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Inherent Case and Locality Requirement: Evidence from Ditransitives and their Nominalizations

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Abstract

Inherent Case is understood as Case, the assignment of which has to be accompanied by theta-assignment (Chomsky 1995). While Nominative on the subject and Accusative on the direct object are typical representatives of structural Case, Genitive or Dative are usually taken as representatives of inherent Case. In this paper I first review the properties of ditransitive verbs in Czech explored in Dvořák (in press) who argues that there are two types of inherent Datives in Czech: a high Dative assigned by an applicative head and associated with a recipient/benefactive theta-role, and a low Dative associated with a path theta-role. I provide the evidence for the independent existence of both of these Datives outside of ditransitives: in unaccusative structures and in structures with only a dative object. After that I draw my attention to the properties of the postnominal Genitive in Czech, especially the Genitive that is assigned to the direct object of nominalized ditransitive verbs. Even though these constructions reveal that Genitive is similar to Dative in terms of the local relationship between the Case-assigning head and the Case-assigned DP, I show that we do not need to refer to Genitive's "inherentness" in order to derive the fact that the Genitive DP always immediately follows the assigning noun. I employ the data from nominalized ditransitives, in which the theta-marking and Case-marking of the object DP is dissociated, complemented by data on nominalizations with small clause subjects in Genitive, to argue for the "structuralness" of the postnominal Genitive in Czech.

Inherent Case and Locality Requirement: Evidence from Ditransitives and their Nominalizations

Věra Dvořák

1 Background

The distinction between structural and inherent Case introduced in Chomsky 1986 belongs nowadays to one of the well-established dichotomies in generative linguistics. Chomsky (1995) attributes the “structuralness” of Case to the observation that such Case is “assigned solely in terms of S-structure configuration” while Case “inherentness” is associated with θ -marking. This distinction was utilized as an explanation of the behavior of ECM verbs in English as illustrated in the following contrast:

- (1) a. John believes [the rumor to be false].
b. * John’s belief of [the rumor to be false].

While Accusative can be assigned to the external argument of the embedded infinitival clause, Genitive cannot because the noun can neither assign a θ -role to it nor has it a structural Case to assign:

- (2) Inherent Case is assigned by α to NP only if α θ -marks NP. (Chomsky 1995:114)

2 Thesis

- There are **two types of ditransitives in Czech** due to two Dative-assigning heads: a higher applicative head and a lower P head incorporated into V (see McFadden 2004 for the parallel distinction in German). Each of the two Datives is associated with a different θ -role. The same inherent Dative assigning heads can be found in **unaccusative** structures, in **monotransitive** structures with a dative object, and also in the **nominalized** structures.
- When ditransitives are nominalized, an underlying direct object always bears Genitive while an indirect object always retains its Dative. I show that the postnominal **Genitive assignment is similar to Dative** assignment in terms of structural requirements (locality).
- On the other hand, **Genitive behaves like structural Case** regarding θ -roles because its assignment does not have to be accompanied by θ -assignment. Moreover, the locality requirement on the assignment of Genitive can be derived from the fact that the nominalized vP constitutes a Spell-Out phase. I conclude that Chomsky’s definition of inherent Case and an analysis of the Czech postnominal Genitive as inherent Case do not fit together.

3 Two Types of Ditransitive Verbs

3.1 Data

In Dvořák (in press) I have shown that Czech ditransitive verbs belong to two distinct classes exemplified in 3a and 3b. I label the two classes as **Acc-Dat verbs** and **Dat-Acc verbs** because of their underlying word order.

- (3) a. Karel podřídil Marii svoje plány. / ... podřídil svoje plány Marii.
Charles.NOM adjusted Mary.DAT his plans.ACC / adjusted his plans.ACC Mary.DAT
‘Charles adjusted his plans to Mary.’
b. Karel poslal Marii dopis. / Karel poslal dopis Marii.
Charles.NOM sent Mary.DAT letter.ACC / Charles.NOM sent letter.ACC Mary.DAT
‘Charles sent Mary a letter.’

