

Nominative Case Assignment in Apparently Tenseless Clauses in Japanese*

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1 Introduction

In the last four decades, there has been extensive investigation of the mechanism of Case assignment in Japanese, and what the crucial factor pertaining to assignment of nominative Case in Japanese is has been much controversial. For instance, Takezawa (1987), Koizumi (1994), Saito (2016), and others claim that a finite T is responsible for nominative Case assignment to a DP.

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On the other hand, Fukui (1986, 2006), Inoue (1989), Aoyagi (2006), and others argue that nominative Case should be assigned to a DP by the default strategy. Based on the latter perspective, nominative Case is no longer taken to be abstract Case that is syntactically assigned to the DP by heads capable of Case assignment, but it has become mere morphological case with which the DP is pronounced (Schütze 1997, 2001; McFadden 2004, 2007; Moritake 2023; among others). In order to figure out which of the two competing measures is employed in Japanese, I focus particularly on the nominative Case realization as exemplified in the bracketed adverbial clauses in (1) and (2). As shown in (1) and (2), there is no overt tense morpheme realization in such clauses; however, the subject *John* successfully receives nominative Case in both the examples.¹

- (1) [John-ga benkyoo-tyuu-ni], Mary-wa utattei-ta.
 John-NOM study-while-DAT Mary-TOP singing-PST
 ‘While John was studying, Mary was singing.’
- (2) [John-ga syukkin-mae/go-ni], Mary-wa ringo-o
 John-NOM go.to.work-before/after-DAT Mary-TOP apple-ACC
 tabe-ta.
 eat-PST
 ‘Before/After John went to work, Mary ate an apple.’

If nominative Case is contingent on the presence of finite T, as assumed by Takezawa (1987), Koizumi (1994), Saito (2016), and others, an immediate question that arises from these two examples is how DPs in the bracketed adverbial clauses obtain nominative Case. I will discuss these examples to show that finite T is indeed present in such clauses, enabling DPs to obtain nominative Case. This paper thus attempts to argue persuasively that nominative Case in Japanese is assigned to the DP not by the default strategy but by finite T. That finite T is responsible for nominative Case assignment in Japanese is, of course, not a new idea, as discussed above. In what follows, I would like to support this idea with further empirical evidence. I will also argue that default case in Japanese is realized as morphologically zero (null) form, suggesting that nominative Case in Japanese can never be assigned to the DP by the default strategy.

¹ The following abbreviations are used: ACC = accusative, DAT = dative, GEN = genitive, NEG = negation, NOM = nominative, PRES = present, PST = past, Q = question, TOP = topic

2 The Complex DP

As shown above, the overt tense morpheme, *-ta*, is present in the matrix clauses in (1) and (2); thus, finite T arguably exists in the matrix clauses in (1) and (2). It seems unlikely, however, that finite T in the matrix clauses is responsible for nominative Case assignment to *John* in the bracketed adverbial clauses in (1) and (2) because a nominative-marked subject in the bracketed phrase headed by *-tyuu* ‘while’ can independently be licensed without a matrix clause, as represented in (3).

- (3) [John-ga benkyoo-tyuu-no] sisei
John-NOM study-while-GEN posture
(Lit.) ‘the posture while John is studying’

Note that the same result obtains by using the phrase headed by *-mae* ‘before’ or *-go* ‘after,’ as demonstrated in (4), in which nominative Case assignment to *John* succeeds.

- (4) [John-ga syukkin-mae/go-no] tenki
John-NOM go.to.work-before/after-GEN weather
(Lit.) ‘the weather before/after John goes/went to work’

The examples in (3) and (4) strongly suggest that nominative Case can be assigned to the DPs within the bracketed phrases headed by *-tyuu* ‘while’ and *-mae/-go* ‘before/after,’ though finite T is apparently missing. Based on these examples, it can be assumed that nominative Case assignment to *John* in (1) and (2) is also accomplished within the bracketed adjunct clauses headed by the same elements. At this point, it still remains unclear whether nominative Case assignment requires the occurrence of finite T or adopts the default strategy. In the following section, I will empirically show that nominative Case does not serve as default case in Japanese, arguing explicitly that nominative Case is assigned to DPs without recourse to the default mechanism, in contrast to Fukui (1986, 2006), Inoue (1989), Aoyagi (2006), and others.

