

## Null Expletives and Case: The view from Romance

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### Starting point: Chomsky (2005)

Claims:

- T inherits both A-related features (EPP/uD and  $u\phi$ ) and Tense from C
- T operates as a Probe derivatively, by virtue of its relation to C (i.e., the Phase head)

Assumptions:

- $u\phi$  acts as a Case Probe (i.e., no uCase)
- phi-features (agreement) are compulsory for structural Case valuation



### Target point: to show that

- ✓ phi-features are NOT compulsory for structural Case valuation, but the phase head is;
- ✓ T lacks an intrinsic Nominative value; whether lexical subjects have Nominative or Accusative values is strictly dependent on the presence of a phi-Probe;
- ✓ this phi-Probe ( $u\phi$ ) may be encoded on a verbal head (e.g., T, Aspect) or a nominal head (i.e., null expletive *pro*);
- ✓ null expletive *pro* is a parametrized UG primitive with a role in Case valuation.

### 1. Phi-features (agreement) as a Case prerequisite

Standard in generative grammar since George & Kornfilt (1981) and Chomsky (1981, et seq.)

More recently: Branigan 2005, Chomsky 2004, 2005, Landau 2004, Schütze 1997

- (1) a. \* There seems [Max to be happy].  
 b. Au făcut-o [de a plecat  
 AUX.3PL made-CL.3SG.F.ACC [of AUX.3SG left  
 (\*Ioana / \*ea) repede]. (Romanian)  
 Ioana / 3SG.NOM ) fast]  
 ‘They made Ioana/her leave fast.’

However, (1a) could be ruled out either (i) b/c T lacks  $u\phi$   
or (ii) b/c there is no phase head (i.e. C) ...

(1b), an inflected indicative, supports (ii);

- Rizzi (1997) argues *de* merges in a low C head (i.e., ‘Finite’) in Romance => non-phasal

Furthermore, (lexical) subjects are permitted in non-finite (uninflected) phasal domains, with variation for Nominative or Accusative values, at both a macro- and a micro-parametric level:

**A.** strictly **Nominative**: infinitives and gerunds in most Ibero-Romance, Greek gerunds (Sitaridou 2002), West Flemish infinitives (Haegeman 1985), absolute participial constructions

in Hungarian (Liptak, p.c.), Albanian (Kallulli, p.c.), Basque (Alcázar & Saltarelli 2005), Italian Aux-to-Comp (Rizzi 1982, Belletti 1990), etc.

- (2) a. Îi punea la calculator [CP \*(pentru) a avea  
 CL.3PL.M.ACC put.3SG at computer [CP \*( for) INF have  
**tu / \*tine** liniște] ’ (Romanian)  
 2.SG.NOM-\*ACC quiet]  
 ‘She would leave them at the computer for you to have peace and quiet.’
- b. [CP Fiind **noi** gata cu toții], am pornit la drum.  
 [being.GER we.NOM ready with all] 1PL started on way  
 ‘Given that we were all ready, we started on our way.’ (Romanian)
- c. [CP Odată (**fata / ea**) deșteptată (**fata / ea**),  
 [CP once girl-the.NOM / she awoken.3FSG, girl-the.NOM / she ]  
 mama puse de mâncare. (Romanian)  
 mother-the put.PAST.3SG of food  
 ‘The girl having awoken, mother started preparing some food.’
- d. Lo supimos [CP después de llegar **él**].  
 we found out [CP after of arrive.INF he.NOM]  
 ‘We found out after he had arrived.’ (Spanish, Ledgeway 1998: 5)
- e. [CP Avendo **Gianni / (lei)** chiuso il dibattito], la riunione  
 [CP having Gianni / (3SGF.NOM) closed the debate] the meeting  
 è finita prima. (Italian, adapted from Belletti 1990: 98)  
 is finished before  
 ‘Gianni having closed the debate, the meeting ended early.’

In tensed (personal) infinitive clause adjuncts (2a,d), gerund adjuncts (2b,e) and absolute participial constructions (2c), lexical **Nominative subjects** are licit in the absence of inflected T!  
**Note:** these are all adjoined structures, so phasal domains by definition

**B.** strictly **Accusative:** English, Ancient Greek infinitives (Sevdali 2005):

- (3) a. [CP For **him** to listen to that talk] was awkward.  
 b. [CP **Him** baking the pie] pleased everyone.  
 c. [PRO filantropon einai] dei  
 PRO.ACC friendly-ACC-3SG to-be must-3SG  
 ‘One needs to love people.’ (Isokrates, II:15. AG, Sevdali 2005: 137)

**C.** **Accusative** or **Nominative:** Old Italian micro-variation sensitive to word order, with postverbal subjects strictly Nominative (Mensching 2000:20).

