English Case: A Revisit*

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Choi, Incheol. 2010. English Case: A Revisit. *The Linguistic Association of Korea Journal.* *18*(3). 1-16. The traditional approaches to English case system involve establishing a full-scale case assignment rule considering the case rule as an NP licensing process. This paper suggests that such approaches are not only redundant but also ignore the historical change from a case to a word order language. Instead, I propose a constraint-based analysis which applies only to personal pronouns, hence obtaining the economy of grammar as well as the adequacy of explanation.

Key Words: English case, abstract case, coding feature, case filter, HPSG, constraint

1. Introduction

The term case is confusingly used because it has two different but related senses. On one hand, case is considered the morphological system of nominals that signals the semantic and syntactic relationship the dependent nouns bear to their heads. On the other hand, the term pertains to NP licensing that explains the distribution of NPs. The latter definition can be represented by the idea of abstract case (Chomsky 1981).

Within English verbal domain, the overt morphological system of NPs is limited to several personal pronouns. What is more, those pronouns do not exhibit the actual functions of case marked NPs. As mentioned by Hudson (1995), they are nothing but historical remnants. To support this point, I will carry out a short typological survey and conclude that English case is different

from those in case languages. Therefore, I suggest that the full-scale case assignment rule based on the idea of abstract case is not appropriate for English case. Instead, building on Choi (2003), I propose a constraint-based analysis which applies only to personal pronouns.

2. The Role of Case

According to Blake (2001), the role of case is to mark dependent nouns for the type of relationship they bear to their heads. For example, case generally correlates with core grammatical functions such as subjects, direct objects or indirect objects.[1)]

(1) Mehmet   adam-a   elma-lar-ı   ver-di
    Mehmet.NOM man-DAT   apple-PL-ACC   give-Past
    'Mehmet gave the apples to the man.'   (Blake 2001)

In the Turkish sentence in (1), *-ı* indicates that *elma* is the direct object and *-a* indicates that *adam* is the indirect object. Although the subject *Mahmet* bears no overt affix in contrast to the other core arguments, it is still morphologically distinctive from other core arguments.

The case morphemes may not directly signal the semantic roles of the nominal dependents. Instead, they identify the roles indirectly through grammatical functions. This allows those cases to cover a wider range of semantic roles.

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1) This generalization reflects a tendency. Otherwise, quirky case would undermine the generalization. According to languages different strategies of verbal dependent coding are arranged.

(2) a. pawi-ka   changmun-ul kkayssta
         rock-NOM   window-ACC   broke
         'The rock broke the window.'

     b. John-i   Jane-ul   saranghanta.
         John-NOM Jane-ACC love
         'John loves Jane.'

     c. John-i   namu-eyse   tteleciessta
         John-NOM   tree-from   fell
         'John fell from a tree.

     d. John-i   ton-ul   patassta.
         John-NOM money-ACC received
         'John received money.'

The nominative marked subjects of Korean sentences in (2) carry different semantic roles such as instrument, experiencer, theme and recipient. The variety of roles are made possible because nominative marking is related to the grammatical function subject whose semantic role is strongly controlled by the verb's semantic argument specification.

On the other hand, noun dependents that are relatively independent from the head verb's semantic specification, e.g. oblique nouns, are assigned oblique cases that encode more homogeneous semantic relations such as location or source. For instance, the ablative case in Latin limits the meaning of its bearers to source, and location among others. The specific choice of meaning is dependent on the head verb.

(3) a. Athens   redeo
         Athens.ABL   return
         'I return from Athens'

     b. Athens   habito
         Athens.ABL live
         'I live in Athens.'
         (Blake 2001)

In (3a) the source sense is deductible from the verb *redeo*; in (3b) the locative sense is deductible from the verb *habito*. Despite this relative freedom of interpretation, the meaning of oblique case bearers cannot be free from the limited semantic range.

By all accounts, the eventual role of case should be considered to mark the semantic roles that the dependents bear in the domain of their head. For core arguments such as subject and objects, the roles are not directly signaled by case, but are deduced in cooperation with the semantic properties of head verbs. In contrast, oblique cases impose more restrictions on their bearers' semantic possibilities. That is, the less oblique the dependents are, the more semantic dependence they have on their heads.

