

# Perfect Dependent Case<sup>1</sup>

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## 1. Introduction

There is an ongoing debate in the theoretical literature about the status of Case in the grammar. While some approaches argue that Case is a syntactic primitive and consequently plays a crucial role in the narrow syntax (Chomsky and Lasnik 1977 and subsequent work), a growing body of work argues that Case is a morphological reflex of a syntactic structure (Marantz 1991 and subsequent work).<sup>2</sup> Crucially, irrespective of the actual modality of Case, these approaches tend to analyze Accusative case (ACC) as a dependent Case. Dependent can mean either that ACC is dependent on another argument, as in Burzio (1986),<sup>3</sup> or it is dependent on a chain assigning Nominative case (NOM) to another argument (Marantz 1991).<sup>4</sup> In both approaches, ACC is the result of a grammatical competition. The Minimalist Program (Chomsky 2001, 2005, 2008) seems to be an exception to these approaches as, in this system, abstract Case is assigned by functional heads. Precisely, ACC is assigned by  $v^*$ .<sup>5</sup> Whether or not  $v^*$  assigns ACC depends on whether or

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<sup>2</sup> Baker and Vinokurova (2010) provide an interesting argument that these two modalities are not a theoretical construct but instead have empirical counterparts, even within one language.

<sup>3</sup> More precisely, a  $\theta$ -role.

<sup>4</sup> More precisely, not governed by a lexical case assigner.

<sup>5</sup> What exactly assigns ACC is subject to continuous debate. For example, according to Lavine and Freidin (2002), ACC is assigned by phi-features on  $v$ . For many authors, ACC

not  $v^*$  is a strong phase.<sup>6</sup> Once we look closely at the system, however, a different picture emerges: even though the Minimalist Program does not seem to employ a competition view of ACC as a dependent case, at its core, it is a look-ahead system, in that whether or not ACC is assigned depends on the presence or absence of another argument (typically assigned NOM). Thus, though the dependency on another argument is not explicitly declared, it is inherent to the system. The role of dependency becomes apparent as soon as the case-assignment system gets clearly spelled-out, as, for example, in recent work by Sigurdsson (2006, 2010).

This paper attempts to challenge the view of ACC as a dependent Case by examining a certain syntactic pattern attested in Slavic languages (Polish, Ukrainian, and Northern Russian) in which ACC may appear in the absence of a NOM-marked argument or an external argument, thus questioning the very empirical core of the dependency view of Case. I will argue that the dependency view of Case is untenable and should be replaced with an alternative stated in terms of structure-dependency; precisely, in terms of phasehood (Chomsky 2005, 2008). Consequently, the paper touches upon more general questions of the role of Case in syntax and the nature of Spell-out domains.

The paper is organized as follows. First, I present data from Polish and Ukrainian, showing why they pose a challenge to the dependency view of Case. Then, I investigate the syntax and semantics of the relevant construction and argue that the construction in question is a type of *have-Perfect* with an optionally demoted external argument. Finally, I will show how this analysis relates to the more general question of Case assignment. Concretely, in order to account for the data, I will propose a Spell-out-based system of Case assignment.

## 2. Puzzle

Eastern Slavic languages (Polish, Ukrainian, and North Russian dialects) have a range of constructions that share some, but not necessarily all, properties of the English canonical passive. An especially interesting

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is related to telicity or aspect. Concretely, ACC is assigned by a telic  $v$  head (Babko-Malaya 2003, Borer 1994, 2005, van Hout 2000, 2004, Kiparsky 1998, Kratzer 2004, Pereltsvaig 2000, Ramchand 1997, Richardson 2007, Svenonius 2002, among others).

<sup>6</sup> But see Legate (2003) for an alternate view.

construction is the so-called *-no/-to* construction (henceforth NT), as exemplified in (1)–(2).

