

# Case, Minimalism, and Diachronic Syntax

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## ABSTRACT

Middle English (ME) is known to exhibit a number of peculiar constructions in which Case-marked NPs can be found in positions where Present-day English (PE) does not allow them to appear. I take up two such constructions in this paper. One example is nominative Case-marked NPs which appear in the subject position of an infinitival construction that is itself the subject of a clause. The other is accusative Case-marked NPs which appear in the position of NP in the “it be ADJ [NP to VP]”-type construction. I attempt to account for the phenomena in terms of Chomsky’s (1995a, 1995b) minimalist approach to the theory of grammar.

## 0. Introduction

It is well known that ME has the following two infinitival constructions. One is the one where PRO or a nominative NP appears in the subject position of the infinitive (see (1)). The other is the one where PRO or an accusative NP appears in the position of NP in the “it be ADJ [NP to VP]” structure (see (2)).

- (1) a. [to beholde hyt] was gret joye (Ch BD 325)  
to behold it was great joy

- b. [thow to lye by our moder] is to moche shame for vs to  
 thou to lie by our mother is too much shame for us to  
 suffre (Morte Darth 453, 4)  
 suffer
- c. [a man to soweyn kokyl] betoknith euelis and stryf  
 a man to sow cockle means evils and strife  
 (Dreambk (Forster, Mitteleng. Volkskunde) 80)
- (2) a. it is good [to go] (Nakao (1972: 318))
- b. it is profitable [him to haue sum thing forto ofte and  
 it is profitable him to have something to often and  
 miche remembre him] (Pecock, Repressor 555, 7)  
 much remember him
- c. it is good and resonable [men to haue chirchis in mesure]  
 it is good and reasonable men to have churches in measure  
 (Wyclif, Pseudo-Freris (Eng. Wks. ed. Matthew) 121)

The corresponding PE constructions are as follows:

- (3) a. [to go at once] is important
- b. \*[we to go] is necessary (cf. For us to go is necessary.)
- c. \*[John to be honest] is desirable (cf. For John to be honest is desirable.)
- (4) a. it is important [to choose good friends]
- b. \*it is necessary [him to do the job] (cf. It is necessary for him to do the job.)
- c. \*it is good [people to have coffee] (cf. It is good for people to have coffee.)

We see from the above that infinitival constructions in which the

subject is nominative Case-marked is grammatical in ME (see (1b, c)), while they are not in PE (see (3b, c)). We also see that an accusative NP is allowed in the position of NP in the "it be ADJ

[NP to VP] " configuration in ME (see (2b, c)), whereas it is not in PE (see (4b, c)). In this paper I will try to account for these contrasts between ME and PE within the framework of the Minimalist Program of Chomsky (1995a, 1995b). It will be seen that the presence versus absence of overt verb raising in the two languages plays a crucial role in the explanation.

## 1. Basic Assumptions

I assume the following for the purposes of discussion in this paper. First, Middle English (ME) is a verb-second and SVO language, while Present-day English (PE) is an SVO language, but not a verb-second one. As for the verb-second property of ME, I assume that it may belong to the phonological component (Chomsky (1995a: 289)). Incidentally, Nakao (1972) takes the Early Middle English period to be c. 1150-1300 and the Late Middle English period to be c. 1300-1500. And Roberts (1993) notes that "...V2 was lost in the 15th century...." Second, ME infinitives (dealt with in this paper) are TPs with *to* as their head.<sup>1</sup> Note, incidentally, Lightfoot's (1979) observation that "... the *to* infinitive in ME was originally a NP and later lost its NP status...." Third, *to* is basically a preposition; that is, it has Case-checking ability. Specifically it is assumed to be responsible for checking of accusative Case features in certain constructions (part of which will be dealt with here). Fourthly, I adopt Chomsky's (1995a) Agrless, multiple-Spec

clausal structure. Chomsky (1995a: 355) notes that "... the change from an Agr-based to a multiple-Spec theory...." And lastly, I assume that ME is an overt verb raising (V-to-T) language both in matrix and embedded clauses, while PE is not. This last assumption is instrumental in explaining important differences between ME and PE.

We will then see what checks nominative Case in the relevant ME examples in (1) and then examine how the Case features of the accusative NPs are checked in (2b, c).

## 2. What Checks Nominative Case?

I assume the relevant structure of (1a) to be as follows:

(5) [<sub>TP</sub> PRO to beholde hyt] was gret joye

In (5) the [+Tense] feature of the infinitive checks null Case, which PRO is marked for. (See Bošković (1997) and also Chomsky (1995a: 120).)

Let us then see some definition and consequences concerning the notion(s) of Last Resort/Greed. Chomsky (1995a: 280) defines Last Resort as follows:

(6) *Last Resort*

Move F raises F to target K only if F enters into a checking relation with a sublabel of K.

Bošković (1997: 178) follows Chomsky (1995a: chapter 1) in

assuming that all instances of movement from Case-checking to Case-checking position are Last Resort Condition violations. That is, the Last Resort Condition forbids NP movement from Case-checking to Case-checking positions. According to Lasnik (1995a), Chomsky's Greed requires that items move only to satisfy their own requirements, while his (Lasnik's) Enlightened Self-Interest states that items move either to satisfy their own requirements or those of the position they move to (see also Chomsky (1995a: 261)). Lasnik (1995a) presents a number of arguments in support of his Enlightened Self-Interest, whereas part of Bošković (1997) is devoted to defending Chomsky's Greed.