3.1.1 Word Order

One of my arguments for the existence of two types of ditransitives is based on a default word order. Both word orders, Acc before Dat as well as Dat before Acc, are possible in Czech for all ditransitives as shown in 3. However, in neutral contexts, i.e. contexts where all information is new and equally important, only the Acc»Dat word order is unmarked for the verbs like 3a while the Dat»Acc word order is unmarked for 3b verbs. The other order is unexpected in the all-new context below. It is associated with the presupposition that the content of the clause is known except for the last argument which represents the prominent/unexpected piece of information.

- (4) context: “Copak se stalo?” ‘What happened?’
- a. Karel **podřídil** svoje plány Marii. / #... podřídil Marii svoje plány.
Charles adjusted his plans.ACC Mary.DAT / adjusted Mary.DAT his plans.ACC
‘Charles adjusted his plans to Mary.’
 - b. Učitel **vystavil** děti nebezpečí / #... vystavil nebezpečí děti.
teacher exposed children.ACC danger.DAT / exposed danger.DAT children.ACC
‘The teacher exposed the children to a danger.’
 - c. Karel **poslal** Marii dopis. / #... poslal dopis Marii.
Charles sent Mary.DAT letter.ACC / sent letter.ACC Mary.DAT
‘Charles sent Mary a letter.’
 - d. Petr **opravil** Lenka počítač. / #... opravil počítač Lenka.
Petr.NOM repaired Lenka.DAT computer.ACC / repaired computer.ACC Lenka.DAT
‘Peter repaired Lenka’s computer.’

3.1.2 Dative Argument Obligatoriness

Acc-Dat verbs cannot appear without their dative DP. They become either ungrammatical, as in 5a, or they receive a different, often nonsensical interpretation. On the other hand, ditransitives preferring Dat»Acc word order in neutral context are always grammatical even if their indirect object is missing. If a dative argument corresponds to an intended recipient, it is existentially quantified, i.e. interpreted as “somebody”, as it would be in 5b if the DP *Marii* was missing.

- (5) a. Král podřídil obyvatelstvo *(synovi) a táhl dál.
king subordinated inhabitants.ACC son.DAT and moved on
‘The king subordinated the inhabitants to his son and moved on.’
- b. Karel předal (Marii) knihu a odešel.
Charles.NOM handed over Mary.DAT book.ACC and left.
‘Charles handed over a book (to Mary) and left.’

3.1.3 Animacy and Further Evidence

Notice that all dative arguments of Dat-Acc verbs are animate while dative arguments of Acc-Dat verbs can be both animate and inanimate. Also, the animate Datives have typically a **recipient** or in a broader sense, a **benefactive/malefactive** meaning while the other ones have a **directional** meaning (in an abstract sense). Further support for separating ditransitives into two classes, presented in Dvořák (in press), comes from the different productivity of the two classes, from their different preference for constituent fronting under topicalization and from passivization data.

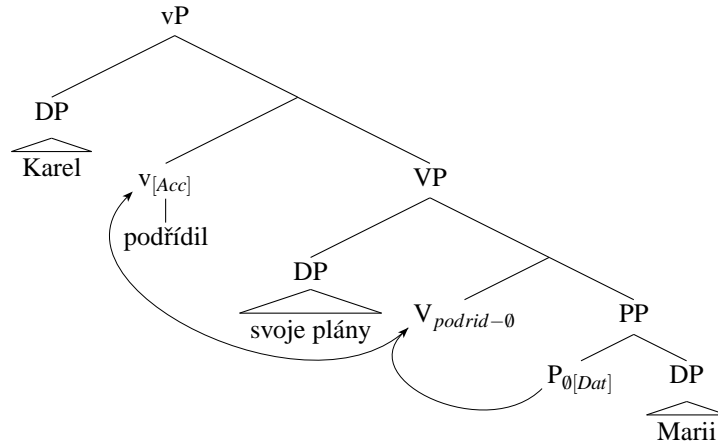
3.2 Structural Difference between Acc-Dat and Dat-Acc Verbs

The distinctions summarized in 3.1 show that there is a class of verbs in Czech that have an obligatory dative argument which linearly follows an accusative argument in the verbal structure. In Dvořák (in press) I proposed that Acc-Dat verbs contain a null preposition which values dative Case on a DP and which is associated with a path θ -role. Since the preposition is phonologically defective,

it conflates with the verbal head taking a PP as a complement, and the whole constituent projects further. I adopted Harley’s 2004 view of the conflation of defective p-sig features (“phonological signature”) of one head into another one under merge.

