

# The irrelevance of case for DP movement in English

Mark Newson

*Eötvös Loránd University, Hungary*

## Abstract

A particular view of English case assignment falls out from an assumption within Dependent Case theory that there are only two structural cases: dependent and unmarked. The different forms of DPs do not necessarily indicate different assigned cases, but may be different contextually determined exponents of the same case. From this perspective, it can be argued that English has a neutral case system. Pronouns have contextually determined forms realising one underlying case. As a consequence, standard assumptions about the interaction of case assignment and movement can be questioned. Many assumptions concerning the exceptional status of certain constructions can be dropped in favour of a simpler theory in which case is assigned to DPs in their base positions.

**Keywords:** Dependent Case Theory; case motivated movement; exceptional clauses; DP-licensing

## 1. Introduction

Chomsky and Lasnik (1977) addressed a puzzling issue of the time: if X-bar theory operates with category variables rather than specific category labels, why do nominal phrases distribute as they do? The tale of how Vergnaud's (1977) belated letter suggesting that considerations of grammatical case should replace Chomsky and Lasnik's filters and how this led to the proposal of the Case Filter (Chomsky 1981) has become almost legendary. And thus, the notion of DP licensing was born.

It was Marantz's (1991) contention that the Case Filter, as a DP licensing mechanism, was not based on case. Indeed, as far back as 1985 (Zaenen, Maling and Thráinsson) this assumption had been shown to be problematic. Although in recent years, the notion of DP licensing has held a less central position in the analyses of DP distribution patterns and the idea of long distance Agree has tended to neutralise the idea that DPs move in order to be licensed by case, there does seem to be a reluctance to let go of the idea entirely and one often finds case features being listed in those needed to be checked (see, for example, Chomsky, 2000).

In this paper, I will argue that case assignment in English is always dealt with locally, which for subjects means from within the clauses that immediately contain them, and

therefore it plays no role in licensing the displacement of DPs<sup>1</sup>. This perspective leads to the possibility of reconsidering certain assumptions about the structure of clauses, especially those considered to be ‘exceptional’. These assumptions have grown out of the view that DPs are licensed by non-local case assignors. My claim will be that there is no need to consider any clause structurally exceptional and one can apply a uniform analysis to them all.

These claims are made from assumptions set within Dependent Case theory (DCT – Marantz 1991), introduced in section 2. Section 3 presents an analysis of case assignment in English based on Newson and Szécsényi (2023) in which it is shown that English is a case neutral language, similar to Chinese. In sections 4 and 5, I show that for structures which have been claimed at some point to involve case motivated movement, there is reason to believe that case is assigned to the DP in its base position. Here, that the realisation of an assigned case can be affected by syntactic context comes to the fore and it is shown how it is therefore only apparent that DPs acquire their cases in their landing sites. In section 6, I will offer some rather tentative ideas concerning why, if not for case reasons, DPs move.

## 2. The basics of Dependent Case Theory

Marantz (1991) argued that Case Theory was not about DP distribution but about the distribution of morphological case. He outlined a theory of case assignment based on a disjunctive hierarchy of case types, distinguished in terms of the conditions on their assignment:

- (1) lexically governed case
  - dependent case
  - unmarked case
  - default case

As they are largely irrelevant to our concerns, we will not discuss lexically governed or default case. This leaves the two structural cases: dependent and unmarked.

Marantz described the case assignment process in terms of a waiting list on which eligible DPs are put. Once case is assigned to one of them, it drops off the list and the rest are evaluated in the next round of assignment. The assignment of dependent case is prior to that of unmarked case and is dependent on there being at least two DPs on the list. Unmarked case is assigned to any DP left on the list after the previous rounds of case assignment have taken place.