Bošković (1997: 178) discusses the following example:

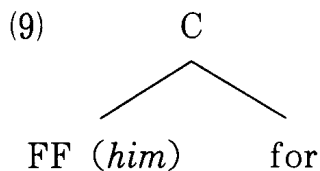
(7) \* $he_i$  seems to  $t_i$  that Mary is ill

In order to account for (7), it has been observed that regardless of whether the Case features of the Case-checker and Case-checkee match, when an NP is found in a Case-checking position, a Case-checking relation is established, thus preventing the NP from moving into another Case-checking position (see also Chomsky (1995a: chapters 1 and 3)). Bošković (1997: 178) goes on to introduce Martin's (1992) proposal to the effect that movement from Case-checking to Case-checking positions is in principle allowed. According to Martin, such movement can still be ruled out if Case features of traditional Case-assigners must be checked. Thus if *he* undergoes Case-checking in the matrix SpecIP in (7), the construction is ruled out because the Case feature of *to* remains unchecked.

Here I point out that these observations are too strong upon closer scrutiny of a relevant example.

- (8) a. [<sub>TP</sub> PRO to read the book] is necessary  
 b. [<sub>CP</sub> for [<sub>TP</sub> him to read the book] is necessary

In (8a), assuming the validity of the VP-internal subject hypothesis, PRO raises to SpecTP for EPP reasons and the null Case of PRO is checked by T (*to*) as a free rider (Chomsky (1995a: 282)). In (8b) *him* raises to SpecTP for EPP, but the position of *him* at Spell-Out is a null Case position, where *him* cannot be Case-checked. It follows then that the Case feature of *him* must be checked at LF. The formal features of *him* (FF (*him*)) are adjoined to *for*, as in the following:



In (9) FF(*him*) adjoins covertly to *for* for Case-checking. Note that the position of FF(*him*) is a Case-checking position. Then it follows that FF (*him*) moves from (null) Case-checking to Case-checking positions. And moreover, the null Case feature of the infinitive remains unchecked.

Still the construction is grammatical. It follows then that the above observation that items cannot move from Case-checking to Case-checking positions or that unchecked Case features cause ungrammaticality is too strong. We will see the same kind of situation obtain in the explanation of (1b, c).

Chomsky (1995a: 342-343) discusses Jonas's generalization to the effect that multiple-subject constructions (MSCs) are contingent on

overt verb raising. Consider the following ME example:

- (10) [a man to soweyn kokyl] betoknith euelis and stryf (= (1c))  
 a man to sow      cockle means      evils and strife

I assume the structure of (10) at Spell-Out to be as follows:

- (11) [<sub>TP1</sub> a man<sub>i</sub> [<sub>T1</sub> [<sub>TP2</sub> t<sub>i</sub>' [<sub>T2</sub> t<sub>i</sub> [<sub>T2</sub> to-soweyn<sub>j</sub>] t<sub>j</sub>  
 kokyl]] [<sub>T1</sub> T-betoknith<sub>k</sub>] t<sub>k</sub> euelis and stryf]]]

Notice that Ura (1993b) discusses a similar Japanese example, as follows:

- (12) a. [<sub>AgrSP</sub> [<sub>DP</sub> bunmeikoku-ga heikinjyumyoo]-ga AgrS  
 civilized country-NOM average life-span-NOM  
 [<sub>TP</sub> T [<sub>AP</sub> nagai]]]  
 long  
 'The average life-span of civilized countries is long.'
- b. [<sub>AgrSP</sub> bunmeikoku-ga<sub>i</sub> [<sub>AgrSP</sub> [<sub>DP</sub> t<sub>i</sub>' [<sub>DP</sub> t<sub>i</sub> heikin-  
 jumyoo]]]-ga AgrS-T<sub>j</sub> [<sub>TP</sub> t<sub>j</sub> [<sub>AP</sub> nagai]]]]] (LF)

Ura (1993b) assumes that Japanese T and AgrS can license multiple features and that a position adjoined to an AgrSP (i. e., a broadly L-related position of an AgrS) can count as an A-position in Japanese, a broadly L-related position of D in Japanese serving as an A-position for A-movement (see also Chomsky (1995a: 196)).

Turning to (11), note that we have assumed that ME is an overt verb raising language both in matrix and embedded clauses, while PE is not. The position of t<sub>i</sub>', which I assume to be an A-position

and an escape hatch, is available due to overt verb raising in the embedded clause (TP2). The position of *a man<sub>i</sub>* is available due to overt verb raising in the matrix clause (TP1). Notice that the position of *t<sub>i</sub>* is a (null) Case position, but see the discussion concerning (8b) for movement from (null) Case-checking to Case-checking positions. The position of *a man<sub>i</sub>* is a Case-checking position and the nominative Case feature of *a man* is checked in the position of *a man<sub>i</sub>* by the matrix T (see Chomsky (1995a: 286, 354)). Note that the movement of *a man* is overt.

In PE the position of *t<sub>i</sub>'* is not available since it is not an overt verb raising language. Movement from *t<sub>i</sub>* would result in a violation of factors that constrain movement: barriers, CED and ECP considerations, and so forth. The position of *a man<sub>i</sub>* is not available either.