(1) *Polish:*

- a. Pies był/został zabity przez samochód.  
dog.M.SG.NOM was/stayed.M.SG killed. M.SG by car  
'A dog was killed by a car.' *canonical passive*
- b. Psa zabito.  
dog.M.SG.NOM killed.N.SG  
'A/The dog was killed.' *NT*

(2) *Ukrainian:*

- a. Žinky byly vbyty  
woman.NOM.F.PL were.F.PL. killed.F.PL  
'(The) women were killed.' *canonical passive*
- b. Žinok bulo vbyto  
woman.ACC.F.PL was.N.SG. killed.N.SG.  
'(The) women were killed.' *NT*

On the surface, NT resembles the canonical passive in that it does not have an overt external argument and the surface form of the main verb is identical to the passive participle form.<sup>7</sup> Yet, there are striking differences between the canonical passive and NT. The differences are of two different kinds: first, there are differences in the morpho-syntactic properties of the constructions (Case marking, agreement, Tense marking); and second, there are differences in the semantic interpretation of the constructions (temporal interpretation, information structure). I exemplify the individual differences below in examples from Polish.

(i) The internal argument in NT is realized as ACC instead of NOM in an apparent violation of Burzio's generalization, as seen in (3).

- (3) a. Psa zabito.  
dog.M.SG.ACC killed.N.SG  
'A/The dog was killed.'
- b. \*Pies zabito.  
dog.NOM.M.SG killed.N.SG

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<sup>7</sup> Except for the inflectional ending, as we'll see later.

Evidence suggesting that the external argument is syntactically absent comes from the fact that NT can be formed by unaccusatives, raising verbs (Maling and Sigurjónsdóttir, 2002, p. 104, (11)) and modal verbs (Migdalski, 2006, p. 145, (61a)).

- (4) a. Balon rozerwano.  
 balloon.ACC pierced.N.SG.PP  
 ‘The balloon was pierced.’ *unaccusative*
- b. Zdawano się nas nie zauważać.  
 seem.IMP REFL us not notice.INF  
 ‘They seemed not to be noticing us.’ *raising*
- c. Musiano to wykonać, bo zbliżał się termin.  
 must.NT this do.INF because approached REFL deadline  
 ‘(They) had to do this, because the deadline was approaching.’  
*modal*

Note that the ACC marker behaves as a morphological reflex of a structural, not of a lexically-governed case. For instance, if the nominal argument of NT appears in the scope of a sentential negation, the ACC morphology is obligatorily converted to GEN, which is the usual pattern for structural ACC in this group of Slavic languages. The relevant data are given in (5).

- (5) a. Kobietę zabito.  
 woman.ACC killed  
 ‘A woman was killed.’ ✓ *POS+ACC*
- b. \*Kobietę/Kobiety nie zabito.  
 woman.ACC/woman.GEN not killed  
 ‘A woman was not killed.’ \**NEG+ACC*

(ii) Even though the main verb is in a non-finite form, there is no overt Tense marking in the clause, which is rather unusual in Polish and impossible in the canonical passive.

- (6) a. Kobieta była/została zabita.  
 woman.NOM was/stayed killed  
 ‘The/\*A woman was killed.’ *canonical passive*

b. Kobietę (\*było) zabito.  
woman.ACC (\*was) killed  
'A woman was killed.'

NT

(iii) There is no verbal element in the construction that can agree with the internal argument (or any other element in the structure). The agreement is always N.SG; in other words, the default verb agreement attested with weather predicates, i.e., predicates lacking an external argument.

(7) Psa zabito/\*zabity.  
dog.M.SG.ACC killed.N.SG/killed.M.SG  
'A/The dog was killed.'

✓DEFAULT/\*AGR

(iv) Even though there is no overt temporal marking, the construction is compatible only with one temporal interpretation, namely, the Past tense. The Future or Present tense interpretation is excluded. No restrictions on temporal interpretation are attested with the canonical passive.

(8) Samochód jest/był/będzie malowany.  
car.NOM is/was/will-be painted  
'The car is/was/will be painted.'

*canonical passive: any tense*

(9) \*Teraz/✓wczoraj/\*jutro opisano problem.  
now/yesterday/tomorrow described.N.SG problem.M.SG.ACC  
'The problem was described/ they described the problem yesterday.'

*\*Present/✓Past/\*Future*

(v) While the internal argument in the canonical passive tends to be interpreted as given, there is no restriction on the information-structure properties of the internal argument in NT. As can be seen in (10), the internal argument can be interpreted as focus. The contrast between givenness and focus in the following examples is exemplified using the definite and indefinite English articles, respectively.

