On Case-Marking in There-Constructions: A Default case Approach

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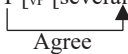
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1. Introduction

This paper explores what Case/case is assigned to a logical subject in *there*-constructions.[1] (1) shows a typical example of *there*-constructions, in which the noun phrase *many people* is regarded as the logical subject.

(1)   There are many people in the park.

In the literature, logical subjects have been referred to as associates. We will follow this convention in this paper.

As is illustrated in (1), it has been generally assumed in the literature that finite T agrees with an associate under the probe-goal relation in *there*-constructions (Chomsky (2000, 2001)). This argument is supported by the fact that finite T reflects the phi-features' values of the associate as in (2a). (2b) roughly illustrates how finite T agrees with the associate.

(2)   a.   There are/*is several cats in the backyard.   (Sabel (2000: 412))

    b.   [$_{CP}$ [$_{TP}$ there T [$_{vP}$ [several cats] in the backyard].

                Agree

What matters here is that the associate agrees with finite T. In the minimalist era (Chomsky (2000 *et seq*)), Case assignment takes place as a reflex of probe-goal Agree. It has been generally acknowledged that finite T and transitive V are responsible for Nominative Case and Accusative Case assignment, respectively. On the basis of these general assumptions, the associate should obtain Nominative Case as a result of agreement with finite T. However, this prediction is indeed not borne out by the following data:

(3) a. There is only me/*I in the garden.   (Sobin (2014: 386))

    b. There are only us.   (López (2007: 212))

    c. *There's I.   (Schütze (1997: 136))

    d. Yes, there's certainly her/*she to consider.

        (Huddleston and Pullum (2002: 462))

As is clearly represented in (3), associates with Nominative Case are not licensed, but those with the Accusative form are. These data crucially contradict the assumption made by Chomsky (2000 *et seq*). What is interesting is that while finite T still agrees with associates with respect to (at least) number, Nominative Case assignment does not take place. Therefore, the problem we must deal with is why Nominative Case assignment is blocked and how associates end up appearing with the Accusative form in *there*-constructions.

      This paper is organized in the following way: Sections 2 and 3 will review the previous approaches. In Section 4, we will lay out the theoretical assumption about the Case value. We will clarify whether associates obtain Accusative Case or case and put forth our proposal for the way associates are pronounced with the Accusative form in Section 5. Section 6 briefly touches upon a peculiar agreement phenomenon in *there*-constructions. Section 7 concludes this paper.

2. Partitive Case Approach

      First of all, consider the following well-known property of *there*-constructions. As represented in (4), a non-specific indefinite NP qualifies as an associate, whereas a specific definite DP is not licensed in *there*-constructions. This semantic restriction on the associate is called the "definiteness effect" (Milsark (1974)).

(4)   There are several/*the cats in the backyard.   (Sabel (2000: 411))

Based on this semantic restriction, Belletti (1988) presents her proposal that the unaccusative verbs including the copula assign Partitive Case to associates in *there*-constructions (Lasnik (1992, 1995), Bošković (1997, 2007), Epstein and Seely (2006), among others).[2] According to Belletti (1988: 5), Partitive Case is always related to an indefinite meaning for NPs with its Case. That is, the semantics of Partitive Case

imposes an indefiniteness requirement on associates, which succinctly accounts for the fact in (4): the interpretation of Partitive Case is closely correlated with the definiteness effect.

The Partitive Case approach may be motivated by the semantic restriction on associates in *there*-constructions. However, as pointed out by de Hoop (1992) and Vainikka and Maling (1996), Partitive Case does not always correspond to its semantics. As the data in (5) illustrate, a noun phrase quantified by the universal quantifiers *all* and *most* can be assigned Partitive Case in Finnish.

(5) a. Presidentti   ampui   kaikkia   lintuja.

president   shot   all-PART   birds-PART[3]

'The president shot at all the birds.'   (De Hoop (1992: 64))

b. Pekka   kokeili   useimpia   reseptejä.

Pekka   tried   most-PART   recipes-PART

'Pekka tried most (of the) recipes.'   (Vainikka and Maling (1996: 187))

As the examples in (5) show, there is no rigid semantic restriction between Partitive Case and indefiniteness. Therefore, we have no absolute motivation that Partitive Case is the underlying reason for the definiteness effect in *there*-constructions.

Bošković (1997) empirically tries to confirm the validity of Partitive Case assignment in *there*-constructions in light of *wager*-class verbs. Pesetsky (1992) and Bošković (1997) suppose that an infinitival subject in *wager*-class verbs cannot receive Accusative Case, which violates the Case Filter proposed by Chomsky (1981) and renders (6) ungrammatical.

(6) a. *He alleged stolen documents to be in the drawer.

b. *John wagered a stranger to have been in that haunted house.

(Bošković (1997: 77))

(7)   Case Filter

*NP if NP has phonetic content and has no Case. (Chomsky (1981: 49))

In contrast, *there* is appropriate for an infinitival subject in *wager*-class verbs because the sentences in (8) will be completely grammatical.

(8) a. He alleged there to be stolen documents in the drawer.

b.   John wagered there to have been a stranger in that haunted house.

