

Case and Licensing: Evidence from ECM + DOC

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This remark argues for the Case-theoretic concept of Case as a syntactic licensing requirement of DPs related to their case morphology, against alternatives where DPs need no syntactic licensing, or where their case morphology is unrelated to it. The argument is made from constraints on combining exceptional Case marking (ECM) and the double object construction, where there is a single object Agree/Case locus for two DPs. The mechanisms and nature of Case are briefly examined. The appendix sketches an extension to *wager*-class ECM.

Keywords: Case theory, case, licensing, \bar{A} -movement, exceptional Case marking

1 Introduction

Case theory proposes that there is a syntactic property of DPs, Case, that accounts for aspects of their distribution and form that do not otherwise follow from their PF and LF content (Chomsky 1981:sec. 2.3, 1986:secs. 3.3.3.3.1, 3.5.2.5, Chomsky and Lasnik 1995:secs. 1.3, 1.4.3, Lasnik 2008). The *Agree framework* of the Minimalist Program implements Case through uninterpretable [u Case] on DPs that must be licensed by Agree with a [$u\phi$] bearer, deleting [u Case] from syntax to satisfy Full Interpretation at LF and giving it a value realized as case morphology at PF (Chomsky 2000:122–123, 127–128, 2001:6–9, 2008:142, 151). However, the framework also shifts much of the work earlier done by Case to the needs of clausal functional heads, such as [$u\phi$], opening up the possibility of reducing the role of Case in DP-licensing (as a condition on Agree or Move; Chomsky 2000:123, 2001:4, 6, 10) or even of eliminating it entirely (leaving case morphology to PF; Marantz 2000, McFadden 2004, Bobaljik 2008, Sigurðsson 2009).

This remark argues that the Case-theoretic view of Case is right: there is a DP-licensing requirement related to DP case morphology. The argument is made from constraints on combining exceptional Case marking (ECM) and the double object construction (DOC)—ECM+DOC—in (1). It builds on Case-based accounts of ECM+DOC by Pesetsky (1991) and Boeckx and Hornstein (2005), but separates Case from potentially independent factors such as adjacency.

- (1) a. the propositions **which**₂ **they**₁ were shown t_1 [t_2 to be true]
 b. ***They**₁ were shown t_1 [**the propositions** to be true]. (**Case licensing of they*)

Section 2 reviews Case theory, section 3 identifies the relevant properties of ECM and the DOC, section 4 argues for Case licensing, section 5 relates it to case morphology, section 6 sets out the consequences, and the appendix extends the proposal to *wager*-class ECM.

I am grateful to two *LI* readers, for saving me from many a blunder and for seeking a clarity that though it has passed my skill to meet has yet led to much improvement, and to Anikó Lipták for generous help with Hungarian. Remaining blunders are mine.

2 Case Theory

Case theory has two core components, DP-licensing and DP morphology.

(2) a. *DP-licensing [The Case Filter]*

DPs must be licensed through certain syntactic dependencies. Those that are not licensed by selection (*inherent Case*) must be licensed by an A-dependency to the clause (*structural Case*). In the Agree framework, this is Agree for [*uCase*] valuation and deletion.

b. *DP morphology*

The Case licensing of DPs influences their case morphology.

The working of structural Case is illustrated in (3). The subject of the infinitive is licensed and bears case in virtue of its clausal context. In (3a), the subject is accusative in virtue of entering an Agree relation (Agreeing) with v/V_{Acc} of an active ECM verb; in (3b), it is nominative in virtue of Agreeing with T_{Nom} of a passive ECM verb; and in (3c), it is accusative in virtue of Agreeing with *C for* of the infinitive. In the absence of a suitable Agree relationship, the subject is not licensed, as when ECM verbs are replaced by control verbs in (3a–b). Case licensing/assignment is limited by the usual conditions on syntactic dependencies: while the subject of the infinitive is licensed by the matrix T_{Nom} in (3b), it is not in (3d), because the infinitive is a sentential subject island opaque to syntactic dependencies.

(3) a. Kate believes_{ECM}/*hopes_{Control} [**them** to have been shown the proof].

b. **They**_i are believed_{ECM}/*hoped_{Control} [*t*_i to have been shown the proof].

c. [**For them** to obtain funding]_i is believed [*t*_i to be difficult].

d. [**PRO**/***They**/***Them** to obtain funding]_i is believed [*t*_i to be difficult].

In the Agree framework, the distribution of the DPs in (3) is largely ensured by the properties of clausal heads independently of the Case of the DPs. The ϕ -probes [*u\phi*] of T, v/V , and C find DPs to Agree with; their ‘‘edge’’ features [EF] ([EPP], [OCC]) license positions for movement; and control infinitives have PRO in virtue of properties of their C/T system, not because of the inability of control verbs to assign Case and of PRO to bear it (Sigurðsson 1991, Chomsky and Lasnik 1995:107–108, 110–124, Marantz 2000:20–21).¹ Moreover, the link between licensing and case morphology has been weakened by arguments that some DPs like left conjuncts have ‘‘default case’’ unrelated to their licensing (Marantz 2000, Schütze 2001), while others have ‘‘quirky case’’ determined by selection yet are licensed in the same positions as DPs with structural Case (Schütze 1993, Marantz 2000, Sigurðsson 2009). These considerations have led to theories that eliminate Case licensing from syntax and shift case morphology to PF (Marantz 2000, McFad-

¹ The distribution of PRO may but need not be construed Case-theoretically (Chomsky and Lasnik 1995, Landau 2004).

den 2004, Bobaljik 2008, Sigurðsson 2009), even as others retain or extend the role of syntactic Case (Bošković 1997, 2002, 2007, Lasnik 2008).

The present argument for Case follows others in the literature: take a well-formed structure, add a DP that should be licensed in it as far as PF/LF needs like thematic interpretation go, and relate the licensing failure to unavailability of case morphology. The usefulness of ECM+DOC comes from its providing controls for other factors such as selectional or movement requirements. Three examples illustrate the format of the argument and the challenges that ECM+DOC meets.

First, (4b) has been ruled out by positing that both *it* and *they/them* need Case and that unaccusatives can only Case-license one DP (Chomsky 1981:113, Burzio 1986:182). However, (4b) is also ruled out if *it* needs a CP associate (Bošković 1997:128–129).²

- (4) a. They_i seem to her [_{t_i} to be tired].
 b. *It seems [they/them to be tired].

Second, (5a) shows that DP arguments of nouns and adjectives need *of*, while DP arguments of verbs and prepositions do not. Case theory explains this by positing that DPs need Case and that V/P but not N/A assigns it. Pesetsky (1982:sec. 2.5) extends the logic to (5b), proposing that *ask* but not *wonder* assigns Case and so allows a DP complement. However, Rothstein (1992) highlights problems such as the licensing of *what* in (5c), returning to Grimshaw's (1979) explanation for (5b) by c-selection.