(10) a. Kobietę zabito.  
woman.ACC killed  
'A woman was killed.'

NT ~ FOCUS

b. Kobieta była/została zabita.  
 woman.NOM was/stayed killed  
 ‘The/\*A woman was killed.’ *canonical passive ~ GIVEN*

Ukrainian and North Russian dialects<sup>8</sup> differ from Polish in that their version of NT has an optional finite auxiliary.<sup>9</sup> When we consider NT with an overt auxiliary, further differences between NT and the canonical passive emerge.

(vi) Interestingly, even if there is an inflected auxiliary in the structure, the Tense interpretation is still restricted. Only the past tense and the future tense interpretation are possible. The Present tense interpretation is always excluded. The following example (11) is from Ukrainian.

(11) Presidenta bulo/\*jest/bude vbyto  
 president.ACC was/is/will-be killed  
 ‘The president was/will be killed.’ *✓Past/\*Present/✓Future*

If there is no overt auxiliary, as in the Ukrainian example (12), Ukrainian and North Russian behave exactly like Polish: the NT structure is obligatorily interpreted as Past tense (Nedashkivska Adams, 1998).

(12) Žinky vbyto.  
 woman.ACC.F.SG killed.N.SG.  
 ‘A woman was/(*\*is*)/(*\*will be*) killed.’

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<sup>8</sup> This is true about one variety of Northern Russian NT. Northern Russian dialects have several distinct constructions related to NT. See Kuz'mina and Nemčenko (1971) for a detailed descriptive overview.

<sup>9</sup> It has been reported in the literature that Polish NT may contain a covert external argument, while Ukrainian never does (Sobin, 1985; Maling, 1993; Lavine, 2000; Maling and Sigurjónsdóttir, 2002; Maling, 2006, among others). I leave the issue of a possible covert argument aside for two reasons. First, even if a covert external argument is sometimes possible in Polish, it cannot be the source of the ACC marking on the internal argument as there are constructions that do not have an external argument (for instance, unaccusatives, modals and raising verbs). Yet, based on these predicates, NT still has the relevant case-marking properties. Second, I am not convinced that the generalization about the difference between Polish and Ukrainian is empirically correct. Kit (2012) reports that with certain verbs in Ukrainian, external-agent-like binding is also attested.

The NT construction has attracted a significant amount of attention in the literature (Sobin, 1985; Borsley, 1988; Maling, 1993; Billings and Maling, 1995; Nedashkivska Adams, 1998; Lavine, 2000, 2005, 2010a; Maling and Sigurjónsdóttir, 2002; Blevins, 2003; Danylenko, 2006; Kibort, 2008, among others). Crucially, most of the existing literature concentrates on the apparent violation of Burzio's generalization (Burzio, 1986). Consequently, most of the literature concentrates on the ACC case assignment and the lack of agreement. As far as I know, none of the existing analyses account for all the basic properties of the construction (partially, because they do not address these properties). The majority of the work agrees that NT is some form of an impersonal passive (Sobin, 1985; Borsley, 1988; Billings and Maling, 1995; Nedashkivska Adams, 1998; Blevins, 2003; Kibort, 2008; Lavine and Freidin, 2002; Lavine, 2005, 2010b, among many others). Some authors argue that the Polish version of the construction is in fact active and that the passive morphology is a morphological 'accident'.<sup>10</sup> Under these accounts, the apparent passive morpheme is analyzed as an incorporated auxiliary (Maling, 1993, 2006; Maling and Sigurjónsdóttir, 2002; Lavine, 2000, 2005, among others). Lavine and Freidin (2002) attribute the lack of NOM and agreement to the Tense head as being defective. According to Maling (1993, 2006); Maling and Sigurjónsdóttir (2002), the Polish NT contains a null subject that gets NOM; ACC is then assigned to the internal argument exactly as we expect (under this view, Ukrainian is a morpho-syntactic accident). Thus, according to some authors, there are language-specific exceptions to the Case assignment system (Sobin 1985 for Polish and Ukrainian and Sigurdsson to appear for a similar construction in Icelandic).

Crucially, none of the existing proposals address the issue of the restricted tense interpretation and the unexpected information structure properties, (iv)-(vi). Also, no uniform account of the properties listed in (i)-(iv) has been proposed. In short, a new account of NT is needed.

