to Sakha, of course (see a recent review by Bobaljik 2008, resuming observations that go back at least to Moravcsik 1974, 1978); the point is that outside of the raising-to-accusative construction, this generalizations holds of Sakha as well.

The question we would like to pose is the following: what is the representation of nominative in Sakha, such that agreement on the embedded verb is able to target, e.g., *bihigi-ni* ("we-ACC") in (2)? (This, even though the latter ultimately surfaces bearing accusative case, and verbal agreement in Sakha can normally target only arguments that surface bearing unmarked case.)

3. An attempt: case-stacking

It seems clear that the question posed at the end of the previous section has to do with *derivational timing*. In particular, one could hypothesize that the noun phrase in question *was* in fact nominative, at the stage of the derivation at which it was targeted for agreement by the embedded verb.[3] This immediately raises a second question: How can this noun phrase go from being nominative (when targeted for agreement in the embedded clause) to being accusative (which is how it surfaces)? Or, more generally, how can a noun phrase bear different cases at different stages in the derivation?

[2] There is more to be said about this type of agreement. Unlike main-clause agreement in Sakha, in situ agreement with raised subjects may exhibit person-number asymmetries; see Baker 2011:892–897 for discussion. This does not, however, affect the point being made here: it is still the case that Sakha verbal agreement—even partial agreement of the kind discussed by Baker—is restricted to targets bearing unmarked case everywhere but in the raising-to-accusative construction.

[3] Here and throughout, we use phrases like "agreement on/by [the] verb" as shorthand for "agreement morphology that surfaces within the same morphological complex as the verb"; we are not committed to a view where it is the verb itself (in the sense of a lexical stem) that bears or triggers this agreement. In fact, in Sakha it is likely T^0 or some other high functional head in the clause that is the syntactic locus of this agreement (see Baker & Vinokurova 2010 for discussion).

Baker & Vinokurova's (2010:603) answer to this question involves *case-stacking* (cf. Schütze 2001, Yoon 2004, on Korean; and Richards 2007, 2013, on Lardil): the idea that a noun phrase can receive case more than once.[4] In Sakha, noun phrases never actually surface bearing multiple case affixes; there would therefore have to be, under the case-stacking approach, some algorithm (operative, perhaps, at the interface of syntax with morpho-phonology) that reduces any such "stack" of cases in Sakha into a single case exponent.

On this view, the raised subjects in examples like (1–2) could be assigned true, non-vacuous nominative case (within a positively-specified view of nominative), and would subsequently raise to a position where they are assigned accusative, "stacked" outside of the already-assigned nominative:[5]

(3) [[NP-NOM]-ACC] $\overset{\textit{stack-reduction}}{\longrightarrow}$ [NP-ACC]

It is not immediately clear to us why accusative would 'win' over nominative, in determining which will be overtly expressed on the raised subjects in (1–2). But even setting this question aside, the approach schematized in (3) runs into problems elsewhere in the language. Recall that accusative in Sakha cannot be analyzed as case assigned by a functional head (e.g. v^0), and instead must be analyzed as *dependent case*. A treatment of accusative on raised subjects along the lines of (3) therefore requires that noun phrases be allowed to enter into a dependent case relation even if they have previously been assigned case. (In this instance, the raised subject, previously assigned positively-specified nominative within the embedded clause, would subsequently receive accusative by entering into a dependent case relation with the matrix subject; see Baker & Vinokurova 2010 for details.) Thus, if a "case stack" like the one in (3) is indeed reduced to a single, accusative exponent, we arrive at the odd prediction in (4):

(4) Any nominative noun phrase locally c-commanded by another noun phrase will surface as accusative, **irrespective of whether the noun phrases in question have previously been assigned nominative.**

That (4) is not only odd but simply false (at least in Sakha) can be seen by examining instances of object scrambling across nominative-marked subjects:

(5) deriebine-ni orospuonnjuk-tar xalaa-byt-tar
village-ACC robber-PL(NOM) raid-PRT-3pl.SUBJ
'Some robbers raided the village.' [*Baker & Vinokurova 2010:604*]

Baker & Vinokurova argue that accusative on the scrambled object in (5) is assigned as the object passes through the edge of the verb-phrase-level phase; at that point, the object is in a sufficiently local c-command relation with the subject, resulting in the assignment of dependent case (i.e., accusative) to the former:

[4] It should be noted that Baker & Vinokurova (2010) do not directly address raised subjects in raising-to-accusative constructions from the perspective of their changing case markings. They bring up *case-stacking* to address a separate matter: object-shifted indirect objects, which unlike other object-shifted arguments in Sakha, surface with dative rather than accusative. The treatment of (1–2) explored here is merely our best attempt at implementing a case-stacking answer to the question at hand, in order to see whether case-stacking could serve to salvage the view that nominative is positively specified (rather than amounting to the outright absence of case, as we argue).