- (5) a. proud (*of) leaving (cf. proud to leave)
 b. ask/*wonder the time
 c. **What**_i John wondered _{t_i} was how to get there.

Third, Burzio's (1986:sec. 3.1) Generalization restricts object Case to v/VPs with an external argument. Rothstein (1992) argues that this explains the distribution of the "ECM" resultatives in (6) if their subject, *X's way*, needs Case licensing. They are licensed in transitives, but only if another object does not use up object Case, (6a); in unergatives, which by Burzio's Generalization can assign object Case, (6b); but not in unaccusatives, which cannot, (6c). However, it is not agreed that the subject of these resultatives is thematically independent of the matrix clause, leaving that as a potential factor in its licensing (Beavers 2012).

- (6) a. We drank (*the beer) **our way** through the room.
 b. The river_i _{t_i} thundered/cascaded (**its way**) down the ravine.
 c. The river_i fell/flowed _{t_i} (***its way**) down the ravine.

3 Selection, Case, Position, and Probes in ECM and the DOC

This section sets out the properties of ECM and the DOC that will allow controlling for selection, Case adjacency, object shift, and ϕ -probes, thus isolating Case.

² See Chomsky 1995:306 for a related argument for Case from *seem* and an alternative explanation.

3.1 ECM

ECM verbs like *believe* or *prove* take an infinitival complement whose subject depends solely on the infinitive for s- and c-selection, but on the ECM verb for case, agreement, and movement. When the ECM verb is active, the subject of the infinitive is accusative and adjacent to the verb, (7a), or the associate of an expletive adjacent to the verb, (7b).³ When the ECM verb is passive, the subject is an agreeing nominative in Spec,T, (7c), or in the pre-participial position as the associate of an expletive, (7d). In both active and passive, it may undergo \bar{A} -extraction, (7e–f).⁴

- (7) a. We proved (*conclusively/*to the reader) **the propositions/them** (conclusively/to the reader) to be consistent.
 b. We proved (*conclusively/*to the reader) **there** (*conclusively/*to the reader) to be **few propositions** consistent with ours.
 c. **The propositions/They** were proven (to the reader) to be consistent.
 d. **There** were **few propositions** proven (to the reader) to be consistent with ours.
 e. **the propositions that** we proved (conclusively/to the reader) to be consistent
 f. **the propositions that** were proven (to the reader) to be consistent

The case, agreement, and licensing of the subject of the infinitive in ECM cannot depend on the subject's selectional relationship to the ECM verb, for it does not have one. Two other phenomena affect the subject in ECM: Case adjacency and object shift. These phenomena have been viewed as reflexes of Case licensing, but on Caseless theories they could be attributed to DP-external requirements—say, [EF] on V. To show that the impossibility of ECM+DOC is due to a Case-licensing failure, they must be controlled for, and they can indeed be separated from case and licensing.

Case adjacency refers to the impossibility of separating accusatives or associated expletives from the verb by adverbs or PPs; see (7a–b), (8a). It has been viewed as reflecting object shift, which is discussed next (Johnson 1991, Bowers 1993, Koizumi 1995), or a PF adjacency condition on Case assignment (Chomsky 1981:94, Alexiadou and Anagnostopoulou 2001:207–208, Ackema and Neeleman 2004:264–266). Nominatives, however, show no adjacency restrictions, belying any general adjacency requirement on Case licensing or case assignment. They may be separated from auxiliaries, finite verbs, and participles in both preceding and following positions (see Johnson 1991: 579–580 for (8b), Bowers 2002:203n25 for (8a) vs. (8d); contrast Culicover and Levine 2001:292 with different adverbs). Thus, nominatives have no need of their own that would impose adjacency, and they will serve here to control for it.

³ I follow Chomsky (2000, 2001) in describing the associate as nominative/accusative, as is overtly the case in Icelandic (25); see the appendix.

⁴ In active ECM, the intervention of an adverb/a PP/a particle at α in $V_{ECM-Acc} \text{---} \alpha \text{---} [_{Inf} t_{Acc} \dots]$ is subject to variation, unlike in simple transitives where such intervention is always acceptable in $V-Acc \text{---} \alpha$. Adverbs and PPs are accepted at α by some speakers but not others (Bowers 1993:632, Koizumi 1995:34 vs. Johnson 1991:630). Particles are acceptable, unless the ECM subject is *there*, in which case speakers' judgments vary (Johnson 1991:608n22); this variation may be related to restrictions on *there*-adverb-T orders discussed by Cardinaletti (1997:sec. 4.2).

- (8) a. John rolled (*perfectly) **the ball** down the hill.
 b. I knew that (probably) **Gary** (probably) had left.
 c. There had been (at first) **only a few finds** (conclusively) attributed to this period.
 d. Down the hill rolled (?perfectly) **the ball** (perfectly).

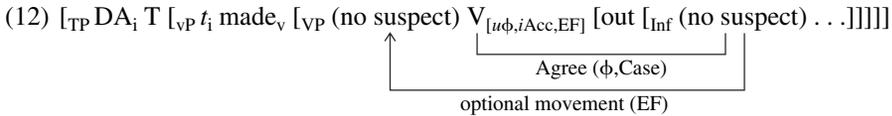
Object shift of the subject of the infinitive into the matrix clause in ECM is likewise not an intrinsic requirement of nominatives or accusatives. Lasnik's (1999, 2001b, 2008, 2010) work on verb-particle constructions establishes that object shift of the accusative subject in active ECM exists but is optional. I illustrate by sketching two arguments. In (9), only the subject-particle order allows the subject to c-command into matrix adjuncts, indicating that in the particle-subject order the subject remains in the infinitive.⁵ In (10), only the particle-subject order allows the subject to take scope below the embedded negation; the subject-particle order patterns with raising in (11) in blocking it, suggesting that only in this case has the subject raised out of the infinitive (on A-movement and inverse scope, see von Stechow and Iatridou 2003:186–194 and the literature cited there).

- (9) a. The DA made no suspect_i out to have been at the scene during his_i/any trial.
 b. The DA made out no suspect_i to have been at the scene (?*during his_i/any trial).
- (10) a. The mathematician made every even number out not to be the sum of two primes.
 b. The mathematician made out every even number not to be the sum of two primes.
 \sqrt{a} , \sqrt{b} : *every* > *not* = 'For every even number, the mathematician made out (proved) that it isn't the sum of two primes [immediately falsified by $4 = 2 + 2$].'
 $*a$, \sqrt{b} : *not* > *every* = 'The mathematician made out (proved) that it isn't the case that every even number is the sum of two primes [unlike $4 = 2 + 2$].'
- (11) Everyone_i seems not to be t_i there yet. (everyone > not, *not > everyone)
 \neq 'It seems that everyone is not there yet.' (not > everyone)

Lasnik (1999, 2001b, 2008, 2010) concludes that ECM allows but does not require object shift.⁶ His mechanism is transposed into the Agree framework in (12). v/V_{Acc} has the ϕ -probe [$u\phi$], it Agrees with the closest DP, the DP's [$uCase$] is valued to accusative, and optional [EF] on v/V_{Acc} moves the DP.

