Why is there NOM-NOM and ACC-ACC but no ERG-ERG? *

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1. Introduction

This paper investigates a typological gap in what will be referred to as double case arrays, in which the internal and external arguments of a transitive clause exhibit the same case morphology. Various languages permit NOM-NOM, ACC-ACC and ABS-ABS case arrays, but ERG-ERG constructions are entirely unattested. The aim of the paper is to show that this typological gap should be taken seriously in our theory of ergativity and provide a mechanism for ergative case assignment that is able to derive this gap.

Double nominatives, for example, are permitted in some stative transitive constructions in Japanese, as shown in (1). In addition to having double nominatives, Icelandic exhibits double accusatives as a result of quirky case assignment, as shown in (2). Icelandic ACC-ACC verbs, such as *vanta* 'need, lack', do not inflect for person or number.

- (1) John-ga Mary-ga suki-da.
 J-NOM M-NOM fond-PRES
 'John is fond of Mary.' (Japanese; Koizumi 2008: 144)
- (2) Mig vanta-r pening-a. Me.ACC need-PRES money-PL.ACC.INDEF 'I need money.'

(Icelandic; Jónsson 2003: 140)

We find double case arrays in ergative languages as well. In Shipibo (Panoan), for instance, transitive subjects normally receive overt ergative marking, as shown in (3a). However, desiderative (3b) and reciprocal (3c) constructions are ABS-ABS, despite being transitive; absolutive arguments in Shipibo are morphologically unmarked (Baker 2014).

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- (3) a. Ochibi-baon-ra bake natex-kan-ke dog-PL.ERG-PRT child(.ABS) bit-PL.SUBJ-PRF 'The dogs bit the child.'
 - b. José-ra yapa keen-ai J(.ABS)-PRT fish(.ABS) want-IMPF 'José wants some fish.'
 - c. Ja-bo-ra piti meni-anan-ke they-PL(.ABS)-PRT fish(.ABS) give-RECIP-PRF
 'They gave fish to each other.' (Shipibo; Baker 2014: 344, 346, 347)

Given that double nominative, accusative and absolutive case arrays are all attested, we might expect double ergative constructions to be possible as well. However, I have not found a single instance of ERG-ERG in any language. This result is confirmed by Jessica Coon (p.c.), Julie Anne Legate (p.c.) and Diane Massam (p.c.), among others. No language marks ergative case on more than one argument of a single verb.

The lack of ERG-ERG case arrays cross-linguistically leads me to posit the following descriptive generalisation:

(4) Single Ergative Generalisation (SEG)A syntactic clause may contain at most one ergative argument.

I set aside the definition of 'clause' in (4) for now but will note here that the SEG may not apply in cases involving, for example, predicates with clausal complements. The SEG can be used to evaluate the empirical adequacy of existing analyses of ergativity: our theory of ergative case assignment must exclude the possibility of producing ERG-ERG arrays.

Current approaches to ergative case assignment generally fall into one of two camps: inherent or structural. Inherent ergative case tends to be idiosyncratic and depends on the properties of particular predicates (Mahajan, 1990; Woolford, 1997, 2006; Laka, 2006; Legate, 2008). The other camp takes ergative to be a purely structural case, assigned to an argument in a particular structural configuration with its case-assigning head (Marantz 1991, Bittner & Hale 1996, Rezac et al. 2014). In this paper, I will show that both approaches fail to account for the lack of ERG-ERG constructions cross-linguistically.

The paper is organised as follows. In §2, I argue that an inherent case view of the ergative predicts the possibility of ERG-ERG in causatives of transitives. A structural case view, however, would expect ergative case to be subject to the same syntactic operations that multiply assign other structural cases, leading to multiple ergatives (§3). A dependent case analysis also fails with regards to the SEG if we allow dependent case to be calculated in more than one case domain. In view of these undesirable predictions, in §4 I sketch a novel account of ergative case assignment that is capable of deriving the SEG. Adapting Wood & Marantz's (2017) configurational approach to the thematic interpretation of external arguments, I propose that ergative case is assigned to an argument on the basis of the content of the constituent it merges with. §5 concludes.