[5] That a nominative-accusative case stack is resolved in the manner shown in (3) is the case-stacking equivalent of Baker & Vinokurova's assertion that "accusative case [is] a feature assignment that can never be removed" (604).

(6) **deriebine-ni$_1$** orospuonnjuk-tar [**t$_1$** [$_{<phase>}$ **t$_1$** xalaa-byt-tar]]
ACC
village-ACC robber-PL(NOM) raid-PRT-3pl.SUBJ
'Some robbers raided the village.' [*Baker & Vinokurova 2010:604*]

But now consider the surface position of the object in the same example. It is virtually inescapable that the surface position of the object c-commands the subject, given the structural properties of syntactic movement. The next question we must ask is whether this is a sufficiently local c-command relation to qualify for dependent case assignment.

Assuming that matrix clauses contain a CP layer, it is certainly possible that there is a phase boundary above the matrix subject in (5)/(6). Is it also possible, then, that the object moves from the highlighted position in (6) (at the edge of the verb-phrase-level phase) directly to a position where it is no longer in the same phase as the subject (*orospuonnjuk-tar* "robber-PL(NOM)")? Note that movement of that sort would be bona fide, phase-edge-to-phase-edge A-bar movement; and movement of the object across the subject in (5)/(6) is classified by Baker & Vinokurova 2010:604 not as A-bar movement but as *scrambling* (and diagrammed as landing within TP proper)—presumably, for reasons having to do with its interpretive properties.

But even if the object *does* move directly to [Spec,CP], it cannot be assumed that movement to an A-bar position renders a noun phrase invisible for the purposes of dependent case in Sakha. The reason is that it is precisely this sort of movement—of an embedded nominal to [Spec,CP] of its clause of origin—that feeds the assignment of accusative to raised embedded subjects in examples like (1–2), above. (Baker & Vinokurova 2010:617 argue that the embedded subject raises to [Spec,CP] of its clause, followed by object-shift-like movement of the entire embedded CP.)

Crucially, phase edges (e.g. [Spec,CP]) are visible *both* to the higher, enclosing phase, and to the lower, embedded phase. If the latter were not so, there would literally be no way to establish a movement relation from a position within the phase proper (e.g. within [Compl,C]) to the phase edge.[6] The overall conclusion is therefore that the surface position of the scrambled object in (5)/(6) is in a *local c-command relation* with the subject.

Thus, if (4) were true—i.e., if previously case-marked noun phrases in Sakha could enter into subsequently dependent case relations—the surface configuration of (5)/(6) would qualify for the assignment of dependent case (i.e., accusative) to the now structurally lower subject (*orospuonnjuk-tar* "robber-PL(NOM)"). Since a "case stack" of nominative-inside-accusative would, by hypothesis, be realized as a single accusative exponent (see (3), above, as well as fn. 5), the prediction is that when the object scrambles across the subject, the latter will surface bearing accusative case.

This prediction is false—meaning (4) cannot be true of Sakha. This, in turn, invalidates a case-stacking answer to the question posed at the start of this section—namely, how it is that embedded

[6] In Levin & Preminger's (2015) account of case in Sakha, it is assumed that when the object moves out of its base position in [Compl,V], the nearest landing site is already at the edge of the verb-phrase-level phase; this is necessary in order to do away with any reference to the *Case Filter* in accounting for what Baker & Vinokurova (2010) analyzed as (pseudo-)incorporation. The absence of a C'-internal landing site for object scrambling, discussed here, would thus resemble the absence of a V'-internal landing site for short object movement. Note that crucially, it is never assumed—in Levin & Preminger's account—that noun phrases at the phase edge cannot enter into case-competition with noun phrases in phase-internal positions; all that is assumed regarding noun phrases at the phase edge is that they can *also* enter into case-competition with noun phrases in the next phase.

subjects in raising-to-accusative constructions in Sakha go from being nominative in the embedded clause (allowing them to be targeted for agreement) to being accusative (which is how they surface).