3. Coding Features

3.1 Case as a Coding Feature

In the previous section we observed that the primary function of the case is to mark dependent nouns for the type of relationship they bear to their heads. However, case is not the only feature that can signal the relationship. The most representative alternative means of case is word order.

(4) a. Tom hit Bill.
    b. Bill hit Tom.

In the above English sentence, the verb *hit* denotes an event that involves a hitter and the person who was hit. The identification of the dependent roles is carried out by word order. That is, following English linking constraints, in (4a) the preverbal element, *Tom,* is interpreted as an agent and the postverbal element, *Bill,* as a patient.[2] The other way of interpretation should be made for the sentence in (4b).

Although not common, agreements can be used for marking dependents. For

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2) For example, Davis (2001) suggests that NPs with proto-agent properties be linked to the subject position and NPs with proto-patient properties to the object position.

example, the Warlpiri auxiliary cross-references certain grammatical functions by manifesting markers for their person and number (Andrews 1985):

(5) Nya-nyi   ka-ran-palangu   wawirri-jarra
    see-NONPAST PRES-1SG-3DU   kangaroo-DU
    'I see two kangaroos.'

The Affixes on the auxiliary verb in (5) may indicate the roles of the dependent noun phrases. That is, *ran* cross-references the first person singular subject and *palangu* the third person dual object.

The functions of case, word order, and cross-referencing are difficult to simply characterize. However, the three features have something in common: they all signal the roles that are carried out by noun dependents in their head's syntactic and semantic domain. Cole et al. (1978) and Andrew (1985) called these features coding features. In this sense, case is nothing but an overt coding feature.

3.2 Competition of Coding Features

In the previous subsection, we observed that the functions carried out by the three types of coding features are basically identical. Then, is it redundant to have two features that perform the identical role? Surely, it is. Therefore, languages in general do not need several types of fully fledged coding features at the same time.

To verify the rough complementary property of coding features, compare the Icelandic and German sentences in (6) (Kiparsky 1997)

(6) a. Mér   lka   essir   blar.
       me.DAT like those cars.NOM
       'I like those cars'
  b. Mir   gefallen diese Autos
       me.DAT please   these cars.NOM
       'I like these ladies.'

According to Zaenen et al. (1985), there are several properties that distinguish subjects from other functions in Icelandic and German. Particularly, they showed that the initial NP in Icelandic is always a subject and that in German is not. For example, the initial NP *mér* in the Icelandic sentence in (6) passes all the subjecthood tests suggested by Zaenen et al. (1985) although it is marked by dative case.[3] On the other hand, in the German sentence in (6b), what passes the subjecthood tests is not the initial dative NP but the postverbal nominative NP. This contrast shows that Icelandic reserves a fixed position for subjects but German has the nominative case to identify subjects. Comparing the subject encoding systems of the two languages reveals how case competes with positional licensing. That is, in Icelandic, the fixed subject position makes it possible to have relative freedom in case marking. In contrast, the fixed nominative case in German causes the relatively free position that the subject holds.

The fully fledged Korean case system causes the arguments to enjoy a certain freedom of order.

(7) a. John-i   Jane-ul   ttayliessta
         John-NOM Jane-ACC beat
         'John beat Jane.'
    b. Jane-ul   John-i   ttayliessta
         Jane-ACC   John-NOM   beat
         John beat Jane.

The Korean sentences in (7) share an identical interpretation in spite of the different word orders. However, in Korean, the postpositions marking case can be dropped. As predicted by the complementary properties of coding features, when the overt case disappears, the Korean sentences should maintain the canonical order in which the subject precedes the object:

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3) According to Zaenen et al. (1985), the properties that identify subjects are raising, reflexivization, subject-verb inversion, extraction, indefinite subject postposing and subject ellipsis.

(8) a. John   Jane   ttayliessta
         John   Jane   beat
         'John beat Jane.'
     b. *Jane   John   ttayliessta
         Jane   John   beat
         'John beat Jane.'

In summary, languages may have word order restrictions and morphological cases concurrently. However, those phenomena do not perform their roles as coding features equally. Word order and case are alternative means of expressing coding features. Thus, if one is strong, the other is supposed to be weak. (cf. Kiparsky 1997)

4. Does English Have Case?

4.1 Historical Perspectives

Old English had a fully fledged case system in which rich morphology signals the roles of dependents. However, that system was not the sole coding feature. Like Icelandic, the position also played a role in indicating the subject. That is, although the subject could be placed before or after verb, it always preceded the other more oblique dependents. Therefore, like Icelandic subjects, Old English subjects could be marked with oblique case as well as nominative case. For example, the initial NP in (9) is analyzed as a subject although it is marked with dative case. This is because only subjects can undergo ellipsis and share their referents with the subjects of the preceding clauses (Zaenen et al. 1985).

