

# The Distribution of Subjects in Non-Finite Clauses: An Account without Case

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## 1 Introduction

In recent Principles and Parameters theories, the role of syntactic Case in accounting for the overt distribution of DPs has diminished significantly. For example, raising to subject position in passives and with unaccusative verbs is now taken to be driven by the EPP (see e.g. Marantz, 1991; Chomsky, 2001):

- (1) a. My computer<sub>i</sub> was stolen t<sub>i</sub>.  
b. Heather<sub>i</sub> appeared t<sub>i</sub> in an example.

However, Case remains relevant in that it still must be checked, and furthermore in that a DP can only be active — i.e. visible for movement — if its Case has not been checked. Because of this, Case is central to accounts of the distribution of subjects in embedded clauses, specifically for data like (2):

- (2) a. \* John<sub>i</sub> seems that t<sub>i</sub> is sick.  
b. \* It seems (for) John to be sick.  
c. \* John tried (for) Frank to get the beer.

In this paper I will argue that in fact Case is not necessary even here.

## 2 The Nature and Implications of Syntactic Case

We must begin by considering exactly what claim the postulation of syntactic Case makes about language. I submit that it can be summed up as in (3):

- (3) **The Case Requirement:** DPs by themselves are in some sense defective and require formal licensing from some other syntactic element.

It is clear that DPs must be integrated into the semantic interpretation of the clause via the system of thematic roles, but the Case Requirement is crucially above and beyond this. It is in no way a conceptual necessity and thus must

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be evaluated in terms of its ability to make correct predictions about empirical patterns. What it predicts is that, even among potential  $\theta$ -positions, those where DPs can actually appear should form a natural class, definable in terms of a restricted set of Case-licensors. The  $\theta$ -positions where DPs can *not* appear should then constitute the elsewhere case. Indeed, this is the standard interpretation of the distribution of overt subjects. Finite T can check Case, thus subjects are generally allowed in finite clauses, but non-finite T cannot, thus subjects are only possible in non-finite clauses when some other element — like a governing matrix verb — is available to exceptionally license them.

However, a closer consideration of the data will show that subjects *are* possible in a wide array of non-finite clause-types. Crucially, there is no factor which defines these clause-types as a unified class and could be held responsible for Case-licensing on the subject. In fact, the real natural class contains the clause-types where subjects can *not* appear, so instead of (3) I propose (4):

- (4) **The Case-less Hypothesis:** Nominal phrases do not require abstract licensing beyond what is needed for integration into the semantic interpretation.

It is thus the instances where subjects are *not* possible that we must explain.

Before I proceed, I should note two non-trivial assumptions I will be making. First, the facts of morphological case have no bearing on the utility of assuming the Case Requirement, because the two are quite clearly independent. Due to space limitations, I cannot present the evidence for this here, but must refer the reader to (Yip, Maling, and Jackendoff, 1987; Marantz, 1991; Harley, 1995; Schütze, 1997; McFadden, 2002, 2004, among others). Second, while a number of theoretical and conceptual issues surrounding the EPP remain controversial, a formal requirement that clausal subject positions be filled is simply an empirical fact of English and many other languages:

- (5) \*(It) is likely that John will be sick.

See McFadden (2002) and McFadden (2004, Ch. 8) for extensive discussion of the EPP and arguments in favor of preferring it to syntactic Case as a device for handling DP displacement.

### 3 Subjects are Generally Possible in Non-finite Clauses

In this section I will present evidence that overt subjects are possible in a number of non-finite clause types where there is no apparent external source of Case-licensing.

### 3.1 Complements of Adjectives and *want*-Class Verbs

To begin with, consider the contrast in (6):

- (6) a. It is unfortunate (that) John is sick.  
 b. \* It is unfortunate John to be sick.  
 c. It is unfortunate for John to be sick.

One is tempted to think that *for* shows up in sentences like (6c) specifically to check Case on the subject, which would not otherwise be licensed. This is suggested by the resemblance it bears to the preposition *for*. However, while a historical connection to the preposition is clear, the *for* that introduces non-finite clauses is synchronically something quite different.