2. Ergative case is not inherent

An inherent case is assigned by particular predicates and typically coincides with a specific set of theta-roles, as captured by the Inherent Ergative Hypothesis, which states that ergative case depends on the relationship(s) between an argument and its lexical predicate (adapted from Rezac et al. 2014: 1275). According to the inherent case approach, lexical predicates can license an ergative-assigning functional head, normally assumed to be Voice (Massam 2006, Legate 2012). Split-S languages such as Basque and Hindi show the relevance of particular lexical predicates in the assignment of ergative case. As shown in these examples from Basque, unaccusative subjects in split-S languages are absolutive (5a) but unergative subjects are marked ergative (5b).

(5)	a.	Txalupa hondora-tu da.
		boat.DEF-ABS sink-PERF is
		'The boat sank.'
	1	

b. Gizon-a-k aharrausi egi-n du. man-DEF-ERG yawn do-PERF has 'The man yawned.'

(Basque; Laka 2006: 376-377)

The prediction made by the inherent case view is that ergative-assigning predicates should consistently assign ergative case (Mahajan 1990; Woolford 1997, 2006; Laka 2006; Massam 2006, 2009; Legate 2008, 2012).

The inherent case view specifically makes the prediction noted independently by Marantz (1991/2000) that ergative case does not occur on an argument moved into a non-thematic subject position. In other words, derived subjects cannot be ergative; this is called Marantz's Ergative Generalisation. This includes, for example, the derived internal argument subjects of unaccusative verbs; these are predicted to never receive ergative case marking in any language. Similarly, we would expect inherent ergative case to be unable to be *removed* from arguments in derived positions.

However, evidence from a number of languages suggests that derived subjects may indeed be marked ergative. In Shipibo, for example, while the subject of the unaccusative verb *joshin* 'ripen' is absolutive in (6a) as expected, it is promoted to ergative with the addition of an applied argument, as shown in (6b).

- (6) a. Kokoti-ra joshin-ke. fruit(.ABS)-PRT ripen-PRF 'The fruit ripened.'
 - b. Bimi-n-ra Rosa joshin-xon-ke. fruit-ERG-PL Rosa(.ABS) ripen-APPL-PRF
 'The fruit ripened for Rosa.' (Shipibo; Baker 2014: 345, 346)

The appearance of ergative case on a *theme* argument in (6b) therefore appears to be in direct contradiction to Marantz's Generalisation as well as the predictions made by the in-

herent case approach. (6b) demonstrates that the assignment of ergative case is dependent not on theta-roles or lexical properties of predicates but on the transitivity of the clause. The intransitive unaccusative construction (6a) has an absolutive subject while its more 'transitive' counterpart (6b) has an ergative subject. An inherent case approach to the ergative cannot account for these case alternations.

Another case alternation of sorts can be found between transitive constructions and their causatives. In Niuean (Polynesian), for instance, the agent of the transitive predicate $tot\bar{o}$ 'hold' is normally marked ergative, as in (7a). However, this agent surfaces as absolutive when embedded in a causative construction (7b), and the causer then becomes the ergative argument. The morpheme *e* marks ergative on pronouns and absolutive on common nouns.

- (7) a. Ne totō e ia e kapiniu.
 PAST hold ERG.P 3SG ABS.C cup
 'He held the cup [in his hand].'
 - b. Kua faka-totō aki e ia e kato e tama haaku.
 PERF FAKA-hold INSTR ERG.P 3SG ABS.C basket ABS.C child 1SG.GEN
 'She made my child hold the basket.' (Niuean; Gould et al. 2009: 6–7)

Similarly, in Ulivelivek (Formosan), transitive causees can be marked either absolutive (8a) or oblique (8b) but never ergative.

(8)	a.	ku=pa-na'u-aw	za	valray	i	Asing.
		1S.ERG=CAUS-read-PV	OBL.IND	book	ABS.P	Asing
		'I made Asing read a bo	ok.'			

b. ku=pa-na'u-wanay na valray kani Asing.
1S.ERG=CAUS-read-IV ABS.DEF book OBL.P Asing
'I made Asing read the book.' (Ulivelivek; fieldwork data)

If ergative case were inherent, then we would expect it to be assigned consistently to the agentive subjects of predicates like 'hold' and 'read', independently of whether it is embedded in a causative construction. Ergative case would also appear on the causer, predicting ERG-ERG in the causative of a transitive. However, (7b) and (8) show that the original agent (the causee) cannot be marked ergative in the presence of an ergative causer.

As predicted by the SEG, we see no recursion of ergative structure in the causatives, regardless of what predicate is being causativised.¹ If inherent cases are assigned consistently to the arguments of particular predicates, then ergative case cannot be inherent.

