

# No Nominative Case in Spanish\*

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## Abstract

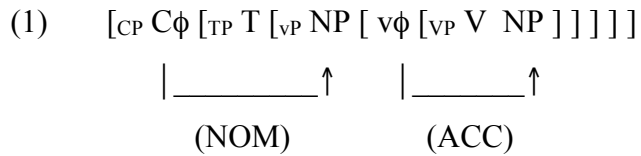
This paper argues that NP subjects are not Case-licensed through Nominative in languages of the Spanish type. We put forward the idea that subjects can be licensed by other surface structure-based strategies, which could in turn account for many of the properties displayed by null subject languages. The scenario we sketch does not question Chomsky's (2000, 2001) arguments for  $\phi$ -feature valuation, the moment  $\phi$ -features and structural Case do not go hand in hand, but it does yield a more complex parametric picture, one where accusative-languages can deploy features that are typically attributed to East Easian languages. If the approach we explore in this paper is correct, it has obvious (and non-trivial) consequences for the nature of T, the functional category responsible for nominative Case assignment.

## 1. The basic Probe-Goal approach to structural Case

Nominative-Accusative languages license two structural Cases in regular transitive sentences. In a system like Chomsky's (2000 et seq.), each of these Cases is assigned in a different domains: Nominative is assigned by C's  $\phi$ -features, whereas Accusative is by  $v^*$ 's  $\phi$ -features. For Chomsky (2000, 2001), the phase heads C and v are lexically endowed with  $\phi$ -features, which make them act as Probes upon introduction in a derivation. After these features are valued (when they match a local Goal), the matching NP receives structural Nominative and Accusative, as can be seen in (1):

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\* Acknowledgments to be added.



The abstract representation in (1) is the one in sentences like *Judas kissed Jesus*, *Arthur pulled out Excalibur*, or any similar transitive structure.

Of course, there are more complex scenarios, involving passive, raising, and ECM phenomena, among others (cf. D’Alessandro et al. 2008, Malchukov & Spencer 2008, and references therein), but the core system is designed in a rather streamlined fashion. In the next section we challenge the situation described above by considering the case of Spanish subjects, which, we argue, are a good candidate to question (not necessarily reject) the basic Probe-Goal approach.

Discussion is divided as follows: section 2 reviews the possibility, already hinted at by different scholars, that postverbal subjects are not licensed through Case, but by Focus, an idea we push to subjects more generally; section 3 puts forward the hypothesis that subjects in Romance languages of the Spanish type are not licensed by Case (which we dub *Subject Case Conjecture*—SCC); section 4 explores some empirical arguments in support of the SCC; section 5 briefly considers the impact of the SCC for the study of functional categories and structural Case; in section 6 we summarize the main ideas of our proposal.

## 2. Spanish postverbal subjects

Chomsky (2000, 2001) discusses some situations, called “defective intervention”, in which Case assignment can be blocked by a NP that is sandwiched between a Probe and its would-be Goal. In Spanish, there are two such configurations, VOS and VSO

(discussed at length by Ordóñez 2000, 2007, Gallego 2013, and references therein). Consider them in (2) and (3):

(2) Invandieron Irak **los EEUU** (Spanish)  
 invaded-3pl Irak the USA  
 ‘The USA invaded Irak’

(3) Invadieron **los EEUU** Irak (Spanish)  
 invaded-3pl the USA Irak  
 ‘The USA invaded Irak’

The case of (2) would not be problematic in languages like Italian and Catalan, assuming that the DO does not c-command the subject, as indicated in (4), where VP fronting obtains.

(4) [TP T [VP [VP V SN ] [VP SN [VP vφ t ] ] ] ]

This is precisely what Gallego (2013) emphasizes, showing that these languages pose no locality conflict for Nominative Case assignment. The case in (3) is easier, at least at first blush. This is so because v\* should assign accusative before moving to T (a process that is subject to parametrization, as is well-known).