### **3. NT as a *Have-Perfect Construction***

There are two main properties about the tense restrictions that remain unexplained under the existing proposals: (i) if there is no finite auxiliary

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<sup>10</sup> These analyses treat Ukrainian as structurally distinct from Polish.

in the structure, the structure must receive the Past tense interpretation; and (ii) if a finite auxiliary is present, it must be either in the Past or Future tense. The Present tense auxiliary is not possible.

Cross-linguistically, it is not unusual that structures without an overt Tense marking receive Past tense interpretation. So-called tense-less languages, i.e., languages that have no overt tense marking, either allow any tense interpretation,<sup>11</sup> or the lack of morphologically overt Tense marking, combined with certain Aspectual properties, allows only for the Past tense interpretation (Bohnemeyer and Swift, 2004; Jóhannsdóttir and Matthewson, 2008).

It is not clear whether the Past tense interpretation is the default interpretation of a phonologically null T head, or whether the T head is entirely missing<sup>12</sup> and the Past tense interpretation arises as the default semantic interpretation (for example, as in f-seq in Starke 2004 or via semantic strengthening of the interpretation of the event as in Bohnemeyer and Swift 2004). Either way, the behavior of NT might be less exotic than it appears at first glance.

The ban on the Present tense interpretation is more surprising. We know that in Slavic languages, the Present tense is excluded with perfective verbs. However, NT may be formed by both Perfective and Imperfective verbs. Furthermore, passive constructions do not display any such restriction on the tense interpretation cross-linguistically.

Interestingly, dialectology and descriptive linguistics literature (Kuz'mina and Nemčenko, 1971; Maslov, 1984; Trubinskij, 1988; Kuz'mina, 1993; Leinonen, 2002; Danylenko, 2006) often mentions that the syntactic distribution of NT resembles the West-European *habere* Perfect.<sup>13</sup>

I argue that NT is indeed a Perfect construction and that all the properties observed in Section 2 are a direct consequence of NT being a *have*-Perfect. This section provides semantic, syntactic and morphological evidence for this claim.

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<sup>11</sup> Even though the range of aspectual and other tense-related interpretations may still be restricted, see, for example, Fitzpatrick (2006). Unfortunately, it is not clear to me how to test for possible differences of this sort, mainly because of complex interactions of Tense interpretations with Aspect.

<sup>12</sup> For instance, because the CP phase is entirely missing.

<sup>13</sup> Note, Perfect does not equal Perfective.



### 3.1 Semantic interpretation: Perfect

The key to analyzing NT lies in its semantic interpretation. If NT is indeed *have*-Perfect, its interpretation should differ from the canonical passive. Precisely, we should be able to find contexts in which only one interpretation, but not the other, is grammatical. This is exactly what we observe in (13)–(14), which provide contexts excluding stative resultative interpretations.<sup>14</sup> We see that whenever the resultative interpretation of the canonical passive is excluded, NT is still well-formed.

#### (13) Polish

- a. \*Anna jest szczęśliwa od kiedy jej syn był zabrany.  
Anna is happy since then her son.NOM stayed taken-away  
*canonical passive*

- b. Anna jest szczęśliwa od kiedy jej syna było zabrano.  
Anna is happy since then her son.ACC stayed.NT taken-away NT

*Intended:* ‘Anna has been happy since her son has been sent away.’

#### (14) Ukrainian

- a. \*Anna je shtaslyva vid koly jij syn zabranij  
Anna is happy since then her son.NOM taken-away.PP  
*canonical passive*

- b. Anna je shtaslyva vid koly jij syna zabrano.  
Anna is happy since then her son.ACC taken-away.NT  
‘Anna has been happy since her son has been sent away.’ NT

*Intended:* ‘Anna has been happy since her son has been sent away.’

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<sup>14</sup> There are non-trivial complications that arise around differences between the Universal and Existential Perfect. I use the resultative interpretation because the right boundary of the time interval denoted by this type of *have*-Perfect excludes the time of the event denoted by the main clause. Notice, however, that a preliminary investigation suggests that there might be differences between Ukrainian NT with or without an auxiliary with respect to the exact delimitation of the right boundary of the time interval denoted by Perfect. I leave these questions aside for reasons of space. I refer the reader to Iatridou et al. (2001) for a cross-linguistic examination of the differences of this sort and their theoretical account.