⁵ (9) and (10) illustrate distinct arguments. (9) requires post-particle subjects to be located in the infinitive while pre-particle ones need not be (but may); (10) requires pre-particle subjects to have raised out of the infinitive while post-particle ones need not have (but may). Only the argument from (9) makes use of argument-adjunct interaction, issues with which are discussed by Chomsky (1995:333, 2004:120–122) and might be relatable to a reviewer's misgivings about Lasnik's (1999, 2001b, 2008, 2010) judgments for (9a–b). Only (9a–b) are problematic for Johnson's (1991) proposal that particles may remain at V or move with V to $v+V$; to explain (9b), the latter movement must be incompatible with object shift, perhaps because particle movement cannot cross the shifted DP.

⁶ Object shift is required of weak pronouns, which occur in the order V-pronoun(s)-particle, where Condition C shows them to be in the matrix clause (Lasnik 1999:200–201), but not in the order V-particle-pronoun(s), owing to a constraint of adjacency to the verb that is often viewed as prosodic (Ross 1967:sec. 3.1.1.3, Williams 1974:69–70, Zwicky 1986, Dowty 1995).



Lasnik's proposal makes accusative licensing and case independent of object shift. At the same time, object shift can be restricted to accusatives by putting [EF] only on active *v/V* as in (12)—that is, on *v/V* with [*uφ, iAcc*]—correctly barring object shift of nonaccusatives such as PPs (*call (*to Kate) out (to Kate)*; Johnson 1991).⁷

Nominatives pattern with other nonaccusatives in failing to shift to the pre-particle position. This is true in expletive constructions (13a), where they prefer to precede the participle, and more strikingly so in locative inversion (13b), where they follow it (cf. Hoekstra 2004:379 (citing Den Dikken 1990), Postal 2004:49, Rezac 2006, 2010).⁸

- (13) a. There are three chairs being set *_α up/out ?_α on the terrace.
 b. On the terrace are *_α being set *_α up/out our three chairs next to each other.

Since nominatives require neither object shift nor Case adjacency for their case, agreement, and licensing, they will provide a control for both phenomena: if a nominative is barred, it is not because of these requirements. This conclusion extends to other restrictions in which nominatives do not participate (e.g., the Object Agreement Constraint barring ECM+DOC in Ormazabal and Romero 2002, 2010:228; as the constraint does not restrict passives with a nominative, it should not rule out passive ECM+DOC).

⁷ There is a principled reason for this restriction if [EF] projects a position but needs to rely on a probe like [*uφ*] to find its filler (Chomsky 2000:122, 2004:114; so also Lasnik 2001a, but not Chomsky 2008). Spec,T has been argued not to be restricted in a similar way (Collins 1997, Holmberg 2000, Bailyn 2004, Nevins 2005; but contrast Postal 2004, Williams 2006, Bruening 2010b, Slioussar 2011). If this suggestion—that [EF] projects a position but needs to rely on a probe like [*uφ*] to find its filler—is correct, it seems to relate to the Extended Projection Principle, which requires Spec,T to be occupied by something, including by expletives that do not appear in Spec,v (Chomsky 2000:109 (discussing (23b)), 102–105, 2004:126n45, 2008:157 and notes thereto).

⁸ The structure of (13b) may be sketched by combining Collins's (1997) analyses for locative and quotative inversion with Johnson's (1991) proposal that particles attach to V but may either raise with it or remain stranded. The order V-particle-Nom conforms to (i), where Nom originates below the lowest position of the particle, provided it cannot shift to the pre-particle position as discussed for (12) (see Hoekstra 2004:379 for an alternative where the PP passes through the pre-particle position). It contrasts with the quotative inversion V-Nom-particle order in (iii), which conforms to (ii): in quotative inversion, the verb raises to T, but the particle may either raise with it to give V-particle-Nom, or remain stranded to give V-Nom-particle. Nom binding into the PP in (13b) does not indicate object shift (Lasnik 2008:28); see Pesetsky 1995:172–180, 228ff., Phillips 1996:44–48. (i) assumes that locative inversion uses unaccusative structure; for locative inversion with unergatives, see Culicover and Levine 2001, Doggett 2004, and Mendikoetxea 2006, where it is analyzed as topicalization + heavy NP shift, rightward Spec,v, and unaccusatives, respectively.

- (i) [_{CP} PP [_{TP} *t*_{PP} T [_{vP} V(+ **particle**)_v [_{vP} V(+ **particle**) **NOM** *t*_{PP}]]]]
 (ii) [_{CP} quote_{Acc} [_{TP} *t*_{quote} called(+ **out**)_T [_{vP} **Maia**_{Nom} V(+ **out**) [_{vP} V(+ **out**) *t*_{quote} to Tom]]]]
 (iii) “Did you see him?” called (out) Maia (out) to Tom.

3.2 The DOC

The double object construction (DOC) combines two DPs: a higher indirect object (IO) and a lower direct object (DO). The indirect object has the same properties as the direct object of plain transitives for case, agreement, and position. In the active, it is accusative (14a). In the passive, it is nominative and agreeing, either in Spec,T as in (14b), or as the indefinite associate of the *there* expletive in the pre-participial position as in (14c). By contrast, the direct object is a nonagreeing accusative in both the active and the passive, with no possibility of raising and no definiteness restriction in expletive constructions. Only the indirect object shifts over particles (15a–b) and is subject to Case adjacency if accusative (15c).⁹

- (14) a. We showed only them_{IO} the propositions_{DO}.
 a'. *We showed the propositions_{DO} the readers_{IO}.
 b. They_{IO} were shown the propositions_{DO}/only them_{DO}/them all_{DO} one by one/it and them_{DO} at the same time.
 b'. *They_{DO} were shown the readers_{IO}.
 c. There were few readers_{IO} shown the new propositions_{DO}.
 c'. *There were new propositions_{DO} shown few readers_{IO}.
- (15) a. Sam sent (%out) the stockholders (out) a schedule (*out).
 (cf. Pesetsky 1995:278)
 b. The stockholders were sent (out) a/the schedule (*out).
 c. Sue gave (*yesterday) Bill (?yesterday) a book.
 (Pesetsky 1995:124)

These facts indicate that the indirect object of the DOC enters into the same agreement, case, and A-movement relationships with clausal functional heads as the direct object of plain transitives, while the case and position of the direct object of the DOC have another source. This source has been argued to be the direct object's selector (Larson 1988, Pesetsky 1995, Baker 1997, Anagnostopoulou 2001): a silent P (overt in *present X with Y*), or V through inherent case (as in Inuit; Bittner and Hale 1996:18), or V through incorporation (as in Mohawk or Nez Perce; Baker 1996:sec. 4.3, Deal 2010:90–91, respectively). On this analysis, the indirect object alone satisfies the needs of clausal heads pertaining to A-dependencies (e.g., [*u*φ] and [EF]) and any further requirements reflected in Case adjacency.¹⁰

⁹ The symbol % indicates speaker variation.