- (4) a. Tu non ti rallegr[aver io incontrata una morte]  
 you not CL delight [to-have I found a death]  
 ‘You are not glad that I have found death.’  
 (D’Azeglio, ch. 18, p222, cf. Schwehendener 1923:72)

- b. Negar non voglio esser possible, [lui essere beato ..  
 to-deny not (I) want to-be possible **him** to-be blessed  
 ‘I do not want to deny that it is possible that he is blessed.’  
 (Boccaccio, Dec., I, 1; cf. Schwehender 1923:82)

**Note:** these are either adjuncts or subject clauses => phasal domains  
 => **correlation seems to be between Case and phases, not Case and agreement**

This indicates that the phase head (here C) is crucial for Case licensing/checking (see also Alboiu 2006, Branigan, 2005, Rivero & Geber 2004, Sitaridou 2002).

- Agreement (phi-features) as a phasal property:

Cross-linguistically, plenty of uninflected CP infinitives / gerunds / participles ...  
 Traditionally, the distinction between finiteness and non-finiteness is correlated to presence versus absence of *inflectional* morphology on T (Ledgeway 1998, a.o.)  
 =>

EPP ([uD]) and Tense ([iT]) are unaffected by finiteness but agreement ([uφ]) is --

Scenario (i): phi-features are optional on C.

But what determines their presence / absence? Need some sort of constraints => undesirable

Scenario (ii): C uniformly contains phi-features (see Rizzi 1982, Rizzi & Shlonski 2005)

=> assume optional transmittal of [uφ] to T (i.e, only in finite domains)

- ✓ Scenario (iii): C only contains phi-features in finite domains

=> must assume obligatory transmittal of [uφ] to T

Why Scenario (iii) might be preferable:

1. if phasal heads are the locus of information read off by the interfaces (Chomsky 2005, Roussou 2006), and if C contains phi-features in both finite and non-finite contexts, how will the semantics interface distinguish between the two?
2. obligatory transmittal of features preferred over optional transmittal
3. if C uniformly contains phi-features, parametric variation in lexical subject spell-out is difficult to capture

Empirical support for (iii)? Subject clitics

In Friulian these are required in finite clauses but are illicit in gerunds, even if Nominative subjects are okay:

- (5) (\*E) Vint Marie / je ciacaraat cun ti, e ha  
 SCL having Mary / she spoken with you, SCL have  
 diciduu di cumprà el libri.  
 decided of buy.INF the book  
 ‘Having spoken with you, Mary decided to buy the book.’ (Paoli, p.c.)

- if SCL are agreement markers (Rizzi 1986), specifically uφ (Roberts 2006), (5) shows uφ is absent on *uninflected* T heads

Following Alboiu (2006), Landau (2004), Roussou (2006), I assume that in languages with overt agreement morphology,  $u\phi$  is absent on *uninflected T heads*.

- ✓ phi-features are NOT compulsory for structural Case checking, but the phase head is;
- ✓ T lacks an intrinsic NOM value

## 2. Tense and Case values

Since Stowell 1982: C-T yields ‘non-anaphoric’ tense (dependent or independent, in the sense of Landau 2004), while ‘anaphoric’ T is NEVER selected by C.

(other references where Tense is a C attribute: Dobrovie-Sorin 1994, Farkas 1992, Krapova 2001, Roberts & Roussou 2002, Varlokosta 1994, a.o.)

=> assume temporal deixis / Tense value on T only if selected by C (Chomsky 2004, 2005)

So, one possibility is to argue for Tense as a Case prerequisite (see Alboiu 2005, Haerberli 2002, Martin 2001, Mathieu 2006, Pesetsky & Torrego 2001, 2004, Svenonius 2001)

### Problems:

(i) Hungarian possessives (Szabolcsi 1983, Kenesei 1986)

(6) a te ház-ad  
 the you.NOM house-SG  
 ‘your house’ (Kenesei 1986: 115)

- agreement obligatory but no Tense =>  $u\phi$  what is relevant and DP (i.e., **phasal**) status

(ii) Romanian gerunds lack Tense (Avram 2003)

- semantically denote events; are verbal in nature but cannot combine with auxiliaries (i.e. T) or Negation and any temporal adverbs denote time of event not time of reference

- allow for epistemic adverbs & topicalized subjects

=> CP (i.e., **phasal**) domains with Aspect but no T

=> **Temporal deixis in the presence of C (phase head) is epiphenomenal to Case**

Focusing on non-finite CP domains, the task is to account for:

- NOM versus ACC subject instantiation
- ‘overt’ C: Long Head Movement (LHM), à la Rizzi, or independent morpheme

### **Proposal A:**

#### **Case spell-out:**

- |           |   |                         |
|-----------|---|-------------------------|
| <b>a.</b> | NOM, <i>iff</i> the Probe is specified as [ $uD, u\phi$ ] | / A-chain w/ agreement  |
| <b>b.</b> | ACC, <i>iff</i> the Probe is specified as [ $uD$ ]        | / A-chain; no agreement |