(Bošković (1997: 77))

If *wager*-class verbs do not assign Accusative Case to an infinitival subject, *stolen documents* in (6a) and *a stranger* in (6b) cannot receive any Case, leading to a violation of the Case Filter. Bošković (1997) ensures the salvation of (8) from a Case Filter violation by claiming that the copula assigns Partitive Case to associates in (8).

It is worth noting here that Postal (1974: 305, fn. 12) shows that if the infinitival subject of *wager*-class verbs receives extremely heavy stress, the acceptability of a sentence would be greatly improved, which has rarely been touched upon in the previous literature. Hasegawa (2003) agrees with Postal (1974) and presents the following examples, in which capital letters mark heavy stress.

(9) a.   *Tom alleged George to have perjured himself.

     b.   Tom alleged GEORGE to have perjured himself.

(Hasegawa (2003: 231))

As (9a) demonstrates, if we pronounce *George* with a typical intonation, the sentence will be ungrammatical. (9b) is, however, grammatical. This fact suggests the possibility that the infinitival subject in *wager*-class verbs somehow obtains Accusative Case from a matrix verb, as opposed to Pesetsky's (1992) and Bošković's (1997) claim. Hence, that *wager*-class verbs prohibit infinitival lexical subjects is not attributed to the Case Filter violation, but some other factor comes into play to rule out (6) and (9a). If this line of reasoning is plausible, we do not have any motivation to say that Partitive Case assignment salvages (8) from the Case Filter violation.[4] The most persuasive conclusion to be drawn from here is that (8) does not corroborate the plausibility of Partitive Case assignment in *there*-constructions.

The discussions so far have presented counterarguments against Partitive Case assignment to associates in *there*-constructions. This paper thus does not adopt the approach pursued by Belletti (1988) and Bošković (1997), among others.

3. Accusative Case Approach
3.1. Maling and Sprouse (1995)

We have confirmed in Section 1 that there is no empirical evidence in favor of Nominative Case assignment to associates in *there*-constructions because pronominal associates never appear with Nominative Case as in (3), repeated here as (10).

(10) a.　There is only me/*I in the garden.　　　　　(Sobin (2014: 386))

　　b.　There are only us.　　　　　　　　　　(López (2007: 212))

　　c.　*There's I.　　　　　　　　　　　　(Schütze (1997: 136))

　　d.　Yes, there's certainly her/*she to consider.

(Huddleston and Pullum (2002: 462))

As for Partitive Case assignment, no empirical fact in English motivates this type of Case assignment in *there*-constructions, which leads us to reject this possibility as we have discussed in Section 2.

Superficially speaking, associates seem to receive Accusative Case, as the contrast in (10) demonstrates. It is worthwhile to note here that postcopular pronouns are usually assigned Accusative Case as shown below:

(11) a.　What would you do if you were me/*I.

　　b.　You can be me/*I.

(Maling and Sprouse (1995: 168))

Maling and Sprouse (1995) try to deduce those facts from the hypothesis that the copula assigns Accusative Case to its complement. If this analysis is on the right track, we can straightforwardly capture the facts in (11). Furthermore, Maling and Sprouse (1995) claim that the copula structurally assigns Accusative Case to associates in *there*-constructions. The fact that associates in *there*-constructions are always realized with Accusative Case as in (10) may empirically favor and support this argument.

The analysis proposed by Maling and Sprouse (1995) would be superior to other previous approaches such as Belletti (1988) and Chomsky (2000, 2001), since it can correctly describe the Case realization of associates in *there*-constructions.

Consider now the following minimal pairs:

(12) a.　John loves her.

　　b.　*John loves she.

It is taken for granted that transitive verbs in English cannot assign Nominative Case

to its nominal complement. Bearing this in mind, let us see the following example:

(13)　　　There am I.　　　　　　　　　　(Huddleston (1984: 69, fn. 3))

According to Huddleston (1984), (13) contains locative *there* because the pronunciation of *there* in (13) is not ðə(r) (expletive *there*) but ðɛə. Therefore, the sentence in (13) is taken to be the locative inversion. Suppose that the subject of the locative inversion remains within vP (Coopmans (1989), Hoekstra and Mulder (1990), Collins (1997), Culicover and Levine (2001), Rizzi and Shlonsky (2006), among others). If we followed Maling and Sprouse (1995), then any kind of copula would assign "structural" Accusative Case to its nominal complement and would not allow it to appear with Nominative Case. However, this is not the case; rather, the copula does allow a nominal complement with Nominative Case as in (13). If the copula invariably assigns Accusative Case to its nominal complement, such pronouns cannot receive Nominative Case in any case, contrary to the fact. This observation leads us to doubt Maling and Sprouse's (1995) claim since ordinary transitive verbs never assign Nominative Case to their complements as in (12b).[5]

Furthermore, let us see the following example:

(14)　　　There had been (at first) only a few finds (conclusively) attributed to this
　　　　　period.　　　　　　　　　　　　　　　　　(Rezac (2013: 303))

It has been assumed that there is a PF adjacency condition on structural Case assignment as in (15) (Chomsky (1981), Stowell (1981)).[6]

(15)　　　John rolled (*perfectly) the ball down the hill.　　　(Rezac (2013: 303))

As (15) shows, an adverb cannot interrupt the adjacency between a transitive verb (Case assigner) and a DP (Case assignee) unless a DP is marked with heavy stress (Culicover and Levine (2001: 292)). Its effect should be evident for (14) if associates receive structural Accusative Case as Maling and Sprouse (1995) assume. However, this is not the case since the adverb *at first* can intervene between the copula and associate. *There*-constructions thus show no adjacency restrictions, belying structural Accusative Case assignment in (14).