4. The solution: nominative as the absence of case

As noted in §2, there is an apparent conflict between the fact that raised subjects in Sakha raising-to-accusative constructions are agreed with by the verb in their clause of origin, and the fact that everywhere else in Sakha, only nominative noun phrases can be targeted for verbal agreement. As detailed in §3, a case-stacking approach to this issue generates false predictions for other structures in the language. Are we back to square one, then?

We suggest that recent advancements in the understanding of case and agreement—motivated independently of Sakha—offer a solution to this puzzle. First, approaches to case assignment have been available for some time which do *not* take unmarked cases like nominative to be positively specified. One prominent example is Marantz's (1991) *disjunctive case hierarchy*, where unmarked case is simply the form given to a noun phrase that has not received case in some other fashion (the assignment of lexical/oblique case or dependent case, to be specific). The precise morphological form given to such a noun phrase can depend on what the spellout domain is; and in particular, whether it is a CP or a DP, yielding the common morphological distinction between 'nominative' and 'genitive' (see Marantz 1991, Levin & Preminger 2015).

This same case assignment algorithm has recently been given a purely syntactic implementation—in contrast to Marantz's original proposal, which was situated in the post-syntactic morphological component—by Preminger (2011a, 2014). In this implementation, cases like nominative and absolutive (and within the DP, genitive) are simply the morphological form afforded to noun phrases whose case features have not been valued in the course of the derivation. In that respect, Preminger's treatment of unmarked case parallels his treatment of so-called '3rd person singular' agreement morphology. The latter is argued by Preminger to be the characteristic spellout given to agreement probes that have failed to locate a viable agreement target bearing [plural] or [participant] values (see Béjar & Rezac 2009, Harley & Ritter 2002, McGinnis 2005)—in other words, probes whose φ-features have remained unvalued.[7] The characteristic spellout given to unvalued case- or φ-features may or may not be null, in a given language; but that is a morpho-phonological matter, not directly relevant to the current discussion (see also fn. 1).

The reader unfamiliar with this particular body of work may find several aspects of the foregoing synopsis puzzling. For one thing, if nominative/absolutive are simply a label for the absence of case valuation, then the lack of valuation of case features must be tolerated by the grammar (much like the lack of valuation of φ-features; see below). This, in turn, means that there can no longer be a *Case Filter* in the grammar. This is not a new idea, of course (see, e.g., Marantz 1991); with respect to Sakha in particular, it is worth noting that Levin & Preminger (2015) demonstrate that a working theory of case in Sakha, based on Preminger's proposal (which in turn is based on Bobaljik 2008), need not appeal to the Case Filter at all.

[7] This relies on a view of agreement where the features on syntactic probes that have failed to locate a viable target (e.g. Chomsky's 2000, 2001 'uninterpretable' features) do not cause "crashes"—or more generally, ungrammaticality—a view that Preminger (2011a, 2014) defends at length.

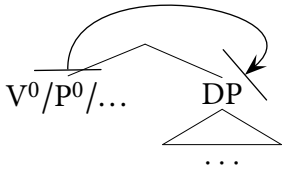
In the remainder of this section, we will present in more detail Preminger's proposal regarding case assignment, and show how it solves the apparent conflict posed by case and agreement in Sakha raising-to-accusative constructions.

4.1. Configurational case assignment in syntax

Preminger (2011a, 2014) proposes a reimplementation of Marantz's (1991) *disjunctive case hierarchy* within syntax proper. He assumes (with much contemporary work on case) that noun phrases bear case features, and that these features enter the derivation unvalued. Departing from GB/minimalist views of case, however, he argues that this lack of valuation—were it to persist through the end of the derivation—would not cause a "crash" or any other kind of violation. In this, he assimilates the behavior of case features to that of φ-features. (With respect to case features in particular, this mirrors Marantz's own 1991 rejection of the Case Filter.)