(9) Ac gode   ne   licode na heora geleafleast,   ne
    but god-DAT not pleased not their lack of faith nor
    heora ceorung ac Ø asende him to fyr of   heofonum
    their grumbling and Ø sent them to fire from heavens
    'But God did not like their lack of faith, nor their
    grumbling, and sent them fire from the heavens.' (ÆHOM 21.68)

Another consequence of the positional licensing in Old English was that the subject position could be occupied by the expletive noun, *hit*.

(10) ðonne hit daӡian   ongynneþ
when it dawn-INF begins
'When dawn comes.'   (Bede 4.10)

However, in contrast with modern English, the positional licensing in Old English was incomplete in that the subject position was not fixed and could be empty in certain contexts. This property resulted in the absence of obligatory expletives. That is why the extraposition of sentential complements in Old English did not necessarily leave an expletive noun in the displaced position.

(11) ðonon cymð   oft   ðætte ...
whence happens often that ...
'Whence it happens often that ...'   (CP 437.27)

The erosion of the case system in English strengthened the positional licensing leaving the word order as the sole coding feature. That is how modern English came to have the fixed word order in contrast to other Germanic languages. The obligatory expletive is a byproduct of this emersion of the tight word order licensing.

4.2 synchronic perspectives

The second edition of the Oxford English Dictionary contains full entries for 171,476 words in current use. Half of the English words are considered nouns. However, only several personal pronouns, which are less than 10 words when possessive nouns are ignored, exhibit case distinction. Does English have a case, then? This question should be answered not only on the basis of the quantity, but also on the basis of the quality of the case.

According to Emonds (1976) and Hudson (1995), English cases are not vital in that they do not perform an actual function as a coding feature. For example, subjects and direct objects have their own fixed positions. Although a

nominative marked or accusative marked NP appears in a sentence, they should be placed in their designated positions.

(12) a. I gave him the pill.
    b. *Him gave I the pill.

English case is in contrast with German case. As shown in the German sentences, in (13), the swapping of positions does not alter the roles of the arguments.

(13) a. Dann wird der Doktor dem Patienten
        then will the doctor-NOM the   Patient-DAT
        die Pille geben
        the pill-ACC give
        'Then the doctor will give the patient the pill.'
    b. Dan wird der Doktor die Pille dem Patienten geben
    c. Dan wird die Pille der Doktor dem Patienten geben
    d. Dan wird dem Patienten der Doktor die Pille geben
    e. Dan wird dem Patienten die Pille der Doktor geben
    f. Dan wird die Pille dem Patienten der Doktor geben

Further, expletives in modern English are not optional but compulsory when the subject position is not occupied by a lexical element. This suggests that in modern English, the subject position is not only designated, but also necessary. All these properties suggest that English case is not a coding feature anymore and different from the cases in other case languages.

4.3 Case Theories

Among case theories, the Case Filter suggested by Chomsky (1981) has been the most influential approach.

(14) Case Filter
    *NP, if NP has phonetic content and has no case

The assumption underlying the Case Filter is that case is universal, whether a language has morphologically overt case or not. Since English common nouns lack morphological case, the case in the Case Filter refers to something invisible, i.e. abstract case. The motivation of abstract case is well summarized by the quotation below (from Haegeman 1991, p. 144):

> Although English does not have the overt case-marking that we find, for example, in Latin and in German, it has the remnants of an overt case system in the pronominal system. We therefore do not wish to say that English lacks case. Rather, following our discussion of agreement we postulate that English has a fully-fledged system of abstract case, similar to that in Latin or German.

Haegeman acknowledges that the abstract case is not necessarily morphologically realized. However, Chomsky must have based the abstract case-marking on the morphological overt case marking in that he applies the case filter to the NP that possesses phonetic content.

Languages without morphological case marking undermine the idea of the universal abstract case.