ME constructions involving a nominative Case-marked NP in a position that cannot be licensed in PE have been dealt with and shown to be amenable to an analysis in terms of Chomsky's (1995a: chapter 4) minimalist approach to the theory of grammar. In the analysis I have made a crucial assumption that ME is an overt verb raising language both in matrix and embedded clauses, while PE is not. My account has also depended on Jonas's generalization that multiple-subject constructions are contingent on overt verb raising. I hope to have shown the availability of the relevant ME construction in terms of a parametric difference between ME and PE: i. e., the presence versus absence of overt verb raising. Now let us turn to the examples in (2) and examine how the Case features of the accusative NPs are checked.



### 3. How is Accusative Case Checked?

I assume the relevant structure of (2a) to be like the following:

(13) it is good [<sub>TP</sub> PRO to go]

In (13) PRO raises to embedded SpecTP for EPP or for null Case-checking (Chomsky (1995a: 282)).

Turning to ME cases where an accusative Case-marked NP is found in a position that cannot be licensed in PE, consider the following example:

(14) it is good and resonable [<sub>TP</sub> men to haue chirchis  
it is good and reasonable men to have churches  
in mesure] (= (2c))  
in measure

In (14) *men* raises to embedded SpecTP for EPP, but the Case feature of *men* cannot be checked in this position, which is a null Case position.

Before getting to the mechanism of checking the Case features of *men* in (14), a word may be in order concerning the categorial status of the infinitival complement. Note that we have observed as one of our basic assumptions (see section 1) that ME infinitives are TPs with *to* as their head. Discussing null-operator relatives in terms of the notion of economy of representation, Bošković (1997: 25) introduces a principle that he refers to as the "Minimal Structure Principle" (MSP), as follows:

(15) *The Minimal Structure Principle*

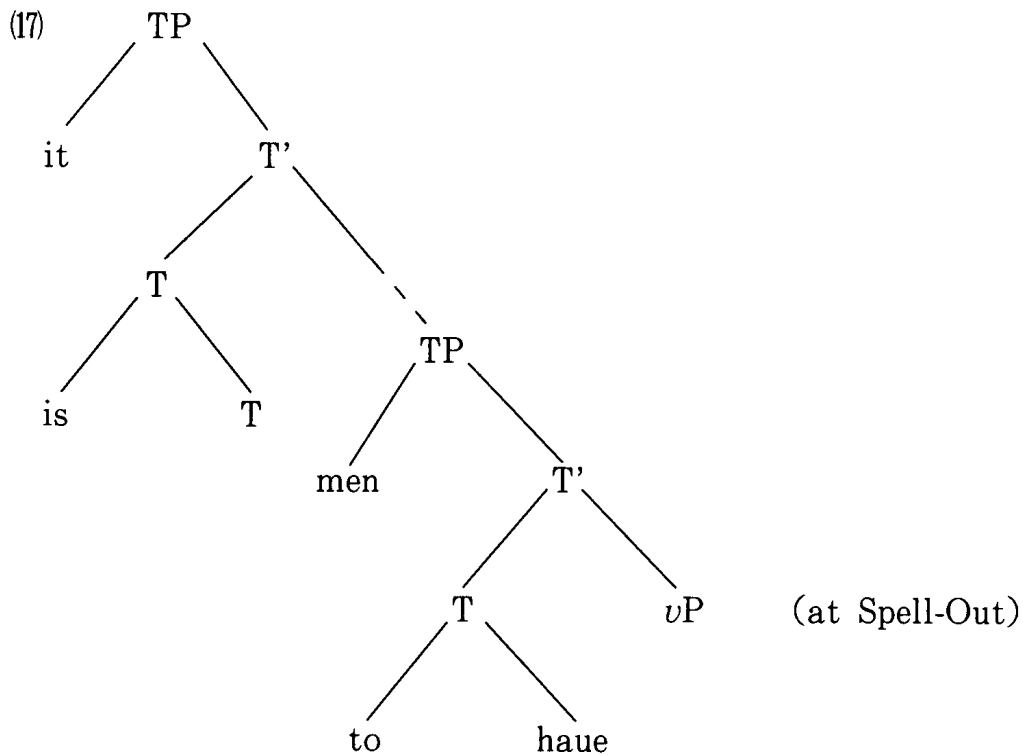
Provided that lexical requirements of relevant elements are satisfied, if two representations have the same lexical structure and serve the same function, then the representation that has fewer projections is to be chosen as the syntactic representation serving that function.

And based on Margaret Speas's proposal, Rohrbacher and Vainikka (1995: 494) give the following version of a Principle of Economy of Projection:

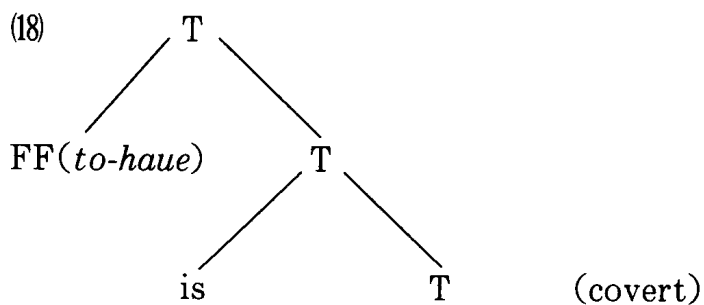
- (16) Project XP only if its head X has independent semantic or phonetic content at D-structure or its specifier XPSpec has such content at S-structure.

