Nominal Licensing via Case or Deictic Anchoring

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1. Introduction

What is Case? There appears to be a straightforward answer from a descriptive point of view: Case is a **system of marking dependent nouns** for the type of relationship they bear to their heads (cf. Blake 1994). On closer inspection, however the answer to this question is not straightforward at all, especially within the Minimalist Program (Chomsky 1995 and subsequent work). As Pesetsky & Torrego 2011: 13 put it: "[*W*]hy [should] languages show "case phenomena" in the first place. This question is particularly urgent in the context of a Minimalist Program that seeks to attribute syntactic properties that do not arise directly from the action of Merge to properties of the interfaces between syntactic computations and adjacent systems (or else to language external factors)." In this context, the question is: can Case be reduced to interface properties?

There are two initially plausible hypotheses that would lead us to answer this question positively. First, on the basis of Classical Latin and Greek we may hypothesize that Case is in fact *interpretable*. After all, it does tell us (sometimes) how a given argument should be interpreted relative to the predicate it depends on (e.g., dative signals a benefactive). And there have indeed been attempts to attribute a semantic value to the structural Cases nominative and accusative, most famously by Jakobson (1936/1984). These efforts have, however, been unsuccessful for the most part: there appears to be no semantic generalizations about the meanings of such Cases that have predictive power (cf. Pesetsky & Torrego 2011)

Alternatively, we could hypothesize that (universally), Case is required for the interpretation of arguments. This is most explicitly stated in the form of the Visibility Condition (Aoun 1979, Chomsky 1981): An element receives a theta-role only if it is visible. An element is visible when it has Case. The problem with this approach is that there appear to be languages which show no evidence for Case (see also Danon 2002, 2006, Markmann 2009). In this paper I will explore the syntax of two such superficially Caseless languages: Blackfoot (Algonquian) and Halkomelem (Salish). Interestingly, despite the absence of evidence for Case, we do find evidence in these languages for grammatical relations (GR). This state of affairs suggests that we need a Case-theory which allows for variation in the deployment of Case: one that allows for superficial Caselessness. The goal of this paper is to develop such a Case-theory: I propose that Case is best understood as a manifestation of anchoring. In so doing I extend Ritter & Wiltschko's (2009) analysis of INFL as an anchoring category to D. In other words, I propose that D is an anchoring category in the nominal domain. This is a logical step, given the assumption that D is the nominal equivalent of INFL (Abney 1991, Grimshaw 1991/2005). Nominal anchoring (just like verbal anchoring) can proceed in two ways: i) deictically or ii) clauseinternally. While deictic anchoring is achieved via deictic features clauseinternal anchoring is the hallmark of **Case.** As such, *Case marked* DP's are the nominal equivalent of dependent clauses such as infinitives while (certain) deictic DP's are the nominal equivalent of root clauses. I will make the argument as follow.

Based on some common diagnostics, I show in section 2 that neither Blackfoot nor Halkomelem show any evidence for structural Case. This property may be interpreted as indicating the absence of A-positions in these two languages (Wiltschko 2003, Ritter & Rosen 2005). This conclusion runs into problems, however, once we consider the fact that both Blackfoot and Halkomelem test positively for grammatical relations (section 3). This suggests that in Blackfoot and Halkomelem DP's do not depend on grammatical relations. I develop a formal analysis of the idea that Case reduces to anchoring in section 4. In section 5, I discuss consequences and implications of the analysis. In section 6, I conclude.

2. Diagnosing Case

How do we diagnose structural Case? Some common correlates of Case are listed and illustrated in i)-iii) below.

i) *Morphological effects*: different structural Case positions are (sometimes) associated with different morphological Case-marking (e.g., nominative and accusative)

(1) a. *He saw him* b. **He saw he.*

ii) *Case filter effects*: in the absence of a Case assigner, nominal arguments cannot be overtly realized (e.g., no overt DP's as subjects of infinitives)

(2) a. He wanted (*he) to_[-tns] play
b. He play-ed_[+tns]

iii) *Linearization effects*: different structural Case positions are (sometimes) associated with strict linearization properties (e.g. SVO)

(3) a. *saw he him b. *him saw he

At least on the basis of English, we can conclude that Case is responsible for morphological Case marking on nominal arguments, spell out of nominal arguments, and distribution of nominal arguments. Making use of these diagnostics, I will show that Case plays no role in the syntax of Halkomelem and Blackfoot. I discuss each of these properties in turn.