So far, we have observed two things: (i) Nominative Case can show up at the complement of the copula and (ii) there is no Case adjacency requirement in *there*-

constructions. These facts strongly suggest that we cannot make recourse to Accusative Case assignment by the copula to exemplify (10), (11), and (14).

3.2. Sobin (2014)

3.2.1. Gratuitous Feature Value of *There*

Sobin (2014: 409) focuses on the following examples:

(16) a. There is/was/are cats in the yard.

b. There is/ only me in that picture.

c. *There am only I in that picture.

d. There was/*were only you/them in the garden.

(Sobin (2014: 409))

What matters here is that when an associate is a plural lexical NP, phi-feature agreement can be either singular or plural, while only third-person singular agreement is licit in cases in which a pronominal associate is used.

Sobin (2014) assumes that finite T bears an unvalued phi-feature ([uphi]), EPP-feature ([EPP]), and unvalued Nominative Case-feature ([uNOM]), and that phi-feature agreement between finite T and DP is closely tied with Nominative Case assignment (George and Kornfilt (1981), Cardinaletti (1997), Chomsky (2000, 2001), among others). He then posits that only DP with the Nominative Case-feature ([NOM]) can be a target for phi-feature agreement with finite T. Let us look at (17).

(17) $[\ldots \text{T}_{\text{[uphi], [EPP], [uNOM]}} [\ldots \text{DP}_{\text{[vphi], [NOM]}} \ldots]]$

Agree

To tease apart the patterns of agreement illustrated in (16), Sobin (2014: 409) proposes that "*there* may (but need not) be assigned a gratuitous person and number value such as third-person singular." This means that *there* with [3-Pseron], [Singular-Number], and [NOM] enters into an agreement relation with finite T. On the other hand, if *there* lacks any person and number value, associates can trigger agreement instead of *there* if they have [NOM] in addition to phi-feature values. The analysis outlined above is able to accommodate the optionality of agreement in (16a).

This immediately raises a question of why pronouns refuse to agree with finite

T as in (16b-d); in fact, there is no optionality, in contrast to plural lexical associates as in (16a). Sobin (2014) assumes that English pronominal associates inherently bear the default Accusative case-feature (see Section 4.1 below for a detailed discussion about default case). This assumption perhaps follows from the fact that in *there*-constructions, pronominal associates always carry Accusative case. Recall that his analysis is based on the assumption that agreement with finite T is established if and only if the target has [NOM]. Following these assumptions, pronominal associates are not able to enter into an agreement relation with finite T since the former bears the Accusative case-feature. This analysis further leads to the consequence that *there* must bear [3-Person], [Singular-Number] with pronominal associates being used. The analysis outlined above accommodates the fact that pronominal associates never trigger agreement with finite T as in (16b-d).

3.2.2. Problems with Sobin (2014)

Sobin's (2014) analysis might seem plausible with respect to the observation that when pronouns are used as associates, (i) the pronouns obtain Accusative case and (ii) the agreement between finite T and pronominal associates results in third-person singular. This forces us to posit that when associates are pronominal, finite T has to agree with *there* with [3-Person], [Singular-Number], and [NOM], resulting in singular agreement. Nevertheless, (18) presents the opposite result: finite T can show plural agreement.

(18) a.　　There are only us.　　　　　　　　　　　　　　(López (2007: 212))

　　　b.　　There were them and there was us.　　　　　　　(Francez (2006: 1))

　　　c.　　There are only you three left in the competition. (Hall (1965: 18, fn. 12))

Of importance here is that pronominal associates can in fact trigger agreement with finite T. This fact falsifies Sobin's (2014) analysis regarding how agreement proceeds.

Note, however, that Sobin's (2014) analysis seems correct in that he does not rely on structural Case assignment by any verbs in *there*-constructions. Instead, he envisions the pronominal associate that is introduced into the derivation with a default Accusative case-feature. However, as we will review in the following section, this

analysis does not fit into the latest framework of the minimalist program.

4. Theoretical Assumption: [uCase]

Since Chomsky (2000), it has been assumed that noun phrases are introduced into the derivation with an unvalued Case-feature ([uCase]) and the unspecified value of [uCase] will be determined as a reflex of Agree in the narrow syntax. That is, the Case value of DPs is not fixed until they undergo syntactic computation.