¹Potential counterexamples to the SEG are found in the causatives of transitives in Agul, Kabardian and Trumai, in which the transitive causee appears to be marked ergative. In Agul and Kabardian, however, ergative case is syncretic with the instrumental (note, as shown in (7b) that instrumental applicative morphology is also required to introduce transitive causees in Niuean); thus it is unclear whether these causees are in fact true ergatives. Causatives of intransitives in Trumai, meanwhile, appear bi-clausal, being morphosyntactically identical to predicates with clausal complements. The SEG makes no claims about multi-clausal structures.

3. Ergative case is not structural or dependent

The main alternative to the inherent case view of the ergative is the structural case approach, where ergative case is either assigned via an Agree relation to a functional head or computed post-syntactically (Marantz 1991, Bittner & Hale 1996, Baker 2014, Rezac et al. 2014, Coon & Preminger 2015). In this section, I discuss some syntactic operations which we would expect to apply to ergative case if it were indeed structural, and show that they predict the possibility of ERG-ERG. I also provide evidence that dependent case theory similarly fails with respect to the SEG.

3.1 Multiple Agree

Nominative case is generally taken to be the canonical example of a structural case. Recall that Japanese has a range of double nominative constructions, like that repeated in (9).

(9)	John-ga Mary-ga suki-da.	
	J-NOM M-NOM fond-PRES	
	'John is fond of Mary.'	(Japanese; Koizumi 2008: 144)

In order to capture the assignment of nominative case to both arguments in (9), Hiraiwa (2001) suggests that in some languages, a single probe can Agree with *multiple* matched goals simultaneously in the derivation. Multiple Agree operates when a probe feature specified as [+multiple] enters into an Agree relation with all of the matching goals within an 'accessible' domain simultaneously. In Japanese NOM-NOM constructions, then, Hiraiwa proposes that probe ϕ -feature on finite T can enter into a Multiple Agree relation with the goal ϕ -features of the internal and external arguments simultaneously. Multiple Agree thus permits the assignment of nominative case to both Agreeing goals.

Crucially, Hiraiwa (2001) assumes that nominative case is a structural case. If ergative case were similarly structural, as many have argued, nothing in the application of Multiple Agree would prevent the assignment of double ergative case, in parallel to the double nominative and accusative arrays found in Japanese and Korean. If structural cases participate in Multiple Agree, then ergative case cannot be structural given the SEG.

Like Hiraiwa (2001), Bobaljik & Branigan (2006) pursue a structural case analysis and propose that finite T may check features on multiple goals. Bobaljik & Branigan in fact take this approach even further, arguing that in Chukchi, T must be able to assign two *different* cases simultaneously. Their multiple checking approach is therefore even less constrained than Hiraiwa's (2001) Multiple Agree, as two (or perhaps more) different cases can be assigned at a single step of the derivation. Again, if structural cases can be multiply checked, then ergative case cannot be a structural case.

The existence of double case arrays suggests that mechanisms like Multiple Agree and multiple case checking may be needed in the grammar. However, if we allow (i) the multiple assignment of structural nominative and accusative case and (ii) the simultaneous assignment of structural ergative and absolutive case, we should also expect to be able to

multiply assign structural ergative case. However, ERG-ERG constructions are unattested. The SEG therefore indicates that ergative case cannot be structural.

3.2 Dependent case

Another approach to ergative case along similar lines to the structural approach is the dependent case view. A dependent case is one that is assigned to an argument in the correct syntactic configuration relative to another argument (Marantz 1991/2000). Proponents of the dependent case view assume that, in at least some languages, the assignment of ergative and accusative case on one DP is dependent upon the existence of another DP in the clause (Baker & Vinokurova 2010, Baker 2014, Coon & Preminger 2015). Marantz (1991/2000: 24) suggests that different types of cases are ranked in a case hierarchy, listed in descending rank order: lexically governed case, dependent case (accusative and ergative), unmarked case (environment-sensitive, e.g. genitive), default case.

Lexically-assigned cases, such as those assigned by prepositions or quirky case in Icelandic, take precedence. Dependent case and the unmarked cases follow. Baker (2014: 342) summarises Marantz's mechanism for dependent case assignment in this way: if there are two distinct DPs in the same domain, then mark the lower one with dependent case (accusative) and/or Mark the higher one with dependent case (ergative). Any DP that remains unspecified for case surfaces as nominative or absolutive by default.