¹⁰ I keep to grammars that allow DOC passives on the indirect but not direct object: for example, **The proposition was shown the readers* (this is the grammar reflected in most of the generative literature; Postal 2004:241). In grammars with direct object passives, the direct object does participate in matrix Agree/Case relations across the goal. Various theoretical accounts of the difference between these two grammar types are available, such as inherent Case on the indirect object (Anagnostopoulou 2003:secs. 2.4, 3.2, 7.2.4). Whether such grammars should allow ECM+DOC *None of the propositions were shown us to be provable* depends on how the DOC blocks ECM (section 5). Grammars with indirect object-only passives show some exceptions to the particle/adverb placement in (15) (Stowell 1981:sec. 5.5, Hudson 1992:259, Farrell 2005:sec. 4.5). Some exceptions have independent explanations (Johnson 1991:625, 630); others are

4 ECM+DOC: DP-Licensing

The verb *show* participates in both ECM and the DOC, and may combine the two, but the resulting ECM+DOC construction is subject to severe limits. It is ungrammatical, as shown in (16) for actives and (17) for passives, unless the subject of the infinitive \bar{A} -extracts, (18) (Kayne 1984: 5, Pesetsky 1991:sec. 4.1, Postal 1993).¹¹

- (16) a. *We showed the reader **the propositions** to be consistent.
 b. *We showed few readers **there** to be any propositions consistent with ours.
 c. *We showed her **'em/only them/them all/it and them** to be consistent.
 d. *I showed him **there** to be mice in the basement.
 (Postal 1993:361)
 e. *I guarantee you **it** to be possible to revise the program.
 (Postal 1993:362)
- (17) a. *The reader was shown ____ **the propositions/'em/them all** to be consistent.
 b. *There were few readers shown **any propositions** to be consistent with yours.
- (18) a. (?)**the propositions that** we showed the reader ____ to be consistent
 b. (?)**the propositions that** the readers were shown ____ to be consistent

From this pattern of (un)grammaticality, I will argue that the subject of the infinitive has a licensing requirement and that its satisfaction correlates with morphological case, revealing the link between licensing and case that defines Case.

The ungrammaticality of ECM+DOC (16) has already been analyzed as failure to Case-license the subject of the infinitive by Pesetsky (1991:sec. 4.1) and by Boeckx and Hornstein (2005). However, the former analysis relies on an approach where Case requires adjacency, the latter on one where it requires object shift. On Caseless theories, Case adjacency and object shift might reflect other requirements than the syntactic needs of DPs: for instance, a syntactic [EF] on a clausal head like *v*, or a PF adjacency requirement on the assignment of morphological case.

more difficult, notably object shift of weak pronoun themes, as in *Sam handed her ?them/*the tools down* (Johnson 1991:622–623). This gives rise to theories of the English DOC where both goal and theme participate in matrix Agree/Case relations even if only the goal promotes in the passive. Some of these theories predict the impossibility of ECM+DOC along lines compatible with the present remark, including Johnson's (1991), where the goal and theme participate in Agree/Case relations as a constituent. Others do not, including Koizumi's (1995:sec. 2.4), where both objects obtain Case/case from dedicated clausal Agr heads. To bar ECM+DOC, these theories might use the phase-theoretic identification of the ECM+DOC problem mentioned in footnote 13.

¹¹ For *show*, ungrammatical ECM+DOC examples contrast with grammatical plain DOC and grammatical plain ECM examples, such as *The propositions were shown to be consistent*, *They were shown the propositions*. Similar verbs include *guarantee* and *grant*, which participate in *wager*-type ECM (discussed in the appendix), and *assure*, *persuade*, and *convince*, which take ECM infinitives only with the DOC, and conversely the DOC only with non-DP themes. DOCs may differ on properties other than the structural Case of the indirect object that matters here: for example, applicative for *guarantee*, causative for *show* (Pesetsky 1991:sec. 4.1.1.5).

The properties of ECM and the DOC established above permit eliminating these and other factors, to show that the culprit is a licensing requirement of the subject of the infinitive itself.

The problem in (16)–(17) is not s/c-selectional requirements, such as incompatibility of ECM and the DOC, because ECM and the DOC do combine in (18). It is also not nonselectional syntactic requirements of the matrix clause, because these are satisfied in the DOC (14)–(15) by the indirect object and they should be in ECM+DOC (16)–(17) as well: for example, [$u\phi$] that gives rise to agreement in passives, and [EF] that requires movement to the pre-participial position in expletive passives. The problem must be some need of the subject of the infinitive that is not met in ECM+DOC, unlike in the plain DOC and ECM. In the plain DOC, the direct object is accusative through a selectional relationship to the DOC verb, but the subject of the infinitive in ECM+DOC is not selected by the DOC verb. In plain ECM, the subject of the infinitive is accusative or nominative according to the active or passive voice of the ECM verb, raising the question of what prevents it from being so in ECM+DOC, namely, accusative in active-voice (16) and nominative in passive-voice (17). The stumbling block must be the presence of the indirect object, since that is the difference between ECM and ECM+DOC. Thus, the subject of the infinitive has some requirement that the indirect object prevents from being satisfied. The requirement is unrelated to Case adjacency and object shift, if these reflect something other than matrix syntactic requirements like [EF] discussed earlier (e.g., a PF adjacency requirement on morphological case assignment), because nominatives are not subject to either phenomenon and ECM accusatives are not subject to object shift, yet both are unacceptable in (16)–(17).

The existence of a requirement needed to license the subject of the infinitive in ECM corresponds to the licensing role of Case—specifically, of Case as construed in the Agree framework, where it is independent of movements like object shift. The indirect object prevents Case licensing, as diagrammed in (19).

$$(19) T_{\text{Nom}}/V + V_{\text{Acc}} (\text{the reader}_{\text{IO}}) [\text{Inf } \mathbf{\textit{the propositions}} \text{ to be consistent}]$$

Agree valuing [$u\text{Case}$]
Agree valuing [$u\text{Case}$] (* with IO)

The next section turns to identifying the problem in (19), linking licensing to morphological case, and explaining how otherwise unavailable case and licensing are permitted by \bar{A} -movement.