First, neither Halkomelem (4), nor Blackfoot (5) display morphological effects of Case. That is, there is no trace of morphological Case marking on those DP's that would be expected to be so marked.

(4) a. *titelem [te swiyeqe]* sing DET man 'The man is singing.'

b.	kw'éts-l-exw-es	[te	swiyeqe]	[te	spá:th]
	see-trans-30-3s	DE	Гman	DET	bear
	'The man sees a be	ear.'		(0	Galloway 1993:41)

- (5) a. Ikakomimmíiwa nohkówa kitáni
 ik-akomimm-ii-wa n-ohkó-wa ??-love-DIR-3SG 1-son-3SG
 'My son loves your daughter'
 k-itan-yi 2-daughter-4SG
 (Frantz 1991: 53 (l))
 - b. Otsikákomimmokwa nohkówa otáni ot-ik-ákomimm-ok-wa n-ohkó-wa ot-itán-yi 3-??-love-INV-3SG 1-son-3SG 3-daughter-4SG 'Her daughter loves my son' (Frantz 1991: 56 (k))

Second, neither in Halkomelem (6), nor in Blackfoot (7) is the spell out of overt DP's regulated by considerations of Case. That is, we don't observe *Case-filter*-effects.

- (6) a. s-*tl'i'-s kw'-s nem'-s toqw'* NOM-want-3POSS COMP-NOM go-3POSS return.home ...*tthe se'wey'qe 'e te-n'a sneyt* DET man.PL OBL DET-DEM night 'The man wants to go home tonight.'
 - b. *s-tl'i'-s kw'-s nem'-s toqw'* NOM-want-3POSS COMP-NOM go-3POSS return.home ...*tthe Tully 'e te-n'a sneyt* DET T OBL DET-DEM night 'He wants Tully to go home tonight.'
- a. kistoo kammayiniki kitaakomai'to kistoo kamm-aani-iniki kit-aak-omai'to 2SG IF-say-1S.SUBJ 2-FUT-believe 'If you say so, I will take your word for it.'
 - b. nitsikkst kistoo kitaahkaa'po'takssi nit-ikksta kistoo kit-aahk-áa'po'taki-ssi 1-want you 2-NON.FACT-get.job-CONJ 'I want you to get a job.'

And finally, neither in Halkomelem (8) nor in Blackfoot (9) is the linearization of DP's governed by Case.

(8)	SVO	<i>te</i> DET 'The m	<i>swiyeqe</i> man an saw the	<i>kw'éts</i> - see-TR e bear.'	- <i>l-exw-es</i> ANS-30-38	te S DET	<i>spáth</i> bear
	VCO	1 ,7,	1		r .t .	,	

VSO *kw'éts-l-exw-es te spá:th te swíyeqe* see-TRANS-30-3S DET bear DET man 'The man sees a bear.' (Galloway 1993:41)

- VOS *kw'éts-l-exw-es te swíyeqe te spá:th* see-TRANS-30-3S DET bear DET man 'The man sees a bear.'
- (9) SVO ooma saahkomapi ihpookoowa'(w)aahkami omi otoomitam OVS omi otoomitam ihpookoowa'(w)aahkami ooma saahkomapi VOS ihpookoowa'(w)aahkami omi otoomitam ooma saahkomapi VSO ihpookoowa'(w)aahkami ooma saahkomapi omi otoomitam SOV ooma saahkomapi omi otoomitam ihpookoowa'(w)aahkami OSV omi otoomitam ooma saahkomapi ihpookoowa'(w)aahkami 'That boy is playing with his dog.'

This establishes that neither Halkomelem, nor Blackfoot has any obvious effects of Case. I submit that in the absence of such effects, a child acquiring any of these two languages would have no reason to posit abstract structural Case to be part of the language. Or to put it differently, if Halkomelem or Blackfoot (rather than English) would have been the main language of investigation for generative grammarians, Case-theory would have not been developed (see also Danon 2006 and Markmann 2009 for the claim that abstract Case is not universally attested).

