Case Theory in GB/Minimalism is about the distribution of NPs, not about morphological form per se. The connection to case as a morphological property was embodied in early Case Theory, in its original conception (Chomsky 1980, 1981, attributed to a personal letter from Vergnaud) in the hypothesis that the formal properties regulating the distribution of NPs are the formal features that are realized by case morphology in languages which show such morphology. As such, Case played a central role in being one of the driving forces of movement, uniting a variety of transformations (passive, raising, unaccusative, etc.). As the theory developed, and in particular after prominent attention was given to quirky Case in Icelandic and ergative case systems, the connection between Case (a formal feature underlying syntactic licensing of NPs) and case (the morphological category) became more tenuous, though the connection between the two is still a live topic of inquiry, with views spanning the spectrum of possibilities.1

1. CASE THEORY IN GB

1.1 The Case Filter

Case Theory is first proposed in the defining works of the GB framework (Chomsky 1980, 1981) as a solution to the puzzling distribution of lexical (i.e., phonologically overt) NP subjects of infinitival clauses, as illustrated in (1). In general, the subject of an infinitive must not be an overt NP ((1a,e)), but this restriction is lifted when the infinitival clause is the complement of a particular class of matrix verbs, such as believe (1b), or when the infinitival clause contains the prepositional complementizer for (1c,d). Where an overt lexical NP subject is prohibited, the subject of the infinitive is assumed to be the silent pronominal element PRO, the interpretation of which is determined by Control Theory.

(1) a. Leo decided [ (*Lina/himself) to leave ].
   b. Leo believed [ Lina to be a genius ].
   c. Leo decided [ for Lina to leave ].
   d. For Leo to win would be great.
   e. *Leo to win would be great.

Prior to the advent of Case Theory in Chomsky (1980), this distribution fell under the purview of the *NP-to-VP filter of Chomsky & Lasnik (1977), stated in (2).

(2) * [α NP to VP], unless α is adjacent to and in the domain of Verb or for ([-N])

1 We write “Case” for the abstract theoretical entity in GB and Minimalism, and “case” for the traditional morphosyntactic notion. As discussed below, the two notions were originally held to be directly related, but the relationship has grown more abstract.
The major result of Case Theory is the deduction of (2), itself little more than a summary of the facts in (1), from assumptions that are argued to be independently necessary, along with one new assumption, of far broader generality than the construction-specific filter in (2). This new assumption, the key element of Case Theory (Chomsky 1980, 1981, attributing the idea to Jean-Roger Vergnaud) is the proposal that all lexical NPs (i.e., NPs other than PRO or NP-trace) require Case, even in Modern English, where the morphological exponence of case is limited to the pronominal system. This proposal is formalized as the Case Filter, given in one version in (3).²

(3) *NP if NP has phonetic content and has no Case    (Chomsky 1981, 49)

Given the Case Filter, the distribution in (1) may be largely deduced from independently motivated rules of Case assignment. A rather rudimentary statement of Case assignment for English (and similar nominative-accusative languages) is given in (4):

(4) a. subject of tensed clause: nominative
b. object of verb: accusative
c. object of preposition: accusative (or oblique)

The (descriptive) content of (4) is a necessary part of a grammatical description of English and many other familiar languages and summarizes the observed basic distributional facts for elements that bear overt case inflection. Absent from (4) is any reference to the subject of a non-finite clause. Given the Case Filter, the absence of case assignment rules applying to the subjects of infinitives translates into the exclusion of lexical NPs from this position. In addition, the “unless” clause of (2) begins to make sense when viewed from the perspective of Case. V and P have the distinctive characteristic of being (accusative) case assigners, and thus the disjunctive environment stipulated in the “unless” clause is none other than the domain of accusative case assignment.³ The NP following for in (1c,d) receives Case from for, thus satisfying the Case Filter. All that remains is the NP in the infinitival complement of believe (1b).

The contrast in (1a-b) shows that there is some difference between the class of verbs represented by decide and that represented by believe. On the proposal that what is special about the believe class is that they permit Case assignment across a non-finite clause boundary (however that is to be derived),⁴ (1b) too falls under the Case Filter. That the NP in the complement of believe is indeed receiving Case as if it were the object

² Note that the Case Filter does not ban a phonetically empty element with Case. Thus in early GB implementations, wh-trace is taken to be Case-marked, and a moved wh-phrase satisfies the Case Filter via its trace. In later implementations, the Case Filter applies to A-chains.