This theory enables an understanding of certain case systems apparent in different languages. Marantz concentrated on accusative and ergative systems. The difference between these is a matter of which of two DPs on the list is selected for dependent case assignment. Suppose it contains a subject and an object. If dependent case is assigned to the object, this will drop off the list leaving the subject to receive unmarked case. The assigned cases will be

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<sup>1</sup> I do not go so far as claiming that case assignment and movement never interact in any language. Baker (2015) provides numerous instances in which the displacement of a DP can affect the assignment of case to that, or indeed other DPs. I do maintain, however, that even in these cases, the case effects are the result of the movement rather than its cause.

the opposite if the subject is selected for dependent case. Why this produces different case systems can be seen by considering what happens in intransitive contexts. Here there is only one DP on the list from the beginning and hence only unmarked case can be assigned to it. This means that the subject of both intransitive and transitive constructions will be assigned unmarked case when the object is assigned dependent case, while the subject of the intransitive and the object will be assigned unmarked case if the subject of the transitive gets dependent case. Clearly, this describes accusative and ergative systems:

(2)	<b>Accusative</b>	<b>Ergative</b>
	Subj <sub>unmarked</sub> ...	Subj <sub>unmarked</sub>
	Subj <sub>unmarked</sub> ... Obj <sub>dependent</sub>	Subj <sub>dependent</sub> ... Obj <sub>unmarked</sub>

Baker (2015) extended Marantz's proposals in a number of ways. He suggested two further possibilities for the assignment of dependent case. In one of these, dependent case is assigned to neither eligible DP, in which case unmarked case is assigned to them all resulting in a neutral case system. The other involves assigning dependent case to both DPs, in which case a tripartite system emerges.

A second development proposed by Baker concerns how items are included on the list. For Marantz, listed DPs were those assigned case by related heads. He assumed that dependent case was assigned by the unified verb and inflection, thus allowing it to be assigned to either the subject or the object. Baker proposed a complete break from the standard 'head assignment' assumption, and claimed case is assigned over constructions which he termed domains. This allowed him to extend the principles of dependent case assignment to constructions other than the clause, resulting in a more general theory.

Case domains not only determine which DPs are on the list, but they also allow different cases to be identified as dependent and unmarked for different constructions. For Marantz, only accusative and ergative are dependent, i.e. cases assigned at the clause level. But Baker, through assuming that there is a case domain within the DP, could explain why some languages can have ergative (dependent) and others have nominative (unmarked) possessors. He also extended the notion to VPs claiming that these too could be domains in which dependent (dative in Sakha) and unmarked (partitive in Finish) can be assigned.

Baker based his notion of a case domain on the Spell-out domain of phase theory (Chomsky 2001). Case is assigned at Spell-out and thus all and only those DPs being spelled-out are considered. So, the standard Spell-out domains (TP, nP and VP - complements of phase heads C, D and v) are case domains.

A problem arises, however, from Baker's claim that VPs are case domains, even though he offers some evidence to support this. For example, in Sakha, the definite object is external to the VP and accusative while the indefinite remains inside the VP and is unmarked. If the VP is a separate domain, the indefinite object is in a different domain to the subject and subsequently only eligible for unmarked case. The definite object is in the same domain as the subject and hence able to be assigned dependent case. However, for other languages where subjects and objects interact but for which there is little reason to believe that objects move out of the VP, it must be the case that its domain status is somehow evaded. For this, Baker

proposes the notion of a ‘soft domain’: a domain for which some of its contained DPs remain active even after Spell-out. This is not a particularly elegant solution and it raises issues which destabilise the assumption that the principles of case assignment are limited by the same restrictions placed on other syntactic processes. We will see that, for English at least, this problem can be avoided.

### 3. A simplification

Both Marantz and Baker take a traditional view concerning the nature of case: case is a feature whose values range over tokens such as ‘nominative’, ‘accusative’, ‘dative’, etc. From this perspective, the notions ‘dependent’ and ‘unmarked’ merely name types which actual case values fall into. However, DCT, if paired with a late insertion approach, à la Distributed Morphology (Halle and Marantz, 1993), allows for a more radical view. In this, dependent and unmarked are the values of the case feature and the different forms that we call ‘nominative’, ‘accusative’, etc. are contextually determined exponents of these values. I will demonstrate below that this latter view offers a substantial simplification.