### 3.2. Passive syntax and morphology?

If NT indeed has a Perfect interpretation, the immediate question that arises is how the Perfect interpretation could occur in a passive construction. The passive participle morphology is often identical to the perfect participle morphology cross-linguistically (Iatridou et al., 2001). It is thus plausible that what has been traditionally analyzed as a passive participle is in fact a Perfect participle. If this is correct, then the difference between Perfect and passive should reveal itself in the syntactic properties of the construction. In English, the canonical passive differs from the so-called adjectival passive (Wasow, 1977). This is not the case in Polish and Ukrainian (and Czech). In Czech,<sup>15</sup> the canonical passive may, and in Polish and Ukrainian, it must, be formed by the adjectival passive participle. Consequently, the adjectival morphology coincides with the syntactic structure we expect in adjectival and copular clauses (Veselovská and Karlík, 2004).<sup>16</sup> The prediction is that if NT is a passive construction, the relevant properties of the syntactic structure of the canonical passive should also be found in NT.

Let us consider two relevant properties that are testable for Ukrainian NT.<sup>17</sup> First, the canonical passive may contain two independent aspectual projections.<sup>18</sup> Second, the canonical passive may contain two independent negation projections. As the following examples show, unlike the canonical passive, NT may have only one aspectual projection and only one negation projection. This strongly suggests that the syntactic structure of NT is radically different from the syntactic structure of the canonical passive.

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<sup>15</sup> I build on Czech here as there is a syntactic analysis of the Czech canonical passive which can be readily used for the purposes of the present study. Crucially, as far as I was able to establish, the relevant structural properties of Czech passives hold for Polish and Ukrainian as well.

<sup>16</sup> Veselovská and Karlík (2004) investigate clitic-like properties, morphological contraction properties, colloquial forms, zero morpheme distribution and a dialectal variation.

<sup>17</sup> The tests cannot be done for Polish because there is no overt finite auxiliary, thus there is not enough overt morphology to control for the relevant properties.

<sup>18</sup> The canonical passive in this group of languages is essentially bi-clausal. See Veselovská and Karlík (2004) for more details.

(15) *Two independent aspectual projections impossible in NT:*

a. *Žinky byvaly vbyty.*

woman.NOM.F.PL. were.HAB.F.PL killed.PF.F.PL.

‘(The) women used to be killed.’

*canonical passive*

b. \**Žinok byvalo vbyto.*

woman.ACC.F.PL was. HAB.N.SG. killed.PF.N.SG.

Intended: ‘Women used to get killed.’

*NT*

(16) *Two independent negations impossible in NT:*

a. *Žinky ne byly ne vbyty.*

woman.NOM.F.PL not were.F.PL. not killed.PF.F.PL.

‘It wasn’t the case that the women weren’t killed.’

*canonical passive*

b. \**Žinok ne bylo ne vbyto.*

woman.ACC.F.PL not was.N.SG. not killed.PF.N.SG.

Intended: ‘It wasn’t the case women were killed.’

*NT*

Finally, NT may resemble participle morphology but the actual inflection is distinct. While the canonical passive inflects as a deverbal adjective (Sobin, 1985; Lavine, 2000; Danylenko, 2006), the NT ending retains an older, so called short-adjectival, inflection. If the NT was inflected in the same way as the canonical passive, the neuter singular ending would be *-e*, and not the attested *-o*. This morphological fact thus provides additional evidence that NT is structurally different from the canonical passive. Precisely, the participle found in NT is a Perfect participle, not a passive participle.

Thus, three pieces of evidence (semantic, syntactic and morphological) seem to converge on the same hypothesis: NT is not a passive construction. Instead it is some form of Perfect construction, as suggested by the traditional grammarians. Once we adopt the Perfect hypothesis, more specifically the *have*-Perfect hypothesis, some facts immediately follow. First of all, cross-linguistically *have*-Perfect participles never agree with the subject (Kayne, 1993; Iatridou et al., 2001, among others). Thus, whatever agreement mechanism we adopt for *have*-Perfect participles naturally extends to NT. No additional mechanism is needed. Furthermore, unlike in the canonical passive, there is no information-structure requirement on the internal argument. Thus, fact (iii) and (v) are both explained by the *have*-Perfect hypothesis,

without the need to introduce any further assumptions or tools in the system.