There are, however, two ways for these case features to acquire values in the course of a syntactic derivation. First, case features on a noun phrase can be valued by the head that (c-)selects it:

(7) *LEXICAL/OBLIQUE CASE* – CASE ASSIGNED UPON FIRST MERGER

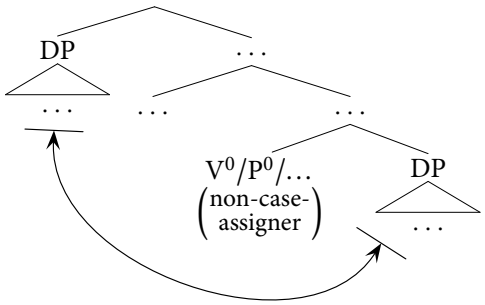


If syntactic structure is built from the bottom up, then case of this sort will be assigned to a noun phrase upon first merger. That is because the sisterhood relation between a noun phrase and the head selecting it (7) will be the first structural relation the noun phrase has a chance to participate in.

Importantly, not all lexical heads impose idiosyncratic (i.e., quirky/inherent) requirements on the case of the noun phrase they select. Stated in terms of the current, syntactic implementation: not all lexical heads are equipped with valued case features that can value the corresponding features on their nominal sister. This is the desired result: lexical/oblique case assignment is the first opportunity for a noun phrase to value its case features; if the lexical head is of the right type (i.e., bears valued case features), these will be assigned to the noun phrase. Only if the head does not bear such values, the possibility will arise for other case markings to be borne by the noun phrase in question.

The next opportunity for valuation of the case features on a noun phrase arises when two noun phrases, neither of which has had its case features valued to that point, stand in an asymmetric c-command relation—a configuration commonly known as *case-competition* (Bittner & Hale 1996):

(8) *CASE-COMPETITION* – CASE ASSIGNED UNDER ASYMMETRIC C-COMMAND BETWEEN TWO AS-OF-YET CASELESS DPS



Depending on the parameterized directionality of dependent case, it will be assigned to either the higher(='ergative') or lower(='accusative') of the two noun phrases in the case-competition configuration.

Because case assignment on this view is nothing more than *valuation*, it follows that dependent case can only arise if neither of the noun phrases in question has been previously assigned case by other means (e.g. (7)).

Finally, if a noun phrase has gone through the entire derivation without having its case features valued, it receives the characteristic morphological form that linguists have come to call 'nominative' or 'absolutive'—much like '3rd person singular' is the label given by linguists to φ-probes whose features have gone unvalued (Preminger 2011a, 2014).

From an algorithmic perspective, this delivers close to the same result as Marantz's (1991) *disjunctive case hierarchy*, given in (9):

(9) lexical/oblique case ≫ dependent case ≫ unmarked case

There are, however, several important differences. First, the ordering in (9) no longer needs to be stipulated, since as detailed above, it arises from basic principles of valuation and bottom-up structure building. Second, the entire mechanism operates within syntax proper, rather than in a post-syntactic/morphological component of grammar.

This latter point has a consequence that is very relevant for our present purposes: because the representation of a case like 'nominative' is simply that of a noun phrase whose case features are (yet) unvalued, a noun phrase can be nominative at one stage of the derivation and subsequently receive dependent case (e.g. by moving into a higher locality domain, where a case-competitor is available). All this, without allowing multiple assignments of (positively-specified) case to a single noun phrase (cf. "case-stacking"; §3).

This, we argue, is precisely what happens to raised objects in structures like (1–2), repeated here:

(1) min **ehigi$_1$-ni** [$_{\overline{C}}$ **t$_1$** bügün kyaj-yax-xyt dien] erem-mit-im
I **you-ACC** today win-FUT-2pl.SUBJ that hope-PAST-1sg.SUBJ
'I hoped you would win today.'

(2) ehigi **bihigi$_1$-ni** [$_{\overline{C}}$ **t$_1$** kyajtar-dy-byt dien] xomoj-du-gut
you **we-ACC** lose-PAST-1pl.SUBJ that become.sad-PAST-2pl.SUBJ
'Y'all were disappointed that we lost.'