It should be clear from the two similar principles above ((15) and (16)) that the infinitival complements in (1-4) must be TPs, but not CPs, for example.

Now let us turn to how the Case features of *men* in (14) can be checked. Notice our basic assumption that ME is an overt verb raising (V-to-T) language both in matrix and embedded clauses. I propose that the structure of (14 (= (2c))) at Spell-Out be as in the following (only the relevant portions are given) :



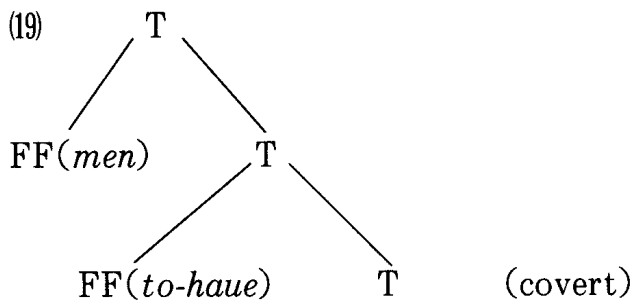
In (17) both the matrix verb (*is*) and the embedded verb (*haue*) have adjoined to T. Then I assume that the formal features of embedded  $T^{0max}$  (the *to-haue* complex;  $FF(to-haue)$ ) adjoin to matrix  $T^{0max}$  in the covert component, presumably due to checking of some kind of V-features, as in the following:



This may remind us of a kind of ‘restructuring’ in the sense of Rizzi (1982: chapter 1), where a number of Italian examples are discussed in terms of this rule. I assume Rizzi’s restructuring rule to be

contingent on overt verb raising both in matrix and embedded clauses. We will see some effects and consequences of this assumption when we consider clitic climbing cases in Italian (and French).

Now what checks the accusative Case feature of *men* in (14) ? I assume that the Case feature of *men* (and hence  $FF(men)$ ) raises to the matrix  $T^{0max}$  (see (18)), yielding a structure like the following (only the relevant portions are given):



In (19) *haue* has already checked the Case feature of *chirchis*, no longer having Case-checking ability. Note that one of our basic assumptions has been that *to* (a preposition) has Case-checking ability. Specifically I assume that *to* is responsible for checking of accusative Case features in such examples as (14). Thus  $FF(to)$  checks the accusative Case feature of *men* ( $FF(men)$ ).<sup>2</sup> The operation adjoining  $FF(men)$  is permitted, since the features of  $FF(to)$  are sublabels of the target of adjunction. And it satisfies the conditions on “closest target,” there being no element with the relevant Case feature intervening between *men* and the target of adjunction. It also satisfies the conditions on formation of complex  $X^0$ s, adjunction always being to the maximal zero-level projection  $X^{0max}$ , never internally to one of its constituents (Chomsky (1995a: 360-361)).

Notice that raising of  $FF(men)$  in (19) is covert. Examining a clitic climbing case from Italian and the lack of it in French, we will see

in the following section that there exist cases where overt raising of the sort is involved.

#### 4. Clitic Climbing (Italian vs. French) and Its Implications for the ME Case

Working within the Government-Binding / Barriers framework, Kayne (1989) discusses the contrast between Italian and French seen in the clitic climbing construction in the following:

- (20) a. Gianni li vuole vedere (Italian)  
b. \*Jean les veut voir (French)  
John them-wants to-see

Although Kayne (1989) is an attempt to explore the possibility of expressing a relation between clitic climbing and null subjects within an approach that tries to do away with Rizzi's (1982) restructuring rule, I analyze the examples in (20) in some depth within Chomsky's (1995a, 1995b) minimalist approach to the theory of grammar, without discussion of the importance of possible relations between clitic climbing and null subjects.

Consider the following contrasts from Pollock (1989):