3 Against the Default Case Analysis

One might argue that the default case analysis for nominative Case assignment is more plausible than the proposal that finite T assigns nominative Case in Japanese, since finite T appears to be missing on the surface in the bracketed clauses/phrases in (1-4). However, this is a hasty conclusion. According to Schütze (1997, 2001), to diagnose a fragment answer is helpful to reveal

what default case is in the language. For instance, only a DP marked with accusative case is appropriate for a fragment answer in English, as in (5).

- (5) Q. Who wants to try this game?
A. Me/*I. (Schütze 2001: 211)

Schütze (1997, 2001) also points out that a left-dislocated DP is likely to be pronounced with default case. In English, such a DP must be marked with accusative case, as shown in (6).

- (6) Me/*I, I like beans. (Schütze 2001: 210)

Based on Schütze's (1997, 2001) analysis, it is a trivial truth that default case in English is accusative case (see also McCloskey 1985; McFadden 2004, 2007; among others).

Now let us turn to the examples in Japanese. As demonstrated in (7A), only a DP without an overt Case-marker is licensed as a fragment answer in Japanese (for relevant discussion, see Abe 2016; Miyagawa et al. 2016; among others). In what follows, 'DP- \emptyset ' stands for a DP without an overt Case-marker.

- (7) Q. Dare-ga ringo-o tabe-ta no?
who-NOM apple-ACC eat-PST Q
'Who ate an apple?'
A. Watasi- \emptyset /*ga/*o.
me- \emptyset /*NOM/*ACC
'Me.'

For left-dislocated DP, Takita (2014) and Moritake (2023) argue that Japanese only licenses a DP lacking an overt Case-marker, as shown in (8).

- (8) Takuya- \emptyset /*ga/*o, kare-wa kasiko-i.
Takuya- \emptyset /*NOM/*ACC, he-TOP intelligent-PRES
'Takuya, he is intelligent.'

The empirical facts in (7A) and (8) can straightforwardly be accommodated by assuming that DPs in Japanese are to be pronounced with default case in the absence of an overt Case-marker. In light of these facts observed above, default case in Japanese should be considered as morphologically zero (null) case (see also Moritake 2023 for relevant discussion). As a consequence, it follows automatically that nominative Case in Japanese cannot be regarded as default case, in contrast to the proposals by Fukui (1986, 2006), Inoue

(1989), Aoyagi (2006), and others. Thus, we must reconsider what makes nominative Case assignment available to *John* in (1-4).

4 Proposal

It is well-known that a subject within a relative clause in Japanese may be marked with *-ga* (nominative Case) or *-no* (genitive Case), as represented in (9). This phenomenon is often referred to as the *ga/no* conversion (Harada 1971).

- (9) [Taro-ga/no nonda] kusuri
 Taro-NOM/GEN took medicine
 ‘the medicine that Taro took’ (Akaso and Haraguchi 2011: 95)

Using the Case alternation illustrated in (9), I will provide evidence that nominative Case assignment in Japanese depends exclusively on the occurrence of finite T.

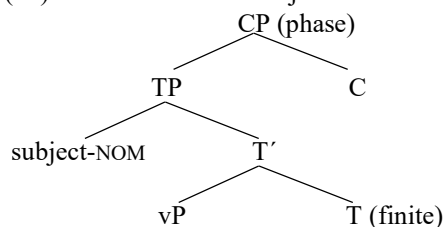
Akaso and Haraguchi (2011) observe the intriguing fact that the genitive subject is incompatible with focus-marking, whereas the nominative subject can be focused. This point is illustrated in (10), in which the subject *Taro* is focused with the focus-particle *dake* ‘only.’