Sobin (2014) implicitly assumes the checking theory proposed by Chomsky (1995). In this theory, the Case value of DPs is determined without syntactic computation. More specifically, DPs enter into the derivation with the specified Case-feature needed to be checked in the narrow syntax. This theory entails a look-ahead problem since what Case DPs eventually obtain is predetermined before they are introduced into the derivation. In contrast, in Chomsky's (2000 *et seq*) approach, Case is not determined until DPs enter into the derivation; rather, it is determined after DPs undergo syntactic computation, probe-goal Agree. Chomsky's (2000 *et seq*) proposal does not cause the look-ahead problem with respect to Case assignment, so that it is conceptually superior to the checking theory. We then have to modify Sobin's (2014) analysis in line with Chomsky's (2000 *et seq*) approach and resolve the look-ahead problem.

In the following, we will put forth an alternative analysis, which succinctly accounts for the basic paradigm in *there*-constructions, and argue persuasively that associates carry default Accusative case instead of any structural Case.

5. Proposal: Default case Approach
5.1. What Is Default case?

Recall that associates enter into the derivation with default Accusative case in Sobin's (2014) analysis. As already noted in Section 4, however, it has the look-ahead problem. Therefore, we cannot adopt his analysis as it is. Even though it remains a problem, the default case approach itself seems to be on the right track because it is unlikely that the unaccusative verbs including the copula assign structural Case (see

Section 2 and 3.1). This paper then pursues the default case approach in a way more in line with the latest minimalist program.

Before presenting the proposal, we need to make it clear what default case is. It has been assumed in the literature that noun phrases are somehow pronounced with default case when they have no structural Case (McCloskey (1985), Schütze (1997, 2001), McFadden (2004), among others). Schütze (1997, 2001) extensively discusses where default case appears. According to Schütze (1997, 2001), left-dislocated DPs reveal what default case is in the languages. For instance, left-dislocated DPs bear Accusative case in English as in the following example:

(19)　　Me/*I, I like beans.　　　　　　　　　　(Schütze (2001: 210))

In (19), *Me* cannot be Case-marked by any element since it cannot establish an agreement relation with any heads capable of assigning Case, such as finite T or transitive V. The left-dislocated DP in (19), thus, does not receive any structural Case. However, this DP is evidently marked with Accusative case in (19). Schütze (1997, 2001) argues that this fact can be accounted for by positing that *Me* has default Accusative case. Following Schütze (1997, 2001), we assume default Accusative case in English.

5.2. How Do DPs Receive Default case?
5.2.1. The Concept of Default case

At this point, it is entirely unclear how default case is 'assigned' to DPs. Moreover, it remains uncertain whether default case is actually 'assigned' to DPs in a structural way. McFadden (2007) deals with these issues and submits the following statement:

(20)　　Default case is not the case that is assigned when other cases fail, but the actual lack of case.　　　　　　　　(McFadden (2007: 231))

McFadden (2007) emphasizes that this is not to say that a DP lacks an overt Case-marker when it is eventually pronounced with default case; rather, it has 'case' in a morphological sense (i.e. morphological case), though it does not receive any 'Case' in a structural mechanism.

The motivation behind McFadden's (2007) claim above lies in the non-controversial assumption that morphological case is not connected to DP licensing, i.e. abstract Case. More specifically, default case assignment does not improve the grammaticality of the sentences that violate the Case Filter (Schütze (2001)). Therefore, there is no need to assume default case 'assignment' to DPs in any component. This claim seems plausible; however, it still remains unclear how the formal implementation of McFadden's (2007) idea will be made possible in the framework of Chomsky (2000 *et seq*). The crucial point in Chomsky's (2000 *et seq*) theory is that DPs have [uCase] and its valuation will be determined in the narrow syntax. We will establish a theoretical implementation of default case along with Chomsky's (2000 *et seq*) idea.

Note here that, following these theoretical assumptions, Moritake (to appear) claims that a DP is pronounced with default case when it reaches at the SM interface with its [uCase] unvalued. What matters in Moritake's (to appear) idea is that [uCase] is a command with which to pronounce DPs. This strategy is much simpler than other theories because we need not suppose default case 'assignment' to DPs in the narrow syntax; it just determines how the SM interface interpret DPs with [uCase]. This paper follows Moritake's (to appear) claim about default case.

5.2.2. [uCase] on Associates in *There*-Constructions

Recall that associates in *there*-constructions should not receive any specific Case value in the narrow syntax, which is vindicated by the fact that they are pronounced with default Accusative case as we have confirmed in Section 5.1. The immediate question we must address next is why [uCase] on associates does not receive any value in the narrow syntax. In the following, we will discuss how the theory ensures the application of default case spell-out to associates in *there*-constructions.
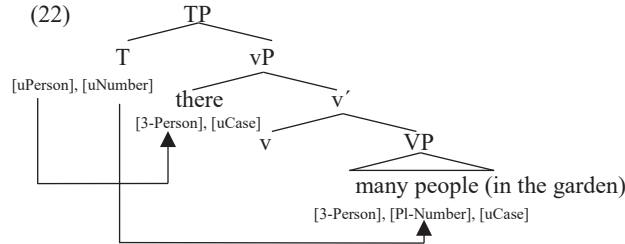
The key to resolving this issue lies in the way the feature valuation proceeds. First, it has been often discussed in the literature that the expletive *there* has person-feature (Chomsky (2001) and Richards (2008)). In particular, Richards (2008) claims

that *there* is specified as [3-person] and [uCase]. In addition, he also argues that *there* is base-generated at Spec-v where it can be probed by finite T and subsequently moves to Spec-T (see also Deal (2009) for a similar proposal). According to Richards (2008), as a result of Agree between finite T and *there*, [uPerson] on finite T will be valued as [3-Person] and [uCase] on *there* will be as [NOM] as a reflex of agreement. In the end, only [uNumber] on finite T will probe an associate, making an agreement relation between two elements.