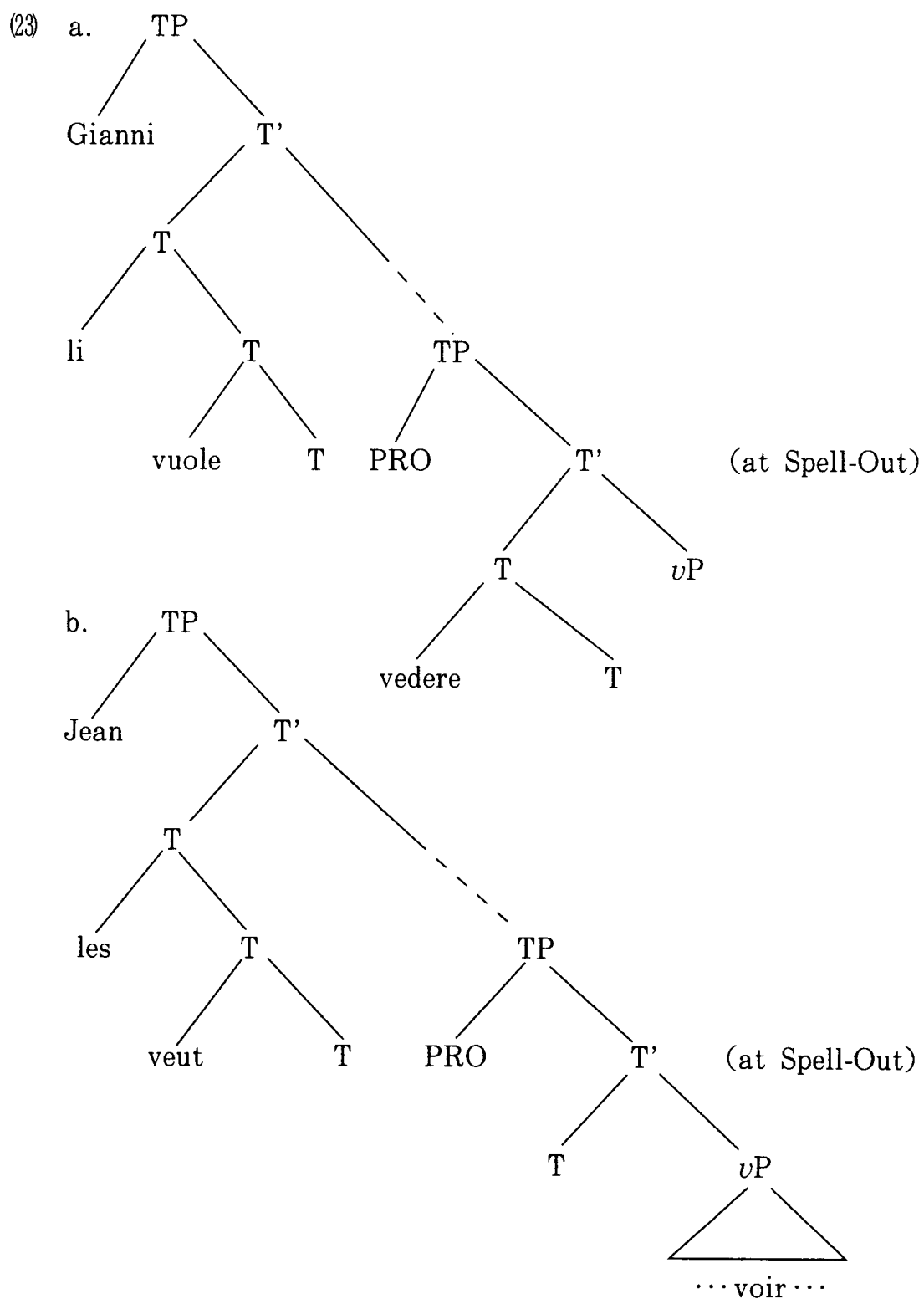
- (21) a. Pierre ne mange pas  
Pierre *ne* eats not  
b. \*Pierre ne pas mange  
Pierre *ne* not eats

- (22) a. Ne pas manger ...  
           *ne* not to eat  
       b. \*Ne manger pas ...  
           *ne* to eat not

I assume from the above that in French finite verbs undergo obligatory overt verb raising (V-to-T), while there is no such raising with infinitives. Then we see that there is an asymmetry with V-to-T movement between finite and infinitival clauses in French.

Turning to Italian, Belletti (1990: 71) notes that “the complete parallelism of the infinitival paradigm and the tensed paradigm naturally leads to the conclusion that the derivation of the infinitival form of the verb proceeds in the same way as that of the finite form with the verbal root moving to the highest inflectional head AGR.”<sup>3</sup> She then goes on to observe that “the most important difference from this point of view is precisely the fact that Italian verb syntax is completely uniform across tensed and infinitive paradigms, while French verb syntax is not, with V raising to AGR only in the tensed paradigm but not in the infinitive (Belletti (1990: 85)).” Without much discussion of my own, I assume based on Belletti (1990) that in Italian there is overt verb movement (V-to-T (Belletti’s (1990) V-to-AGR)) both in tensed and infinitival clauses.

Then let us see the relevant structures of (20a, b) at Spell-Out. The complements in (23a, b) are assumed to be TPs, contra standard assumptions (see Kayne (1989, 1991), among others).



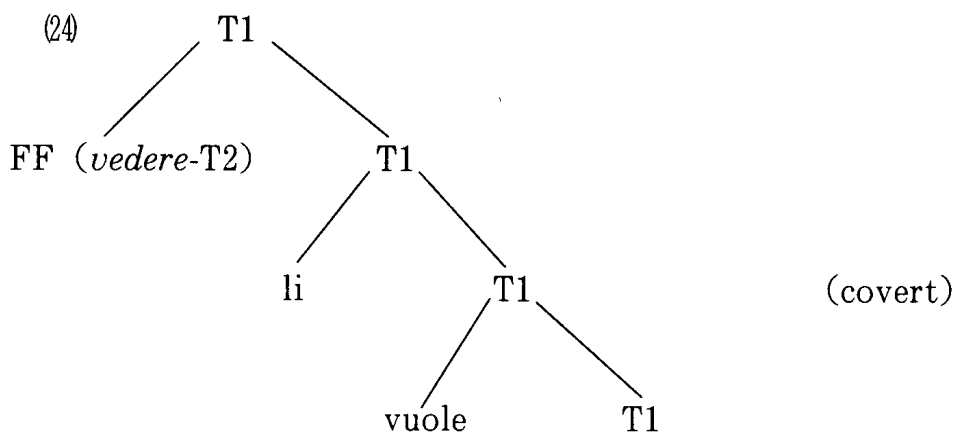
Note that in (23a) the embedded verb *vedere* has raised to the embedded T, while in (23b) the embedded verb *voir* stays in *vP*.