In this concrete case, the projecting verbal head contains the p-sig of V as well as the defective p-sig of the null Dative-case marking P, as indicated in the following tree.

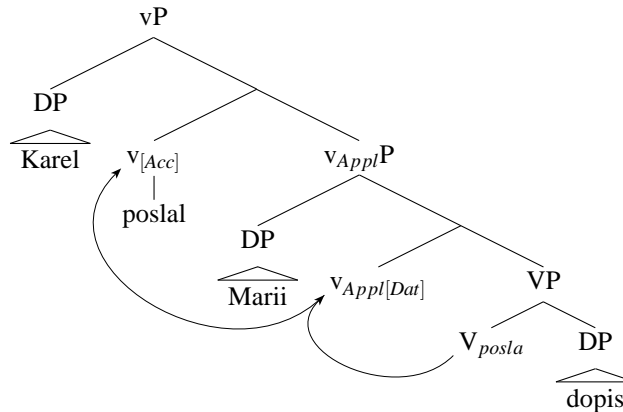
- (6) a. Karel podřídil svoje plány Marii.
 Charles.NOM adjusted his plans.ACC Mary.DAT
 b.



Notice that even though both a theme and a path argument are introduced within a VP, they differ substantially in the way they get their Case valued. While Dative is assigned to a DP immediately after its merge with P (which makes the DP inactive for the purpose of further checking), the introduction of a theme DP and its Case valuation are dissociated. Therefore the DP receives an object θ -role first, independently of Case assignment. Only if an active little *v* is merged subsequently, does it probe down for a suitable goal to satisfy its unvalued ϕ -features in exchange for valuing accusative Case-feature on an object DP, under Agree of Chomsky (2000, 2001).

We made two important observations as to what distinguishes Dat-Acc from Acc-Dat verbs: an indirect object of Dat-Acc verbs precedes a direct object in an unmarked word order, cf. 3.1.1, and the overt presence of an indirect object is optional, cf. 5b. In order to capture these generalizations I assume that in the case of Dat-Acc verbs, the accusative argument and the verb form a constituent to the exclusion of the dative argument. I propose that there is a high Dative position in Czech introduced by the applicative functional head which takes the whole VP as its complement.

- (7) a. Karel poslal Marii dopis.
 Charles.NOM sent Mary.DAT a letter.ACC
 b.



Positing two independent Dative-checking heads is independently supported by the fact that all dative DPs of Dat-Acc verbs have to be animate, while there is no such requirement for Datives of Acc-Dat verbs. Such a distinction would be unexpected if there was only one Dative in Czech.

4 Two Types of Dative in General

The intermediate conclusion of my proposal is that there are two classes of ditransitives in Czech due to two types of Dative-checking configuration: low Dative assigned by a non-overt P, present in Acc-Dat verbs, and high Dative assigned by v_{Appl} present in Dat-Acc verbs. However, neither of the two dative arguments hinges on the presence of an accusative DP in the structure. Low Dative is assigned even before the direct object DP is merged, and the high one is assigned after the formation of the VP for which v_{Appl} is subcategorized. Therefore, we would expect to find the two Datives independently of their occurrence with Accusatives in a double object structure.

4.1 Unaccusative Verbs

If unaccusative verbs like ‘arrive’ or ‘fall’ appear with a dative argument with a benefactive or malefactive meaning, this argument precedes the DP bearing Nominative. Such data support the structure proposed in 7b in which the applied argument is introduced above the internal argument, and therefore it is this argument that moves to check an EPP feature on T. Moreover, such an argument can be omitted on par with the higher Dative of ditransitives:

- (8) a. (Petrovi) přijel vlak.
Peter.DAT arrived train.NOM
‘Peter’s train arrived.’
- b. (Lence) spadlo připojení.
Lenka.DAT fell connection.NOM
‘Lenka’s connection got down.’