Second, Chomsky (2001) proposes that the valuation of unvalued features succeeds only if the probe has a complete set of phi-features, i.e. phi-complete. This means that the probe must have both [uPerson] and [uNumber] and agree with a DP with [uCase] in order to value its [uCase] as a reflex of agreement. On the other hand, Chomsky (2001) argues that if phi-features on a probe are defective, the valuation of [uCase] on a DP cannot take place.

This paper will argue why associates end up being pronounced with default Accusative case, together with two assumptions made by Richards (2008) and Chomsky (2001). Now, consider the derivation of (21), where we omit the irrelevant points to our discussion.

(21)   There are many people in the garden.

(22)
```
              TP
           ___|____
          T        vP
   [uPerson], [uNumber]   |___
              there        v′
         [3-Person], [uCase]  |____
                         v       VP
                               ___|___
                           many people (in the garden)
                        [3-Person], [Pl-Number], [uCase]
```

Recall that *there* bears [3-Person] and [uCase] and is base-generated at Spec-v. After agreement with finite T, its [uCase] is valued as [NOM] and T's [uPerson] as [3-Person].[7] Therefore, finite T becomes defective at this point in the sense that finite T is now phi-incomplete. Finite T subsequently makes a relation to the associate and agrees with it.[8] Consequently, [uNumber] on finite T is valued as [Pl-Number]. This operation accurately captures the inflection appearing on the copula, that is, the third-

person plural form (*are*) in (21). However, finite T only makes an agreement relationship with the associate in number and therefore fails to value its [uCase]. In section 5.2.1, we have proposed that when a noun phrase is shipped to the SM interface with its [uCase] intact, [uCase] itself functions as a command for the SM interface to pronounce it with default case. The associate in (22) lacks any Case specification at the SM interface, expecting that it should be pronounced with default Accusative case under our proposal. This prediction is in fact borne out as the examples we have already discussed so far. Let us see the representative examples here.

(23) a.   There is only me/*I in the garden.   (Sobin (2014: 386))

    b.   There are only us.   (López (2007: 212))

    c. *There's I.   (Schütze (1997: 136))

    d.   Yes, there's certainly her/*she to consider.

                      (Huddleston and Pullum (2002: 462))

Our analysis has made it clear why associates in *there*-constructions appear with default Accusative case. In addition, we have explained how associates in *there*-constructions end up showing up with default Accusative case in a novel way in light of the framework pursued by Chomsky (2000 *et seq*). Moreover, this analysis has no need to stipulate the fixed Case form of the associate before the derivation begins. In fact, this does not cause any look-ahead problem which remains an unresolved issue in Sobin (2014). Our proposal is thus superior to Sobin (2014) with respect to these points.

6. Peculiar Agreement in *There*-Constructions

Before concluding this paper, we will briefly consider the following paradigm with respect to agreement:

(24) a.   There is/was/are cats in the yard.

    b.   There is only me in that picture.

    c. *There am only I in that picture.

    d.   There was/*were only you/them in the garden.

(25) a.   There are only us.   (López (2007: 212))

   b.   There were them and there was us.   (Francez (2006: 1))

   c.   There are only you three left in the competition. (Hall (1965: 18, fn. 12))

(24a) shows an optional agreement between finite T and an associate, especially in number. (24c) might seem to indicate that finite T exhibits no agreement in person. The ungrammaticality of (24c) is correctly deduced from our analysis: T's [uPerson] obtains a value by virtue of Agree with *there*, and thus the first-person form (*am*) never appears. Our analysis correctly expects the grammaticality of (24b). (24d) is, on the other hand, difficult to be accounted for. As noted in Section 5.2.2, [uNumber] on finite T can probe the number-feature on the associate so that it should be possible for finite T's [uNumber] to reflect the associate's number value. Thus, it remains entirely unclear why (24d) is ungrammatical if finite T shows an agreement in number with the associate. The state of affairs is, however, much more complicated because (25) is completely acceptable even though the copula exhibits a full agreement with the associate.

One idea would be that the peculiar agreement in *there*-constructions is caused by a 'virus.' This assumption is adopted by Chomsky (1995) and Sobin (1997). According to Chomsky (1995: 384, fn. 43), the nonagreement, i.e. number-less agreement as in (24a, d), seems superficial and the form of *there's* seems to be a frozen form as in (26).

(26)   There's three books on the table.   (Chomsky (1995: 384, fn. 43))

This argument might be attested by the following data:

(27)   *Is there three books on the table?   (Henry and Cottell (2007: 297))

If *there's* is frozen, *Is* cannot precede *there*, making (27) ungrammatical. However, as (24a) and (24d) clearly represent, the acceptable sentences are not restricted to those with the frozen form, but they allow *there is* and *there was*. Schütze (1999) also reports that (28) is acceptable in a casual speech.