Before getting to the examination of (23a, b), let us review some relevant assumptions concerning Case and Case theory in the minimalist framework. Case features are not strong, and hence LF Case-checking if nothing happens to make it overt. In the usual case covert Case-checking is preferred to overt Case-checking for some reasons presumably associated with a procrastinate-like principle.<sup>4</sup> Case features are generally –Interpretable. Both the Case feature of nouns and the Case-assigning feature of T and V are –Interpretable. Chomsky (1995a: 278) discusses the formal asymmetry of the checking relation in connection with the notion of Interpretability, observing that in the relation between a feature F of the checking domain of the target K and a sublabel F' of K, F' is always –Interpretable. Chomsky gives the Case-assigning feature of T and V as an example of F' in the case of a Case-related relation. Although Chomsky's (1995a: 278) notion of formal asymmetry of the checking relation points to some differences between checker (within the target; e.g., the Case-assigning feature of T and V) and checked (within the checking domain; e.g., the Case feature of nouns), we will see a case where the relation between the Case-assigning feature of T and V and the Case feature of nouns is reversed. I will assume that a checking relation can be established in the reversed case as well, since the Case feature of a noun (a clitic, which is a D), which corresponds to a sublabel F' of K in this case, is –Interpretable.

Notice that in the ME case in (14) the formal features of embedded  $T^{0max}$  (FF(*to-haue*) in (14)) adjoin to matrix  $T^{0max}$  in the covert component, which I assume to be responsible for the restructuring effects



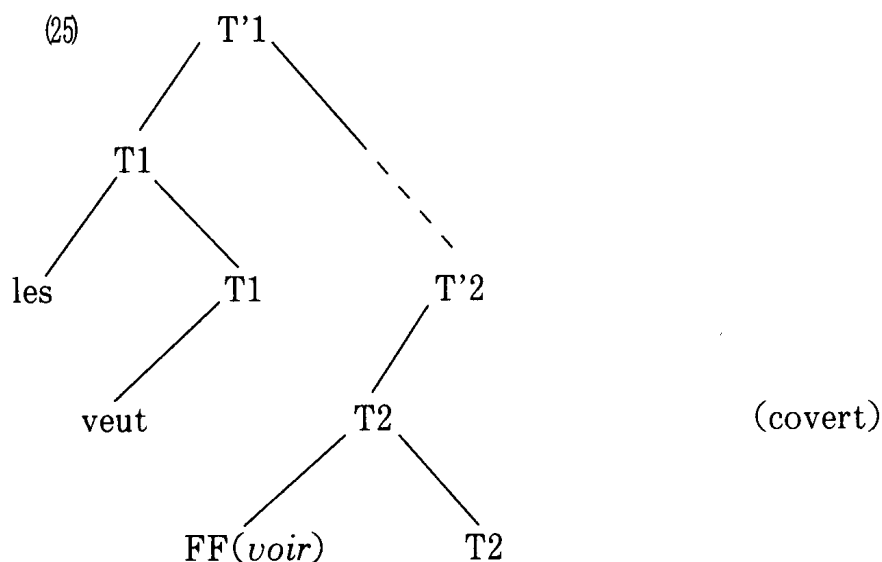
in the sense of Rizzi (1982: chapter 1). Now let us see what happens to (23a) in this connection.



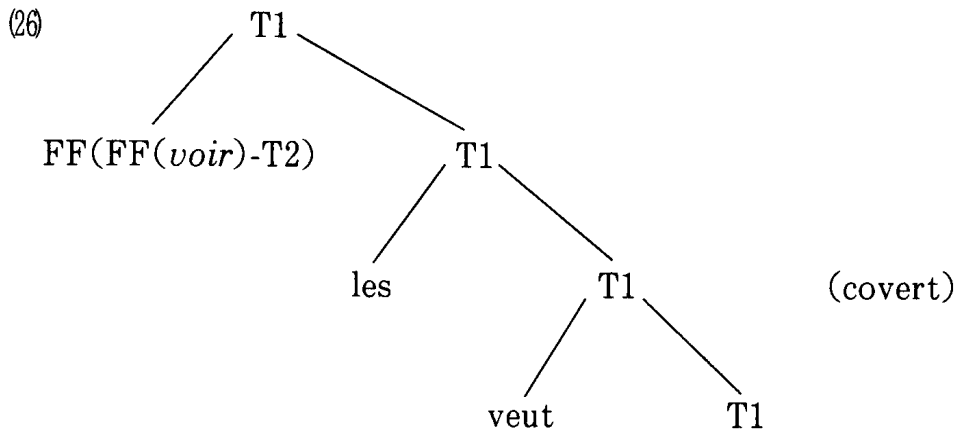
In (24) T1 indicates matrix T and T2 embedded T. There may be at least two reasons that FF(*vedere*-T2) adjoins to T1 (matrix  $T^{0_{max}}$ ). One reason may be that connected with the restructuring effects, which presumably require checking of some kind of V-features. And the other may be that coming from Case reasons, the reversed case (*li* as a sublabel F' of K and FF(*vedere*-T2) as a feature F of the checking domain of the target K) in connection with Chomsky's (1995a: 278) notion of formal asymmetry of the checking relation being permissible, as discussed above. Note that in the former case Case-checking is done as a free rider and in the latter case the restructuring property is satisfied as a free rider. I assume that the adjunction operation in (24) is permitted, either because of the restructuring property of the construction, or because the features of *li* are sublabels of the target of adjunction, and the operation satisfies the conditions on "closest target," there being no element with the relevant Case-assigning feature intervening between *vedere*-T2 and the target of adjunction, and also satisfies the conditions on