³ That V and P share this property in English is immediately detectable only by examining pronouns, but given the Case Filter, this observation provides the reason why only V and P may take NP complements. A and N (even when derived from verbs) may only take PP and CP complements, requiring of where a corresponding verb might take an NP complement.

⁴ Proposals in the GB framework for allowing Case assignment across the infinitival clause boundary vary in details, but share the common core that the complement of the believe class verbs is (or becomes, after a deletion operation) smaller than the complement of the decide class (control verbs). Updating the notation, the proposal in LGB is that infinitival complements are CPs, but that believe-type verbs induce a rule of CP-deletion, hence taking IP-complements at the level relevant for the application of the Case Filter. In later work, it is suggested that believe selects an IP rather than a CP complement as a lexical property (Chomsky & Lasnik 1995, 112).
of *believe* is supported by various diagnostics, for example, the loss of accusative in this position when *believe* is passivized, and the somewhat murky adjacency requirement between *believe* and the NP that is characteristic of objective case assignment in English (see below). The lexical subject of the non-finite complement of *believe* avoids the fate of other infinitival subjects (i.e., limitation to PRO) because in this configuration (which would come to be known as *Exceptional Case Marking* or ‘ECM’), it is subject to Case assignment.

In sum, Case Theory constituted a significant advance in deducing the major effects of a rather puzzling, essentially descriptive, filter (the *NP-to-VP* filter), largely from independently motivated elements of the theory (as in (4)) together with a very broad, and not construction-specific assumption, the Case Filter (3).5

### 1.2 Extensions: Case Theory

The main interest in Case Theory in GB and on into Minimalism lies not in the original empirical result, but in the consideration of a variety of intricately connected consequences. The postulation of the Case Filter had ramifications well beyond the distribution of infinitival subjects.

For example, Case could now be seen as one of the driving forces of movement for a variety of constructions. Thus, a unified account of promotion to subject in passive (5), raising (6), and unaccusatives (7), becomes possible: in each construction, the NP in its original position is not governed by a case assigner, and thus in each configuration, the NP must raise to finite subject position in order to satisfy the Case Filter. The Case Filter thus becomes one of the answers to the perennial question of why movement occurs, in the examples at hand, with reference to movement to subject position occurs in English.6

(5) a. Lina was kissed by Leo.
   b. Kai was believed to have won the soccer match.
   c. The birdcage was found empty.

(6) a. Lina seems to like her brother.
   b. Lina is likely to fall asleep.

(7) a. Jeffrey’s bus arrived.
   b. The tree fell.

Note, though, that a Case-based account of movement in these configurations is largely redundant with another core component of GB, namely the *Extended Projection Principle* (Chomsky 1982, 10), which includes the requirement that every finite clause have a subject (compare the *Final-1 Law* in Relational Grammar). The question of whether this redundancy can be eliminated has long stood as a research problem in GB/Minimalism.

5 Not all of the effects of the *NP-to-VP* filter are reduced to the Case Filter. Some effects, as well as some empirical problems for the *NP-to-VP* filter, largely having to do with infinitival relatives, are addressed independently in Chomsky (1980), where a more comprehensive analysis of infinitival relatives is proposed.

6 Case is not a complete account of the distribution of NPs in passive, since the demotion or suppression of the external argument must figure into the account. For discussion in the GB literature, see especially Chomsky (1981, 117-127), Burzio (1981, 1986), and Baker, Johnson & Roberts (1989).
Another early result of Case Theory, set out by Stowell (1981), regards the “order of complements” problem. As shown in (8), for verbs in English that select for multiple complements, it is generally held that the NP argument must precede all other (PP, CP) arguments, at least in “neutral” clauses (i.e., clauses that are not derived by, for instance, Heavy NP Shift or similar operations which are typically associated with a “special” intonation).