(28) a.   How many calories's there in a Tic Tac?

   b.   'S there any cookies in the cupboard?

(Schütze (1999: 475))

Schütze (1999) thus concludes that the nonagreement is not a 'virus' but is a result of syntactic computation (in this regard, Abe (2018) also adopts Schütze's (1999) conclusion). Henry (2005a, b) and Henry and Cottell (2007) also suggest that some speakers accept the subject-auxiliary inversion as Schütze (1999) reports. Consider (29).

(29) a.   Is there any holes in the bed?

   b.   Is there any white bits?

(Henry (2005b: 1614))

However, Henry (2005a, b) and Henry and Cottell (2007) note that there is a massive speaker variation in the relevant agreement phenomena in *there*-constructions. According to these studies, many intricate factors are involved in the obligatorily or optionality of agreement in *there*-constructions. These issues are thus much more complicated and need to be investigated in depth. However, for reasons of space, we cannot fully discuss these remaining issues and decide whether these peculiar phenomena are completely 'virus-like' or syntax-driven. We leave these intriguing matters for future research.

7. Conclusion

   This paper has examined what Case should appear on associates in *there*-constructions. There have been three major approaches in previous literature: Nominative Case, Partitive Case, and Accusative Case. The first one should be abandoned since the pronominal associate in *there*-constructions is never realized with Nominative Case. As for the second approach pursued by Belletti (1988), Bošković (1997), among others, we have argued for the dispensability of their analyses by showing that (i) there is no semantic correlation between Partitive Case and indefinites in Finnish and (ii) the existence of Partitive Case is not empirically motivated in English. Finally, we have discussed the Accusative Case approach. This analysis is classified into two types: one is a structural Case analysis and the other a default case one. The former, which Maling and Sprouse (1995) assume, faces difficulties to

explain why Nominative Case can show up after the copula in some cases and why a PF adjacency condition does not pertain to *there*-constructions. This paper has argued against Maling and Sprouse's (1995) approach and put forth the default case analysis. Central to our proposal is that [uCase] functions as a command for the default strategy at the SM interface, and associates in *there*-constructions end up appearing with default Accusative case by virtue of it. This analysis can not only overcome the thorny problems posed by the previous literature but also explain why and how Accusative case appears on associates in *there*-constructions without any stipulation.

Notes

[1] This paper generally uses the term 'Case' when referring to the abstract notion of Case. However, we will write 'case' for the morphological notion and distinguish it from Case when the division is relevant to the discussion.

[2] Belletti (1988) argues compellingly that Partitive Case is inherent Case, in the sense of Chomsky (1986). This means that Partitive Case is not assigned structurally by the unaccusative verbs in question. On the other hand, Lasnik (1992, 1995) argues that Partitive Case is inherent Case as Belletti (1988) assumes, but it is structurally licensed in Spec-Agr. We do not go into any detail between two analyses here for reasons of space. See also Abe (2018), who also argues that Partitive Case is structural Case. As will be discussed, we will argue against Partitive Case Approach. Therefore, we do not need to wonder whether Partitive Case is structural Case or not.

[3] Abbreviations used in this paper are as follows: PART = Partitive, NOM = Nominative, uphi/vphi = unvalued phi-feature/valued phi-feature, uNumber = unvalued Number-feature,

uPerson = unvalued Person-feature, Pl = plural.

[4] It has been sporadically argued in the literature that the Case Filter should be eliminated from the theory because there is no direct link between morphological case and DP-licensing (Marantz (1991), McFadden (2004), Sigurðsson (2012), Moritake (2022), among others). Schütze (2001) discusses the more nuanced view of the Case Filter: the Case Filter itself should be vacuous adopting default case, but there is an alternative licensing condition on nominals. It follows from these discussions that the concept of the Case Filter is no longer tenable. In this paper, we assume with these studies that the Case Filter does not rule out any nominal that fails to be assigned Case. This notion is vital to our proposal put forth in Section 5.2.1, where we will argue that DPs with [uCase] can be tolerated at the SM interface. See Bobaljik and Wurmbrand (2009) for a general discussion about abstract Case and morphological case. On the other hand, see Bošković (2007) and Rezac (2013) for the argument for the indispensability of the Case Filter.

[5] See also Schütze (1997) for a similar conclusion reached on independent grounds; more precisely, he discusses the construction like *It is me/I*.

[6] Johnson (1991) and Rezac (2013) note that structural Nominative Case can be assigned to DPs though the PF adjacency condition is violated as in (i) and (ii).

(i)   a.   I knew that probably Gary had left.

      b.   I wonder whether in fact Gary will leave.

(Johnson (1991: 579))

(ii)   a.   Gary probably has left.

      b.   Gary in fact will leave.

(Johnson (1991: 580))

Johnson (1991) argues that Nominative Case assignment succeeds both in (i) and (ii) regardless of whether C or T is a Case assigner. Therefore, Nominative Case would not impose the adjacency condition, in contrast to Accusative Case. But see Johnson (1991) for a radical approach that eliminates the PF adjacency condition entirely.