(5) a. [TP T [VP NP [VP vφ [VP V NP ] ] ] ]

| \_\_\_\_\_ ↑

b. [TP T [VP NP [VP NP [VP vφ [VP V <NP> ] ] ] ] ]

↑ \_\_\_\_\_ |

c. [TP <T, <v\*, V>> [VP NP [VP NP [VP <v\*, V> [VP <V> <NP> ] ] ] ] ]

↑ \_\_\_\_\_ |

Interestingly (and rather surprising), it is precisely the VSO order the one that is the most restricted within Romance languages. Zubizarreta (1999) discusses this matter, which she relates to the existence of a differential-marking strategy for NPs (so-called DOM; cf. Belletti 2004 for a similar analysis).<sup>1</sup> More specifically, this author makes the following suggestion:

But I will first attempt to answer the following, fundamental question: to what other grammatical property of the language could we link the existence of the VSO order? My proposal is that the existence of VSO in Spanish and the lack of it in Italian should be linked to another salient difference between the two languages: in Spanish, but not in Italian, an overt morphological Case marker (i.e. the Case marker *a*) distinguishes the object from the subject in a number of crucial cases. [from Zubizarreta 1999:232]

Gallego (2013) further explores these word order facts, providing evidence that seem to show that VOS can be generated through distinct strategies: (a) object fronting and (b) VP fronting. The key thing, for this author, is that verb-subject agreement should be blocked if “(a)” is resorted to. In order to prove this, Gallego (2013) provides the data in (6), where a singular NP intervenes a plural AGREE (C,NP) dependency:

- (6) a. ??Llamaron a cada alumno sus profesores (Spanish)  
           called-3pl ACC each student his teachers  
           ‘His teachers called each student’
- b. Llamó a cada alumno su profesor (Spanish)  
           called-3pl ACC each student his teacher  
           ‘His teacher called each student’

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<sup>1</sup> Alexiadou & Anagnostopoulou (2007) also pay attention to VSO, which they relate to the existence of clitic doubling.

The outcome in (6a) is degraded, compared to that in (6b), which we can take to signal a problem of the minimality / intervention type. Plausible as this may be, it is nonetheless odd that the outcome is not totally degraded—a defective intervention situation should give rise to upfront unacceptability, contrary to fact. In this context, notice that when binding is not ensured, as in (7) below, the outcome is much better, which could follow from Spanish making use of the VP fronting strategy.

- (7) a. Recogieron el libro los estudiantes (Spanish)  
 picked-up-3pl the book the students  
 ‘The students picked up the book’
- b. Recogió el libro el estudiante (Spanish)  
 picked-up-3pl the book the student  
 ‘The student picked up the book’

More generally, V-subject singular agreement works fine, even under a local variable-binding configuration. If nothing else, this could indicate either that there is no agreement (singular agreement being a last-resort strategy) or that this is defective (just number):

- (8) Llamó a todos los estudiantes su profesor (Spanish)  
 called-3pl ACC all the students his teacher  
 ‘His teacher called all the students’

Let us sum up so far. We have seen that VOS and VSO orders pose interesting puzzles for Nominative Case assignment. Firstly, because S stays within the VP (or low TP) area, thus showing no ‘EPP behavior’, and secondly because S should have more problems than it seems to display when it comes to being Case-licensed.

### 3. Subjects Licensing without Nominative

Taking the VOS example (6a) above as a departing point, we would like to defend the hypothesis that Spanish (and presumably Romanian and Greek too, although we put an in-depth comparative discussion here) does not license NP subjects through Nominative Case. We would like to state this as follows:

(9) *Subject Case Conjecture (SCC)*

Spanish does not license NP subjects through Nominative Case

Of course, something similar to the SCC has already been proposed in the literature in one way or another. On the one hand, it nicely fits with the idea that verbal morphology is pronominal in pro-drop languages (cf. Alexiadou & Anagnostopoulou 1998, Ordóñez & Treviño 1999, among others), which allows to license NP subjects by means of incorporation (à la Baker 1988). On the other hand, Belletti (2004) explores the possibility that postverbal subjects (which are typically focal) are licensed through focus. In her own words:

*Suppose that not Case but Focus plays the role of the licenser of the postverbal subject. From the interpretive/informational point of view, the hypothesis seems entirely justified. But what is the status of Focus in this view? To make the proposal technically more precise, I assume that Focus is a syntactic feature that is heading a functional projection in the clause structure, thus creating a regular checking configuration. In this proposal, the syntactic feature in question has licensing abilities. In a broader perspective, we can assume that Case is not the only licenser of overt DPs in the clause. It is probably the most typical and widespread one, but others are available as well. Focus is one of them in this view.*

[taken from Belletti 2001:64, our emphasis, RE & AJG]

Subject licensing through a pragmatic-discourse functional category is also reminiscent of Uriagereka's (1988, 1995) work on F, a projection meant to capture interpretive effects associated to displacement, clitics, focus particles, and other point-of-view-encoding elements.

We hasten to add that, the way we see it, the SCC is not incompatible with the Probe-Goal system of Chomsky (2000, 2001), especially if we do not assume that "focus" is an inflectional category (like number, person, and the like; *pace* Irurtzun 2007, Miyagawa 2010, or Rizzi 1997). Even though an NP is licensed through focus, C's  $\phi$ -features can access such NP and be valued, all that matters is that the NP is not modified in the valuation process (only C's  $\phi$ -features can be, according to recent formulations of the Phase Impenetrability Condition; cf. Chomsky et al. 2019).

Our proposal (the SCC) poses a series of empirical and theoretical questions. Consider them in the following pages.

#### 4. Consequences of the SCC

Let us start by addressing the fact that nominative Case has no morphology associated to Spanish NPs, unlike accusative or dative. Differently put, Nominative is unmarked in Spanish. Obviously, this can be a morphological accident, but it perfectly fits with the absence of these features in the syntax.

NP subjects can be licensed without agreement in Spanish, at least in adjunct structures (cf. Rigau 1993, 1995) and also in some control structures (cf. Ordóñez 2009). Consider both situations in turn, where we signal subjects with bold letters:

- (10) a. [ Al llegar **María** ], me dijeron que saliese (Spanish)  
to-the arrive-inf María to-me said-3pl that went out-1sg

‘When María arrived, they told me to leave’

b. Quería [ salir **María** de casa ], pero no la dejaron (Spanish)

wanted-3sg go-out-inf María from home but not cl-her allowed-3pl

‘María wanted to leave home, but she was not allowed to’

In (10a) and (10b), the NP María is licensed within an infinitival clause. According to Rigau (1993, 1995) this was a consequence of the (abstract) [+AGR] feature of T to be strong in Romance. We can leave her analysis intact, as we are assuming that C’s  $\phi$ -features are valued. Notice, interestingly, that subject licensing seems to be parasitic on postverbal position. Thus, switching the order of the subject and the verb results in deviance:<sup>2</sup>

(11) a. \*[ Al **María** llegar ], me dijeron que saliese (Spanish)

to-the María arrive-inf to-me said-3pl that went out-1sg

‘When María arrived, they told me to leave’

b. ??Quería [ **María** salir de casa ], pero no la dejaron (Spanish)

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<sup>2</sup> González Rodríguez (2017) discusses data from Caribbean Spanish (in particular, Puerto Rican Spanish), where preverbal subjects are indeed possible in examples like those below (where ES and PRS stand for European and Puerto-Rican Spanish respectively):

(i) Al **Juan** llamar, me asusté. (\*ES/PRS)

to-the Juan call-inf cl-me got-frightened

‘When Juan called, I got frightened’

(ii) De **ella** haber estado, no hubiera sucedido. (\*ES/PRS)

of she have been not had happened

‘Had she known, it would not have happened’