- (10) [Taro-dake-ga/*no nonda] kusuri
 Taro-only-NOM/*GEN took medicine
 ‘the medicine that only Taro took’

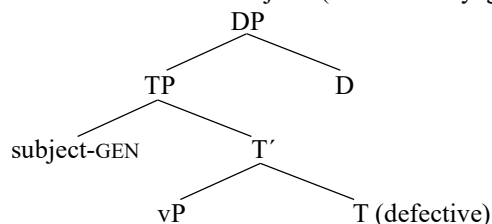
Adopting Rizzi’s (1997) articulated CP system, Akaso and Haraguchi (2011) assume that the focus-particle *dake* ‘only’ is licensed by a focus head located in the CP, concluding that a relative clause with nominative subjects is projected into the CP with a potential focus licensing head. For a relative clause with genitive subjects, Akaso and Haraguchi (2011) argue that it consists of the TP at most, given that no focus-marking on genitive subjects is possible. Related to this analysis, Miyagawa (2011, 2012, 2013, 2017) claims that in Japanese, the focus licensing of subjects requires a full phasal CP to be present in the clauses, with the assumption that a focus feature originates at the phase head C and is inherited by T. Based on Chomsky’s (2008) assumption that T is able to assign nominative Case only if it is selected by the phase head C, Miyagawa (2011, 2012, 2013, 2017) argues that nominative Case assignment is warranted within the bracketed relative clauses in (9) and (10) by assuming the presence of T selected by the phase head C, a presence of which is guaranteed by the focus-marking on the nominative subject. In contrast, Miyagawa (2011, 2012, 2013, 2017) suggests that when genitive Case

is assigned to the subject in a relative clause, it is implied that the bracketed relative clauses in (9) and (10) are composed of defective TPs: the defective nature of T follows from the assumption that T is not selected by the phase head C, thereby lacking the Case assigning property, just as with T in Exceptional Case-Marking and Raising Constructions in English (Chomsky 2008; Akaso and Haraguchi 2011; among others). The tree diagrams shown in (11) succinctly summarize the discussions so far.

(11) a. Nominative subjects



b. Genitive subjects (based on Miyagawa's series of works)



In light of these discussions, it is suggested that nominative Case assignment is available only if T is selected by the C head bearing a phasal status. A general assumption in Chomsky (2000, 2001, 2008) is that T should be finite when it is selected by the phase head C. Based on Akaso and Haraguchi's and Miyagawa's insightful analyses, I argue that in Japanese, nominative Case assignment is dependent on the presence of finite T selected by C, rather than the default strategy (see also Moritake 2022 for relevant discussion concerning the close relation between the availability of nominative Case in Japanese and the presence of the CP phase).

5 Analysis

This section analyzes specific examples, with the assumption that the focus licensing of the subject is key to identifying whether or not the clause in question consists of a CP with finite T. Let us first observe the examples in (12), in which *John* is focused within the bracketed constructions headed by *-tyuu*

‘while.’ As evidenced by (12), the subject *John* obtains a focus interpretation because the focus-particle *dake* ‘only’ is attached to it. Based on Akaso and Haraguchi’s (2011) analysis and Miyagawa’s series of works, the availability of focus-marking on the subject leads to the conclusion that both the phase head C and finite T are present in the bracketed clauses/phrases in (12).²

- (12) a. [Kyoositu-de John-dake-ga benkyoo-tyuu-ni], Mary-wa
classroom-in John-only-NOM study-while-DAT Mary-TOP
utatte-ita.
singing-PST
‘While only John was studying in the classroom, Mary was singing.’
- b. [John-dake-ga benkyoo-tyuu-no] kyoositu
John-only-NOM study-while-GEN classroom
‘the classroom in which only John was studying’

Given the presence of finite T within the bracketed constructions headed by *-tyuu*, nominative Case assignment to the subject *John-dake* ‘only John’ is expected to be controlled by the same head. This analysis holds of the bracketed clauses/phrases headed by *-mae/-go* ‘before/after’ in (13), in which the overt focus-particle *dake* ‘only’ is attached to the subject *John*, thereby allowing *John* to be focused within these constructions. It is then plausible to conclude that finite T is present within such a clause/phrase and is responsible for nominative Case assignment to *John-dake* ‘only John.’

- (13) a. [Busyo-no-nakade John-dake-ga syuppatu-mae/go-ni],
department-GEN-within John-only-NOM leave-before/after-DAT
Mary-wa eeru-o oku-tta.
Mary-TOP cheers-ACC send-PST
(Lit.) ‘Before/After only John leaves/left in the department, Mary sent a hearty cheers to him.’
- b. [John-dake-ga syuppatu-mae/go-no] eki
John-only-nom leave-before/after-gen station
(Lit.) ‘the airport at which only John is/was before/after departure’