In this demonstration, I will refer to the analysis of the alternation between nominative and dative case (forms) in Hungarian proposed by Newson and Szécsényi (2020). This paper argued that nominative case and some uses of dative case are unmarked in the language. As is typical of accusative languages, the subject of the finite clause is nominative, realised as a null morpheme, in both transitive and intransitive contexts:

- (3) a. *Péter-Ø el-olvas-t-a a könyv-et.*  
 Peter-NOM away-read-PAST-3S. the book-ACC  
 ‘Peter read the book.’
- b. *Péter-Ø alud-t-Ø.*  
 Peter-NOM sleep-PAST-3S.  
 ‘Peter slept.’

However, Hungarian has an inflected infinitive for which the subject, in both transitive and intransitive contexts, is dative:

- (4) a. *Nem szabad Péter-nek olvas-ni-a a könyv-et.*  
 not allowed Peter-DAT read-INF-3S. the book-ACC  
 ‘Peter is not allowed to read the book.’
- b. *Nem szabad Péter-nek alud-ni-a.*  
 not allowed Peter-DAT sleep-INF-3S.  
 ‘Peter is not allowed to sleep.’

The dative case used here cannot be analysed as a lexically governed case as it is no more semantically restricted than the nominative subject of the finite clause. Indeed, its equivalence to the nominative subject leads straightforwardly to the conclusion that it is an unmarked case. Newson and Szécsényi extend this analysis to cover the well known facts about Hungarian possessive DPs (Szabolcsi, 1983), where the possessor can either be nominative or

dative, depending on its position within the DP: nominative if lower than the determiner and dative if higher, as shown in (5).

- (5) a. *az én / Péter-Ø kutyá-m/-ja*  
           the 1S.NOM Peter-NOM dog-1S./-3S.  
           ‘my/Peter’s dog’
- b. *nekem / Péter-nek a kutyá-m/-ja*  
           1S.DAT Peter-DAT the dog-1S./-3S.  
           ‘my/Peter’s dog’

If there are two unmarked cases in the language, Newson and Szécsényi argue, then there must be two domains which they are the unmarked cases of. Assuming that case domains are Spell-out domains, it follows that there must be two different phase heads involved in these constructions: one which introduces the unmarked nominative domain and the other introducing the unmarked dative domain. The same agreement morpheme, differing from finite agreement, appears in both the inflected infinitive and the possessive DP, which Newson and Szécsényi call non-finite agreement (AgrN). They claim this to be the phase head introducing the unmarked dative domain<sup>2</sup>. The standard phase heads C and D introduce the unmarked nominative domain.

Clearly, the assumption of an extra phase head adds complexity to the theory and given that the effects of this particular phase head are detectable only in terms of case phenomena, it is not independently justified. But the argument that there must be two different case domains assumes that nominative and dative are two different cases. Under the assumptions discussed above, however, there is only one case at play here: unmarked, though its realisation differs, depending on its context. If true, we need only assume one type of domain, introduced by the standard phase heads, C and D, with unmarked case assigned to the subject and possessor of both. We then add the following realisation rule for the unmarked case morpheme<sup>3</sup>:

- (6)  $\text{Case}_{[\text{unmarked}]} \Leftrightarrow \begin{matrix} \emptyset & / & \text{C/D} \\ \text{nVk} & \text{elsewhere} \end{matrix}$

This rule states that the case feature valued ‘unmarked’ is realised by the null morpheme (=nominative) in the local context of a preceding C or D and as ‘nek/nak’ (=dative) in all other contexts. This is where we see the true nature of AgrN, as its presence does not define a separate domain, but a distinct context blocking the application of the first condition and allowing the elsewhere form to emerge.

As can be seen from the above, the effects of the suggested simplification are fairly broad ranging. It not only reduces the number of structural cases the system operates with but a

<sup>2</sup> Due to the appearance of unmarked dative in other constructions which do not involve AgrN, Newson and Szécsényi conclude that the unmarked nominative domain is defined as that introduced by C and D and the unmarked dative domain is defined as ‘elsewhere’.

<sup>3</sup> As with most Hungarian morphemes, the vowel of the dative morpheme is harmonic with the vowels of the stem.

substantial and positive simplification can be made in terms of the definition of domains and the phase heads required.