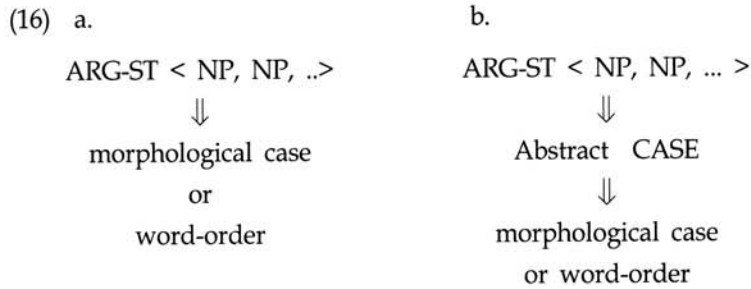(15) Wo you chi fan
    I have eat rice
    'I have eaten rice.'

No morphological case marking is involved in the Chinese sentence. The roles of dependents are signaled by the strict SOV word order.[4] To maintain that the abstract case marking is universal, the positional licensing should be reinterpreted as a certain type of abstract case marking. Then, the abstract case marking should be interpreted either as case morphemes or as certain positions. When the specific theory internal mechanism is ignored, this assumption is to say that the abstract case is tantamount to the general definition of the coding features.

The complication caused by the abstract case is not attractive in that it

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4) The data and generalization are due to personal communication with Henrietta Yang.

results in a redundant step of mapping between argument structures and surface forms. The figures in (16) illustrate the problem.

(16) a.   b.

ARG-ST < NP, NP, ..>   ARG-ST < NP, NP, ... >
⇓   ⇓
morphological case   Abstract CASE
or   ⇓
word-order   morphological case
or word-order

Without abstract case, the members of the syntactic subcategorization frame or ARG-ST list may be directly identified by the morphological case marked entities or entities in certain positions, as illustrated in (16a). In contrast, the idea of abstract case forces us to set up an additional process, as in (16b), that does not seem to be necessary when the theory-internal consideration is ignored.

With respect to English nominal licensing, lexicalist approaches as well as GB approaches assume that English nominal is assigned a case (Pollard and Sag 1994). The motivation for this type of case marking is found from the fact that English still has several nouns that require case resolution. However, assuming full scale case marking for the English nominal because of the several personal pronouns is not only redundant but also misleading. This is because the case in English does not play a role as a coding feature. Further, the full-scale case approach ignores the historical change from a case to a word order language.
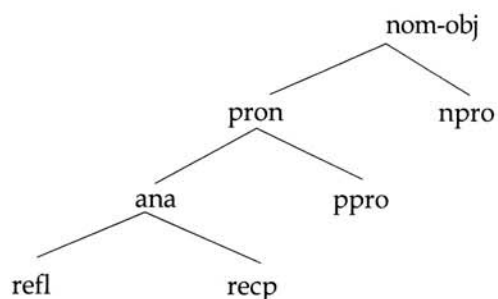
5. An Alternative Approach to English Case

In the previous sections, I have shown that assuming a full-scale case system for English is not only to override its historical change, but also to accept considerable redundancy in the grammar. Instead, on the basis of the feature regime of HPSG, I suggest an English case constraint which applies only to personal pronouns.

Pollard and Sag (1994) classify nominal-objects into several subtypes on the

basis of the referential properties of the NPs. Those types are hierarchically organized in (17).
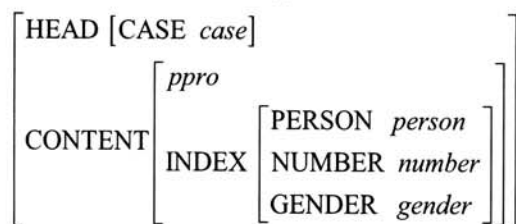
(17) Type Hierarchy of nominal objects:[5]

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                              nom-obj
                         ___/        \
               pron                    npro
          ___/      \___
      ana              ppro
    _/    \_
 refl       recp
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Each type in (17) represents the value of the CONTENT feature. Assuming that there is a noun type hierarchy that is parallel to the hierarchy in (17), we can identify a type *ppro-noun*, which is a personal pronoun whose content value is *ppro*, and a type *npro-noun* whose CONTENT value is *npro*.

Among the noun types, only nouns of the type *ppro-noun* have a CASE feature. The type declaration of personal pronouns is given in (18).