So suppose abstract structural Case does indeed play no role in the grammar of Halkomelem and Blackfoot. The question that arises in this context is whether or not these languages display evidence for the presence of A-positions. Can we equate the absence of Case with the absence of A-positions (as for example argued in Ritter & Rosen 2005 for Algonquian and Wiltschko 2003 for Halkomelem)? In the following section I show that we cannot: both Halkomelem and Blackfoot display evidence for the existence of grammatical relations, which I take to be indicative for the existence of A-positions.

3. Diagnosing Grammatical Relations

How do we diagnose grammatical relations? Some common diagnostics are listed and illustrated in i)-iii) below.

i) *Expletive subjects:* In the absence of a thematic role that could map onto the grammatical subject relation an expletive subject must be inserted.

(10) a. *It is raining.*b. *It seems that he is really sick.*

ii) *Mismatches between thematic and grammatical relations*. In passives, the logical object (PATIENT) is realized as the grammatical subject (11)a. In ECM constructions, the logical AGENT is realized as a grammatical object of the embedding predicate (11)b.

(11) a. *He* was chased.b. She wanted him to play

iii) Agreement is conditioned by grammatical relations: subject verb agreement is triggered by the grammatical rather than the thematic subject relation, as evidenced by the passive sentence in (12).

(12) a. *He was chased.* b. *They were chased.*

At least on the basis of English, we can conclude that we must recognize grammatical relations that are partially independent of thematic relations. That is, in the unmarked case a logical (thematic) subject (AGENT/CAUSE) will map onto the grammatical subject relation while a logical (thematic) object (PATIENT/THEME) will map onto the grammatical object relation. But this is not always the case. Instead, there are constructions in which a thematic role other than AGENT or CAUSE is realized as the grammatical subject and a thematic role other than PATIENT or THEME is realized as the grammatical object. And crucially there are phenomena independent of structural Case that are sensitive to these grammatical relations. In what follows, I show that the existence of grammatical relations must be recognized for both Halkomelem and Blackfoot.

First, both Halkomelem and Blackfoot display evidence for expletive subjects. Consider the Halkomelem passive sentence in (13). On the one hand we observe no evidence for A-movement: the logical object is not realized as the grammatical subject as evidenced by the fact that it triggers (passive) object agreement. However, interestingly the auxiliary is marked for 3^{rd} person agreement despite the absence of a 3^{rd} person argument. This is consistent with an analysis that posits an expletive 3^{rd} person subject triggering 3^{rd} person agreement.

(13) *éwe i-s kw'éts-l-àlèm* NEG AUX-3S see-TRANS-1SG.PASS 'I wasn't seen.'

Next consider the Blackfoot sentence involving a weather verb in (14). Assuming that weather verbs are not associated with logical subjects, the fact that we nevertheless find a 3^{rd} person prefix in this context is consistent with an analysis that posits an expletive 3^{rd} person subject.

(14)	ĺíkssoka 'piiwa	otáísootaahsi			
	iik-soka'pii-wa	ot-á-sootaa-hs-yi			
	very-good.AI-IN.S	3-dur-rain.II-CONJ-CONJ			
	'It's good that it's raining.'				

Second, both Halkomelem and Blackfoot show evidence for a mismatch between thematic and grammatical relations. On the basis of examples like (15) it has been argued that Halkomelem has a construction which involves raising to object position (Davis 1980 for Mainland Comox). In particular, *te swiyeqe* ('the man') functions as the logical subject of the embedded predicate but has the distribution of a grammatical object of the matrix predicate (see Gerdts 1988).

A similar construction is found in Blackfoot as shown in (16). This is known as cross-clausal agreement in the Algonquian literature. The crucial property to observe here is that transitive verb stems agree in animacy with their object. In (16)a, the matrix predicate behaves as an intransitive in that it only agrees in animacy with its subject. It is however also possible for the same predicate to be realized as a transitive in which case agreement is with the logical subject of the embedded predicate (16)b. This construction is consistent with the assumption that the logical subject of the embedded clause maps onto the grammatical object relation of the matrix clause.