Given just these heuristics, however, a number of questions arise, namely (i) how is 'height' determined and (ii) within what domain? A sensible way to characterise the relative syntactic height of arguments in terms of c-command (Baker & Vinokurova 2010); argument A is higher than argument B if A c-commands B. The domain of evaluation of the argument height, meanwhile, could conceivably be the whole clause, i.e. CP or TP.

At first glance, the dependent case approach seems to be good news for the SEG: in a monotransitive construction, only one argument receives ergative case. However, it is unclear what happens in ditransitive constructions such as the double object construction sketched in (10); the goal DP_2 is assumed to be introduced by a low applicative head (Pylkkänen 2008). In this tree, what case should DP_2 be assigned?

(10) Clausal dependent case in double object constructions



While DP_2 c-commands DP_3 , suggesting that DP_2 should receive ergative marking, DP_2 is also c-commanded by DP_1 , which suggests absolutive case. If DP_2 is marked as ergative, however, then we would be left with an ERG-ERG-ABS case array, which is unattested according to the SEG. We can avoid this prediction if we assume that ergative case may only be assigned once and only when all argument structural material is merged. Thus the dependent approach to ergative case requires the assumption of a single case assignment domain per clause (Baker & Vinokurova 2010, Coon & Preminger 2015).

However, Baker & Vinokurova (2010) and Baker (2014) propose that in different languages, VoiceP may be either a 'hard phase' whose vP complement is invisible for later operations, or a 'soft phase' whose complement remains visible in the next stage of the derivation. In languages for which VoiceP is a soft phase, ergative case is not assigned before the complement of Voice is spelled-out but during the CP phase, which is always a hard phase. Thus ergative case assignment is "keyed" to the spell-out of the TP domain but not the vP domain, so that ergative case may be assigned maximally once per clause, despite multiple spell-outs.

Baker (2014) suggests that the permeability of the VoiceP phase might be parameterised across languages, so that VoiceP is a soft phase in Shipibo but could be a hard phase in another language. Yet if VoiceP is a hard phase, then we would predict the possibility of ERG-ERG-ABS in double object constructions, for example. Indeed, all of the existing dependent case analyses that I have come across posit a single case assignment domain for ergative case.

3.3 Possessives

However, multiple case domains might be desirable for ergative/genitive case syncretisms found in many languages, such as Kaqchikel (Mayan) (11) and Nez Perce (Sahaptin) (12).

(11)	R-ixjayil	nu-xb'al	x-Ø-pe.	
	ERG.3SG-wife	e GEN/ERG.1SG-brothe	r PERF-ABS	.3sg-come
	'My brother's	wife came.'		(Kaqchikel; Imanishi 2014: 35)

(12) 'ip-nim lawtiwaa-ma-pim pe-'pt'e-six-Ø haacwal-a.
3SG-GEN/ERG friend-PL-ERG.1SG 3/3-hit.IMPERF.PL-PRES boy-OBJ
'His friends are hitting the boy.' (Nez Perce; Deal 2013: 410)

Languages which exhibit case marking on possessors are usually said to have a genitive case. In both (11) and (12), the external argument of the clause and the possessor embedded within the external argument are marked with the same morphology. The result is that the possessor argument features case marking that is syncretic with ergative case morphology in the language. It is therefore possible that the ergative and genitive cases in Kaqchikel and Nez Perce may be assigned in the same or similar ways. If we take the ergative/genitive case to be dependent, then there must be an additional cyclic domain in which ergative case may be assigned.

Based on this and similar evidence, Imanishi (2014) proposes that ergative case in Kaqchikel is assigned upon the spell-out of each of the CP, VoiceP and DP phases. However, if multiple case domains are permitted, then we would expect ERG-ERG arrays, in violation of the SEG. It is possible to stipulate that ergative case cannot be keyed to both CP and VoiceP. Yet limiting ergative case assignment to a single phase seems to weaken the dependent case approach to the point where it is no longer in practice any different from an inherent case approach in which a particular functional head assigns ergative case.

This section has shown that nothing in the structural or dependent case views of ergative case prevents the assignment of multiple ergatives. This approach therefore fails with respect to the SEG.