We also expect to find unaccusatives with the low dative argument. They should have the unmarked word order opposite from the one in 8 because their underlying object is merged higher than the dative argument, cf. 6b. The Acc-Dat class of verbs is much less productive. However, *patřit* ‘belong’ seems to instantiate one such example. According to our analysis, the structure with low Dative should be ungrammatical if only the theme argument is present but the path-like argument is missing. This prediction is borne out:

- (9) a. Tahle kniha patří Marii.
this book.NOM belongs Mary.DAT
‘This book belongs to Mary.’
- b. *Tahle kniha patří.
this book.NOM belongs

4.2 Monotransitive Verbs with Object in Dative

In the previous section, we discussed verbs which have an internal argument associated with an object θ -role but which do not assign Accusative to such an argument due to a missing external argument. But what about verbs that do not have an internal theme argument at all? According to our prediction, such verbs (containing only an external argument and a dative argument) should again be found with either high or low Datives.

One of the tests showing that Dat-Acc verbs pattern with only a subclass of inherent Dative verbs is based on the possibility of the implicit argument quantification. We saw in 3.1.2 that Dat-Acc verbs allow an implicit quantification of a dative argument while Acc-Dat verbs are ungrammatical if their dative argument is missing on the surface. Now some verbs like *pomáhat* ‘help’ or *ubližovat* ‘hurt’ with a sole dative argument do allow the argument’s implicit existential quantification while others like *holdovat* ‘reveal’ or *zabraňovat* ‘prevent’ are ungrammatical without an overt dative DP:

- (10) a. Petr pomáhá Lence.
Peter.NOM helps Lenka.DAT
‘Peter helps Lenka.’
- b. Petr pomáhá.
Peter.NOM helps
‘Peter helps somebody.’
- (11) Petr ubližuje (Lence) a neví o tom.
Peter.NOM hurts Lenka.DAT and not-knows about that
‘Peter hurts Lenka and doesn’t know about that.’

- (12) a. Dino holduje sportu.
 Dino.NOM revels sport.DAT
 ‘Dino revels in sport.’
- b. *Dino holduje.
 Dino.NOM revels
- (13) Policisté zabraňují *(násilí) na ulicích.
 policemen.NOM prevent violence.DAT in streets
 ‘Policemen prevent the occurrence of violence in the streets.’

The class which I label as high Dative on account of its patterning with Dat-Acc verbs is again much more productive than low Dative class patterning with Acc-Dat verbs. Also the animacy requirement on the dative argument of Dat-Acc verbs is preserved: high dative DPs can only be animate, while low dative DPs can be either animate or inanimate. This ties closely to the different semantics of the two classes. As McFadden (2004:127) puts it, the internal arguments of high Dat verbs are instantiated as “beneficiaries, recipients, experiencers and pertinence possessors” while low Datives correspond to locations, directions, goals, or reference points of motion. In terms of θ -roles, the distinction between the recipient role versus the path role introduced during my analysis of ditransitives gets repeated at the level of inherent Dative verbs.

5 Nominalized Ditransitives

When ditransitives are nominalized, an underlying direct object always bears postnominal Genitive while an indirect object always retains its dative Case. The arguments appear in the Gen \gg Dat order **for both Acc-Dat as well as Dat-Acc verbs**. If we expected the parallelism between the verbal and nominal structure, the word order under nominalization is as expected for Acc-Dat verbs but the opposite from the expected one for Dat-Acc verbs:

- (14) Acc-Dat verbs
- a. Přizpůsobování cviků studentům (se učiteli nevyplatilo.)
 adjusting.NOM exercises.GEN students.DAT REFL teacher.DAT not-paid-off
 ‘Adjusting exercises to students (didn’t pay off for a teacher.)’
- b. ?? Přizpůsobení studentům cviků (se učiteli nevyplatilo.)
 adjusting.NOM students.DAT exercises.GEN REFL teacher.DAT not-paid-off
- (15) Dat-Acc verbs
- a. Darování knihy Marii (se Karlovi nevyplatilo.)
 giving.NOM book.GEN Mary.DAT REFL Charles.DAT not-paid-off
 ‘Giving a book to Mary didn’t pay off to Charles.’
- b. ?? Darování Marii knihy (se Karlovi nevyplatilo.)
 giving.NOM Mary.DAT book.GEN REFL Charles.DAT not-paid-off