(16) a. *Nitsiksstaa* ... nit-iksstaa 1-WANT.AI

b.

- ... ana mááhksinohsi amiksi imitááiks an-(w)a maahk-ino-hsi am-iksi imitaa-iks(i) DEM-PROX might-see-CONJ DEM-PL dog-PL 'I want him to see the dogs.'
- Nitsíksstaatawa... nit-iksstaat-a-wa 1-want.TA-DIR-PROX ... ana mááhksinohsi niksi imitááiks an-wa maahk-ino-hsi an-iksi imitaa-iksi DEM-PROX might-see-CONJ DEM-PL dog-PL 'I want him to see the dogs.'

We have now established that there is evidence for mismatches between thematic and grammatical relations in both Halkomelem and Blackfoot. In turn, this suggests that grammatical relations must be recognized in both languages.

Finally, agreement is conditioned by grammatical relations as already evidenced by the examples in (13) and (14).¹

Moreover, in Halkomelem object agreement will always be with the highest object. With a simple transitive predicate, object agreement is with the THEME argument. However, in the presence of an applicative, object agreement is with the applicative argument (Gerdts 1988).

Interestingly, it is precisely in this domain that Case-effects appear to play a role in the language. That is, arguments that are not associated with agreement must be introduced by an oblique marker. This is the case for objects of formally intransitive predicates as in **Error! Reference source not found.** as well as for the THEME objects in the context of applicatives as in **Error! Reference source not found.**b. Since Upriver Halkomelem has lost its oblique marker, we have to show this pattern on the basis of the Island dialect of the language.

a. ni? $l \partial k^{w} - at - \emptyset - \partial s$ $[k^{w} \partial \partial sc' e \delta t]$ AUX break-TR-3O-3ERG [DET stick] 'She broke the stick.'

¹ In Blackfoot agreement is conditioned by a complex interaction between personhierarchy and grammatical relations and for reasons of space we cannot discuss the relevant evidence here.

b. ni? $l \partial k^{w} - \partial t c - t - \mathcal{O} - \partial s$ $t^{\theta} \partial swiw' l \partial s$ [? $\partial k^{w} \partial \partial sc' e \delta t$] AUX break-BEN-TR-3O-3ERG DET boy [OBL DET stick] 'She broke the stick for the boy.'

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Thus there is evidence that in both Halkomelem and Blackfoot we must recognize the existence of grammatical relations despite the absence of any evidence for structural Case. Moreover, at least in Halkomelem there appears to be a fundamental distinction between DPs that are indexed by agreement and DP's which are not. The former can be realized as bare DPs while the latter must be introduced by an oblique marker. Nevertheless, there is no evidence that would force us to distinguish the structural Case associated with subjects from the one associated with objects in either language.

4. Towards a Case-Theory which allows for Caselessness

Facts from Halkomelem and Blackfoot indicate that abstract structural Case is not universally attested. This calls for a Case-theory which allows for Caselessness. The question that needs to be addressed then is how nominal arguments (i.e., DP's) are licensed in the absence of Case?

I propose that Case can be understood as a specific instance of anchoring. We follow the formal analysis of anchoring developed in Ritter & Wiltschko 2009, 2010 (R&W), which I briefly outline below.

4.1 Background: the syntax of anchoring

In R&W's system, INFL is universally associated with an unvalued coincidence feature ([*u*coin]) where coincidence is understood in the sense of Hale 1984 (see also Demirdache & Urribe-Etxebarria 1997). This is illustrated in (17).

(17) $\begin{bmatrix} IP & I_{[u \text{ coin}]} & [VP & Ev & v \end{bmatrix} \end{bmatrix}$

The coincidence feature serves to order an abstract event argument associated with VP relative to some abstract argument in SpecIP or higher. In root clauses, tense serves to value [ucoin] ordering the event-time relative to the utterance time. This results in deictic anchoring achieved via m(orphological)-valuation: *present* values [ucoin] as [+coin] asserting that the event time coincides with the utterance time; *past* values [ucoin] as [-coin] asserting that the event time doesn't coincide with the utterance time. This is illustrated in (18).