4. Configurational case

My analysis of the ergative case dovetails with Wood & Marantz's (2017) configurational approach to the thematic interpretation of external arguments. In the Government and Binding/Minimalism tradition, θ -roles are assigned by a collection of functional heads (e.g. Voice, Appl, *p*) at varying places in the syntactic structure. Wood & Marantz attempt to unify these heads into a single external argument-introducing head *i**, which "generally assigns to the second constituent it merges with the θ -role implied by the first constituent it merges with" (2017: 277). That is, XP in (13) is assigned the theta-role implied by YP.



If XP = DP and YP is a *vP*, for example, the DP would be assigned an agent theta-role, as implied by the properties of the *vP*. The functional head *i** would be therefore be interpreted as Voice, which typically introduces an agent. Other configurations result in different interpretations of *i** and its external argument, given in (14).

(14) Function of *i** as determined by its syntactic context

- a. Voice (agents): bare i^* that merges with vP
- b. High appl (affectees): i^* with adjoined prepositional root
- c. Low appl (possessors): bare i^* that merges with a DP

Wood & Marantz suggest that theta-roles are not directly assigned by i^* in the narrow syntax but computed post-syntactically at the semantic interface, so that the function of i^* is subject to contextual allosemy.

In a similar fashion, I propose that some cases are determined based on syntactic context. The ergative case is the prime example of what I will call a configurational case:

(15) *Configurational case*

A case is configurational if its assignment on an argument XP depends on the content of the complement (YP) of the functional head that introduces XP (i^*).

Like how XP in (13) is interpreted as an agent if YP contains a vP, ergative case in this approach is assigned if YP contains a particular category. In fact, I propose very similar syntactic conditions on the spell-out of ergative case in (16) as those assumed for agent theta-role assignment.

(16) Basic configurational requirement for ergative case Ergative case is assigned to an argument introduced by a bare *i** with a *v*P complement.

(16) ensures that only a subset of external arguments receive ergative marking: non-applied arguments whose sister constituent contains a *v*P. For clarity, I use the label *v*P to refer only to the projection within which the internal argument of the verb may be introduced.²

A configurational approach to ergative case is able to derive the SEG because the function of each argument-introducing head (i^* with or without an adjoined root) is determined by its syntactic context. Since the syntactic context changes each time a new argument is merged, ergative structure cannot 'recurse'. That is, ergative case is assigned to an argument whose sister constituent is composed of bare i^* plus vP. The resulting constituent is Voice*P rather than vP, and so no additional material that merges would be in the correct configuration to receive ergative case. Thus the SEG emerges because the configuration for ergative case assignment may only arise once in a clause.

The rest of the paper fleshes out the details of this account of ergative case assignment, showing how it plays out in various argument structural configurations.

4.1 Transitives

A sketch of a basic transitive predicate is given in (17). The external argument 'Rosa' merges with a bare i^* which has a vP within its complement, and is therefore ergative.

As shown in (17), the internal argument is assigned absolutive case. Given the possibility of ABS-ABS constructions in ergative languages, I suggest that the absolutive is a structural case, assigned by an Agree relation to a functional head or by default, viz Marantz's (1991/2000) case hierarchy as discussed in §3.

Because of their similar configurational requirements, ergative marking in this system often appears on the agentive argument, capturing the frequent association of ergative case with a particular set of theta-roles. However, their conditions must be different. We saw in §2, for example, that ergative cannot appear on transitive causees, even if it is agentive. Furthermore, as discussed in the next section, some languages assign absolutive case to the agents of unergatives.

²My labels therefore differ from those used in Wood & Marantz (2017), where every external argument introduced by i^* becomes a specifier in an extended vP projection.



4.2 Intransitives

The treatment of unaccusative predicates is straightforward in the configurational system. In unaccusatives, the internal argument is introduced directly by v, as shown in (18). Given that the internal argument is not introduced by i^* but generated within vP, this unaccusative structure does not fulfill the configurational conditions for ergative case assignment.

(18) Unaccusative predicates in Basque and Shipibo



The unaccusative subject thus cannot be assigned ergative case but is absolutive instead.

The behaviour of unergative predicates differ across ergative languages. While unaccusative subjects are always absolutive, unergative subjects are ergative in split-S languages like Basque and Hindi but absolutive in non-split-S languages like Shipibo and Inuktitut. The tree in (19) shows that the configurational requirements for ergative case is satisfied in split-S unergatives, as the external argument is introduced by i^* which has already merged with a vP.