formation of complex  $X^0$ s, adjunction always being to the maximal zero-level projection  $X^{0max}$  (Chomsky (1995a: 360-361)). Recapitulating Case-related points in (24), the Case feature of *li*, which is a sublabel of the target, checks the Case-assigning feature of  $FF(vedere-T2)$  (or of  $FF(vedere)$ ), which is a case reverse to the usual one.

Then let us see what we can say about (23b), where there is no overt verb raising in the embedded clause.<sup>5</sup> We get the following structure for (23b) in the covert component:



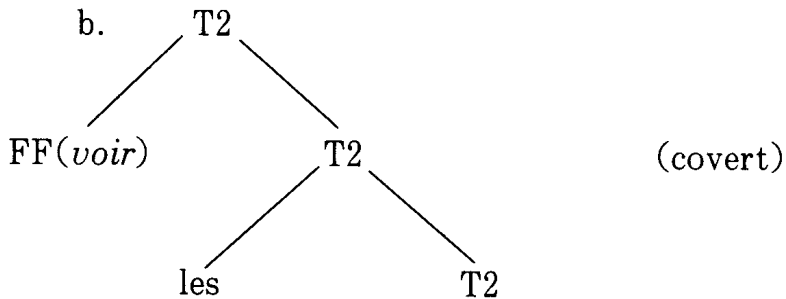
In (25) T1 indicates matrix T and T2 embedded T. We see that the formal features of *voir* ( $FF(voir)$ ) have adjoined to the embedded T in (25). Notice that there is no restructuring in the sense of Rizzi (1982: chapter 1) in French (and hence no checking of relevant V-features). But in (25) the clitic *les* has an unchecked Case feature. I assume that the formal features of the embedded  $T^{0max}$  ( $FF(FF(voir)-T2)$ ) adjoin to the matrix  $T^{0max}$  for Case reasons, as in the following:



Before turning to the examination of the structure in (26), let us see the relevant portion of the structure of the grammatical French example containing a clitic in the following:

(27) a. Jean veut les voir

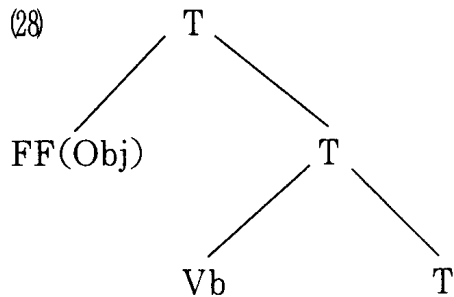
John wants them-to-see



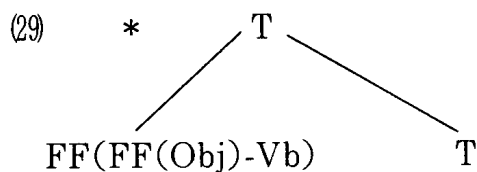
In the grammatical French example in (27) the clitic *les* has adjoined to the embedded T in the overt component, and the formal features of *voir* (FF(*voir*)) adjoin to the embedded  $T^{0max}$  for Case (and other) reasons, as we see in (27b).

Chomsky (1995a: 360-362) introduces the notion of poverty of interface interpretation, which is assumed to be a minimalist principle that follows from the conceptual requirement of maximizing uniformity of LF outputs. Chomsky gives a specific configuration as a

concrete implementation of the minimalist principle of poverty of interface interpretation, as follows (Chomsky (1995a: 360)):



Although Chomsky (1995a: 362) concludes that “adjunction is to the maximal  $X^0$  projection  $X^{0max}$  and that heads raise before elements of their domains,” I claim concerning the latter conclusion that there may be cases where heads raise *after* elements of their domain, particularly given an element (such as a clitic) that overtly adjoins to the relevant T or  $T^{0max}$  (see (24), (26), (27b)). Chomsky (1995a: 361) notes that FF(Obj) cannot raise to V or to the verbal complex Vb before Vb adjoins to T. Notice that this assumption does not rule out a clitic that adjoins to T or  $T^{0max}$ . Suppose that FF(Obj) raised to Vb before Vb adjoined to T and then the formal features of the whole complex (FF(Obj)-Vb) adjoined to T, we would obtain the following configuration:



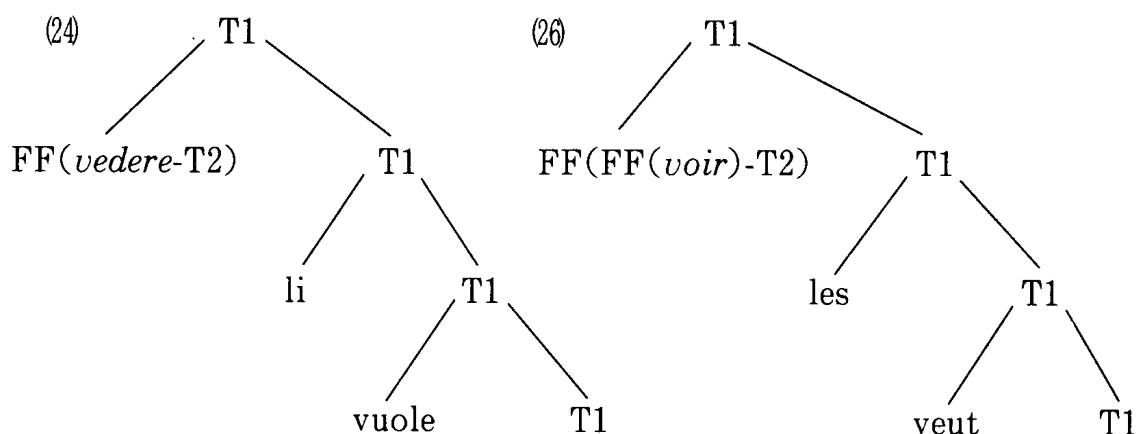
Note that the configuration in (29) should be ruled out by Chomsky’s (1995a) minimalist principle of poverty of interface interpretation. Specifically it follows that the formal feature(s) of

the formal feature(s) of an element cause(s) unacceptability.

Then let us compare the grammatical Italian example in (20a), where we see a case of clitic climbing, with the ungrammatical French example in (20b), where clitic climbing is impossible, both repeated here:

- (20) a. Gianni li vuole vedere  
 b. \*Jean les veut voir

The relevant portions of their structures are as in (24) and (26), repeated here:



(24) is part of the structure for (20a) and (26) for (20b). Comparing the two structures above, we can immediately see that (26) has a portion of a structure that leads to unacceptability; that is, the presence of formal features of the formal features of an element (FF (FF(*voir*)...); see the discussion concerning (29) above). It then follows that (26) violates the principle of poverty of interface interpretation, explaining the deviance of the French example in (20b). Note that there is nothing wrong with the structure in (24), and hence the grammaticality of the Italian example in (20a). Nor is there anything wrong with the structure in (19) (see the ME example

in (14 (= (2c))) with respect to the principle of poverty of interface interpretation.

## 5. Conclusion

We have assumed in this paper that ME is an overt verb raising (V-to-T) language both in matrix and embedded clauses (or both intensed and infinitival clauses), while PE is not. As for checking of nominative Case in such examples as (1b, c), Jonas's generalization has played a major role in procuring extra Spec positions for the analysis to go through. We have also seen some evidence that shows that observations to the effect that items cannot move from Case-checking to Case-checking positions and that unchecked Case features cause ungrammaticality are too strong.

As for checking of accusative Case in such examples as (2b, c), recall that we have assumed that both ME and Italian are overt verb raising (V-to-T) languages both in matrix and embedded clauses (or both in tensed and infinitival clauses). Italian has clitic climbing (see (20a)), where an embedded element goes up overtly to a matrix functional position. We have seen a covert counterpart of the clitic case in the treatment of the ME example in (14(=(2c))), where *FF(men)* raises to the matrix  $T^{0max}$  (see (19)). I assume that the presence of *overt* clitic climbing in Italian supports the kind of analysis presented in this paper of ME cases such as the ones in (2b, c) by enabling one to assume the existence of its *covert* counterpart. As for the checker, *to* (a preposition) has been assumed to be responsible for checking of accusative Case features. We have also seen that restructuring in the sense of Rizzi (1982: chapter 1) derives from

checking of some kind of V-features, which drives the adjoining of the formal features of the embedded  $T^{0max}$  to the matrix  $T^{0max}$ .<sup>6</sup> (See the discussion below (25) for the case where the formal features of the embedded  $T^{0max}$  adjoin to the matrix  $T^{0max}$  for Case reasons.)

## NOTES

1. See (15) and (16) below in the text.
2. Note that we have seen in section 2 that the null Case of PRO is checked by T (*to*). I assume that it depends on the configuration which Case is checked: null Case is checked in a Spec-head relation and accusative Case within  $T^{0max}$ .
3. Belletti (1990) assumes that AGR is higher than T in the tree structure, diverging from Pollock (1989), who hypothesizes that T is higher than AGR.
4. Assuming that V raises overtly to the light verb *v*, it might be possible to raise the clitic to the verbal complex Vb or to some SpecvP, thus overtly checking its Case features. But notice that Ura (1996) proposes that feature-checking be a syntactic operation subject to the general economy condition, leading to the claim that checking takes place only when it is required for convergence. Specifically it follows from Ura's proposal that Case features, which are generally not strong, need not be checked off before Spell-Out, economy then requiring them to be checked off after Spell-Out (i.e., in the covert component). So, as for the Case-checking of the clitic, I assume following Ura (1996) that the Case feature of the clitic need not be overtly checked, economy requiring it to be covertly checked.
5. I assume that there is an option that makes the intermediate structure in (23b) possible; that is, one where we see a case of clitic climbing (though the ultimate structure will be ruled out for other reasons, as we will see below in the text).
6. Exploring the exact nature of the relevant V-features is beyond the scope of this paper. I leave the matter for future research.

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