Note e.g. that its distribution closely parallels that of the complementizer *that* (Pesetsky and Torrego, 2001). Both are optional in post-verbal position (see 7), obligatory when heading a subject clause (see 8), and impossible when a subject *wh*-trace follows (the *that*-trace or COMP-trace effect, see 9):

- (7) a. I would like (for) him to buy the book.  
 b. I believe (that) he bought the book.  
 (8) a. [\*(For) him to buy the book] would be preferable  
 b. [\*(That) he bought the book] was unexpected.  
 (9) a. Who<sub>i</sub> do you think (\*that) t<sub>i</sub> bought the book?  
 b. What<sub>i</sub> do you think (that) he bought t<sub>i</sub>?  
 c. Who<sub>i</sub> would you like (\*for) t<sub>i</sub> to buy the book?  
 d. What<sub>i</sub> would you like (for) him to buy t<sub>i</sub>?

However we explain the distribution of *that*, it doesn't seem to have anything to do with Case. Instead, people have generally tried to handle these data in terms of constraints on non-overt complementizers, from Stowell's (1981) ECP story to Bošković and Lasnik's (2003) null-complementizer affixation. The parallels in (7–9) suggest that we should treat *for* in the same way. In other words, the problem with (6b) is not that the subject cannot be licensed, but that the null counterpart of *for* is illicit. Case simply plays no role.

But if this is correct, and *for* is not a Case-licenser, then what licenses the subject in such clauses? We could hypothesize that non-finite T is exceptionally a Case-licenser in such clauses, but on its own, this would be pure stipulation. We could revise this to say that the special Case-licensing version of non-finite T is selected by *for* in C, thereby at least maintaining an indirect connection between that element and subject licensing. However, this idea — as well as the idea that *for* itself is a Case-licenser — runs into serious trouble with the pattern in (7a). That is, following *like* and other *want*-class verbs, *for*

is optional. If only *for* selects the Case-licensing version of non-finite T — or if it is directly responsible for Case-licensing itself — then what licenses the subject in sentences like (7a) in its absence?

One possibility is that the non-overt counterpart of *for* can do the job, either by selecting a version of non-finite T that can license subjects, or by licensing the subject itself. But this would undermine the simplicity that made accounts relating subject licensing to the presence of *for* attractive in the first place. If non-overt *for* can license subjects as well, then why is (8a) bad? To account for such sentences, we would still need an independent theory of overt complementizer distribution like the one I am proposing. The assumption that *for* plays a role in Case-licensing would then no longer be doing any work accounting for the distribution of overt subjects. A second possibility we could entertain for sentences like (7a) is that *want*-class verbs can license the embedded subject via ECM when there is no overt *for*. However, embedded subjects under these verbs do not show the close association with the matrix clause found with the prototypical ECM verbs, i.e. the *believe*-class. E.g., under passivization, the embedded subject can become the subject of matrix *believe*-class verbs, but not of *want*-class verbs:

- (10) a. John<sub>i</sub> was believed/proven/made out t<sub>i</sub> to be sick.  
 b. \* John<sub>i</sub> was wanted/preferred/liked t<sub>i</sub> to be sick.

Additional evidence from scope interpretation and certain word-order facts points in the same direction (see e.g. Bošković, 1997; Martin, 2001). Embedded subjects get into a close syntactic relationship with the matrix clause when it contains a *believe*-class verb, and whether this involves overt or covert movement, Agree *in situ* (perhaps the closest thing to a direct Minimalist formulation of GB era ECM) or something else entirely, this relationship is *not* formed when the matrix verb is in the *want*-class. Thus the equivalent of ECM is a viable analysis for the Case-licensing in (7a).

The point of this discussion is not that it's impossible to develop a theory of Case-licensing for these clause-types. Rather, the simple idea that *for* shows up to license overt subjects does not work, and what we end up with when we try to modify it to get the details right is largely stipulative and far less attractive. If we are assuming some version of the Case requirement from the outset, then we can certainly implement it here one way or another. However, if we are considering whether the Case requirement really does any work in our theory of grammar, then such a stipulative account of the data surrounding *for*...*to* infinitives can hardly count in its favor, contrary to what is often assumed. Now, matters would be different if it turned out that all the non-finite clause-types that allow overt subjects are introduced (optionally) by *for*.

Such a pattern would provide strong justification for the claim that *for* and its non-overt counterpart play a crucial role in Case-licensing, and the Case requirement would be doing important work for us. However, the pattern found with the complements of adjectives and *want*-class verbs does not hold up elsewhere.