(iii) Para **su padre** quejarse, tiene que portarse muy mal. (\*ES/PRS)

for her father complain-inf had that behave very badly

‘She must behave very badly, if her father complains’

(iv) Con **vosotros** saberlo, es suficiente. (\*ES/PRS)

with you know-inf-cl is enough

‘It is enough if you know it’

González Rodríguez (2017) offers an analysis following Gallego’s (2010) ideas about the valuation of C’s features. Roughly put, PRS licenses SPEC-T as a subject position in a series of structures, while ES cannot. We cannot provide a detailed analysis of these facts here, but we would like to point out that our approach would be compatible with a situation where PRS licenses SPEC-T as an additional focus position (along with SPEC-v, presumably). We leave the specifics of such parameter for future research.



wanted-3sg María go-out-inf from home but not cl-her allowed-3pl  
'María wanted to leave home, but she was not allowed to'

So-called "antiagreement" effects (cf. Torrego 2010), illustrated in (12) below, do not fit with a system in which NPs are licensed by means of agreement:

- (12) Los políticos {mentimos / mentís / mienten} (Spanish)  
the politicians lie-1pl / 2pl / 3 pl  
'We / You / They politicians lie'

There are phenomena similar to (12) in the case of clitic doubling with NPs in object position. Consider the data in (13), explored at length by Di Tullio et al. (2019):

- (13) a. **Nos** vieron **a los profesores** (Spanish)  
cl-us saw-3pl ACC the teachers  
'They saw us teachers'
- b. **Os** vi **a los profesores** (Spanish)  
cl-you saw-3pl ACC the teachers  
'They saw us teachers'
- c. **Los** vi **a los profesores** (Río de la Plata Spanish)  
cl-them saw-3pl ACC the teachers  
'They saw us teachers'

One might wonder if the absence of Nominative Case in Spanish, which can be translated in morphological terms through the absence of any overt marking, can carry over to other Case systems where unmarked Case is not necessarily the subject Case. Ergative languages are one type of this kind of language.

Etxepare (2009) observes, in the context of long distance agreement facts in Basque, that agreement and Case assignment do not go hand in hand. In other words: the

dependency between Case assignment (understood as the valuation of an uninterpretable aspect-tense feature of the Goal) and agreement (the valuation of the uninterpretable  $\phi$ -features of a Goal) do not depend on each other. Chomsky’s (2000, 2001) so-called Activity Condition, from the perspective of this kind of agreement, simply does not exist.<sup>3</sup> Long distance agreement in Basque can be illustrated with examples like the next one:

- (14) [PRO liburuak erostea] erabaki ditu (Basque)  
 books buy.nom.det decided aux-3sERG-3plABS  
 ‘She decided to buy the books’

The object of the verb within the nominalized clause, *erostea* (Eng. ‘buy’), is what triggers the plural agreement with the main clause auxiliary verb. Etxepare (2009) shows that a nominalized clause in the cases at hand can display a syntactic complexity enough to license the object Case—if this is to be assigned. Agreement, therefore, does not depend on absolute Case valuation. Particularly revealing examples are those where there is a mismatch between Case value and agreement value, like (15):

- (15) Uko egin di-e [PRO agindu horiek betetzeari] (Basque)  
 refuse fact aux-3sERG-3sABS-3plDAT order those follow.NOM.DAT  
 “She refused to follow those orders”

The *-e* morpheme in the auxiliary indicates two things: plurality and dative Case. Whereas the origin of the dative agreement is obvious (the nominalized clause

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<sup>3</sup> Problems with the Activity Condition are already noted by Nevins (2004). Chomsky (2007, 2008) abandons the Activity Condition under the Phase Impenetrability Condition (PIC): if a subject NP lands in SPEC-T, then this position is not accessible from the next phase. It is not clear how this scenario holds in a system where the PIC is not restricted this way as Probes can access previous phases as long as the material contained in them is not changed (cf. Chomsky et al 2019).

displays dative Case), the source of plural agreement cannot be the same, as the clause is necessarily singular: It must then be the Absolutive object in the embedded clause (*agindu horiek*, Eng ‘those orders’). Differently put: Case agreement (dative) is associated to number features that corresponds to an absolutive argument.