### 3.3. The semantics of *have*-Perfect and the Tense restriction on NT

The question of interest is whether analyzing NT as *have*-Perfect might shed light on the Tense restrictions attested in the construction. There is a continuing debate in the literature on the semantic nature of Perfect, which amounts to the question of whether Perfect should be semantically analyzed as Aspect (i.e., in addition to Perfective and Imperfective) or as Tense. An interesting perspective is offered in von Stechow (to appear). von Stechow argues that Perfect is relative time but the denotation of *have* adds an additional aspect-like component.<sup>19,20</sup> Consequently, the denotation of Perfect is identical to the denotation of simple Past. The denotation of *have* then adds a requirement on the subinterval property, essentially the “extended now” of McCoard (1978), here modeled after Dowty (1979).<sup>21</sup>

(17) *Paslawska and von Stechow (2003, p. 322, (40))*

POST =  $\lambda P \lambda t \exists e . \tau(e) < t \ \& \ P(e)$  (“Perfect”)

(18) *XN-Perfect*

[[has]] =  $\lambda t . \lambda Pit . (\exists t') [t \text{ is a final subinterval of } t' \ \& \ P(t')]$   
(von Stechow, to appear)

The proposal has direct consequences for the Tense interpretation of NT. Since the denotation of the *have* component is XN, it is incompatible with the proper episodic “now” of the Present tense. Consequently, *have*-Perfect is compatible with the Past and Future interpretation but the Present tense interpretation is excluded. Furthermore, since the denotation of POST is identical to the denotation of the Past tense, unless

<sup>19</sup> Perfect is thus semantically distinct from morphological Perfective and Imperfective.

<sup>20</sup> According to Iatridou et al. (2001), anteriority is not part of the meaning of the Perfect participle. Instead, anteriority follows from independent properties of the perfect time span, namely, from the fact that the eventuality always precedes the right boundary of the span. As far as I can tell, either of the proposals makes the same predictions for the issues at hand.

<sup>21</sup> Cf. also Iatridou et al.’s claim that *have*-Perfect is always XN.

the time of the event is overtly shifted to the future, Past arises as the default interpretation, thus explaining the other crucial property of the NT construction.

However, a question immediately arises from this interpretation: if NT is really *have*-Perfect, why there is no auxiliary *have*? A suggestive answer comes from the distribution of *be* and *have* in Slavic dialects. Roughly, the distribution of *be* and *have* forms a continuum, with the Western dialects having a higher degree of *have* in comparison to the Eastern dialects. Even though Polish has possessive *have*, the syntactic distribution of *have* is very much restricted in the language. This restrictive distribution can be demonstrated by the fact that there is no auxiliary usage of *have* in Polish. Ukrainian is in between. In Russian, *have* is entirely gone. Consequently, if the morphological forms of *have* are missing in these languages, or at least if their auxiliary variants are missing, *have* cannot be used to mark Tense. Hence, Tense must (in Polish) and may (in Ukrainian) stay morphologically unexpressed. Alternatively, it may be realized by default auxiliary forms based on *be*, as in Ukrainian and North Russian dialects.

### **3.4. Relevance of the lack of agreement?**

The fact that the NT construction is an instance of *have*-Perfect in and of itself does not explain the ACC marking on the internal argument. A possible hypothesis worth investigating is whether the ACC assignment could be related to the fact that the *have*-Participle does not agree with the subject. Alternatively, one could ask whether the ACC assignment might arise because the Tense head is defective (Lavine and Freidin, 2002), and thus not able to assign NOM. This type of reasoning is based on the hypothesis that there is a connection between NOM and finite T (Chomsky 1980 and much subsequent work). Northern Russian dialects provide evidence suggesting that neither of these hypotheses is empirically adequate.