(18) Type Declaraton of *ppro-noun*:

$$
\begin{bmatrix}
\text{HEAD } \begin{bmatrix} \text{CASE } case \end{bmatrix} \\
\text{CONTENT} \begin{bmatrix}
ppro \\
\text{INDEX} \begin{bmatrix}
\text{PERSON } person \\
\text{NUMBER } number \\
\text{GENDER } gender
\end{bmatrix}
\end{bmatrix}
\end{bmatrix}
$$

The type declaration in (18) includes the specification of the CASE feature. The value of the feature is *case*, which is resolved into either *nom* or *acc*.[6]

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5) *nom-obj* stands for nominal-object, *pron* for pronoun, *npro* for non-pronoun, *ana* for anaphor, *ppro* for personal pronoun, *refl* for relfexive and *recp* for reciprocal.

6) To focus on verbal case assignment, my proposal does not include a genitive case

On the other hand, differently from traditional views, non-pronominals such as common nouns and proper nouns do not specify CASE features.

Owing to the reduction of the case domain, case rule is not applied to the whole noun phrases but only to personal pronouns. The descriptive rule given in (19) explains what we need for the case resolution of personal pronouns.

(19) Personal Pronoun Case Resolution Principle (descriptive)
For every *ppro-noun* object whose CASE value is *nom*, it appears on the initial position of a finite verb's ARG-ST list.

The principle in (19) describes that we not only need a rule which predicts the condition in which nominative case-marked NPs can occur, but we also need to ensure that those NPs do not occur in other conditions.

First, the description for the occurrence environment can be captured by the implicational AVM in (20).

(20) English Nominative Constraint I

$$\begin{bmatrix} \text{VFORM} & \textit{fin} \\ \text{ARG-ST| FIRST| CAT | HEAD } \textit{ppro}-\textit{noun} \end{bmatrix}$$

$$\Rightarrow \begin{bmatrix} \text{ARG-ST| ... |HEAD } \begin{bmatrix} \text{CASE } \textit{nom} \end{bmatrix} \end{bmatrix}$$

The implicational AVM in (20) specifies that the pronoun in the subject position of a finite verb must be assigned nominative case. However, we still cannot capture the second description of the principle in (19). That is, the rule in (20) does not rule out the possibility of nominative marked objects in other situations. For example, the rule does not mention anything about the possibility of nominative marked NPs in the prepositional object position. The second constraint in (21) restricts nominative case from being assigned to an NP that is not in the initial argument position of a finite verb.

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assignment rule. I believe that a little extension of the proposal can cover the genitive case.

(21) English Nominative Constraint II

The value nom must be the terminus of a path satisfying the following description:

$$\begin{bmatrix} \text{VFORM } \textit{fin} \\ \text{ARG-ST| FIRST| CAT| HEAD| CASE } \textit{nom} \end{bmatrix}$$

The analysis proposed here explains the case of personal pronouns without generalizing an accusative case assignment rule. As declared in the type declaration of *ppro-noun* in (18), every personal pronoun is assigned a case. Following (20) and (21), nominative case is assigned only to a pronoun that occurs in the subject position of a finite verb. Therefore, the personal pronoun that is not licensed by the rules in (20) and (21) should be assigned accusative case.[7]

A benefit of this analysis is to explain the case given to isolated NPs as in (22) (Choi 2003).

(22) A: Who love me?
B: Him

The isolated case in the answer of the exchange shows that case is resolved into accusative case when it is not licensed by a lexical head. Since my proposal embodies the idea of the default case resolution for the accusative case, the isolated case can easily be explained without any further theoretical complications.

6. Conclusion

In this paper, I have investigated the role of case through a short typological survey. The findings suggest that case is one of the coding features which

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7) To be well-formed, a word that enters the syntax should be totally well-typed. Therefore, any personal pronouns that is not assigned a case should automatically be assigned an accusative case. This process is ensured by the type declaration of (18) and the type hierarchy of *case* consisting of *nom* and *acc*.

encode the information about the argument structure. In this sense, English case does not function as a coding feature. Therefore, instead of the traditional full-scale case assignment process, I have proposed a partial case constraint that applies only to personal pronouns. In addition, the constraint only concerns nominative case assignment, while leaving accusative case assignment as a default process. By doing this, the approach not only obtains an economy of grammar, but also covers a wider range of case phenomena in English.

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