For split-S languages like Basque, any argument whose sister constituent meets the basic requirement (bare i^* merged with a vP) receives ergative marking.

In languages like Shipibo, however, intransitive subjects are always absolutive, whether the internal or external argument of the verb. Therefore non-split-S ergative languages such as Shipibo have an additional requirement for the assignment of ergative case: i^* must merge with a vP containing an internal argument. I propose that non-split-S languages require that the features of the internal argument be passed up through vP in order to be 'visible' for evaluating the configurational requirements for assigning ergative case to the external argument. This feature visibility mechanism will also be needed to capture Shipibo applicatives of unaccusatives, shown in §4.4.

The difference between split-S and non-split-S languages therefore lies in their configurational requirements on the assignment of ergative case. In split-S languages like Basque, ergative case is marked on any external argument introduced by i^* and which satisfies the compositional requirements of a vP; this includes unergative subjects. In languages like Shipibo, on the other hand, the vP must also contain an internal argument, so that no intransitive predicates qualify for ergative case.

4.3 Causatives

In my approach, the causee in the causative of a transitive clause does not receive ergative marking because it is not introduced by regular Voice (bare i^*). The evidence for this comes from the optionality of the causee: leaving a causee unexpressed yields existential closure of the argument, while leaving the external argument of regular Voice unexpressed yields a specific null subject interpretation (Folli & Harley 2007). I therefore take the causee to be introduced by a lower Voice projection, Voice₂ in the sketch of a Niuean causative in (20). Thus when the causer is introduced by Voice₁ (bare i^*), which I also assume is the locus of causative interpretation, we have the configuration of a transitive clause, which satisfies the requirements for ergative case assignment.

The subject 'I' in (20) is assigned ergative case because its sister constituent satisfies the ergative configurational requirements. This captures how agents of simple transitive clauses and causers pattern together with regards to ergative case and how they are introduced syntactically. The causee 'Rosa' must be prevented from also being assigned ergative, however. I propose an additional requirement that only the highest Voice head may assign ergative case; Deal (2010) makes a similar claim.

4.4 Applicatives

This account also extends to derived ergative subjects in Shipibo, discussed in §2. In Shipibo applicatives of unaccusatives, the theme receives ergative case marking. As shown in (21), I assume that the theme raises to the specifier of Voice, whose complement is vP, placing it in the correct configuration for ergative case assignment.

In (21), the benefactor 'Rosa' is introduced by High Appl (i^* with adjoined prepositional root) and is thus ineligible for ergative case. As in causatives, I assume that applicative structure is adjoined to vP so that the resulting constituent is also vP. I propose

that the features of this applied argument are passed up through vP—a mechanism that we determined in §4.2 to be independently required to capture unergative case patterns in non-split-S languages. This establishes the necessary configuration for ergative case assignment on 'fruit', which surfaces with ergative morphology.



4.5 Possessors

The proposed configurational approach to ergative case also makes predictions for possessives. I take possessors to be external arguments introduced by a bare i^* that merges with a DP, interpreted as Low Appl, which relates two DPs to each other.



Viewing possessors as external arguments provides an explanation for why genitive and ergative case are often syncretic in ergative languages: ergative case reflects the sensitivity of a language to 'transitivity' in both the verbal and nominal domains.

One concern that arises given frequent ergative/genitive syncretisms in ergative languages is whether the SEG should also apply within the nominal domain and what is means for there to be only one ergative argument per 'clause'. For this reason, Imanishi (2014) appeals to a particular theory of phases, but it is not clear whether this is necessary or desirable. This 'clause' issue is important but is left for further study.

5. Conclusion

In this paper, I argued that, on the basis of the SEG, ergative case cannot be inherent or structural. I then proposed a new analysis of the ergative, arguing that it is assigned configurationally and that languages may vary (to a limited extent) as to what these configurational requirements are. My approach is able to derive the SEG because the function of i^* is determined by its syntactic context. Since the syntactic context necessarily changes each time a new argument is merged, ergative structure cannot 'recurse'. Thus the SEG emerges because the configuration for ergative case assignment may only arise once in a clause.

The SEG seems to indicate that ergative case is special, though it may turn out that other cases are configurational in some languages; genitive case, for example, may be subject to a similar uniqueness requirement within the DP (Sabine Laszakovits, p.c.). Exploring the parallels between verbal and nominal 'transitivity' in future research should prove fruitful.

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