Northern Russian dialects have the same type of NT as Ukrainian and Polish.<sup>22</sup> Interestingly, these dialects have, in addition to the Polish/Ukrainian type of NT, a variant of the NT construction in which the

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<sup>22</sup> As I mentioned earlier, these dialects in fact have several distinct constructions related to NT (Kuz'mina and Nemčenko 1971).

internal argument is NOM, instead of ACC. Crucially, even if the internal argument carries the NOM marking, the finite auxiliary still fails to agree with the NOM argument, as shown in (19). It immediately follows that while the NOM marking and agreement might be related, in principle, they are two separate syntactic processes and therefore cannot be tied to the presence or absence of the same feature or functional head. Crucially, for our present discussion, only NT with ACC is compatible with the Perfect interpretation (Zhanna Glushan, p.c.), as shown in (20).

(19) *North Russian (Danylenko, 2006, p. 255–256, (18), originally from Kuz'mina 1993, 135–137):*

a. (u njego) syn (bylo) otpravleno

at him son.NOM.SG.M. be.N.SG.AUX.PRET send-away.N.SG.PP

‘His son has been sent away (by him).’

b. (u njego) parnja (bylo) uvedeno

at him fellow.ACC.SG.M be.N.SG. AUX.PRET take away.N.SG. PP

‘The guy has been taken away (by him).’

(20) a. \*Vot uže tre goda kak u nego syn v amerku uvezeno.

here already three years how by him son.NOM toAmerica taken away

b. Vot uže tre goda kak u nego syna v amerku uvezeno.

here already three years how by him son.ACC=GEN to america taken away

‘It has been three years since his son has been taken away to America.’

We can thus conclude that the Case assignment (or at least its morphological realization) is in principle independent of agreement. Consequently, the ACC case assignment in NT does not seem to have any direct relation to the Tense head. In the next section, I will propose instead that the ACC case assignment is a direct reflex of the *have*-Perfect structure.

#### 4. Dependent Case is Phase-dependent

I argue that there is no real dependency of ACC on NOM, or any other case for that matter. In fact, what looks like a structural (or

morphological) dependency is a consequence of phase-based syntax.<sup>23</sup> In a certain sense, my proposal revisits the view of Case in an early GB era and the intuitions therein, i.e., the pre-Burzio formulation of Case (Chomsky, 1981; Emonds, 1985). In Chomsky (1981), Case was a marker that made categories visible to the interpretive components of the grammar. An alternative to this proposal is to understand a “visibility marker” as a morphological realization of a syntactic structure, which is the view adopted, for instance, in Distributed Morphology (Halle and Marantz 1993). If case is solely a morphological realization of a syntactic structure, it is less likely to involve any case-internal specific dependencies beyond correlations already present in the syntactic structure.

Notice that the guiding intuition behind the dependency view of ACC is based on the frequent co-occurrence of the ACC marked argument with another argument. However, perhaps the fact that there are two arguments or argument chains in the structure does not really matter. Instead, the crucial fact is that the structure is big enough to allow Merge of two arguments. In other words, whenever we find ACC in environments other than NT, the first Merge of *v* and VP is not the maximal projection of *v*. In all these cases, *v*P has been further extended.<sup>24</sup>

As soon as we analyze the more common case of ACC assignment as an instance of a *v*P-structure extension, we are able to investigate the hypothesis that the ACC assignment in NT is a result of a more general structure extension. If this hypothesis is correct, we are forced to ask what might cause the relevant extension, as there is no external argument merged in the structure.

I argue that the extension is a result of NT being *have*-Perfect. If NT is *have*-Perfect, it should contain a *have*-related structure, i.e., a structure which is in a certain technical sense ‘transitive’.

For concreteness, I follow Kayne (1993) in arguing that whether a language has *have* or *be* depends on the head-movement properties of the language. In particular, *have* is an instance of a functional-head

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<sup>23</sup> Supporting evidence for this claim comes from the fact that ACC can be systematically found in measure phrases, i.e., in a syntactic environment lacking NOM (Henk van Riemsdijk, p.c.).