As discussed above, nominative Case assignment to *John* can be done within

² In (12a), the PP *kyoositu-de* ‘in the classroom,’ which modifies an event that a verb expresses in the bracketed adjunct clause, is placed before the subject *John-dake* ‘only John’ to make it clear that the subject occupies the bracketed adverbial clause. The presence of the PP provides evidence in support of the current analysis that nominative Case assignment takes place independently of finite T in the matrix clause.

the bracketed constructions headed by *-tyuu* ‘while’ or *-mae/-go* ‘after/before’ in (12) and (13). This analysis has an immediate consequence for the analysis of nominative Case assignment to subjects in the bracketed clauses/phrases in (1-4). These constructions in question are headed by *-tyuu* ‘while’ and *-mae/-go* ‘before/after,’ as with the relevant constructions in (12) and (13). Therefore, I argue that what is responsible for nominative Case assignment to *John* in (1-4) is the occurrence of finite T within the bracketed constructions. As can be seen, the discussions so far have presented evidence in favor of the view that finite T plays the decisive role in nominative Case assignment in Japanese (Takezawa 1987; Koizumi 1994; Saito 2016; among others).

6 Extension

Before concluding this paper, I will extend the current analysis to the examples with the structure of coordination, as exemplified in (14). Note that the subject *ame* ‘rain’ in the first conjunct is marked with nominative Case.

- (14) [Ame-ga tuyo-ku], kaze-ga hagesi-i (koto).
rain-NOM heavy-KU wind-NOM strong-PRES (fact)
(Lit.) ‘The rain is heavy, and the wind is strong’ (Takezawa 1998: 97)

The adjectival inflection *-ku* in the first conjunct has been regarded as an infinitival marker (Takezawa 1998; Yoshimoto 2019; among others). If the first conjunct in (14) consists of infinitival clause, a question arises as to why nominative Case is licensed in this conjunct. Recall that focus assignment to the subject is closely correlated with the occurrence of the phase head C. If the focus licensing of the subject is possible in the first conjunct in (14), then the occurrence of finite T follows automatically under the current analysis. Since the preceding discussions suggest that nominative Case assignment is tied to the presence of finite T, it is mandatory to make sure that the subject *ame* ‘rain’ in (14) obtains nominative Case by finite T. The existence of finite T in the first conjunct is confirmed by the example in (15), in which the subject in question is focused with the focus-particle *dake* ‘only’ attached to it.

- (15) [Ame-dake-ga tuyo-ku], kyou-wa kaze-wa huitei-na-i.
rain-only-NOM strong-KU today-TOP wind-TOP blowing-NEG-PRES
(Lit.) ‘Only the rain is heavy, and the wind does not blow today.’

The focus-marking on the subject *ame* ‘rain’ necessarily entails the occurrence of both the phase head C and finite T. It is thus suggested that the first conjuncts in (13) and (14) in fact contain finite T, and as a result, nominative

Case assignment to the subject is made possible within such a conjunct.

7 Conclusion

This paper has compared two previous analyses of nominative Case assignment in Japanese: finite T versus the default strategy. I have provided some evidence in support of the argument that the presence of finite T is crucial for assigning nominative Case to the DP in Japanese, as assumed by Takezawa (1987), Koizumi (1994), Saito (2016), and others. I have argued that the adverbial clauses/phrases, in which there seem to be no overt finite tense morphemes on the surface, in fact involve finite T. This analysis is confirmed by assuming that the focus licensing of the subject is available if and only if the construction in question is projected into the CP phase headed by the phase head C selecting finite T (Akaso and Haraguchi 2011; Miyagawa 2011, 2012, 2013, 2017). To further fortify this analysis, I have revealed that default case in Japanese is indeed taken to be morphologically zero (null) case; thus, nominative Case can never be assigned to the DP by the default strategy, contrary to previous analyses by Fukui (1986, 2006), Inoue (1989), Aoyagi (2006), and others. Finally, the proposed analysis has been extended into the structure of coordination that apparently lacks an overt finite tense morpheme. I have demonstrated that the subject in this construction can be focused, which guarantees the presence of finite T in the CP phase. Therefore, finite T is capable of assigning nominative Case to the DP in the same way observed in the adverbial clauses/phrases that have been dealt with in this paper.