The nominalization data in 14 and 15 enable the refinement of our understanding both structural and inherent Case licensing in syntax. Dative arguments can never appear in Genitive under nominalization. More precisely, if they do, they lose their θ -role and are interpreted as themes/patients:

- (16) Karlovo darování knihy Marii / #Karlovo darování Marie
 Charles.POSS giving.NOM book.GEN Mary.DAT / Charles.POSS giving.NOM Mary.GEN
 ‘Charles’ giving of a book to Mary / Charles’ giving of Mary’

Such data support the analysis which associates dative morphology on a DP with the DP’s merge with the Dative-checking head (v_{Appl} or P_θ) or its projection so that it becomes immediately inactive for the purpose of further Case-checking. If such categories like v_{Appl} or P_θ are present in the nominalized verbal structure, it explains not only the preserved dative morphological marking but also that dative DPs are associated with the same θ -roles as they were in the purely verbal structure.

On the other hand, I assume that the active little v introducing an external argument and responsible for the accusative Case checking is missing in nominalizations. The fact that nominalizations

contain an *-n/t-* morpheme which is present in passive structures might support this assumption. However, I am reluctant to claim that the *-n/t-* is exactly the same morpheme with the same function in both structures because only transitive verbs can passivize while all three types of verbs (transitives, unaccusatives) and unergatives can nominalize.

On a par with many other authors (Abney 1987, Borer 1999, Alexiadou 2001, Alexiadou et al. 2008, among others) I assume that the nominalized verbs have a nominalizing head attached to the extended verbal projection with a defective *v* (a *v* that has no Case-marking capacity). As a result, the DP merged in the internal argument position of complement of *V* gets only the object θ -role but not the canonical object Case-marking. Conforming to the refined version of UTAH (Baker 1997), I conclude that the thematic argument has to receive its object θ -role under merge with *V*, but is Case-marked later, as a result of the movement that leads to the DP's local relationship with the Genitive-valuing nominal head. The simplistic view would be that such an object DP raises in the spirit of the Case Filter (Chomsky 1981) to a postnominal position to receive genitive Case. In order to understand accurately the way in which postnominal Genitive is assigned we need to examine the nominalizing structure in more detail.

5.1 Postnominal Genitive Adjacency

In Czech, adverbials can freely adjoin at (or move to) various parts of the verbal structure (the unmarked position between a dative and an accusative DP is in bold):

- (17) (Uprostřed přednášky) Karel (uprostřed přednášky) daroval (uprostřed přednášky)
 (in the middle of lecture) Charles (in the middle of lecture) gave (in the middle of lecture)
 Marii (**uprostřed přednášky**) knihu (uprostřed přednášky).
 Mary (in the middle of lecture) book (in the middle of lecture).
 'Charles gave Mary a book in the middle of the lecture.'

The positions to which adverbials can attach in the nominalized structures are much more limited. They can appear at the right edge or between the nominal complements (in which case the last constituent is contrastively focused) but never between the nominalized verb and the Genitive DP:

- (18) a. přepadení stařenky zlodějem **uprostřed noci**
 robbery.NOM grandma.GEN thief.INST in the middle of night
 'the robbery of a grandma by a thief in the middle of the night'
 b. ? přepadení stařenky **uprostřed noci** zlodějem
 robbery.NOM grandma.GEN in the middle of night thief.INST
 'the robbery of a grandma in the middle of the night BY A THIEF'
 c. * přepadení **uprostřed noci** stařenky zlodějem
 robbery.NOM in the middle of night grandma.GEN thief.INST

In the prenominal position, adjectives rather than adverbs function as modifiers:

- (19) noční přepadení stařenky zlodějem
 night.ADJ.NOM robbery.NOM grandma.GEN thief.INST
 'the night robbery of a grandma by a thief'

Similarly, even though adverbs intervening between the DPs in Genitive and Dative are possible, they can not interfere between the nominalized verb and Genitive DP. The structure in 20b is again limited to marked contexts where "Mary" represents the only new or contrastive piece of information.