<sup>24</sup> I assume a version of Bare Phrase Structure with no vacuous structures (Chomsky 1995).

incorporation into *be*. Even though the languages discussed in this paper do not have the corresponding morphological realization of the auxiliary, I argue that the underlying syntactic structure is still present.<sup>25</sup> Specifically, I argue that head-movement-incorporation yields a structure extension that is responsible for the ACC assignment observed in NT.<sup>26</sup>

A question that immediately arises is: why should an extension matter? As argued on numerous occasions, most recently in Richard 2010 (and references therein), vP is a strong phase only if it is transitive. Typically, this is understood as V having a complement and v having a distinct specifier. However, as I have argued elsewhere (Kučerová 2012, in press), the relevant condition might instead have to do with the number of merge operations within the structure. Thus, for v to be a strong-phase head, v must participate at least in two instances of merge.

A possible explanation in support of this proposal comes from independent restrictions on linearization. If we adopt Chomsky's (1995) Bare-phrase structure version of the LCA (Kayne 1994), a head may be linearized only if it participates in two instances of Merge. I argue that a phase head can trigger Spell-out only if it can be linearized with respect to its complement. Even though the head itself is not sent out to the interfaces, the head is still required to satisfy the total ordering requirement necessary for linearization to be possible. Consequently, we can formulate a condition on Spell-out domains, as in (21) and (22).

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<sup>25</sup> An independent piece of evidence for *have*-Perfect to contain an additional functional structure comes from its semantics. Iatridou et al. (2001) observe that cross-linguistically the semantics of Perfect can be located solely on the participle only in *be*-Perfect languages. In *have*-Perfect languages, the participles are semantically less contentful and at least part of the meaning of *have*-Perfect must be associated with a higher functional structure. An analogical conclusion is corroborated in von Stechow (to appear) as discussed in Section 3.3.

<sup>26</sup> Whether or not head-movement extends the structure is the subject of a continuous debate, even though the issue arises only under certain definitions of c-command. (See Kayne (1994) for a discussion and for a proposal that avoids problems with governing traces in head-movement chains. See also Chomsky (1995) for a reformulation of the same idea within the Bare Phrase Structure framework.) I refer here to Fukui and Takano (1998); Toyoshima (2001); Mohr (2005); Matushansky (2006) who argue that head movement, like phrasal movement, targets the root and as such extends the tree.



(21) If the Merge of *v* and its complement is not followed by another extension of *v* within the same projection, the complement of *v* cannot be spelled-out.

(22) *Strong Phase Condition:*

*v*P may be a strong phase only if *v* undergoes more than one instance of Merge within its Spell-out domain.<sup>27</sup>

It follows from (21) that, at Spell-out, the internal argument is assigned ACC by \**v*. Alternatively, if ACC is a morphological case, ACC may be defined as the case assigned to the sole argument within the *v*P spell-out domain which is governed by V+*v* (assigned down).<sup>28</sup> After C/T is merged, NOM remains unassigned/unrealized because the internal argument has already been spelled-out. The difference between the NT with and without an auxiliary is a property of T. If there is no valued Tense feature on T, no auxiliary is inserted and the resulting interpretation is Past as the default.

## 5. Conclusion

I have argued that ACC arises only in structures that are in some sense ‘transitive.’ I argued that the relevant notion of transitivity needs to be formulated in terms of phasehood (related to a structure extension), and not with respect to another argument or argument chain. In the case study investigated here, ‘transitivity’ is a result of a *have*-Perfect structure. Interestingly, the observed relation between ACC and *have*-Perfect is reminiscent of the case distribution in so-called split-ergative languages. It is thus plausible that the case assignment we observe in NT is cross-linguistically more prevalent than usually assumed. Finally, the Slavic

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<sup>27</sup> This condition is analogous to the condition proposed in Kučerová 2012, in press.

<sup>28</sup> This formulation is very close to Katzir’s reformulation of Marantz in a response to Legate (2008)’s critique of Marantz (1991):

- (i) Dependent case is assigned by V+I to a uniquely merged DP in the domain of V+I.  
Dependent case assigned up to subject: ergative Dependent case assigned down to object: accusative (Katzir, 2007, (148))
- (ii) DP<sub>i</sub> is uniquely merged in the domain of a head *x* if DP<sub>i</sub> is either a complement of *x* or a specifier of *x* but not both (Katzir, 2007, (149))

data suggest that there is not one type of a passive structure. Instead, we are likely dealing with a whole range of constructions with different degrees of argument demotion.

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