(18)	Deictic anchoring (indicative root clauses)					
	a.	[_{IP} Utt	I[pres: +coin]	[_{VP} <i>Ev v</i>]]		
	b.	[_{IP} Utt	I[past: -coin]	[VP Ev v]]		

On this approach, tenseless constructions, such as infinitives are still associated with [ucoin] but they differ from root clauses in two respects: i) valuation is not via morphological tense marking but instead via a higher predicate (the embedding verb); ii) ordering is not relative to the utterance

argument, but instead relative to a higher event argument. Embedded under an aspectual predicate, INFL is valued as [+coin] and thus asserts that the embedded event coincides with the matrix event resulting in a simultaneous infinitive (19)a. In contrast, embedded under a future oriented predicate, INFL is valued as [-coin] and thus asserts that the embedded event doesn't coincide with the matrix event resulting in a future irrealis infinitive (19)b.

Dependent IP's (19)

a. $\dots [v_{P} \text{ Ev } V_{aspectual} \quad [I_{P}I_{[+coin} \quad [v_{P} \text{ Ev } v]] \text{ simultaneous inf.}$ b. $\dots [v_{P} \text{ Ev } V_{future-oriented} \quad [I_{P}I_{[-coin} \quad [v_{P} \text{ Ev } v]] \text{ future irrealis inf.}$

4.2 Case as a nominal anchoring strategy

In line with the assumption that D is the nominal parallel of INFL, I propose that D is a nominal anchoring category. In particular, I propose that the difference between the verbal anchoring category INFL and the nominal anchoring category D is twofold: i) the feature universally associated with D is *identity* (rather than *coincidence*; see for example Baker 2003 for the significance of identity for nounhood); ii) the arguments that are being anchored are referential and participant arguments (rather than spatio-temporal arguments). Concretely, the system works as follows.

D is universally associated with an unvalued identity feature ([uident]) as illustrated in (20).

 $\begin{bmatrix} DP & D_{[uident]} & [NP R n \end{bmatrix} \end{bmatrix}$ (20)

The identity feature serves to relate the R-argument associated with nPrelative to an abstract argument in SpecDP or higher. In (some) demonstrative DP's, deictic features serve to value [uident] relating the R-argument relative to the utterance. This results in deictic anchoring achieved via m(orphological)valuation. There are two cases to consider.

On the one hand, 1^{st} and 2^{nd} person pronouns can value [*u*ident] as [+ident] asserting that R-argument is identical with the utterance participant (21)a. In contrast, 3rd person can value the identity feature as [-ident] asserting that the R-argument is not identical with the utterance participant (21)b.

(21)Deictic anchoring 1: indexical pronouns a. [DP Utt-part $D_{[1/2: +ident]}$ [$_{nP} R n$]] b. [DP Utt -part $D_{[3: -ident]}$ [$_{nP} R n$]]

Another possibility is for the identity relation to pick out the location of the R-argument relative to the utterance. This is achieved via deictic determiners such that proximate demonstratives serve to value the identity feature as [+ident] asserting that the location of the referent (R) is identical to the utterance location (22)a. In contrast, distal demonstratives serve to value the identity feature as [ident] asserting that the location of the referent is not identical with the utterance location. This is illustrated in (22)b.

Deictic anchoring 2: demonstratives (22)a. [DP Utt-loc $D_{[prox:+coin]}$ [nP R n]]

b. [DP Utt-loc $D_{[dist:-coin]}$ [nP R n]]

Deictic anchoring is however not the only way in which DP's can be anchored, just like deictic anchoring is not the only way in which IP's can be anchored. As we have seen, dependent clauses such as infinitives are anchored to the embedding predicate. Similarly, I propose that dependent DP's are anchored to the embedding predicate. This is precisely what Case is.