#### 4. English accusative

English is typically assumed to be an accusative language, judging from the forms most of its pronouns take in different contexts. We find ‘nominative’ pronouns (*I, we, he, she, they*) in subject positions of finite clauses and ‘accusative’ (*me, us, him, her, them*) in object position. It is striking that this assumption about the case system of the language is based on the behaviour of five words. All of the other nominals in the language do not show this pattern, but rather demonstrate a neutral system in which the same form emerges in all contexts.

Newson (2019) argued that accusative on the subject of the English acc-ing gerund (7a) must be an unmarked case, given that there is no other nominal element within its domain to license the assignment of a dependent case. Newson and Szécsényi (2023) extend this claim to *for*-clauses and small clauses for exactly the same reason. Both of these can appear in subject position and in that configuration, there can be no external DP to license dependent case on the subjects of these clauses:

- (7) a. Him playing fair was unexpected.  
 b. For them to succeed would please the supporters.  
 c. Them disappointed would be upsetting.

Indeed, the only time an accusative form realises dependent case seems to be in object position and then only when the object is one of the five pronouns which has such a form. The fact that this form realises unmarked case in significantly more contexts raises the question of whether it is ever really used to realise anything else.

If English is an accusative language and dependent case is assigned to the object, then it must be a language with a ‘soft’ VP domain, as there is little reason to believe that the object moves out of the VP. As discussed above, Baker’s notion of ‘soft domains’ is problematic and it would be better avoided if possible. Fortunately, there is an assumption that enables us to avoid claiming that the English VP is soft and which unifies all the uses of the accusative pronouns as the realisation of a single case. If we simply assume that the English VP is a case domain, then it follows that the object can only be assigned unmarked case. Therefore, accusative pronouns only ever realise unmarked case and, indeed, there is no dependent case assigned in the language at all, as is indicated by most of its nominal elements<sup>4</sup>.

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<sup>4</sup> A reviewer points out that under these assumptions English has smaller spell-out domains than accusative languages as for these the VP is not a case domain and wonders if there is any empirical evidence for this. Unfortunately, this is a problem facing Baker’s suggestion that case domains and spell-out domains coincide as, as far as I am aware, there is no reason to think that VP is ‘soft’ with respect to other phenomena, such as movement or long distance agreement. It is unlikely, therefore, that we will detect any difference between English and accusative languages in this respect.

The realisation of case in English is therefore very simple. Unmarked case, in the vast majority of instances, is realised as a null morpheme. For the five pronouns which have context dependent realisations, the ‘nominative’ form is restricted to finite clause subject position and, like the ‘dative’ in Hungarian, the ‘accusative’ form is used elsewhere. Thus, we have the following realisation rules:

(8)	1pl.	⇔	<i>we</i>	/	C <sub>FIN</sub> –
		⇔	<i>us</i>		elsewhere
	1	⇔	<i>I</i>	/	C <sub>FIN</sub> –
		⇔	<i>me</i>		elsewhere
	3pl.	⇔	<i>they</i>	/	C <sub>FIN</sub> –
		⇔	<i>them</i>		elsewhere
	masc.	⇔	<i>he</i>	/	C <sub>FIN</sub> –
		⇔	<i>him</i>		elsewhere
	fem.	⇔	<i>she</i>	/	C <sub>FIN</sub> –
		⇔	<i>her</i>		elsewhere
	3	⇔	<i>it</i>		
	2	⇔	<i>you</i>		
	Case <sub>[unmarked]</sub>	⇔	∅		

## 5. DP movement contexts

With the above analysis in place, we can now turn our attention to contexts in which DPs move and which have in the past been claimed to be case motivated. We will consider three movements: the passive movement, raising to object and raising to subject:

- (9) a. [<sub>CP</sub> C [<sub>TP</sub> They may be [<sub>VP</sub> follow-ed [<sub>VP</sub> ~~follow~~ ~~they~~]]]].  
 b. The magistrate believed them (unwisely) [~~them~~ to be honest].  
 c. [<sub>CP</sub> C [<sub>TP</sub> They seemed [~~they~~ to be honest]]].