(8)  
<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Maggie put [NP the ball] [PP under the table].</td>
<td></td>
</tr>
<tr>
<td>b. *Maggie put [PP under the table] [NP the ball].</td>
<td></td>
</tr>
<tr>
<td>c. Julia promised [NP her friends] [CP that it was snack time]</td>
<td></td>
</tr>
<tr>
<td>d. *Julia promised [CP that it was snack time] [NP her friends]</td>
<td></td>
</tr>
</tbody>
</table>

For verbs that take only PP and/or CP complements, there is either no ordering effect, or the effect is much less strong (9).

(9)  
<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Maggie talked [PP to Ryan’s father] [PP about Jillian].</td>
<td></td>
</tr>
<tr>
<td>b. ?Maggie talked [PP about Jillian] [NP to Ryan’s father].</td>
<td></td>
</tr>
<tr>
<td>c. ?Julia said [PP to her friends] [CP that it was warm]</td>
<td></td>
</tr>
<tr>
<td>d. ?Julia said [CP that it was warm] [PP to her friends]</td>
<td></td>
</tr>
</tbody>
</table>

As Stowell argues, the particular requirement that NP complements precede all others (in English) can be seen as a special case of the general requirement of Case Adjacency, whereby the direct object of an accusative Case assigner (V or P) must be adjacent to its assigner (abstracting away from parentheticals and the like). Deriving the order of complements from Case Theory meant that these ordering restrictions could be eliminated from the phrase-structure rules, an important step in the move towards a generalized X’-Theory, now standard in GB/Minimalism.

The above paragraphs illustrate the way in which Case Theory, originally suggested as an alternative to some very construction-specific filters regarding infinitives, could be neatly applied to a wide range of phenomena, allowing for increased generality of the rules at each step.

1.3 Government

Although (4) suffices as a good first pass at a description of Case assignment rules, the articulation of the details proved to be an important area of inquiry, largely because grammatical functions (subject, object) have been taken in GB and related frameworks to be derivative, structurally defined notions (see Chomsky 1965). From this perspective, an adequate characterization of the domain of objective case assignment seemed to require reference to two notions, namely c-command and adjacency. In formalizing the domain of Case assignment to capture the results discussed above, Chomsky (1980, 25) defines the notion of government. The original formulation is given here:

(10)  
 alpha is governed by beta if alpha is c-commanded by beta and no major category or major category boundary appears between alpha and beta.

The proper definition of government, and in particular, the formulation of what it means for a category to “appear” (or later to “intervene”) between alpha and beta was one of the most significant technical questions of the 1980s (see Aoun & Sportiche 1983, Chomsky 1981, 1986, Lasnik & Saito 1984, 1992 and Rizzi 1990 for a sample of important works). In Chomsky (1980), the definition was intended to subsume linear adjacency as well as
structural intervention, though in most later work the adjacency condition on government, and hence on Case assignment, was held to be derivable from other properties of the theory (see, among others, Johnson 1991). Within the GB framework, the government relation, motivated originally for Case, was proposed to be a key notion at work in some way or another in a variety of modules of the theory; a derivative notion, *proper government*, playing a central role in subject-object asymmetries in extraction and related topics for example (see Chomsky 1986, and work cited there, especially Huang 1982). Stepping back from the details of a rather extensive literature, there is nevertheless a sense in which Case assignment remained at the core of the notion of government, providing the observable instances of the phenomenon from which the operational notion is to be generalized. If an NP in some configuration is clearly dependent on a particular element (V or P) for case, then that configuration must constitute a configuration of government, and that can be used heuristically to set parameters on the bounds of the definition.

1.4 Summary: Case Theory in GB

In sum, Case Theory, comprising at its core the Case Filter and a description of Case assignment, such as (4), stood very close to the core of the GB framework, with tangible results that moved the theory forward, and new questions that it opened up. Ultimately the results of Case Theory would be dependent on successful articulation of the theory of Case assignment. The explorations of locality, couched in terms of *government*, constituted one aspect of the careful formalization of (4). Another area of exploration considered the implications of cross-linguistic variation in Case assignment rules (see below).

Although the notion *government* and the various attendant notions provided a greater technical precision, the basic rules of Case assignment in (4) left open a variety of questions, which would later serve as the impetus for a body of work at the transition from GB to Minimalism. Among the questions which received significant attention were asymmetries between nominative and accusative (or other) cases, as sketched in (11). In addition, questions were asked such as why only finite Infl could assign nominative case (key to the analysis of (1)).