A dependent DP differs from deictically anchored ones in two respects: i) valuation is not via morphological marking in the form of deictic features, but instead via a higher predicate or functional head; ii) a relation is established not relative to the utterance, but instead to participant argument or grammatical relation.² A DP whose identity feature is valued via INFL as [+ident] is dependent on the grammatical relation introduced in SpecIP. This is what we call nominative Case. A DP whose identity feature is valued via Asp as [+ident] is dependent on the grammatical relation introduced in SpecAspP. This is what we call accusative Case.

- (23)**Dependent IP's**
 - a. $[_{IP} GR.subj I [_{DP} D_{[+ident]} [_{nP} R n]] \rightarrow nominative$ b. $[_{AspP} GR.obj Asp [_{DP} D_{[+ident]} [_{nP} R n]] \rightarrow accusative$

The analysis of Case in terms of anchoring meets the demands we have defined in section 1-3: it is a Case theory that allows for Caselessness. In particular, if D is anchored deictically, it will not be anchored to the grammatical relation and thus will not show any Case-effects.³ Thus, the main insight here is the recognition of a particular parallel between INFL and D: deictic DP's are to root clauses what Case-marked DPs are to infinitives. The former are deictically anchored while the latter are anchored clause-internally.

4.3 **Theoretical implications**

A welcome result of the proposal that abstract structural Case reduces to anchoring is that there is no need for an abstract (dedicated) Case feature (as for example in Chomsky 1995). On the current proposal the feature [u ident] is responsible for Case. It is however not a dedicated Case feature. First, the *identity* feature is key in distinguishing nominal categories from verbal categories. As such it is responsible for nounhood (cf. also Baker 2003). Moreover [uident] can also be valued deictically in which case it doesn't result

² Note that both nominative and accusative are here formalized as instances of [+ident]. This raises the question as to whether we also find cases that could be analyzed as involving [-ident]. I submit that the answer is positive: the valuation of D by INFL as [ident] derives genitive whereas its valuation by Asp as [-ident] derives partitive. For this hypothesis to go through we need to decompose the notion 'grammatical relation', however. I submit that the subject role can be equated with the 'bearer of attitude' (Giorgi & Pianesi 1997) while the object role can be equated with the 'event measurer' (e.g. Tenny 1994).

The proposal predicts that only deictic determiners allow for deictic anchoring. This prediction is borne out in both Halkomelem and Blackfoot. However, as evidenced by English, it is not the case that all deictic determiners trigger deictic anchoring. For example DP's introduced by demonstratives in English still show case effects and can therefore not be taken to instantiate deictic anchoring.

in Case-effects. On this approach Case is a special case of anchoring D (similar to anchoring of infinitives).

This leads us to the next advantage of the Case-theory developed here, namely that there is *no need for a macro-parameter* to distinguish between languages in which the distribution of nominal argument is regulated by Case and languages where this is not so (i.e., pronominal argument languages; see for example Baker 1995). Instead, we expect such pronominal argument (polysynthetic) properties as well as Discourse configurational properties. What distinguishes our approach is that these properties need not define an entire language. Instead even with a given language we may expect that some DP's are deictically anchored while other DP's are anchored to grammatical relations (i.e., have Case). Moreover, on the present approach we predict a correlation between Caselessness and deictic DP's such that Caseless DP's must be deictically anchored, whereas non-deictic DP's must be anchored via Case. While I show below that this makes the right predictions for Halkomelem and Blackfoot, it remains to be seen whether it is indeed a universally valid generalization.

Finally, according to the present proposal, morphological Case marking does not play a role in the anchoring mechanism (i.e. it does not serve to value D, for example). I assume (following recent work by McFadden 2004 and Legate 2008) that morphological Case is a post spell out phenomenon.

5. Consequences

In this section, I discuss two consequences of the proposal developed above. First, I show that there are in fact two sources of Caselessness: i) deictic anchoring of D and ii) absence of D. I discuss each of them in turn.

5.1 Lack of Case Due to Deictically Anchored D

If indeed Case-licensing reduces to anchoring, we predict that deictically anchored D's remain Caseless. This predicts that in a language where DP's remain Caseless they must be deictically anchored. This is indeed the case in the languages we have considered here. Both Halkomelem and Blackfoot have obligatory determiners which are associated with deictic force. In Halkomelem, determiners encode spatial proximity/distance as well as visibility (see table 1).