5 ECM+DOC: Case and Licensing

Case theory attributes to Case both DP-licensing and DP case morphology. To identify the problem in ECM+DOC as Case rather than some other licensing requirement of DPs, it should be relatable to case morphology. This relationship is supported by two lines of evidence: the blocking of ECM+DOC by the indirect object of the DOC rather than by any intervener, and its obviation by \bar{A} -movement.

ECM structures, both active and passive (= raising), are blocked by the DOC (16)–(17), but not by the prepositional object construction (POC) (20) (Bowers 1993:632; see (7) and

footnote 4 above). The POC indirect object intervenes between the ECM verb and the infinitive both in linear order and in structural c-command, as shown in (21) for Condition C and variable binding.¹²

- (20) a. We showed **few propositions** ([%]to the reader) to be consistent (to the reader).
 b. **Few propositions** were shown (to the reader) to be consistent (to the reader).
 c. There were **few propositions** shown (to the reader) to be consistent (to the reader).
- (21) a. The project_k was shown **to her**_{*i} [_{t_k} to be about **Mary**_i].
 b. The project_k was shown **to every group**_i [_{t_k} to meet **its**_i needs].
 c. ?There is one project that_k we can show **her**_{*i} [_{t_k} to be about **Mary**_i].
 d. ?There is one project that_k we can show **every group**_i [_{t_k} to meet **its**_i needs].

Therefore, the problem in ECM+DOC is not simply the intervention of a matrix argument between the ECM verb and the infinitive. Something about the indirect object or the head introducing it differs in the DOC and the POC. Case theory provides this difference by linking licensing and case. The case morphology of the ECM subject and the DOC indirect object depends on nonselectional relationships to the matrix clause: both are accusative in actives and nominative in passives. By contrast, the case of the indirect object in the POC *to*-PP is independent of the clause and assigned by P. Therefore, morphological case groups the ECM subject and the DOC indirect object to the exclusion of the POC indirect object. This is the same grouping as for licensing: licensing of the subject of the infinitive is blocked by the DOC but not by the POC. Case unifies these groupings by linking licensing and case, and the ungrammaticality of ECM+DOC may then be explained through competition for clausal structural Case:

- There is only one Case licenser/assigner κ for both the DOC indirect object and the subject of the infinitive: v/V_{Acc} in actives and T_{Nom} in passives.
- κ can relate to only one of the two DPs. This follows if (i) ϕ -Agree occurs with one goal at a time and valuation by a nondefective goal deactivates the probe, or (ii) if locality limits ϕ -Agree to the closer DP, as under the notion of intervention-based locality where the indirect object is the closest ϕ -bearer (Chomsky 2000).¹³

¹² The c-command relation $IO > Inf$ corresponds to $IO(DP) > DO$ in the DOC (Larson 1991:122n11), but not to $DP > IO(to-PP)$ in the POC. DP/PP-internal arguments seem to c-command clausal ones generally: in (i), the PP c-commands into the CP for quantifier binding, also for Condition C (cf. Boeckx, Hornstein, and Nunes 2010:174n33) or negative polarity item licensing (cf. Pesetsky 1991:137, (533)). This seems independent of linear order; see, for example, (ii)—or (iii), where reconstruction gives results comparable to those with *seem* (on which, see Bošković 2002).

(i) The mayor_k {vowed/made a promise} to every soldier_i PRO_k {to pay/that she_k will pay} his_i parking.

(ii) ?The project was shown to meet its_{i/k} needs to every group present_i.

(iii) a. ?[Its_i project]_j was shown (seemed) to every_i group [_{t_j} to be superfluous].

b. ?[Each other_i's aims]_j were shown (seemed) to them_i [_{t_j} to be compatible].

¹³ Agree with defective goals leaves the ϕ -probe unvalued, which is not relevant here. On multiple-Agree approaches, Agree is not restricted to a single/closest goal (Hiraiwa 2005). The DOC might then prevent infinitive subject licensing by trapping the subject below a phase boundary—for instance, if Appl⁰ of the DOC is a phase head, or if it interrupts Agree with C/T_{Inf} needed for Agree into the infinitive (cf. Pesetsky and Torrego 2001, Rackowski and Richards 2005; on Appl⁰ below vs. above V⁰, see Bruening 2010a). The relationship of this blocking effect to the nature of the indirect object as DP/PP would need further exploration. I am grateful to a reviewer for raising a phase-theoretic analysis.

The link between licensing and case is supported by the saving effect of \bar{A} -movement in (18). Kayne (1984:5) and Pesetsky (1991:sec. 4.1.1.5) propose that \bar{A} -movement allows Case licensing in ECM+DOC by bringing the subject of the infinitive into a local configuration with the ECM verb, a configuration it would otherwise lack. To support the idea that \bar{A} -movement can establish new Case relations, Kayne observes that it affects case morphology in (22): \bar{A} -movement past a transitive verb, but not an unaccusative one, assigns accusative to *whom*.

- (22) a. %the people **whom** {you say}/{they tell me}/{I believe} ____ are extremely bright
 b. *the people **whom** it is obvious ____ like you
 (Kayne 1984:5, where the ungrammaticality of (22b) is ‘‘surmised’’)

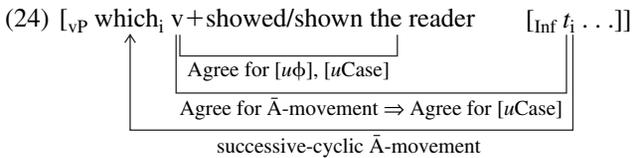
This is a link between licensing and case, but in English it is on shaky ground. It is not clear whether the *who-whom* alternation ever reflects case, as (22) indicates (Lasnik and Sobin 2000). In other languages, however, \bar{A} -movement past v/V_{Acc} does assign otherwise unavailable accusative, confirming Kayne’s proposal. The Hungarian examples in (23) illustrate (É. Kiss 1987, Lipták 1998, Gervain 2002, Coppock 2004, Den Dikken 2006, 2009).