### 3.2 Gerundival Clauses

There are other non-finite clause-types in English which allow overt subjects, yet show no trace of the element *for*, including small clauses and gerundivals. I will concentrate on the latter here, though the behavior of the former is the same in relevant respects (see Schütze, 1997, Ch. 2 for discussion of both types). Consider the examples in (11):

- (11) a. John remembered (\*for) Frank buying the beer.  
 b. (\*For) Frank buying the beer was unexpected.  
 c. (\*For) Frank being too sick to move, John had to buy the beer.

What could be licensing the subject *Frank* in these gerunds? For (11a) we could entertain the possibility of ECM, because the gerundival clause is the complement of a transitive verb. But this is not possible for (11b) where the gerundival is in subject position, not c-commanded by the matrix verb. Even worse, in (11c) the gerundival is an adjunct, and both structural Cases of the matrix clause have been associated with other nominal arguments. We could of course claim that *-ing* spells out a special Case-licensing version of T, but this is nothing more than a restatement of the distribution of overt subjects. Unless it can be shown that the T in gerunds has something else in common with finite T and the T that appears under *for*, simply stipulating that they are Case-licensors, while the T in raising infinitives is not, explains nothing.<sup>1</sup>

### 3.3 Cross-linguistic Evidence

Licensing of overt subjects in non-ECM, non-finite clauses is well-attested cross-linguistically as well, e.g. in the European Portuguese (EP) inflected infinitive (examples from Raposo, 1987):

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<sup>1</sup>It has been claimed (see especially Bošković, 1997; Martin, 2001) that the ability to license Case correlates with certain tense/mood and eventivity properties of T. However, such theories suffer from serious empirical and theoretical problems. See (McFadden, 2004, Ch. 8) for discussion.

- (12) a. Será difícil [eles aprovarem a proposta].  
 will-be difficult they to-approve-AGR the proposal  
 'It will be difficult for them to approve the proposal.'
- b. \*Será difícil [eles aprovar a proposta].  
 will-be difficult they to-approve the proposal
- c. Será difícil [PRO aprovar a proposta].  
 will-be difficult PRO to-approve the proposal  
 'It will be difficult to approve the proposal.'

It is again tempting to say, as Raposo does, that the overt agreement in (12a) licenses the overt subject, since non-agreeing infinitives only take PRO subjects, as shown by the contrast between (12b) and (12c). In other words, we could claim that Case is licensed by AGR. But an agreement requirement for overt subjects simply doesn't generalize to other languages, and Case theory is supposed to be universal, not just a theory of EP.<sup>2</sup>

In fact, the agreement requirement is probably not even right for Portuguese. If it were really the agreement that exceptionally licensed overt subjects in EP infinitives, then we would expect overt subjects to become impossible if that agreement were lost. However, dialects spoken in Brazil which have lost agreement directly disconfirm this (from Pires, 2002):

- (13) a. A Maria ligou antes de nós/ eu/ \*mim sair  
 The Maria called before of we/ I:NOM/ \*me:ACC leave-INF  
 'Maria called before we/I left.'
- b. [O Carlos e o Pedro/ eu/ \*mim chegar cedo]  
 [The Carlos and the Pedro/ I:NOM/ \*me:ACC arrive-INF late]  
 não surpreendeu ninguém.  
 not surprised no one  
 'Carlos and Pedro/me arriving late did not surprise anyone.'

One could argue that the subject in (13a) is licensed by the preposition *antes de*, but this won't help for (13b). Note also that these dialects have lost *pro*-drop, so we cannot simply say that the loss of agreement has not progressed far enough to affect the syntax. We can then say that the reason why (12b) is bad is not that the subject is not licensed in the absence of agreement, but that the verb is not well-formed according to the rules of EP morphology because it fails to agree with an overt subject.

<sup>2</sup>Not only is agreement not a necessary condition for overt subjects, it is also not a sufficient condition. Modern Greek obligatory control and raising clauses show overt verbal agreement, yet do not allow overt subjects (see Iatridou, 1993).

An even worse language for Case-theory is classical Latin, with its accusativus cum infinitivo (AcI) construction:

- (14) a. Thalēs Milēsīus aquam dīxit esse initium rērum.  
 Thales Milesius water:ACC said be beginning things:GEN  
 'T. M. said that water was the first principle of things.' — or —  
 'T. M. claimed water to be the first principle of things.' (C., *N.D.*, 1. 10, 25)
- b. Est inūsītātum rēgem reum capitis esse.  
 is extraordinary king:ACC answerable:ACC head:GEN be  
 'It is an extraordinary thing for a king to be tried for his life.  
 (C., *Dei.*, 1. 1)
- c. Hominem-ne Rōmānum tam Graecē loquī?  
 man:ACC-PART Roman:ACC such Greek:ABL speak  
 'A Roman speak such good Greek? (To think that a Roman  
 should speak such good Greek.)' (PLIN., *Ep.*, IV. 3, 5)