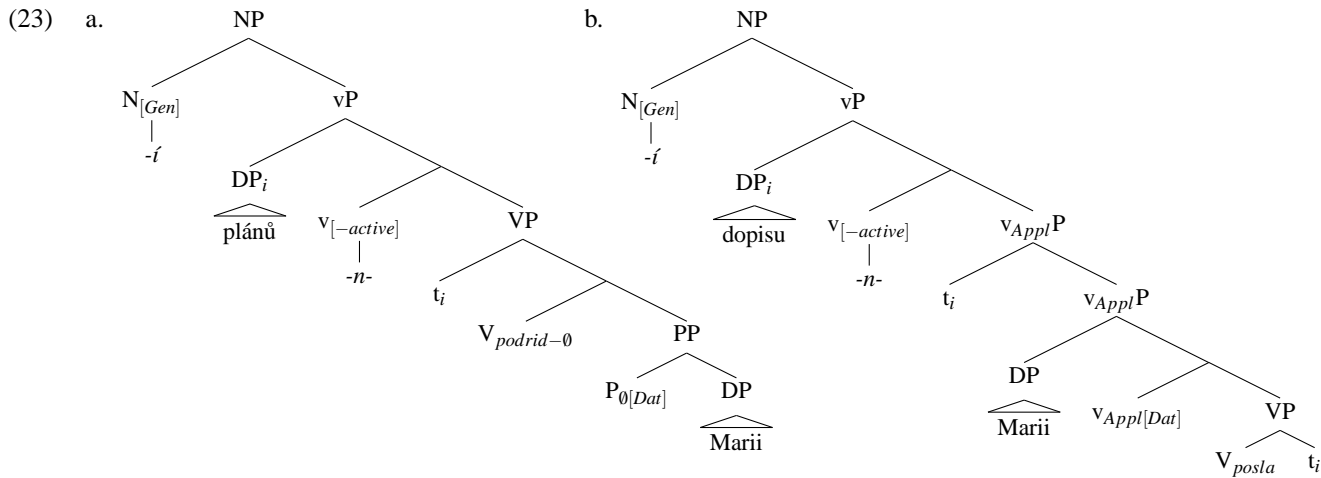
- (20) a. darování knihy Marii **během ceremonie**
 giving.NOM book.GEN Mary.DAT during ceremony.GEN
 'giving of a book to Mary during the ceremony'
 b. ? darování knihy **během ceremonie** Marii
 giving.NOM book.GEN during ceremony.GEN Mary.DAT
 'giving of a book TO MARY during the ceremony'

- c. * darování **během ceremonie** knihy Marii
 giving.NOM during ceremony.GEN book.GEN Mary.DAT

These data suggest that Genitive does not behave like structural Nominative and Accusative which can be checked under Agree at a distance. Rather, it seems to be parallel to (inherent) Dative which is assigned only in a local relationship to its Case-assigner, cf. the trees in 6 and 7.

If the derivation proceeds by phases (Chomsky 2000, 2001) whereby Spell-Out applies to the complements of phase heads, the DP merged as a complement of V has to move to the edge of a vP phase right before VP is sent to Spell-Out. Otherwise the derivation won't converge due to the unchecked Case feature on the object DP. This movement, depicted for Acc-Dat verbs in (23a) and for Dat-Acc verbs in (23b), complies with the Last Resort condition because it is a necessary step to eliminate unchecked Case features on a DP that could not be eliminated otherwise:

- (21) *Last Resort* (Chomsky 1995:256)
 Movement of α targeting K is permitted only if the operation is morphologically driven, by the need to check some features.
- (22) Nominalizations corresponding to the tree diagrams in 23:
 a. Podřízení plánů Marii (se Karlovi nevyplatilo).
 adjusting.NOM.SG plans.GEN Mary.DAT REFL Charles.DAT not-paid-off
 'Adjusting plans to Mary (didn't pay off to Charles).'
- b. Poslání dopisu Marii (se Karlovi nevyplatilo).
 sending.NOM letter.GEN Mary.DAT REFL Charles.DAT not-paid-off
 'Sending Mary a letter (didn't pay off to Charles).'