References

- Abe, J. 2016. Make Short Answers Shorter: Support for the In Situ Approach. *Syntax* 19: 223–255.
- Akaso, N. and T. Haraguchi. 2011. On the Categorical Status of Japanese Relative Clauses. *English Linguistics* 28: 91–106.
- Aoyagi, H. 2006. *Nihongo no Josi to Kino Hantyyuu (Particles and Functional Categories in Japanese)*. Hituzi Syoboo, Tokyo.
- Chomsky, N. 2000. Minimalist Inquiries: The Framework. *Step by Step: Essays on Minimalist Syntax in Honor of Howard Lasnik*, ed. R. Martin, D. Michaels, and J. Uriagereka, 89–155. Cambridge, MA: MIT Press.
- Chomsky, N. 2001. Derivation by Phase. *Ken Hale: A Life in Language*, ed. M. Kenstowicz, 1–52. Cambridge, MA: MIT Press.
- Chomsky, N. 2008. On Phases. *Foundational Issues in Linguistic Theory: Essays in Honor of Jean-Roger Vergnaud*, ed. R. Freiden, C. Otero, and M. Zubizarreta, 133–166. Cambridge, MA: MIT Press.
- Fukui, N. 1986. A Theory of Category Projection and its Applications. Doctoral

- dissertation, MIT.
- Fukui, N. 2006. *Theoretical Comparative Syntax: Studies in Macroparameters*. London/New York: Routledge.
- Harada, S.-I. 1971. *Ga-No Conversion and Idiolectal Variations in Japanese*. *Gengo Kenkyu* 60: 25–38.
- Inoue, K. 1989. Shugo no Imi Yakuwari to Kaku Haireru (Thematic Roles on the Subject and Case Alignment) *Nihongo no Sintenkai (New Developments in Japanese Linguistics)*, ed. S. Kuno and M. Shibatani, 79–101. Tokyo: Kurosio Publishers.
- Koizumi, M. 1994. Nominative Objects: The Role of TP in Japanese. *MIT Working Papers in Linguistics* 24: 211–230.
- McCloskey, J. 1985. Case, Movement, and Raising in Modern Irish. *WCCFL* 4: 190–205.
- McFadden, T. 2004. The Position of Morphological Case in the Derivation: A Study of the Syntax-Morphology Interface. Doctoral dissertation, University of Pennsylvania.
- McFadden, T. 2007. Default Case and the Status of Compound Categories in Distributed Morphology. *Proceedings of the 30th Annual Penn Linguistic Colloquium*: 225–238.
- Miyagawa, S. 2011. Genitive Subjects in Altaic and Specification of Phase. *Lingua* 121: 1265–1282.
- Miyagawa, S. 2012. *Case, Argument Structure, and Word Order*. New York/London: Routledge.
- Miyagawa, S. 2013. Strong Uniformity and *Ga/No Conversion*. *English Linguistics* 30: 1–24.
- Miyagawa, S. 2017. *Agreement beyond Phi*. Cambridge, MA: MIT Press.
- Miyagawa, S., Nishioka, N. and Zeijlstra, H. 2016. Negative Sensitive Items and the Discourse-Configurational Nature of Japanese. *Glossa* 33: 1–28.
- Moritake, N. 2022. A Focus-Based Analysis of Nominative Objects in Japanese. *Lingua* 278: 1–31.
- Moritake, N. 2023. Default Case and Chain Interpretation. *JELS* 40, 161–167.
- Rizzi, L. 1997. The Fine Structure of the Left Periphery. *Elements of Grammar: handbook in Generative Syntax*, ed. L. Haegeman, 281–337, Dordrecht: Kluwer.
- Schütze, C. 1997. *Infl in Child and Adult Language: Agreement, Case, and Licensing*. Doctoral dissertation, MIT.
- Schütze, C. 2001. On the Nature of Default Case. *Syntax* 4: 205–238.
- Takezawa, K. 1987. *A Configurational Approach to Case-Marking in Japanese*. Doctoral dissertation, University of Washington.
- Takezawa, K. 1998. Kaku no Yakuwari to Kozo (The Role of Case and Structure). *Kaku to Gojun to Togo Kozo (Case, Word Order, and Syntactic Structure)*, ed. M. Nakau, 1–102, Tokyo: Kenkyusha.
- Yoshimoto, Y. 2019. Morphological Case in Okinawan: A Dependent Case Analysis.

The 159th Linguistic Society of Japan Conference Handbook: 111–116.