[*Vinokurova 2005:369; annotations added following Baker & Vinokurova 2010*]

The raised subject starts out, in the embedded clause, as 'nominative'—meaning simply that its case features are not valued. In these instances, this is trivial, since there is neither a case-competitor nor an assigner of lexical case in the embedded domain in either example. But even if the embedded verbs were transitive rather than intransitive, it would not be the subject—the higher of the two noun phrases—that would receive dependent case, since Sakha is parameterized to assign dependent case downward(='accusative').

Consequently, agreement between the embedded verb and its subject—at this stage of the derivation—does not stand in violation of the aforementioned generalization whereby only nominatives are targeted for verbal agreement in Sakha. The embedded subject subsequently raises to a position where it is sufficiently local to the matrix subject, giving rise to a configuration along the lines of (8), and resulting in the assignment of dependent case ('accusative') to the lower of the two case-competitors—the raised embedded subject.

4.2. Case without agreement

To this point, we have been speaking of the relation between verbal agreement and unmarked case (e.g. 'nominative') in terms of correlation, not causation. A common view holds that this correlation arises because agreement *gives rise to* unmarked case (Chomsky 2000, 2001). It should be clear that this view is incompatible with the results of previous sections, since it is—by definition—a positively-specified view of unmarked case. The results to this point demonstrate that cases such as nominative are not *assigned* at all, but rather, represent the absence of any otherwise assigned case.

One might therefore wonder whether there is an alternative, coherent view of the relation between agreement and unmarked case, that captures the correlation between the two but does not rely on a positively-specified view of the latter. Recent work by Bobaljik (2008) and Preminger (2011a, 2014) provides just such a view, where it is agreement that is *case-discriminating*—and so, if anything, one might say that agreement arises by virtue of (certain) case-markings, rather than the other way around (a view that traces back to Bittner & Hale 1996:3).

Since space considerations preclude us from providing a meaningful review of that work here, we instead provide an existence proof—independent of Sakha—for unmarked case arising in the absence of agreement.

The relevant data come from Basque. We know that dative nominals in Basque act as interveners, disrupting agreement relations (unless and until they have undergone clitic doubling); we know this from Person Case Constraint (PCC/**me-lui*) effects (see, e.g., Rezac 2008), and also from dative intervention in long-distance agreement (LDA) relations in "substandard" Basque (Etxepare 2006, Preminger 2009). So, for example, the change from a benefactive PP (*Miren-entzat* "for Miren") in (10) to dative nominal (*lankide-e-i* "colleague(s)-ART$_{pl}$-DAT") in (11) results in intervention—hence the impossibility of plural absolutive agreement on the matrix auxiliary in (11):[8]

(10) [[**Miren-entzat**]$_{PP}$ [**harri** **horiek**]$_{(ABS)}$ altxa-tze-n] probatu
Miren-BEN **stone(s)** **those$_{pl}$** lift-NMZ-LOC attempted
[d-**it**-u-zte]$_{aux}$.
3.ABS-**pl.ABS**-√-3pl.ERG
'They have attempted to lift those stones for Miren.' (subject is *pro*<3pl.ERG>)

[8] These data, and their consequences for an agreement-based theory of case, are also discussed in Preminger 2011b.

(11) [[**Lankide-e-i**]$_{\text{DAT}}$ [**liburu horiek**]$_{(\text{ABS})}$ irakur-tze-n] probatu
colleague(s)-ART$_{\text{pl}}$-DAT **book(s) those$_{\text{pl}}$** read-NMZ-LOC attempted
[d-ϕ/***it**-u-(z)te]$_{\text{aux}}$.
3.ABS-**sg/*pl.ABS**-√-3pl.ERG
'They have attempted to read those books to the colleagues.' (subject is *pro*<3pl.ERG>)
[*Preminger 2009:640–641*]

Crucially, the dative nominal in (11) has, in *liburu horiek* ("book(s) those$_{\text{pl}}$") an absolutive co-argument; and the failure of plural agreement in (11) demonstrates that this absolutive noun phrase is syntactically lower than the dative. This means that no φ-probe—not even v^0—is close enough to the absolutive argument to agree with it without being intervened with by the even closer dative.[9] Note furthermore that the absolutive argument in question is a full-fledged DP, replete with a demonstrative (rather than some sort of bare or incorporated nominal).

This shows that absolutive—an unmarked structural case—can arise on noun phrases even when agreement has demonstrably failed to reach them. These data also illustrate that this is not a matter of, e.g., 'morphological' case as opposed to 'abstract' case: since abstract case is still expected to be sensitive to dative intervention, the foregoing argument would hold of abstract case, as well.