(11) Nominative Accusative
    assigned by finite Infl (functional) V,P (lexical)
    environment Spec,Head (m-command) head-complement / c-command
         (adjacency not required) +adjacency

2. HOW ABSTRACT IS ABSTRACT CASE?

Given the explicit nature of the emerging theory, the ramifications of variation in Case assignment properties (as discussed in detail throughout this volume) would have predictable consequences for observable phenomena, and to some degree this was exploited with successful results. For example, Chomsky (1981, 122-123), discussing the work of Burzio (1981), suggests that Italian has a rule of nominative Case assignment to the post-verbal position, where English lacks such a rule. Under a Case-Theoretic approach to movement in passive, as sketched above, this difference in Case entails that
Italian lacks obligatory NP-movement to the preverbal subject position in the counterparts to the English examples in (5).  

On the other hand, the foundations of GB Case Theory were taken head on in a landmark paper on Icelandic Zaenen, Maling & Thráinsson (1985, ZMT). This paper demonstrated that the original solution to the puzzle in (1) was inadequate, and that a the traditional notion of Case, even allowing for an “abstract” Case (in the sense of case lacking morphological realization), was not the driving force in the distribution of NPs, neither in the control/ECM alternation nor in the promotion to subject position in passive, raising and unaccusatives. Space limitations do not permit a thorough review of this work here, but they key point can be made with reference to a few examples.

The basic point is the following. Icelandic is a language with overt morphological case distinctions. Transitive constructions involving a nominative-accusative array work exactly like their English counterparts—i.e., all the key distributional properties that are held to be the purview of Case Theory (including ECM, the ban on lexical subjects of infinitives etc.) are robustly attested in Icelandic as well. In contrast to English, however, Icelandic also has what has become known as *Quirky Case* subjects, that is, subjects which are marked with a case other than nominative. One such example is given in (12a). The verb hjálpa ‘help’ governs lexical dative case on the object and this case is hence retained in the passive (cf. (12b)). Importantlly, the dative in (12b) must be seen as the subject of the sentence, a fact for which ZMT provide ample and convincing evidence (on this score, Icelandic contrasts minimally with German, which has superficially similar examples, but in which the datives are not subjects). If it is assumed that ‘subjecthood’ is a structural property associated with a particular syntactic position (e.g., the specifier of IP), one must conclude that the dative argument moves to this position. This, then, however, is in conflict with a theory which aims at deriving movement to subject position from the Case Filter. Since the dative arguments receive lexical case, they automatically satisfy the Case Filter in (3), and hence there would be no need for them to move to receive Case.

(12) a. Ég hjálpaði honum. 
    *I helped them.* [ZMT 98]

    b. þeim / honum var hjálpað.
    *They/He were/was helped.* (ZMT, 99, 96)

The point can also be made with the control versus ECM distinction, the distributional puzzle at the historical core of Case Theory. In Icelandic, as in English, the subject of an infinitive must not be an overt NP, except when the infinitival clause is the complement of an ECM verb, such as telja ‘believe’. However, this distinction cross-cuts case distinctions. A quirky subject shows exactly the same alternation between PRO and lexical NP as other subjects, but the quirky subject clearly does not depend on *believe* for its (overt) case—the dative on the NP þeim ‘them’ in (13b) is assigned by the verb ‘help’, not by tel ‘believe’ (which assigns accusative).

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7 If the movement in (5) is driven instead by the EPP, then Italian would be characterized as lacking the EPP. The EPP as originally presented was held to be a point of potential parametric variation (Chomsky 1981, 27-28); for recent arguments that the EPP, as a requirement that the subject position be filled, is parametrized within Germanic, see Wurmbrand (2006).
The work of ZMT shows that Case, for the purposes of the Case Filter, cannot be equated with the morphological case that is realized on NPs (even allowing for zero-realization, as on English nouns). ZMT thus argue for the abandonment of Case Theory (a direction pursued in the GB/MP framework by Marantz 1991 and others), and suggested that the relevant licensing theory be formulated directly in terms of GFs (they thus took their paper as support for LFG). Others within the GB framework (Cowper 1988, Freidin & Sprouse 1991) took the ZMT results as instead showing that the Case Filter was correct, but referred to an even more abstract notion of Case than envisioned in LGB, one which may align with the morphologically visible case system in the basic patterns, but need not do so in all instances. Thus in Icelandic, “abstract nominative” (the Case of finite subjects) could be realized as morphological nominative (the basic realization), accusative, dative, or genitive, and similarly, “abstract accusative” (the Case of objects, including ECM objects) could also be realized by any of the four morphological cases. Largely missing from the debate, so far as we know, are concerted attempts to show that these two perspectives are distinct in substance, and that the postulation of “abstract nominative”, for example, is distinct from the postulation of “subject” as a grammatical primitive.8