DET		FEM
PROX: VIS.	te	the
PROX: INVIS.	kwthe	kwse
DISTAL	kw'e	kw'se

Table 1: Deictic force in Halkomelem determiners

While in Halkomelem, we observe a two-way deictic anchoring system (whether or not the referent is close to the speech act location; in Blackfoot, we observe a three-way deictic anchoring system: i) close to speaker (LOC 1), close to addressee (LOC 2) or elsewhetre (LOC 3) (see table 2).

DET	ANIM	INANIM
loc 1	amo	amo
LOC 2	anna	anni
LOC 3	oma	oomi

Table 2: Deictic force in Blackfoot determiners

On this proposal then, we predict that only DP's that have deictic force may remain Caseless. This differs from the approach in Baker 1995 according to which a macro-parameter is responsible for whether or not a language is polysynthetic. Furthermore, according to our proposal we predict that even in a language that allows for its DPs to be deictically anchored, we may find pockets in the grammar where DP's are not deictically anchored and consequently show Case-effects. This prediction is borne out. In Squamish Salish (closely related to Halkomelem), there is one non-deictic determiner and it does indeed show Case effects (Gillon 2006). First, observe that DP's introduced by deictic determiners do not show linearization effects: such DP's may be linearized in a position following or preceding the verb and auxiliary. This is shown in (24).

(24) a. Na lúlum [Iha/tsi/kwelha slheny'-úllh]. rl sing det.f woman-young 'A/the girl was singing.'
b. [Lha/tsi/kwelha slheny'-úlh] na lúlum. det.f woman-young rl sing 'A/the girl was singing.' Gillon 2006: 145 ex (65)

In contrast, there is one determiner (kwi), which is not associated with deictic force and DP's introduced by this determiner do show linearization effects. In particular, such DP's can only follow the verb and auxiliary as shown in (25).

- (25) a. *Na lúlum [kwi slheny'-úllh]*. rl sing det woman-young 'A girl was singing/sang.'
 - b. *[*Kwi slheny'-úllh*] na lúlum. det woman-young rl sing Gillon 2006: 145 ex (66)

Thus, Squamish provides us with evidence for the predicted complementarity between deictic force of determiners and Case effects. Linearization effects are observed with the non-deictic determiner kwi but not with the deictic determiners.

Another piece of evidence for the complementarity of deictic features and Case effects comes from Halkomelem. As briefly mentioned in section 3, DP's which are not linked to grammatical relations are realized as obliques. Interestingly, Halkomelem has an oblique determiner tl', which is the only determiner which is not marked for deictic features. This follows straightforwardly from the claim that deictic features and Case-features should be in complementary distribution.

Actes du congrès annuel de l'Association canadienne de linguistique 2011. Proceedings of the 2011 annual conference of the Canadian Linguistic Association. © 2011 Martina Wiltschko In sum, our proposal predicts complementarity between deictic features and Case-effects: non-deictic determiners must be anchored via Case while Caseless determiners must be deictic. However, it does not appear to be the case that deictic force always implies caselessness. Consider for example the German paradigm of demonstratives (deictic) in table 3.

DET	MASC	FEM	NEUT
NOM	dies-er	dies-e	dies-es
ACC	dies-en	dies-e	dies-es
DAT	dies-em	dies-er	dies-em
GEN	dess-en	dies-er	die-es

Table 3: German demonstratives inflect for Case

For the proposal developed here to go through, we have to find a principled way as to when a given demonstrative manifests deictic anchoring and is thus Caseless. While in Halkomelem and Blackfoot they do, in German they do not. I submit that this difference correlates with the distinction between head features and modifying features in the sense of Wiltschko 2009. There I argue that in Halkomelem and Blackfoot deictic features constitute an integral part of the determiner: they are head features and as such obligatory. In contrast, in German deictic features are analyzed as modifying features and as such may or may not be present. This suggests, that modifying features may not serve to value the identity feature associated with D.