Each of these constructions has at some point in the past been claimed to involve case motivated movement and central to that claim is the assumption that case is assigned to the DP after it moves. It is my contention that in each of these the simpler assumption is that case is assigned to the DP in its base position. One of the main reasons to assume that case is assigned after movement is that a pronoun takes the form appropriate to its landing site. But the form a pronoun takes is irrelevant to the issue of case assignment as this is determined post syntactically on a contextual basis and so this argument is undermined.

The issue is not only a matter of case assignment, however. The movements themselves have led to assumptions about the exceptional status of what would have been Spell-out domains in other constructions. This impacts on case assignment under Baker’s claim that case domains are Spell-out domains. If VP in the passive and the TPs in raising constructions are not Spell-out domains, then they are not case domains either and case will not be assigned until the next phase head is merged into the structure. This will be after the relevant movement and hence case will be assigned to the DP in its landing position. My claim for simplicity will rest on the argument that there is no need to assume an exceptional status for

these phrases. If this is so, then case will be assigned before the movement takes place and it will therefore play no role in any aspect of the movement itself.

Let us start with the passive. The standard ‘GB’ approach to this was to claim that the object position is caseless due to the passivised verb losing its ability to assign accusative case. Therefore, in order to satisfy the Case Filter, the object moves to the subject position where it will be assigned the case relevant to this position. Later descendants of this approach claimed that the accusative case was the responsibility of the little *v* head which introduces the external argument. In the passive, this head is absent and hence the accusative case also goes missing. While it is not typically assumed that there is no Voice head in the passive, the passive morpheme being its realisation, this element cannot be assumed to assign case and its status as a phase head might also be questioned.

From the present perspective, the question of whether the Voice head in the passive construction assigns case or not is not a meaningful one. In a strict interpretation of DCT principles, no head assigns case. The issue of whether it is a phase head is relevant however, as this impinges on the status of the VP as a case domain. There are a number of ways in which it can be maintained that the passive *v* is a phase head without any problems for the movement. One would be to suppose that the object makes use of its specifier position as an escape hatch. This might run into problems concerning the motivation for this movement, under the assumption that movements involve the checking/valuation of some feature. This would be especially so as it does not appear that the passive *v* always requires a DP to move through its specifier<sup>5</sup>:

- (10) It was [<sub>VP</sub> – thought [<sub>CP</sub> that no one knew]].

A second possibility that would not require movement through the specifier of the vP would be to adopt a weaker version of the Phase Impenetrability Condition (PIC), as suggested in Chomsky (2001). Under this assumption, elements within a Spell-out domain do not become immediately inaccessible after Spell-out but can be accessed until the next phase head is merged. This would avoid the assumption that the passive *v* is exceptional at the same time as allowing the object to move directly into the subject position. Under these assumptions, the VP is still a Spell-out domain and therefore a case domain. It would be more complicated to prevent case from being assigned within the VP and pointless to claim that it is

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<sup>5</sup> A reviewer suggests that it might be possible for the pleonastic subject to raise from a position inside the vP, perhaps object, to subject position and thus making use of the vP specifier. This is currently not an assumption that is normally made and typically the clausal complement is assumed to be in this position, thus excluding the pleonastic element from originating there. Early generative analyses, however, often assumed that clausal arguments were inside a nominal phrase, the head of which could be realised by *it*. The underlying assumptions which led to this proposal have largely been abandoned and it is no longer felt necessary to adopt it. Empirically, the suggestion rests on the status of examples such as:

(i) I never thought it that everyone knew.

To my ear, this sounds very marginal and the clause seems to have the status of an epenthetic element rather than that of an argument. Thus, there is little to support the idea that pleonastic subjects raise from within the vP.



assigned in both positions. As there are independent reasons for adopting the weak PIC (Chomsky, 2001), I claim that this is the preferred analysis.