3. CASE THEORY IN THE MINIMALIST PROGRAM

The early 1990s marked a transition from GB to Minimalism as the declared framework of choice for many generative syntacticians. A good deal of confusion seems to have arisen around nomenclature. Throughout the Minimalist writings, Chomsky has been at pains to stress that Minimalism is a program, not a theory or theoretical framework. That is, in contrast to formal approaches to this point, which have focused on providing explicit characterizations of grammar (universal and particular) at increasing levels of abstraction and generalization, Minimalism has been proposed as a set of rough guidelines about the types of questions that may advance linguistic inquiry into the domain of asking why UG is the way it is. Despite the new focus underlying the Minimalist Program, the sizeable majority of work cast as Minimalist is characterized by a renewed focus on uniformity and theoretical parsimony, but the goal on the horizon in most of this work is still (as in GB) an explicit specification of the principles and parameters of UG, in other words, the limits of what it means to be a “possible

8 Steps towards untangling these views have appeared only quite recently (see Legate 2005, see Bobaljik, to appear for an alternative perspective on some of the phenomena considered there). Related issues concern the distribution of nominative objects in Icelandic, and the rather abstract question as to whether this is the “same” nominative as that assigned to nominative subjects. For recent perspectives and review of the current literature, see Hiraiwa (2005), Nomura (2005). The issue is made more complex if the scope of Case Theory is understood differently, for example, if the distribution of PRO versus lexical subjects is regulated by a theory other than Case (see, e.g., Landau 2000b), while other aspects of Case Theory are retained. As in many domains, subtle differences in the use of key terms (abstract, inherent, lexical, structural, and quirky) among authors have contributed to the complexity of the debate.
language”. We turn now to a brief outline of where Case Theory fits within Minimalism in practice, the next phase of the Principles and Parameters framework, and then examine where Case Theory fits in the (currently programmatic) discussion of what is known as the Strong Minimalist Thesis.

3.1 Minimalism in practice

For Minimalism in practice, the major questions of Case Theory revolve around the differences between nominative and accusative case assignment identified above (as in (11)), and thus, the possibility of developing a uniform theory of nominative and accusative case assignment.

This has proven to be a productive domain of inquiry, with a variety of proposals for a unified theory of Case assignment on offer. One perspective (exemplified prominently by Chomsky 1991) proposes to assimilate accusative Case assignment to the same type of structural configuration as nominative, namely m-command, or in more current terms a spec(ifier)-head relation (see Koopman 2005 for a recent defense, and Wurmbrand 2006 for empirical problems in generalizing spec-head even in the limited domain of nominative subjects in Germanic). At the other end stands the proposal that all case assignment, including nominative to the subject, should be characterized by a government relation, that is, c-command and locality (see Chomsky 2000, where the relationship is termed Agree). The door to this possibility is opened by assuming that all subjects in Spec,IP are moved there from lower positions, a proposal originally suggested by Ken Hale (class lectures) and Koopman & Sportiche (1991). Note that the Agree perspective, while unifying the mechanisms involved in structural Case assignment, shifts the burden of the motivation for movement in examples like (5)-(7) away from Case Theory, to the EPP or an extension thereof.