Again, the embedded subject licensing in sentences like (14a) could be explained as ECM, where the infinitive is the complement of a transitive verb. However, overt accusative subjects are allowed in all types of infinitives, including subject clauses, the complements of nouns and adjectives (see 14b) and historical and exclamatory root infinitives (see 14c). Yet there is no EP-style agreement (in spite of the general richly-inflecting character of the language), and there is no evidence for an analogue of English *for*. And lest one imagine that it is the rich overt case-marking of Latin that licenses these subjects, it should be noted that Modern Irish displays essentially the same patterns (see McCloskey, 1985).

This continues the general pattern, in which a number of non-finite clause-types in English and elsewhere allow overt subjects without any other unifying feature. Positing Case-licensors in each such clause-type without any theoretical connection between them does nothing more than restate the distribution of overt subjects in formal terms. It is not an explanation, because it fails to make any predictions. Let us see, then, if we can do any better by considering the alternative view which I proposed in Section 2.

#### 4 On Raising and the Positions Where DPs Cannot Appear

Recall that the prediction of the Case-less Hypothesis in (4) is that DPs should generally be able to appear overtly in their thematic positions. Thematic positions where no overt DP is possible should constitute a natural class defined

by some factor which can explain their behavior. Consider then that instances where overt DPs are not possible in object position — passives and unaccusatives — are just those where there is no underlying subject present to satisfy the EPP. As argued by Marantz (1991) and Burzio (2000), this point of view allows us a better insight into the behavior of these objects than Case-based formulations of Burzio's Generalization did. They must raise to the derived subject position not because the lack of a thematic external argument has any effect on object licensing, but because they are the closest potential satisfiers for the clausal subject requirement. It turns out that this account can be extended to handle those instances where overt subjects are truly impossible, in the non-finite complements of raising predicates.

The raising that distinguishes the bad (15a) from the good (15b) could either be driven by the matrix EPP or by the embedded subject's need for Case licensing. Things get interesting, however, when we consider the examples in (16) with finite embedded clauses:

- (15) a. \* Is likely John to be sick.  
       b. John<sub>i</sub> is likely t<sub>i</sub> to be sick.  
 (16) a. It is likely that John will be sick.  
       b. \* John<sub>i</sub> is likely that t<sub>i</sub> will be sick.

Inserting an expletive to satisfy the EPP yields a grammatical result in (16a), but raising the embedded subject as in (16b) does not work, even though it did in (15b). This is normally explained by saying that *John* has its Case checked in the embedded clause, and thus cannot properly satisfy the requirements of the matrix clause, either in the form of the Inverse Case Filter (every functional head which *can* check Case *must* check Case) or the Activity Condition (a DP is only active for syntactic operations until its Case feature is checked).

However, the ICF and the Activity Condition are probably too strong. When A-movement from object position in transitive clauses can and cannot occur is adequately handled as noted above without any reference to Case. In transitive clauses it is blocked by relativized minimality, since the thematic subject is a closer potential satisfier for the EPP (Marantz, 1991). Worse, A-movement of prepositional objects is possible in English when there is no DP argument available to satisfy the EPP as in (17b), even though Ps must be seen as Case-licensors:

- (17) a. George Washington sat in this chair.  
       b. [This chair]<sub>i</sub> has been sat in t<sub>i</sub>.

Assuming something like 'abstract P incorporation' for such examples just to maintain the ICF/Activity condition is not reasonable. Fortunately, there is



reason that is independent of Case for raising in (16b) to be blocked. As (18) shows, the embedded finite clause in such constructions can itself raise to matrix subject position, i.e. it is a potential satisfier for the EPP:

- (18) [That John will be sick]<sub>i</sub> is likely t<sub>i</sub>.  
 (19) \* Frank<sub>i</sub> seems [the picture of t<sub>i</sub>] to be hanging askew.

This means that raising the embedded subject into the matrix clause in (16b) is parallel to raising one DP out of another as in (19) and constitutes a relativized minimality violation.

The other datum related to raising which has been taken to require the assumption of Case is (20):

- (20) \* It seems John to be sick.