5.2. Lack of Case Due to Lack of D

According to our proposal deictic DP's are not the only nominal arguments that may remain Caseless. Rather, since Case reduces to anchoring, which in turn is a function of the unvalued identity feature associated with D, we predict that in the absence of D, Case is not observed. This prediction is borne out in Hebrew. Danon (2002, 2006) argues that bare NP's in Hebrew lack Case. This is evidenced by the fact that a nominal argument preceded by the definite determiner *ha* must be Case marked by the object marker (*et*) (26)a. In contrast, a nominal argument which is not preceded by the definite determiner cannot be Case marked (26)b.

- (26) a. *Dan kara* *(*et*) *ha-itonim*. Dan read OM DET-newspapers 'Dan read the newspapers.'
 - b. *Dan kara (*et) (kama) itonim* Dan read OM (some) newspapers 'Dan read (some) newspapers.'

In sum, Caselessness can arise in one of two ways: i) in the absence of deictic features on the determiner; ii) in the absence of a determiner (bare NPs).

5.2 Caselessness is not tied to tenselessness

Finally, a discussion of Case would not be complete without addressing the well-known correlation between tense and Case, which has played a major role in the development of Case theory.

On the basis of the fact that in many Indo-European languages overt nominative subjects are restricted to tensed (finite) clauses but cannot occur in infinitives, it has been argued that it is tense that is responsible for nominative Case assignment. In fact, Williams 1994 suggests that Case is the nominal equivalent of tense. A recent implementation of this idea is developed in Pesetsky and Torrego 2001 who argue that Case corresponds to an uninterpretable tense feature on D. If this approach is on the right track we expect that Caselessness may correlate with tenselessness. That is, we might expect that tenseless languages generally lack Case (see Wiltschko 2003 for this view). Since Halkomelem and Blackfoot are both tenseless languages⁴ this may be another source for their Caselessness. As we have seen however, both Blackfoot and Halkomelem are not completely Caseless. Instead Halkomelem shows oblique marking. This is unexpected on the assumption that tenselessness leads to Caselessness. A second prediction of the claim that Case reduces to an uninterpretable feature on D is also discussed in Wiltschko 2003. We expect that languages in which tense on D is interpretable should always remain Caseless. Since in Halkomelem Tense on D is in fact interpretable, this would appear to support the prediction. But again, the cases where Halkomelem does show Case effects (i.e., oblique marking) would be unaccounted for. Moreover, there are languages where tense on D is interpretable and nevertheless they show Caseeffects. This is true for Somali as discussed in Lecarme 2004.

- (27) a. *dhibaatá-da Khalíij-ku welí way taagán tahay* problem-DET.FEM Gulf-DET.M.NOM still FEM3.S permanent is 'The Crisis of the Gulf still persists.'
 - b. *dhibaatá-dii Khalíij-ku wáy dhammaatay* problem-DET.F.PAST Gulf-DET.M.NOM F.3s ended.PAST 'The Crisis of the Gulf ended'

Lecarme 2004: 444 (4)

This establishes that tenselessness is not the determining factor for Caselessness.

6. Conclusion

The main goal of this paper was to explore the idea that Case reduces to anchoring. In particular, I have proposed that D, as the nominal counterpart of INFL functions as an anchoring category in the sense of Ritter & Wiltschko 2009, 2011. At the core of the proposal is the idea that D is universally associated with an unvalued identity feature. There are two strategies to value [*u*ident]: deictic features can value D thereby anchoring the nominal expression to an utterance participant. Deictically anchored DP's (just like root clauses) do not require further licensing, i.e., they remain Caseless. On this analysis, Case arises if the identity feature is valued by a clausal head (such as INFL or

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⁴ "Tenselessness" here is understood as lacking a grammatical category *tense* which is responsible for obligatory tense-marking in a given language.

Aspect). Thus, the Case-theory developed here, meets the requirement to allow for Caseless nominal expressions. In particular, Caselessness may arise in two distinct ways: either D is deictically anchored or D is absent. As such, we don't need to posit a macro-parameter \dot{a} la Baker to account for languages in which DP's do not seem to be licensed by Case. Another virtue of the analysis is that it reduces Case to an independently established mechanism in the grammar, namely anchoring. Whether or not the predictions of the analysis are borne out across a larger set of languages has to await further research.

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