An additional line of investigation on the theme of a uniform case assigning mechanism concerns the functional versus lexical difference in the case assigners. Mahajan (1989), Déprez (1989), Chomsky (1991), Johnson (1991) and others postulate VP-external functional projections responsible for Case on objects, leading to a uniform proposal that Case is assigned by functional heads. One striking piece of empirical evidence for this comes from Long Passive (and Long Unaccusative) in German, Spanish, Japanese and other languages. Relevant examples are given in (14) and (15)—embedded clauses are used to avoid the additional complications posed by Verb Second. The key point to observe is that it is the voice distinctions on the embedding verb (in this case versuchen ‘try’) that determine the possibility of a nominative/accusative case alternation on the object of the embedded verb. The alternation is passive-like, but it is the voice marking associated with the higher verb only that determines the case properties in the lower domain. See Wurmbrand (2001) for extended discussion and additional references.

(14) weil er den/*der Traktor versucht hat [ tOBJ zu reparieren]
    since he the.ACC/*NOM tractor tried has [ tOBJ to repair]

    ‘since he tried to repair the tractor’

(15) a. weil der Traktor zu reparieren versucht wurde
    since the.NOM tractor to repair tried was

    ‘since they tried to repair the tractor’
b. weil die Traktoren zu reparieren versucht wurden
    since the tractors (NOM) to repair tried were
    ‘since they tried to repair the tractors’

Though there has been a veritable explosion of proposals, it seems clear that some reduction of the differences in (11) is a real possibility, within the GB/MP frameworks.

3.2 Programmatic Minimalism

In addition to the technical innovations that characterize Minimalism in practice, a small minority of Minimalist work poses questions that go beyond specification of the principles and parameters of UG, and toy with the key Minimalist question: how close does language come to “optimal design”, where “optimal design” is to be understood as having no properties other than those dictated by the need for the language module to interface with two other cognitive systems: conceptual-intensional system and the motor-articulatory system. The Strongest Minimalist Thesis (SMT, Chomsky 2001, 1) is the conjecture that language approaches optimality in this very particular sense. Case, in particular Abstract Case, should leap to the foreground in such a line of inquiry, in the form of the question in (16).

(16) Why should there be Abstract Case at all?

At first blush, Abstract Case seems problematic for the SMT, in the sense that there is no obvious interface pressure for its existence. To the extent that there is any temptation to toy with functionalist explanations, such as the identifying and distinguishing functions of case recognized by Mallinson & Blake (1981), Comrie (1989) and others, these seem ill-suited to the core examples of Abstract Case at work in languages such as English where Case is not marked.

One speculation (see, e.g., Chomsky 2004) is that abstract Case features, now generalized as part of a system of uninterpretable formal features, lie at the heart of the linguistic coding of what Chomsky refers to as the “duality of semantics” (Chomsky 2004, 7), one side being thematic relations/argument structure, and the other being information structure and scopal relations. Under the most recent conception, Case features allow for the proper working of the Probe-Goal system, a feature-checking mechanism that is in a loose sense the descendent of licensing under government. Another speculation (see Pesetsky & Torrego 2001) is that what we call Case is in fact the NP analogue of tense in the verbal system. As pointed out above, at the time of writing, that aspect of the Minimalist Program which focuses on the SMT and questions at a similar level is, according to Chomsky, a research program, still in its infancy. We believe it is fair to say that the jury is still out as to whether this perspective will yield new insights in this unexplored terrain, in large part due to a paucity of evidence concerning the properties of the interfaces.

4. TOPICS IN CASE THEORY WITHIN GB/MINIMALISM

In closing, we note briefly three additional topics that have received prominent attention from the perspective of Case Theory within GB and/or Minimalism. In some sense, each of these topics constitutes an add-on to the core Case Theory, in that the proposals cited have had less influence on the direction Case Theory has taken than the topics considered above.
4.1 Null Case