- (23) a. Péter-t/[%]Péter mond-t-am, hogy jön.
 Peter-ACC/NOM say-PAST-1SG COMP come.3SG
 ‘It is Peter who I said is coming.’
 (Coppock 2004:8, (30))
- b. Téged mondtá-lak hogy szeretné-lek hogy elnök leygél.
 you.ACC said-1SG→2 that would.like-1SG→2 that president be.2SG
 ‘It is you that I said that I would like to be president.’
 (Den Dikken 2009:13, (29))
- c. János két dolgot szeretne, ha sikerülne.
 Janos two thing.ACC would.like.INDEF if succeeded
- c’. János két dolog szeretné, ha sikerülne.
 Janos two thing.NOM would.like.DEF if succeeded
 ‘As for Janos, it is two things that he would like if they succeeded.’
 (É. Kiss 1987:141, Gervain 2002:31)
- d. A fiúk/*fiúkat lenne jó ha úsznának.
 the boys.NOM/*ACC be.SUBJ.3SG good.SG if swim.SUBJ.3PL
 ‘It is the boys that it would be good if they swam.’
 (Anikó Lipták, pers. comm.; cf. Lipták 1998)

A finite subject focus-moved past a transitive bridge verb may surface as nominative, as when unmoved, but it may also become accusative and trigger upstairs object agreement for person (23b) and definiteness (23c). The distribution of accusative case and object agreement on focus-moved subjects has led researchers to conclude that these properties have the same source as they do on regular objects, specifically checking with Agr_O (Lipták 1998) and Agree with v/V_{Acc} (Den Dikken 2006). Transitive objects are accusative and control obligatory object agreement on their selecting verb, as well as optional object agreement on a transitive bridge verb under focus movement past it. Subjects moved past a transitive bridge verb may be nominative without

upstairs object agreement (23c') or accusative with upstairs object agreement (23c). However, when the bridge verb is unaccusative and so cannot assign accusative or bear object agreement, subjects moved past it can only be nominative without upstairs object agreement (23d).

Similar arguments for object case/agreement through \bar{A} -movement have been made on the basis of topicalization in Norwegian (Taraldsen 1981) and \bar{A} -movement in Passamaquoddy (Bruening 2001:sec. 5.7), and it has been related to DP-licensing both in ECM+DOC and in ECM with *wager/croire*-class verbs that are discussed in the appendix (Kayne 1984:sec. 5.3, Pesetsky 1991:sec. 4.1.1.5, Ura 1993, Bošković 1997:secs. 3.3, 4.4.2). Ura, Bošković, and Bruening develop economy-based accounts. I adapt Bruening's proposal to ECM+DOC in (24).



The ability to value [$uCase$] as accusative and nominative reflects interpretable properties of v/V_{Acc} and T_{Nom} (Chomsky 2000, Pesetsky and Torrego 2004). These are shared by v/V in both active and passive structures.¹⁴ However, active v/V has [$u\phi$] that Agrees with the closest goal, while passive v/V does not, allowing [$u\phi$] on T to do so. In ECM+DOC, the goal of the [$u\phi$] of v/V in actives and T in passives is the indirect object, since it is the closest [ϕ] bearer. Agree eliminates [$u\phi$] on v/V_{Acc} and T_{Nom} and [$uCase$] on the indirect object, but does not affect the interpretable properties of v/V_{Acc} and T_{Nom} , including their ability to value [$uCase$]. For the subject of the infinitive, no [$u\phi$] probe is left, but \bar{A} -movement brings it to Spec, v/V (Fox 1999, Legate 2003, Sauerland 2003) and thereby allows [$uCase$] valuation as follows. Let us suppose that successive-cyclic \bar{A} -movement entails Agree—for instance, for [uwh] in Chomsky 2000, since it is reflected in the morphology of v both as *wh*-agreement (Chung 1994, Cole and Hermon 2000) and as ϕ -agreement (Bruening 2001). Let us further suppose that Agree between items α , β maximizes to include all their features as free riders (see Chomsky 1995:secs. 4.4.4, 4.5.2, 2001:15–19, Bruening 2001:sec. 5.7). Then a DP that Agrees for \bar{A} -movement through Spec, v/V_{Acc} can have its [$uCase$] valued by the interpretable properties of v/V_{Acc} as part of that Agree.¹⁵

¹⁴ This correctly allows accusative-assigning passives and impersonals, which have been argued to have at least quasi-expletive external arguments (Maling and Sigurjónsdóttir 2002, Szucsich 2007, Schäfer 2008; see Chomsky 2004: 126n37 on expletive external arguments). Pure unaccusatives do not assign accusative in (22) and (23), fitting a version of Burzio's Generalization where the Case-assigning potential of v/V depends on external argument selection (Chomsky 1995:306, 316–317, 389n90).

¹⁵ Chomsky (2000:110) proposes that movement through Spec, v counts as an A-position if ϕ -Agree occurs, and as an \bar{A} -position otherwise. In English *It was him_i who_j he_i t'_j wanted Peter to invite t_i*, this makes Spec, v an \bar{A} -position for t'_i , allowing it to corefer with he_i , in contrast to A-movement in *He_i seems to him_{s_i} t'_j to have been invited t_i*, where Condition B rules out coreference between him_i and t'_j in an A-position. In Hungarian focus movement, upstairs Spec, v should be an A-position and coreference should be disallowed if and only if the fronted argument Agrees in the upstairs clause. Lipták (1998) argues that this is so. This provides independent evidence that upstairs case/agreement in Hungarian focus movement is due to syntax rather than being established outside syntax, at PF (see section 6), since it affects interpretation (coreference).

This Case-licenses the subject of the infinitive in ECM + DOC, in both active (18a) and passive (18b) contexts. The mechanics extend to extracted finite subjects (22)/(23), if their [*u*Case] need not be valued in their clause, or if it can be valued multiply. From analogues of (22a) where the \bar{A} -moved element bears both nominative and accusative, Béjar and Massam (1999) argue for parametric availability of the latter option.¹⁶

6 Consequences

The argument from ECM+DOC has two independent steps: identifying a licensing requirement of DPs and relating it to case morphology. In ECM, the subject of the infinitive is licensed and assigned case by the matrix clause. Case unifies these relationships: in plain ECM, where both succeed; in ECM+DOC, where both are blocked by another DP with structural Case; and under \bar{A} -movement, by which both are restored.

Case theory attributes case and licensing to a syntactic Case dependency. In this, it contrasts with proposals that DP-licensing belongs to syntax but DP case (and agreement) belong to an interpretive PF component that realizes but does not filter syntax (Marantz 2000:20). On this view, PF needs to relate DPs and case assigners (and agreement targets) across phrase-structurally unbounded domains, as in (25), where the case of ‘several boats’ within the infinitive depends on the voice of the matrix ECM verb. Such dependencies are characteristic of syntax (A/\bar{A} -movement) and LF (quantifier-variable binding), but arguably not of PF, where independently established dependencies such as contextual allomorphy are phrase-structurally local (Rezac 2011: chap. 2). If there is syntactic case-and-licensing, as Case theory proposes, then there is no reason to attribute all case to PF and thereby require it to encompass long-distance dependencies like those in (25).