The DP movement depicted above explains why direct objects have to precede indirect objects in both types of nominalized ditransitives, as shown in 14 and 15. Dative DPs stay in situ because their θ -marking and their Case-assignment are simultaneous. But we also need to explain why no adverbial can intervene between a Genitive assigning head and a DP that needs to be Case-marked. Procházková (2006:74-75) shows that not all types of adverbs can go together with Czech deverbal nouns. While manner (*quickly, precisely*), temporal (*this year, the day ago*) and aspectual (*monthly, for/in an hour*) adverbs can be occasionally used to modify them, modal (*probably, possibly, certainly*) and speaker-oriented (*fortunately*) adverbs never appear under nominalization. Importantly, all adverbs that appear in nominalizations are VP-adverbs and never S-adverbs which is the distinction coined in Jackendoff 1972. On the basis of this evidence, I propose that all adverbials that appear in nominalizations are first merged as VP adjuncts, cf. the default position in 17, and they cannot move out of the verbal part of the structure into the nominal part of the structure, i.e. they cannot move outside of vP. The furthest position any adverbial can move to is a left adjunct to vP. On the assumption that adverbials that remerge as vP adjuncts cannot move further up within the same projection (Ko 2005), the limitations of adverbial placement in nominalizations follow if the object DP

moves out of the to-be-spelled-out VP to the escape hatch created by vP only after the adverbial movement. Support for my proposal could come from further research on the ordering restriction at the edges of syntactic domains in Czech, especially when it comes to adverbial scrambling.

5.2 Structuralness vs. Inherentness of Postnominal Genitive

There is one important difference between the way Genitive and Dative are assigned in the nominalized structures in 23. While the Dative DP merges directly with Case-assigning head 23a or its projection (23-b), Genitive is assigned to a DP that is embedded within a vP. Recall that the DP had to move “only” to the edge of a vP phase before the verbal structure was submerged by the nominalizing suffix.¹ Genitive assignment thus does not obey the “strict locality principle” to the effect that a Case-assignee is not contained within the same maximal projection as its Case-assigner, cf. Radford 1992:242. This has one important consequence: an object DP cannot be θ -marked by N because it merges with the whole vP that the DP is only a part of. Moreover, θ -roles can be assigned only under Merge (and not under Move), as stated in TRAP (Theta-Role Assignment Principle) (Hornstein et al. 2005:54) but the DP has to move to get in the local relationship with N. This is the reason why the Genitive DP can keep its original patient/theme θ -role without violating Theta Criterion.

I suggest that the Czech postnominal Genitive is a structural Case which is simply assigned by a noun to the first DP that it c-commands, and that this kind of Case-assignment does not need to be accompanied by θ -assignment. On par with Nominative or Accusative, it can be assigned after the movement of a DP that already got its θ -role assigned. Support for this proposal is provided by the behavior of nominalized constructions with small clause subjects discussed below.

First of all, the argument for the inherentness of the postnominal Genitive in English in Section 1, based on the behavior of prototypical ECM verbs under nominalization, cannot be replicated in a language like Czech, which does not have a genuine case of ECM verbs with infinitival complements (Řezáč 2005:108). The closest relative seems to be verbs of perception. However, according to Řezáč, these verbs should be analyzed as containing the controlled PRO argument:

- (24) Marie viděla Karla_i PRO_i běžet.
Mary.NOM saw Charles.ACC PRO_i run.

On the other hand, postnominal Genitive *can* be assigned into a small clause, i.e. in a configuration where it is clearly not associated with θ -role assignment:

- (25) a. Shledání Martina vinným (matku rozplakalo).
finding.NOM Martin.GEN guilty.INS mother.ACC made cry
'Finding Martin guilty (made the mother cry).'
b. Pokládání Martina za dobrého učitele (se ukázalo jako omyl).
considering.NOM Martin.GEN for good.ACC teacher.ACC REFL turned as mistake
'Considering Martin a good teacher (turned up to be a mistake).'

The relation between the Case assigner and the Case assignee is no more direct/thematic than the relation between the verb and the Accusative object in the corresponding verbal structures:

- (26) a. Shledali Martina (být) vinným.
found.3.PL Martin.ACC be.INF guilty.INS
'They found Martin (to be) guilty.'
b. Pokládali Martina za dobrého učitele.
considered.3.PL Martin.ACC for good.ACC teacher.ACC
'They considered Martin (to be) a good teacher.'