In Etxepare (2009), this fact is taken as evidence against the Activity Condition and the notion of active Goal, under the assumption that the absolutive argument already has its own Case licensed by *betetzeari* (Eng. ‘follow’). An alternative vision of these data, however, is that absolutive Case has simply no role in the system, so that it can hardly be a Probe-Goal intervener. This alternative analysis may be extended to Hindi’s long distance agreement cases (cf. Bhatt 2005), where the idea that Case (de)activates Goals has also been questioned. The special nature of absolutive in Basque, and the very existence of long distance agreement could be due to the absence of absolutive Case. In fact, as Etxepare (2009) shows, long distance agreement is restricted to absolutive.<sup>4</sup>

The idea that discourse-related relations involved in the computational system can license a nominal argument and become alternatives to Case are further sustained in the well-known phenomenon of anti-agreement. In many languages, A-bar movement is not compatible with verbal agreement. The Berber example in (16) is taken from Ouhalla (1993: 479):

- (16) a. t-zra        tamghart Mohand                                    (Berber)  
               3sg.F-see woman Mohand?  
               ‘Did the woman see Mohand?’
- b. man tamghart<sub>i</sub> ay yzrin / \*t-zra \_<sub>j</sub> Mohand?                                    (Berber)

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<sup>4</sup> Other apparent cases of long distance agreement, like the ones concerning datives, or the ones that involve person features, have to do with clitic climbing phenomena, with varying locality properties.

what woman C seen / 3sg.F-see Mohand?

‘What woman saw a Mohand?’

Movement to SPEC-C of an interrogative phrase blocks agreement with the auxiliary. A way to interpret this fact is that Case is not necessary, since there is a different way to license the argument. As it is not necessary, valuation becomes impossible, along with its morphological correlate: agreement.

One further consequence of this approach concerns non-local obviation. Gallego (2010) argues that Romance subjunctives are an instance of ECM. If the licensing of subjects can be based on focus, then we have a way to explain why obviation effects go away (or are weakened) when the topic-focus structure is tampered with or when we have elements that are inherently focal, like strong pronouns and passives (cf. Quer 2006):

- (17) a. Espero pro<sub>i</sub> que gane solo yo<sub>i</sub> ahora (Spanish)  
hope-1sg that win-subj.1sg just me now  
‘I hope that it is just me who wins now’
- b. Espero pro<sub>i</sub> que pro<sub>i</sub> sea autorizado a ir (Spanish)  
hope-1g that be-subj-1sg authorized to go-inf  
‘I hope that I am authorized to go’
- c. Fue convencido pro<sub>i</sub> de que pro<sub>i</sub> se marchara (Spanish)  
was-3sg convinced of that cl go-subj-3sg  
‘He was convinced to leave’

Let us take stock. In the previous pages we have seen different empirical consequences that follow from the SCC. All of them are consistent with the possibility that the valuation of T’s  $\phi$ -features and the assignment of structural Case are independent from each other.

## 5. The nature of functional categories and parametric variation

In the previous pages we have explored the SCC, which we repeat as (18) for convenience:

(18) *Subject Case Conjecture (SCC)*

Spanish does not license NP subjects through Nominative Case

All other things being equal, the SCC should hold of all null subject languages, and it should have further theoretical and empirical consequences. We will briefly discuss two of them.