¹⁶ Other interactions of \bar{A} -movement and Case licensing call for comment. \bar{A} -movement does not usually lead to undesirable DP-licensing, because of independent factors: for instance, DP complements of N/A require *of* by virtue of selection, and control infinitives require PRO by virtue of properties of their C/T (see Chomsky and Lasnik 1995, esp. pp. 107–108, 114–115). Whether any step of \bar{A} -movement beyond the first should license Case (Bošković 1997:128–129) depends on whether and when spell-out of the lowest link with [*u*Case] causes the derivation to crash (see Chomsky 1995:300–301, Gärtner 2002). Whether T_{Nom} should license Case under \bar{A} -movement past it depends on whether it Agrees with the \bar{A} -moving DP: in Chomsky 2000, 2001 it does not, unlike v_{Acc} , while in Chomsky 2008 C/ T_{Nom} and v/V_{Acc} behave symmetrically. Empirically, this may not be testable in English (see Bošković 1997:128–129, discussing Pesetsky 1991:sec. 4.1.1.5), while in Hungarian (23d) allows optional agreement with the subject, *lennének* ‘be.SUBJ.3PL’, that may be pertinent (Lipták 1998:154n1). Finally, where ϕ - and \bar{A} -Agree are both possible as in ECM+DOC (i), ϕ -Agree must occur with the closest DP, giving (ia) rather than (ib), where Agree occurs with the farther DP while the higher one is Case-licensed by \bar{A} -movement; this suggests an economy or locality condition that prefers the closer DP as the goal of the ϕ -probe ((ib) is not reducible to the weaker and variable degradation that the Oblique Trace Filter causes, (iib), on which see Stowell 1981:secs. 5.3.2.3, 6.4.2, Hudson 1992:258).

- (i) a. (?)What did Roger try to show his students ____ to be a liquid?
- b. *Who did Roger try to show ____ glass to be a liquid?
- (ii) a. What did Roger try to show his students ____ is a liquid?
- (Stowell 1981:413)
- b. ?*Who did Roger try to show ____ glass is a liquid?
- (Stowell 1981:414; speaker variation)

- (25) a. Hún **taldi** hafa verið keypta **einhverja báta**.
 she believed to.have been bought.MASC.PL.ACC several boats.MASC.PL.ACC
 ‘She believed several boats to have been bought.’
- b. Það **voru taldir** hafa verið keyptir **einhverjir bátar**.
 there were believed.MASC.PL.NOM to.have been bought several
bátar.
 boats.MASC.PL.NOM
 ‘There were believed to have been several boats bought.’
 (Sigurðsson 1991:355–356)

The existence of the Case-theoretic relationship between case and licensing does not entail that all case morphology should straightforwardly reflect licensing dependencies. Case morphology may reflect dependencies other than [*u*Case] valuation by Agree, such as thematic ones (see Chomsky 2000:127 on quirky case). Systems outside core syntax may obscure [*u*Case] realization: it cannot surface on null operators (Chomsky and Lasnik 1995:115–116), morphology adjusts it in language-specific ways in multiple case resolution (McCreight 1988, Béjar and Massam 1999), and it may be adjusted by rules ‘‘external to the normal grammatical system’’ (Lasnik and Sobin 2000:350). Finally, there may be configurations where DPs do not need licensing. Their existence and character bear on what Case is.

Schütze (2001) argues that in certain configurations—dislocation, apposition, coordination, modification, and deletion remnants—PF assigns default case to DPs. It is not clear whether these DPs do or do not require syntactic Case licensing. If they do not, then two natural domains for configurations where DPs do require it are the following:

- (26) Syntactic Case licensing is required by DPs that are
- a. introduced by set but not pair Merge, or
 - b. goals of ϕ -Agree and/or (A-)movement.

(26a) attributes Case to argumental but not adjoined DPs. It covers ground similar to that covered by the view that Case is required for thematic interpretation (Chomsky 1981:176–177, 334ff., 1986:secs. 3.3.3.3.1, 3.4.3 (also see 212n71 for expletives), Chomsky and Lasnik 1995:sec. 1.4.3). (26b) views Case as a property that allows DPs to participate in certain operations, rendering them available to ϕ -Agree (Chomsky 2000:123) or to movement (Chomsky 2000:123, 2001:4, 6, 10, Sobin 2009). Both proposals call for a principled explanation of why these DPs need Case licensing, such as those mentioned by Chomsky (2000:148n86). Both require the DP subject of ECM infinitives to be Case-licensed syntactically, since it is argumental and relates to a T to satisfy its [EF]/[*u* ϕ]. It remains to be seen whether the two proposals can be differentiated by examining argumental DPs that do not participate in certain operations: for instance, unmoved DPs in infinitives opaque to external Agree and with no internal Agree.¹⁷

¹⁷ Candidates are Icelandic infinitives with quirky case subject + in-situ DP with structural Case. The DP is nominative in contexts where it cannot get infinitive-external Case. Thus, accusative under ECM in (25a) contrasts with nominative

Appendix: Extension to *Wager*-Class ECM

The role of \bar{A} -movement in Case licensing also appears with ECM verbs like *wager* or *allege* in (27), discussed by Postal (1974:secs. 9.3–9.4, 1993), Pesetsky (1991), and Bošković (1997). They license a weak pronoun and the trace of A- and \bar{A} -movement, but not a full DP. *Wager*-class ECM thus differs both from *believe*-class ECM, which licenses all of the above, and from *wager/believe*-class ECM+DOC, which licenses only an \bar{A} -trace.

- (27) a. We alleged them/*THEM/*the propositions to be inconsistent.
 b. (?)the propositions that we alleged [____ to be inconsistent]
 c. The propositions were alleged [____ to be inconsistent].

In this appendix, I shall suggest an approach to the *wager* limitation that assimilates it to ECM+DOC, following Pesetsky (1991:sec. 4.1.2). The guiding intuition is that both have extra structure blocking matrix v/V_{Acc} ϕ -Agree, but that the extra structure of *wager* vanishes by the time of T_{Nom} Agree. I shall proceed on the assumption that Agree is constrained by feature-relativized minimality (Chomsky 2000:122–124), so that in ECM+DOC, the indirect object intervenes in ϕ -Agree with the subject of the infinitive (Boeckx and Hornstein 2005). In *wager* but not *believe* ECM, a silent N^0 in [v/V_{Acc} [N^0 Inf]] will intervene in v/V_{Acc} ϕ -Agree but become invisible by the time of T_{Nom} ϕ -Agree.

From unergatives in ergative languages, Laka (2000) argues for the existence and parameterization of a silent N^0 intervener for ϕ -Agree. These unergatives may have the case/agreement pattern of transitives, attributed to a silent N^0 visible to ϕ -Agree, or that of unaccusatives, attributed to a lexically incorporated N^0 (eastern vs. western Basque *borrokatu* ‘fight’, respectively; Oyharçau-

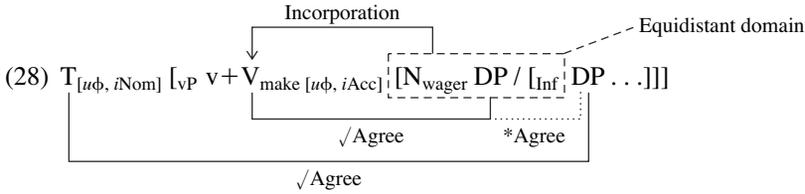
when a dative subject blocks ECM, (i), and when the infinitive is a subject, (ii) (Freidin and Sprouse 1991:sec. 6, Sigurðsson 1993:54n4, Jónsson 1996:sec. 4.7.2).