Next, we consider raising to object. The analysis of this construction has undergone development since the standard GB approach. Originally, the DP subject of the infinitival clause was said to be case marked in situ and this required assumptions about the status of the clause. The general approach took this case assignment to be exceptional, given that verbs do not normally assign case into their clausal complements. Hence, ‘exceptional’ clauses were claimed to be IPs rather than the usual CP. Subsequent work, based on observations originally made in Postal (1974), claimed that the subject raises to object position, where its case requirements are satisfied (Lasnik, 1995). This still requires an exceptional status for the infinitival clause to allow for the movement. More recently, this movement has been argued to be optional (Lasnik 2001; den Dikken 2018). This means that the movement is not required for case purposes; the DP, even when unmoved, is still assigned case. We can therefore be confident that it is possible to assign case to the subject of the infinitive before it moves, even in cases where it does move.

However, even if we can conclude that it is possible to assign case to the exceptional subject before it moves, it is still not demonstrated that case assignment must be made prior to movement due to the assumed exceptional categorial status of this clause. If there is no complementiser, then the clause is not a case domain, and case will only be assigned once the next phase head, the little *v* of the higher clause, is merged into the structure. As this is subsequent to any movement of the subject, it follows that the subject will get its case in its landing site. Therefore, although the movement may not be essential for case assignment, it is still possible that case and movement interact. We therefore need to examine the claims for the exceptional status of this clause.

In many ways, the claim for the exceptional status of exceptional clauses is similar to those made about the passive VP discussed in the previous section. They originate in assumptions about case assignment and movement, many of which are no longer relevant. As argued for the passive VP, it would be simpler not to have to assume a special status for these clauses if there is no longer any need for it. There certainly is no need for this assumption from the perspective of the current theory of case assignment. Furthermore, under the adoption of the weak PIC suggested in the previous discussion, there is no need to assume exceptional clauses not to be CPs either, as movement to object position should be possible out of a CP. Again, I argue that a simpler analysis follows if we reject the exceptional status of these clauses, thereby favouring the analysis in which case is assigned prior to the movement.

Finally, we turn our attention to raising to subject constructions. As we argued, the fact that a raised pronoun subject has a form consistent with the position it moves to is no indication of where it was assigned case. The relevant questions are whether case could have been assigned before the movement and what structural conditions must hold in order for this to happen. Given that the simplest analysis of the other cases we have discussed involves case being assigned before movement, there is some reason to believe that the same will be so for raising to subject. Once again, however, standard assumptions would not favour this analysis. The original observation, mainly based on English data, was that raising is only possible out of non-finite clauses. Raising out of a finite clause is impossible:

- (11) a. They seem [~~they~~ to be harmless].  
 b. \*They seem [~~they~~ are harmless].

It was therefore assumed that there must be something exceptional about these non-finite clauses to allow the movement and hence they were claimed to lack the CP layer. Note that the raised DP must also escape the higher VP. The absence of an agentive little *v* goes some way in accounting for this, but the situation is similar to that of the passive discussed above.

Some pause for thought is suggested, though, by the observation that raising out of finite clauses is possible in some languages, e.g. Brazilian Portuguese (Ferreira, 2000), Zulu (Halpert, 2019) and Mongolian (Fong, 2019). While there have been numerous responses to these observations which try to square them with current assumptions (see Zyman, 2023, for a detailed review), it is in principle possible that the original assumption that infinitives are exceptional in English for allowing raising was misdirected and the question should have been: what is exceptional about English finite clauses that they prevent raising? Pertinent to this is Halpert's (2019) observation that in Zulu while raising from finite clauses is possible, it is prevented from non-finite clauses. Such observations suggest that it is not necessary to assume an exceptional status for the infinitive from which raising takes place. Though I will not attempt to argue in favour of one of the approaches which seek to account for raising out of CP, I will be satisfied with the fact that assuming a non-exceptional status for English raising constructions provides us with a uniform, and thereby simpler, analysis of case assignment in which case is always assigned prior to movement.

To conclude this section, I have argued that the theory of case assignment adopted here removes the main motivation for assuming late case assignment in the constructions we have discussed. Moreover, a simpler analysis follows in which supposed exceptional statuses for certain constructions can be done away with by assuming early case assignment. This all leads to the conclusion that case has no role in movement in English.

## 6. So why do DPs move?

In this final section, I will briefly consider why DPs move, if not for reasons of case. While I am not able to provide anywhere near a full answer to this question, I believe there is enough evidence to conclude that the assumption that there is a licensing requirement on DPs, following from the original Case Filter approach, is incorrect.