The ECM/control distinction (1a-b) at the historical heart of Case Theory received renewed attention in the early Minimalist period. The original analysis relied on three stipulations: (i) a selectional difference for the infinitival complements of ECM (IP) vs. control (CP) verbs, (ii) the absence of a Case assignment rule to the subject position of infinitives (see (4)), and (iii) exempting the NP PRO from the Case Filter. One strand of inquiry asked whether these stipulations might not be derivable, at least in part. The major investigation in this area centred on Stowell’s (1982) observation (developed in more detail in Pesetsky 1992) that control infinitives are typically future irrealis infinitives, whereas ECM infinitives are typically propositional infinitives.9 Building on this observation, Chomsky & Lasnik (1995), Bošković (1996, 1997), Martin (1996, 2001) proposed an amendment to (4) whereby the subjects of “tensed” infinitives (those with a future irrealis interpretation) do assign Case to their subject position, but the Case assigned is a special “Null Case” that only PRO (but not lexical NPs) may bear. Under this view, the Case Filter could thus be taken to regulate all NPs including PRO, an (apparent) reduction in the stipulations needed to account for the difference. The Null Case approach has proven controversial within the MP, though (see Landau 2000a, Baltin & Barrett 2002, Hornstein 2003, Cecchetto 2004, Wurmbrand 2005, To appear, for a variety of empirical and theoretical challenges). One of the most serious problems raised for the Null Case view is that the presence vs. absence of “infinitival tense”—the predictor of Null Case—has itself not been shown to be predictable on independent grounds, leaving Null Case as possibly simply a notational variant of the earlier account.

Another challenge for Case Theoretic treatments of the ECM/Control distinction, (problematic for both the Null Case view and the original Case Theoretic analysis in section 1) comes from languages in which the subject of (non-ECM) infinitives receives a detectable morphological case (not Null Case). Once again, Icelandic has played an important role in the discussion since morphological case on PRO is detectable via elements that show agreement in case with the subject position (see Sigurðsson 1991). A different aspect of this problem (noted already in Chomsky 1981, 140, n.25) is posed by languages that allow overt, case-marked subjects of non-finite, non ECM clauses, such as accusative subjects in Latin and Greek.

4.2 Ergativity and Case Typology

Within GB (and to a lesser degree in Minimalism), Case Theory was dependent upon rules of Case assignment, which were held to be a point of cross-linguistic variation (see section 2). Perhaps the most striking aspect of cross-linguistic variation in (morphological) case lies in the existence of alignments other than nominative-accusative, including ergativity, and split systems (cross-reference, this volume). Ergativity received a treatment early in the GB period in Marantz 1981, with a variety of subsequent proposals in both the GB and Minimalism frameworks, (see Butt 2006, chapter 6, for a survey and Johns, Massam & Ndayiragije 2006 for a collection of recent views). perhaps the most important question of this literature (still unresolved) is whether ergativity is a syntactic or morphological phenomenon, in other words, whether the difference in case patterns correlates with any syntactic differences. In the early GB period, when (structural) Case was equated with (morphological) case, an ergative case

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9 As shown in Pesetsky (1992), the picture is, in fact, far more complex. However, we abstract away from various complications here.
system should be expected to have a variety of syntactic ramifications. For example, if absolutive is like accusative (i.e., the object cases), in not being tense-dependent, then intransitive subjects in ergative systems should not be limited to PRO in infinitives (see Bobaljik 1993 for a Minimalist exploration of this idea with respect to Inuit languages). On the other hand, the post-ZMT recognition of a more abstract relation between Structural Case (the abstract, syntactic licensing) and morphological case, leaves open the possibility that ergativity is best described in terms of the relation between syntax and morphology, and thus lies outside the domain of Case Theory. The dominant view at this point appears to be that ergativity is not a uniform phenomenon, and that there is considerable syntactic variation among languages with ergative case systems, and hence the questions just raised must be asked not for ergativity as a phenomenon, but for individual languages or groups thereof.

4.3 Case and agreement

A final topic that has been explored within GB and MP concerns the relationship of case to other features of the grammatical system. A popular view is that case and agreement represent the same fundamental grammatical relationship, and instantiate head versus dependent marking of that relation. Inasmuch as the relationship between Case and case is transparent, this simple view is simply incorrect in light of “split” systems, such as Warlpiri or Chukchi, in which ergative-absolutive case marking occurs alongside subject-object (nominative-accusative) alignments in agreement. Even more complicated relationships among case and agreement arise in, for example, the Ergative Displacement of Basque (Laka 1993, Hualde & Ortiz de Urbina 2003), or the Chukchi Spurious Antipassive (Spencer 2000, Hale 2002, Bobaljik & Branigan 2006). Of course, as with ergativity, the issue becomes far more complex as the relevant notion of Case for Case Theory became more abstract along the transition from GB to Minimalism. For two recent, opposing perspectives on the relation of Case and agreement within Minimalism, see Legate (2005) and Bobaljik (to appear).

REFERENCES