[7] Chomsky (2001: 16) suggests that [uphi] on functional heads cannot obtain values as a reflex of Agree with *there*. Consider the following derivation:

(i)   a.   We expect there to be a man in the room.

      b.   [$_{CP}$ [$_{TP}$ [$_{v*P}$ v* [$_{VP}$ V [$_{TP}$ there to be a man in the room]]]]]

In (ib), v* bears both [uPerson] and [uNumber]. According to Chomsky (2001), Agree holds between v* and *there* but leaves these unvalued features intact, continuing to search a goal. Finally, v* agrees with *a man*. As a consequence, *a man* obtains structural Accusative Case. Crucial to this analysis underlies in the valuation of [uCase] by a phi-complete functional head, v*. The same strategy applies to the following sentence under Chomsky's (2001) proposal:

(ii) a. There is a man in the room.

   b. [$_{CP}$ [$_{TP}$ T [$_{vP}$ there is a man in the room]]]

In this case, both [uPerson] and [uNumber] on finite T agree with *there* but leave them unvalued. Search then goes to *a man* within VP and Agree holds between finite T and *a man*, resulting in Nominative Case assignment to *a man*. Chomsky's (2001) analysis always predicts that associates in *there*-constructions obtain structural Case as a reflex of agreement since [uPerson] on finite T would not be valued by virtue of Agree with *there* and the complete set of [uphi] will agree with the associate. However, as we have already observed, this is not the case to the extent that the associate never receives structural Case. Therefore, we basically assume with Richards (2008) that [uPerson] will be valued by Agree with *there*. This point will provide a fruitful result as will be discussed below.

[8] We assume with Deal (2009) that the copula is a type of unaccusative verbs and does not constitute a phase. Therefore, agreement between T and the associate succeeds without betraying the phase impenetrability condition (Chomsky (2000)):

(i)   Phase Impenetrability Condition

         In phase α with head H, the domain of H is not accessible to operations outside α, only H and its edge are accessible to such operations.   (Chomsky (2000: 108))

References

Abe, Jun (2018) "How to Probe Expletives," *Studia Linguistica* 72, 76-112.

Belletti, Adriana (1988) "Unaccusatives as Case Assigners," *Linguistic Inquiry* 19, 1-34.

Bobaljik, Jonathan David and Susi Wurmbrand (2009) "Case in GB/Minimalism," *The Oxford Handbook of Case*, ed. by Andrej Malchukov and Andrew Spencer, 44-58, Oxford University Press, Oxford.

Bošković, Željko (1997) *The Syntax of Nonfinite Complementation: An Economy Approach*,

MIT Press, Cambridge, MA.

Bošković, Željko (2007) "On the Locality and Motivation of Move and Agree: An Even More Minimal Theory," *Linguistic Inquiry* 38, 589-644.

Cardinaletti, Anna (1997) "Agreement and Control in Expletive Constructions," *Linguistic Inquiry* 28, 521- 533.

Chomsky, Noam (1981) *Lectures on Government and Binding*, Foris, Dordrecht.

Chomsky, Noam (1986) *Knowledge of Language: Its Nature, Origin, and Use*, Praeger, New York.

Chomsky, Noam (1995) *The Minimalist Program*, MIT Press, Cambridge, MA.

Chomsky, Noam (2000) "Minimalist Inquiries: The framework," *Step by Step: Essays on Minimalist Syntax in honor of Howard Lasnik*, ed. by Roger Martin, David Michaels, and Juan Uriagereka, 89-155, MIT Press, Cambridge, MA.

Chomsky, Noam (2001) "Derivation by Phase," *Ken Hale: A Life in Language*, ed. by Michael Kenstowicz, 1-52, MIT Press, Cambridge, MA.

Collins, Chris (1997) *Local Economy*, MIT Press, Cambridge, MA.

Coopmans, Peter (1989) "Where Stylistic and Syntactic Processes Meet: Locative Inversion in English," *Language* 65, 728-751.

Culicover, Peter, and Robert D. Levine (2001) "Stylistic Inversion in English: A Reconsideration," *Natural Language and Linguistic Theory* 19, 283-310.

Deal, A. Rose (2009) "The Origin and Content of Expletives: Evidence from "Selection"," *Syntax* 12, 285-323.

Epstein, Samuel D. and T. Daniel Seely (2006) *Derivations in Minimalism: Exploring the Elimination of A-Chains and the EPP*, Cambridge University Press, Cambridge.

Francez, Itamur (2006) "Semantic Structure and Agreement Realization in (Mostly Hebrew) Existentials," *Proceedings of Israel Association for Theoretical Linguistics* 22, http://linguistics.huji.ac.il/IATL/22/Francez.pdf

George, Leland and Jaklin Kornfilt (1981) "Finiteness and Boundedness in Turkish," *Binding and Filtering*, ed. by Frank Heny, 105-127, MIT Press, Cambridge, MA.

Hall, Barbara C. (1965) *Subjects and Objects in Modern English*, Doctoral dissertation, MIT.

Hasegawa, Kinsuke (2003) *Seiseibunpoo no Hoho: Eigo Toogoron no Sikumi (The Mechanism*

of Syntax: The System of English Syntax), Kenkyuusha, Tokyo.