We therefore have, in these data, an existence proof for unmarked structural case in the absence of agreement.

4.3. A new perspective on case/agreement co-occurrence patterns

Before concluding, let us provide one more illustration of how this reversal of perspective on the co-occurrence patterns of case and agreement, noted in §4.2, works in practice.

Consider the well-known correlation, in Turkish this time, between agreement and the presence of a subject (Kornfilt 1984, 2003, 2006, George & Kornfilt 1981, a.o.):

(12) [Sen dün opera-ya git-ti-n] san-dı-m (Turkish)
you.sg(NOM) yesterday opera-DAT go-PAST-2sg believe-PAST-1sg
'I believed (that) you went to the opera yesterday.'

In (12), there is agreement on the embedded verb. In the absence of this agreement morphology, the subject of that clause must undergo raising-to-accusative; no speaker accepts a nominative subject without agreement:

(13) [Sen***(-i)** dün opera-ya git-ti] san-dı-m
you.sg***(-ACC)** yesterday opera-DAT go-PAST believe-PAST-1sg
'I believed (that) you went to the opera yesterday.'

On Chomsky's (2000, 2001) view, such correlations arise because nominative is assigned *by way of agreement*. In (12), agreement with the embedded subject results in the assignment of nominative case to that subject. Alternatively, the subject can receive accusative case in an ECM-like fashion, as in (13). The unacceptability of the nominative variant of (13) is derived using the Case Filter: neither accusative case assignment nor nominative-by-agreement have applied to the noun phrase in question. Of course, as demonstrated in the preceding sections, this approach fails to generalize

[9] Since the embedded clauses in (10–11) are non-finite, there is no clitic doubling of the dative nominal, and it remains an intervener for person and number agreement alike; see Preminger 2009 for further discussion.

to Sakha. (It should also be noted, in this context, that an approach that would implicate agreement in the distribution of PRO via the conduit of case-by-agreement is susceptible to the same problems facing the direct implication of case in the distribution of PRO; see Landau 2006, Bobaljik & Landau 2009, and references therein, for criticism of the latter.)

On the view discussed in §4.2, these correlations reflect the fact that agreement (in Turkish, as in most other languages) can only target noun phrases bearing unmarked case.[10] Case assignment proceeds independently of φ-agreement (e.g. as detailed in §4.1). Agreement is *attempted*, in the relevant sense, in both (12) and (13); the absence of an overt agreement suffix on the embedded verb in (13) is simply the spellout given to a finite agreement probe in Turkish that has not located a DP, bearing unmarked case, that carries [plural] and/or [participant] features. The ungrammatical variant of (13) is ruled out because if the embedded subject were indeed nominative, agreement would have successfully targeted it; and successful agreement cannot go gratuitously unexpressed (cf. **The boys is in the garden.*); see Preminger (2011a:85–93), as well as Preminger 2014, for a more detailed discussion.[11]

5. Conclusion

We have seen that once we accept Baker & Vinokurova's (2010) arguments that accusative in Sakha is a *dependent case*, it follows that: **(i)** raising-to-accusative constructions in Sakha (§2) furnish an instance of finite agreement with a noun phrase that subsequently enters into a dependent case relation; and **(ii)** only caseless noun phrases can enter into dependent case relations in Sakha (§3).

Given these two premises, and the well-established interdependence between nominative case and finite agreement (Bobaljik 2008, Chomsky 2000, 2001), this entails that **the representation of nominative is simply the absence of case**. We saw at least one theory of case assignment (the syntactic case calculus proposed by Preminger 2011a, 2014, modeled after Marantz's 1991 algorithm) that delivers this result.

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[10] This is a somewhat simplified view of Bobaljik's (2008) account. As he shows, there are actually instances of finite agreement targeting marked nominals (e.g. ergative subjects in Nepali). But crucially, even in languages where this is possible, unmarked nominals (e.g. nominative subjects in Nepali) are still viable agreement targets.

[11] Gratuitous non-expression of syntactically extant agreement should be (and can be) distinguished from agreement that is syntactically partial, in the first place. See Baker 2011 and Preminger 2011b.

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