¹The derivation in (23-b), in which the Dat-Acc verb is nominalized, raises certain locality issues. The object DP moves across another Case-position, Spec,_{vAppI} on its way to Spec,_v. If _{vAppI} heads a phase, as McGinnis (2001, 2002) argues, the object has to move to the edge of this phase first, and then on to the position in which it actually receives Case. McGinnis suggests it is an EPP feature on _{vAppI} that triggers the movement of the direct object across the indirect one. I assume that the unchecked Case feature on the DP can be the triggering force itself so we do not need to posit an extra formal feature associated with the high applicative head.

At the same time, Genitive *can* be associated with a specific θ -role in case of non-eventive nominals. This role might be labeled as “appurtenance” (Pit’ha 1992) or “possessor” in a broad sense (Barker 1995), including not only ownership but also authorship or another inalienable connection:

- (27) a. kniha mojí matky b. náměstí Míru
 book.NOM my.GEN mother.GEN square.NOM peace.GEN
 ‘the book of my mum’ ‘the Square of Peace’

Under the proviso that the noun merges directly with a DP that does not have a θ -role yet, Genitive-assignment *is* accompanied by θ -marking. This would suggest that N has θ -marking capacity that does not always have to be put into effect, which seems to go against Theta Criterion. Alternatively, we could assume that there are two types of nominal head. An N that is present only in non-eventive nouns and that θ -marks a DP that merges with it, and a “little n” that is present in all nominals and that has Case-marking capacity. This nominal counterpart to little *v* would function as a nominalizing suffix in the trees in 23.

6 Summary and Consequences

The following chart summarizes the Case-assignment properties of the four major Cases discussed or mentioned in this paper:

Case assigned:	at a distance	to an already θ -marked DP	requires surface adjacency
Nom	✓	✓	x
Acc	✓	✓	x
Gen in nominalizations	x	✓	✓
Gen in simple nouns	x	x	✓
Dat	x	x	x

It clearly shows the twofold behavior of postnominal Genitive. In this paper, I focused on the properties of Genitive in nominalizations in order to show that this Case behaves in many ways like structural Case, which is something that is often underestimated. If we advocate Chomsky’s characterization of inherent Case in 2, we have to conclude that postnominal Genitive in Czech is structural Case because it can be assigned to a moved element and its assignment does not have to be accompanied by θ -assignment. The next natural step in the research started here would be in the area of the interaction between Genitive assignment in nominalizations and in simple nouns.

The chart also shows that there is a seeming similarity between Genitive and inherent Dative in terms of the local relationship between a Case-assigning head and its Case-assignee. In this paper, I have argued that this locality requirement has a different motivation in each case. There are two types of Dative DPs (recipients and paths) whereby each type is θ - and Case-marked at the same time by a single head (v_{AppI} or P_θ). On the other hand, the adjacency of a Genitive DP to its Case-assigner is explained as a result of the interaction between the verbal and the nominal part of the structure, namely the fact that the *vP* embedded in nominalizations represents a Spell-Out phase which forces the movement of a thematic DP to the postnominal position, where it receives Case. My analysis therefore suggests that there are at least three types of little *v*. An active little *v* assigns Accusative and creates a phase, a passive little *v* does not assign Accusative and is generally assumed not to create a phase, and a little *v* in nominalizations which is not a Case assigner but is a head of a phase.

The last mentioned property, the surface adjacency of postnominal Genitive to its Case-assigning head was discussed in 5.1. But it also relates to the fact that Genitive cannot move much farther in the nominalized structure (the following examples are reminiscent of Old Czech which had a prenominal Genitive):

- (28) a. ?? dortu darování
 cake.GEN giving
 b. ?? dortu darování mamince
 cake.GEN giving mom.DAT
 c. * mamince dortu darování
 mom.DAT cake.GEN giving
 d. * mamince darování dortu
 mom.DAT giving cake.GEN

The impossibility of Genitive fronting follows from the nonexistence of other landing sites for a Genitive DP above the position at which the nominalizing head is merged. Even though both Accusative and Dative arguments can “freely” move within the clause in a scrambling language like Czech (with implications for information structure, cf. Kučerová 2007), Dative DP fronting within nominalizations is excluded as well, as exemplified in 28d. The prenominal position can be occupied only by adjectives, possessives and demonstrative pronouns in Czech, i.e. only by elements that agree in their ϕ -features with the matrix noun.

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