The EPP is again satisfied in both clauses, and here there's no potentially illicit raising. It is thus standardly assumed that the embedded subject cannot be Case-licensed because T is non-finite, and there is neither *for* nor ECM verb present. But note that these sentences do not improve if we add *for* or if we replace the overt subject with PRO:

- (21) a. \* It seems for John to be sick.  
 b. \* It seems PRO to be on edge lately.  
 intended: 'People seem to be on edge lately.'

This should at least make us suspicious of the Case account of (20).

Fortunately, another explanation is again available. As it turns out, expletive *it* can only appear with those clause-types which are independently able to raise to matrix subject position and (presumably for this reason) do not allow their own subjects to be extracted out. The non-finite complement of raising verbs is not one of these types:

- (22) a. \* John<sub>i</sub> is likely [that t<sub>i</sub> will be sick]. (finite clauses)  
 b. [That John will be sick] is likely.  
 c. ✓ It is likely [that John will be sick].  
 (23) a. \* John<sub>i</sub> would be odd [for t<sub>i</sub> to be sick]. (*for* ... *to* infinitives)  
 b. [For John to be sick] would be unfortunate.  
 c. ✓ It would be unfortunate [for John to be sick].  
 (24) a. \* PRO<sub>i</sub> would be unfortunate [t<sub>i</sub> to be sick]. (arbitrary PRO infinitives)  
 b. [PRO to be sick] would be unfortunate.  
 c. ✓ It would be unfortunate [PRO to be sick].  
 (25) a. John<sub>i</sub> is likely [t<sub>i</sub> to be sick]. (raising infinitives)

- b. \* [John to be sick] is likely.
- c. \* It is likely [John to be sick].

That is, the expletive-associate relation places certain restrictions on the associate, as with *there*. The problem with (20) is thus with *it*, not the licensing of an overt subject.

The phenomenon of subject-to-subject raising can thus be handled without any reference to a Case requirement. Overt subjects are indeed impossible in raising infinitives, but this is simply because they are forced to raise to satisfy the EPP of the matrix clause, not because they are in some way deficient on their own. That this is the correct analysis is supported by data from languages like German, Irish and Latin which lack a strict EPP of the English type. In such languages, subjects are indeed allowed to remain within the non-finite complements of raising verbs (see McCloskey, 1985; McFadden, 2004, Ch. 8, for data and discussion). What all of this means is that the subject positions in raising infinitives can be unified with the object positions in passives and unaccusatives as discussed at the beginning of this section. Overt DPs fail to appear in all of these positions not because of some deficiency related to Case-licensing, but because they must raise to satisfy the EPP in some higher position.<sup>3</sup> Thus unlike the array of thematic positions where overt DPs are possible, those where they are not possible are indeed a natural class to this point.

## 5 On the Distribution of PRO

Of course, there is one remaining instance where overt subjects are not possible, and where we could not easily say that this is because they have been forced to raise to a higher position. These are the infinitival complements of obligatory control verbs, which are standardly analyzed as having the empty category PRO for a subject. Contrary to what one might think, however, PRO has always been problematic for Case theory. The standard GB idea, embodied in the PRO Theorem, was that PRO appears in ungoverned positions where Case is not licensed. However, among other things it was never clear why PRO, being a DP, should have been exempt from the Case filter. Furthermore, a formal notion of government was notoriously problematic (e.g., why is it that finite INFL governs its subject while non-finite INFL does not?) and has since been abandoned.

<sup>3</sup>If one assumes that ECM subjects raise overtly into the matrix clause, then they are exactly parallel with raising subjects and belong in this category as well. If not, then this is just one more class of non-finite clauses that allows overt subjects.

Chomsky and Lasnik (1993) (q.v. for discussion of additional problems with the PRO Theorem) thus argued that PRO has a special 'null' Case, licensed by non-finite T, as opposed to the non-null Case licensed by finite T on overt DPs. But null Case is just another stipulation, for example lacking any morphological correlate. As agreement on secondary predicates in languages like Icelandic, Russian, Latin and Greek shows, PRO is actually assigned the same morphological cases as overt subjects (Sigurðsson, 1991):

- (26) a. Strákarnir vonast til að PRO komast allir í skóla.  
 the boys:N hope for to PRO:N get all:N to school  
 'The boys hope to all get to school.'  
 b. Strákarnir vonast til að PRO leiðast ekki öllum í skóla.  
 the boys:N hope for to PRO:D bore not all:D in school  
 'The boys hope not to all be bored in school.'