- (i) Ég taldi henni hafa verið {%gefni} bílarnir / {%gefna} gefna
 I believed her.DAT to.have been given.MASC.PL.NOM the.cars.MASC.PL.NOM given.MASC.PL.ACC
 bílana}.
 the.cars.MASC.PL.ACC
 ‘I believed her to have been given the cars.’
 (Sigurðsson 1993:54n4)

- (ii) [Að PRO batna veikin] er venjulegt.
 PRO.DAT to.recover.from the.disease.NOM is usual
 ‘To recover from the disease is usual.’
 (Freidin and Sprouse 1991:409)

However, nominative here arguably reflects infinitive-internal ϕ -Agree (Sigurðsson 2000, Rezac 2004:sec. 5.4, Nomura 2005:sec. 3.6) and not default case (Frampton and Gutmann 1999:sec. 3.3.1, Hiraiwa 2005:71), since it controls ϕ -agreement on participles. In turn, the ungrammaticality of English **Few readers were shown there to be any proposition consistent with ours* would follow if the expletive associate requires but cannot get Case licensing, contrary to (26b).

bal 1992).¹⁸ I propose that *wager* but not *believe* ECM verbs have N^0 visible to Agree, as a lexical parameter.¹⁹ This gives the structure (28).



In (28), N^0 intervenes for ϕ -Agree of v/V_{Acc} of actives with the subject of Inf.²⁰ However, during the v/V cycle, N^0 incorporates into v/V (Baker 1988). This renders it invisible to higher ϕ -probes, since N^0 in $[_X^0 N^0 v/V_{Acc}]$ does not c-command Inf and perhaps loses its status as a syntactic atom (Frampton and Gutmann 1999:11) or as an intervener in XP chains (Chain Uniformity). Therefore, T_{Nom} of passives Agrees without any interference from N^0 . In both actives and passives, Baker-style incorporation satisfies any Case needs N^0 might have.²¹ Thus, the N^0 of *wager* and the indirect object of the DOC limit ECM in the same way, but the former is partly obviated by incorporation.

\bar{A} -movement relates the infinitival subject to v/V_{Acc} in *wager* ECM in the same way as in ECM+DOC, by $[uCase]$ valuation as a free rider on \bar{A} -Agree. Movement can also account for the licensing of weak pronouns in *wager* ECM (27a). Bošković (1997:58–59) proposes that weak pronouns incorporate into the verb, as the V-adjacency restrictions of footnote 8 suggest, and thereby satisfy the Case Filter. However, incorporation would be expected to license weak pronouns in active and passive ECM+DOC (16c), (17a) as well. Rather, following Johnson (1991: 621–624), I take footnote 8 to reflect a movement reserved for weak pronouns, as in Mainland Scandinavian object shift. If it targets a position between v/V_{Acc} and N^0 , the raised pronouns can be reached by the ϕ -probe of v/V_{Acc} for Case licensing. In ECM+DOC, this will not suffice, because there are still two DPs in need of Case, the indirect object and the infinitive subject, and but one ϕ -probe.

Among the weak pronouns licensed in *wager* ECM are expletives (29).

- (29) a. He alleged there to be stolen documents in the drawer.
 b. There were alleged to be stolen documents in the drawer.

¹⁸ Other possibilities include N^0 with(out) ϕ and N^0 (non)equidistant from v/V_{Acc} .

¹⁹ It is tempting to link the parameter to Pesetsky's (1991:sec. 4.1.2) identification of the distinctive characteristic of the *wager*-class as the selection of a human agent; this might plausibly require a transitive frame, but it is not clear how to ensure that it requires N^0 visible to ϕ -Agree (see the discussion of Basque *borrokatu* 'fight' in the text). As reviewers emphasize, the presence of N^0 with *wager* but not *believe* cannot be related to paraphrasability (*wager*-class *make the claim*, *wager*, **maintenance CP*; *believe*-class *make the discovery CP*, *have the belief CP*). See Pesetsky 1991 for lists of *believe*- and *wager*-class ECM verbs, and Postal 1974:sec. 9.3–9.4, 307–309, Pesetsky 1991:sec. 2.7, Bošković 1997:sec. 3.2 for other patterns.

²⁰ Agree with the DP sister of N^0 is fine since DP and N^0 are equidistant: *We claimed them*.

²¹ If incorporation involves Agree with v/V_{Acc} , $[uCase]$ of N^0 is deleted as a free rider.

Of the Case of their associates, nothing need be said on partitive Case approaches (Belletti 1988, Lasnik 1992, 2008:28, Bošković 2007:628) or if unmoved DPs are exempt from Case licensing (Sobin 2009:sec. 5.9). Chomsky (2000, 2001) instead takes expletive associates to be nominative or accusative, as is overtly the case in Icelandic (25), with the same definiteness effect and for some speakers with overt expletives as in English (Thráinsson 2007:317–323, 482). On this view, expletive and associate in (29) should be assigned Case as a whole. This may be done without positing expletive-associate chains, by combining the notion of free riders (section 5) with the proposal that Agree unifies features (Frampton and Gutmann 2000, Pesetsky and Torrego 2007). Following Chomsky (2000:128–129, 2001:16–19), in (29) T_{Inf} Agrees for [$u\phi$] with *stolen documents* and *there* Agrees with T_{Inf} for [$u\text{person}$]. [$u\text{Case}$] of *stolen documents* Agrees as a free rider at each Agree step. This results in a single [$u\text{Case}$] linked to *stolen documents*, *there*, and T_{Inf} . Agree between v/V_{Acc} and *there* in Spec, T_{Inf} values this single [$u\text{Case}$] to accusative at all three occurrences.

Stepping back from the details, the guiding intuition is that of Pesetsky 1991: *wager* has a structure richer than *believe* in such a way that a Case problem arises and is obviated by \bar{A} -movement, as when ECM is enriched to ECM+DOC. Intervention by N^0 in (28) achieves this, while cyclic incorporation limits the problem to the v/V cycle.²²

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²² For alternatives, see Pesetsky 1991:sec. 4.1.2 and Bošković 1997:secs. 3.2, 4.4.2.1. The *wager*-class resembles the French *croire* ‘believe’ class, which allows ECM only with \bar{A} -movement. Kayne (1984:sec. 5.3), Rizzi (1990:58–59), and Bošković (1997:sec. 3.4) propose that *croire* complements are opaque to ECM; this is construable as intervention through D/*that*-like C (on which, see Rezac 2004:sec. 3.5.4, 2005:298).

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