The first immediate consequence of the SCC concerns the very nature of structural Case, which can still be a side effect of  $\phi$ -features (as in Chomsky's 2000 et seq. Probe-Goal approach), but does not have to be. This should in turn have an impact on accounts where Case is used to determine the derivational availability of an NP (Chomsky's 2001 Activity Condition) or the local competition with another NP (Richards' 2010 Distinctness, and presumably Dependent Case and Anti-locality theories). From this perspective, for instance, it is no longer obvious that the problem with VSO structures in all NSLs but Spanish can follow from Case alone:

- (19) a. Vio Juan a su hermana (Spanish)  
saw-3sg Juan ACC her sister  
'Juan saw her sister'
- b. Vio Juan la película (Spanish)  
saw-3sg Juan the movie  
'Juan saw the movie'

While one could argue that the DOM marker in the object NP makes it possible for the NP-NP structure to be licensed in (19a), the same idea cannot be pushed to (19b), where we have two apparently ‘non-distinct’ NPs, as Colomina (in progress) discusses.

A second consequence of the SCC brings us back to the very nature of functional categories and parametric variation. Most post P&P approaches to parameters endorse the idea that the locus of parametric variation is in the lexicon, more specifically in the functional inventory of units (cf. Ouhalla 1991, Kayne 2000, and many others). Our discussion above has concluded that it is not Chomsky’s (2000) Core Functional Categories (C, T and  $v^*$ ) that vary cross-linguistically (they can all be said to have a bundle of  $\phi$ -features, thus adhering to an alleged universality of cyclic domains; cf. Miyagawa 2010 for qualifications), but it is actually NPs that should feature such variation. If Case is encoded in a K projection (as in Bittner & Hale 1996), then the relevant parameter should be formulated as in (20):

- (20) Case Parameter  
K is present in NP’s extended projection

In standard P&P terms, (20) is marked positively or negatively by the relevant languages. Apart from more specific empirical considerations, what (20) is saying is that there are things harder to parametrize than others. In the case at hand, an alternative version of the parameter in (20) (given the facts we have taken into account) is (21):

- (21) Case Parameter’  
T (or C) is endowed with  $\phi$ -features

We believe (21) is less plausible than (20) is, and this is so for the very nature of the cyclic system. Whereas it makes sense for variation to be concerned with word order or agreement facts (which we want to relate to some version of 20), it is less obvious that

languages vary with respect to the presence of  $\phi$ -features in so-called phase heads, for the very reason that core properties like locality should be the last things one should think about parametrizing—it is ultimately an empirical question, of course, but if we take the unexpected existence of  $\phi$ -features to signal cyclic points (Chomsky 2000), then they constitute a defining property of the computational system, just like economy and other third-factor principles that we should not expect to vary.

## 6. Conclusions

This paper has put forward the idea that nominative Case is not the licensing strategy that languages of the Spanish type make use of. Instead, an alternative discourse-oriented mechanism is the key. The SCC is consistent with the fact that, unlike thematic roles, both Case and information structure belong to what we could call (invoking a P&P-rooted notion) Surface Structure, and as such it is more subject to variation than everything that belongs to Deep Structure.

The system we have sketched displays a hybrid characterization. In particular, Spanish lacks nominative Case, but not accusative. Intuitively, Spanish combines a licensing system based on Case (for objects) and information structure (for subjects). This must have clear consequences for the feature composition of functional categories involved in Case (the C-T complex, according to Chomsky 2008 et seq.), as well as for the parameters associated to them (the pro-drop parameter; D'Alessandro 2016 and references therein). The proposal does not affect the essence of how Case assignment operates in Chomsky's Phase Theory, which depends on the valuation of the  $\phi$ -features C and  $v^*$  are endowed with.

Among many of the various questions that our proposal raises is how the notion of “focus”, key to subject licensing here, is to be interpreted. Nothing in what we have said precludes a standard Probe-Goal treatment (with a prominent presence, for

instance, in the Cartographic Project, but also elsewhere). However, given the general dissociation between NP licensing and Probe-Goal dependencies we are considering, we should explore alternative routes. These, and many other details, remain to be carefully explored, along with other consequences for language typology and parametric variation, as we have pointed out in section 5.

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