Consider the following observations:

- (12) a. It is likely [(that) they will win].  
 b. [\*(That) they will win] is likely.  
 c. [\*(For) them to win] is likely.  
 d. They are likely [~~they~~ to win].
- (13) a. It seems [ [that they won] has been confirmed]].  
 b. [ That they won] seems [[~~that they won~~ to have been confirmed]  
 c. \*It seems [ [that they won] to have been confirmed].

- (14) a. I believe [(that) they will win].  
 b. I believe [them to have won].  
 c. I believe them [~~them~~ to have won].
- (15) a. I consider them [~~them~~ mad].  
 b. \*I consider [them mad].

It is generally assumed that movement, as opposed to long distance agreement, involves the checking of a specific feature (sometimes termed the EPP feature). One incarnation of this, which tied the idea to DP-licensing, was that for DP movement contexts, the feature involved is a ‘D’ feature on the tense head which would be checked by the DP moving to subject position (Chomsky 1995). The fact that clauses can act as subjects (12), however, suggests that whatever lies behind the original EPP requirement (that clauses must have subjects), is not dependent on the specific category of the subject. Indeed, this suggests that the licensing involved here is not that of the subject, but rather the clause that it is subject of.

If we take this perspective, we can observe that different clauses are licensed by different subjects. Finite clauses are licensed by both DP and CP (but only those with an overt complementiser). Certain non-finite clauses, however, cannot be licensed by an overt subject, be it DP or CP, as shown in (13c). This cannot be accounted for by the standard case-based view of raising, which has nothing to say about the distribution of clauses.

The contrast between (14) and (15) suggests that different conditions hold of licensing requirements in the VP. If we assume that it is not just clauses that require licensing, we can account for a difference in raising to object, noted by Hong and Lasnik (2010) and supported by den Dikken (2018), concerning infinitives and small clauses. In a raising to object context, the subject of a small clause must raise, contrasting with the optional raising from the subject of the infinitive. One possible way to account for this is to assume that the movement serves to satisfy some licensing requirement of the VP in a similar way to how the licensing requirement of clauses results in movement to subject position. The optionality of the movement with infinitives falls out from the assumption that both DP and CP can act as licensors and so the VP is licensed by its clausal complement when movement does not take place and by the DP when it does. The obligatory movement out of the small clause indicates that small clauses cannot act as licensors. Note that small clauses can, to a limited extent, license clauses and as such they behave like other clauses:

- (16) a. [Workers angry about pay] is what the management were trying to avoid.  
 b. \*It seems [ [workers angry about pay] to be what the management were trying to avoid].  
 c. [Workers angry about pay] seems [ – to be what the management were trying to avoid].

Obviously, this is a very different perspective from the standard point of view and one which is barely worked out. But it does, at first glance, appear to have merit. Given that our understanding of licensing from a standard ‘EPP’ feature approach is not particularly advanced, it may well be worth exploring the kind of licensing outlined here, even if only to come to a better realisation of what licensing is not about.

## 7. Conclusion

If it is true that English is a neutral case language and the forms of its pronouns are merely contextually determined realisation of a single underlying case, then most of the arguments that have led to the assumption of the exceptional status of certain VPs and clauses are undermined. An analysis in which such exceptions can be avoided is simpler and therefore preferable. I have argued that a simpler analysis is possible without adding complexity elsewhere which is not otherwise motivated. As a consequence, there is no reason to assume that case is not assigned to DPs in their base positions and this is therefore the null hypothesis. This does raise the question, however, of why movements take place if not to satisfy some requirement of DPs. Although I have no fully developed answer to this, I have indicated that there is reason to believe that whatever it is that lies behind the relevant movements, it is not specific to DP, as CP and other constructions are subject to it, and therefore it is not the licensing of the phrases that undergo the movements that is involved, but rather that of the constructions containing the landing site of the movement. I have pointed out that different constructions, clauses and VPs, appear to be licensed by different elements and this assumption offers some explanation of why certain movements are optional and others obligatory.

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