What is more, PRO and overt subjects are *not* in complementary distribution:

- (27) a. John remembered (*\*for*) Frank buying the beer.  
 b. John remembered (*\*for*) PRO buying the beer.

There is no difference in the embedded clauses in (27a) and (27b) that would lead us to expect a difference in their Case-licensing abilities. This is problematic for both theories of PRO. In the end, the distribution of the Case features ends up being stipulated, merely restating the distribution of overt versus PRO subjects.<sup>4</sup>

Case-based accounts of the distribution of PRO thus turn out to be inadequate, which means that the relevant data can't really be counted as evidence in favor of a Case requirement. But we must ask then, what *does* regulate the distribution of overt and non-overt subjects in non-finite clauses? The proper treatment of PRO and control is a difficult issue which remains unresolved and has again become a topic of extensive research (see e.g. Hornstein, 1999; Manzini and Roussou, 2000; Martin, 2001; Culicover and Jackendoff, 2001; Wurmbrand, 2001; Landau, 2003, among many others). No consensus has developed around any particular account, and I do not have a new solution to the various problems. I will simply suggest, following a discernible trend in works on the subject, that our explanation of the distribution of PRO should

<sup>4</sup>The reworking of the null Case idea in Martin (2001) does not satisfactorily address this failing either. If anything, the problem becomes more apparent as Martin (to his credit) considers problematic data from the complements of *want*-class verbs and is forced to the rather odd conclusion that, under certain circumstances, null Case can license overt DPs as well.

be tied in some way to its interpretation. This is a promising avenue to pursue because PRO and overt DPs clearly differ in how they are interpreted, the former having a highly restricted and dependent reference. It is not clear, on the other hand, that they differ in a purely syntactic way that would lead us to expect different syntactic licensing requirements as was the claim of Case-based accounts.

As an example of how this might work, consider instances of 'obligatory control' in the complements of verbs like *try*, where overt subjects are in fact impossible:

- (28) a. John tried PRO to get a keg.  
 b. \*John tried for Frank to get a keg.

The problem with (28b) is traceable to the semantics of *try*, which implies agentive involvement of its subject in the embedded eventuality (as suggested also by Schütze, 1997; Wurmbrand, 2001). In support of this view, note that the felicity of an embedded subject varies according to the lexical verb:

... from perfect with *want* to somewhat marginal with *hope (for)* to quite difficult with *try (for)* to impossible with *start* (Schütze, 1997, p. 35).

In fact, it is possible to get overt subjects below *try* given the right semantic/pragmatic context:

- (29) I've actually tried for him to catch the ball. He just wouldn't move.

This sentence was found via Google search on a message board discussing the beta version of a soccer game, where the speaker controls — in a sense actually is — the goalie. The fact that overt subjects are usually not possible in obligatory control controls is thus due to semantic factors, not issues of syntactic licensing.

Consider in this light Hornstein (1999), one of the better-known recent treatments of these phenomena, according to which obligatory control is derived by movement, and PRO is simply the trace of this movement. While Hornstein's particular formulation depends on Case, there is nothing in it that could not be translated into the Case-less theory advocated here. E.g., Hornstein blocks control into finite clauses, because in his terms it would be movement from a Case position, but this is just the same raising out of finite CP that I argued above can be blocked by Relativized Minimality. Indeed, he argues quite strongly *against* the theory of null Case. Now, Hornstein's theory of control as movement faces a number of serious issues (see e.g. Culicover and Jackendoff, 2001; Landau, 2003), and I do not wish to argue either for or

against it here. My concern has simply been to show that, while a number of questions remain surrounding the distribution of PRO and overt subjects, the relevant data do not actually militate against the Case-less Hypothesis that I have put forward here. Indeed, even so thoroughly syntactic a theory of control as Hornstein's does not crucially depend on the assumption of syntactic Case.

## 6 Conclusion

The assumption of a syntactic Case requirement on DPs is not necessary to account for the distribution of overt subjects in embedded clauses. The environments where overt subjects are syntactically possible are a mixed bag, whereas those where they are not form a natural class. A theory that could unify the former in an attempt to maintain the idea that DPs require explicit syntactic licensing may well be possible, but it would be hopelessly complicated and stipulative. On the other hand, if we simply assume that DPs are by default licensed to appear wherever they can be associated with a  $\theta$ -role, then the data discussed here fall out quite simply. The only exceptions to the default situation are those — like the subjects of raising infinitives — where the DP is forced to raise away in order to satisfy a higher EPP feature.

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