Henry, Alison (2005a) "Idiolectal Variation and Syntactic Theory," *Syntax and Variation: Reconciling the Biological and the Social*, ed. by Leonie Cornips and Karen O. Corrigan, 109-122, John Benjamins, Amsterdam/Philadelphia.

Henry, Alison (2005b) "Non-standard Dialects and Linguistic Data," *Lingua* 115, 1599-1617.

Henry, Alison and Siobhan Cottell (2007) "A New Approach to Transitive Expletives: Evidence from Belfast English," *English Language and Linguistics* 11, 279-299.

Hoekstra, Teun and René Mulder (1990) "Unergatives as Copular Verbs," *The Linguistic Review* 7, 1-79.

De Hoop, Helen (1992) *Case Configuration and Noun Phrase Interpretation*, Doctoral dissertation, University of Groningen.

Huddleston, Rodney (1984) *Introduction to the Grammar of English*, Cambridge University Press, Cambridge.

Huddleston, Rodney and Geoffrey K. Pullum (2002) *The Cambridge Grammar of the English Language*, Cambridge University Press, Cambridge.

Johnson, Kyle (1991) "Object Positions," *Natural Language and Linguistic Theory* 9, 577-636.

Lasnik, Howard (1992) "Case and Expletives: Notes toward a Parametric Account," *Linguistic Inquiry* 23, 381-405.

Lasnik, Howard (1995) "Case and Expletives Revisited: On Greed and Other Human Failings," *Linguistic Inquiry* 26, 615-633.

López, Luis (2007) *Locality and the Architecture of Syntactic Dependencies*, Palgrave Macmillan, New York.

Maling, Joan and Rex A. Sprouse (1995) "Structural Case, Specifier-Head Relations, and the Case of Predicate NPs," *Studies in Comparative Germanic Syntax*, ed. by Hubert Haider, Susan Olsen and Sten Vikner, 167-186, Kluwer, Dordrecht.

Marantz, Alec (1991) "Case and Licensing," *ESCOL* 91, 234-253.

McFadden, Thomas (2004) *The Position of Morphological Case in the Derivation: A Study of the Syntax-Morphology Interface*, Doctoral dissertation, University of Pennsylvania.

McFadden, Thomas (2007) "Default Case and the Status of Compound Categories in Distributed Morphology," *Proceedings of the 30th Annual Penn Linguistic Colloquium*, 225-238.

McCloskey, James (1985) "Case, Movement, and Raising in Modern Irish," *WCCFL* 4, 190-205.

Milsark, Gary (1974) *Existential Sentences in English*, Doctoral dissertation, MIT.

Moritake, Nozomi (2022) "The Validity of Default Case and Its Verification," paper presented at the 31st Annual Meeting of the JAELL 31, March 2022.

Moritake, Nozomi (to appear) "Default Case and Chain Interpretation," paper presented at the English Linguistic Society 15th International Spring Forum, May 2022.

Pesetsky, David (1992) *Zero Syntax, Volume 2*, ms. MIT.

Postal, Paul (1974) *On Raising: One Rule of English Grammar and Its Theoretical Implications*, MIT Press, Cambridge, MA.

Rezac, Milan (2013) "Case and Licensing: Evidence from ECM + DOC," *Linguistic Inquiry* 44, 299-319.

Richards, Marc D. (2008) "Quirky Expletives," *Agreement Restrictions*, ed. by Roberta D'Alessandro, Susann Fischer, and Gunner Hrafn Hrafnbjargarson, 181-214, De Gruyter, Mouton.

Rizzi, Luigi and Ur Shlonsky (2006) "Satisfying the Subject Criterion by a Non Subject: English Locative Inversion and Heavy NP Shift," Phases of Interpretation, ed. By Mara Frascarelli, 341-362, Mouton de Gruyter, Berlin/New York.

Sabel, Joachim (2000) "Expletives as Features," *WCCFL* 19, 414-424.

Schütze, Carson (1997) *Infl in Child and Adult Language: Agreement, Case, and Licensing*, Doctoral dissertation, MIT.

Schütze, Carson (1999) "English Expletive Constructions Are Not Infected," *Linguistic Inquiry* 30, 467-484.

Schütze, Carson (2001) "On the Nature of Default Case," *Syntax* 4, 205-238.

Sigurðsson, H. Ármann (2012) "Minimalist C/case," *Linguistic Inquiry* 43, 191-227.

Sobin, Nicholas (1997) "Agreement, Default Rules, and Grammatical Virus," *Linguistic Inquiry* 28, 318-343.

Sobin, Nicholas (2014) "Th/Ex, Agreement, and Case in Expletive Sentences," *Syntax* 17, 385-416.

Stowell, Tim (1981) *Origins of Phrase Structure*, Doctoral dissertation, MIT.

Stowell, Tim (1983) "Subjects across Categories," *The Linguistic Review* 2, 285-312.

Vainikka, Anne and Joan Maling (1996) "Is Partitive Case Inherent or Structural?," *Partitives: Studies on the Syntax and Semantics of Partitive and Related Constructions*, ed. by Jacob Hoeksema, 179-208, Mouton de Gruyter, Berlin/New York.