=>  $\phi$  (agreement): crucial role in Case *valuation*

- ✓ NOM or ACC values: strictly dependent on the presence or absence of a phi-Probe ( $u\phi$ )
- ✓ C-T and v\*-V lack intrinsic NOM and ACC, respectively

**Note:** this implies that PRO bears Case (as in Bošković 1997, Chomsky & Lasnik 1995, Landau 2004, Martin 2001, but contra Bouchard 1984, Chomsky 1982, Koster 1984). Empirical evidence from Case-agreement in Icelandic control infinitives (Harley 1995, Sigurðsson 1991), Latin and Italian (Cecchetto & Oniga, 2004) and Ancient Greek (Sevdali 2005) supports this view.

### 3. The role of null expletives

#### 3.1 Probe correlate

Recall that:

- presence of phi-features [ $u\phi$ ] is strictly det'd: exclusively present on finite C

Ledgeway (1998) and Sitaridou (2002) observe that:

- NOM subject in uninflected clauses allowed only in null subject languages (NSLs)

*Refinement:* only in **null expletive Ls – NELs** (West Flemish is not *pro*-drop, Haegeman, p.c.)

Further support: various Western dialects of English (e.g. Newfoundland English, working-class Somerset English) permit lexical NOM subjects:

- (7) For **he** to listen to that talk was awkward. (Newfoundland English, Ruth King, p.c.)

These dialects are not *pro*-drop but have null expletives (Somerset English, Ihalainen 1991: 205):

- (8) a.  $\emptyset$  Was old chaps called Toutes use to do it.  
 b. You could hardly see 'cause  $\emptyset$  was so much dust around.

*Question:* But why? What is the role of the null expletive?

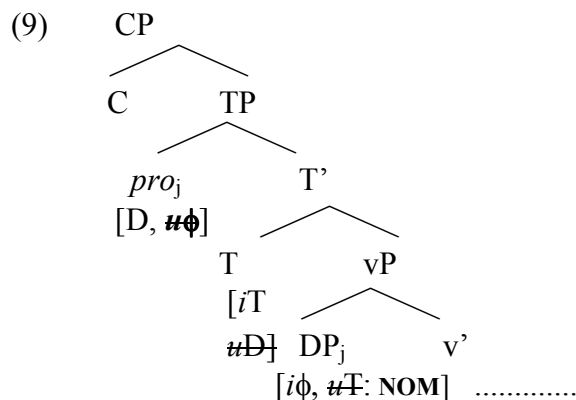
*Answer:* Null expletive acts as a **Probe** --

#### Proposal B:

Where available, *pro*, as  $u\phi$  (i.e., null expletive), acts as a phi-Probe  
 => ensures NOM lexical subjects

So, in languages with null expletives, in non-finite CP:

EPP ( $uD$ ) on T may be satisfied by null expletive, a Caseless nominal which fails to trigger agreement (Chomsky 1995: 288) => *phi-deficient* nominal, as in (9)



In non-finite CP domains, where T lacks  $[u\phi]$ , once *pro* checks off EPP ( $[uD]$ ) on T, T will not Probe further for the thematic subject. BUT: the expletive will --  
 →  $u\phi$ : satisfies the Chomskyan ‘Probe requirement’ (i.e., ensures an A-chain)  
 →  $u\phi$ : guarantees NOM, as opposed to ACC Case spell-out on thematic subject

### 3.2 on *pro*: $[D, u\phi]$

Questions:

(i) what guarantees *pro* in the lexical array?

- minimum premise:  $[D, u\phi]$  as part of the mental lexicon

Typically, in Ls that are structurally pragmatically oriented (Tomić 2006);

Why? B/c this ensures that contentful DPs are free to occupy structural positions with various semantic and pragmatic relevance

=>  $[D, u\phi]$  is a formal device required by “discourse conditions” or “communicative intentions” (Rizzi & Shlonski 2005)

✓ Null expletive *pro* is a parametrized UG primitive with a role in Case valuation

(ii) does the ‘null’ status of the expletive have any bearing on the issues at hand?

- shouldn’t, as phonetic features are not visible to the syntactic component

(10) $[D, u\phi]$	$[D, \pi:3, \#:SG, g:N]$	$[D, \pi:3]$	$[D, \pi:3, u\#, ug]$
<i>pro</i>	<i>il, it, það</i>	<i>there</i>	<i>von</i>

Note: most overt expletives have various degrees of  $\phi$ -specifications (perhaps crucially, Person properties - Uriagereka (2006) argues that the Person feature is crucial for Case) and possibly deixis (see Kayne 2006 on *there*) => different syntax

## 4. Analysis: Null expletive Languages (e.g. Romanian)

**Note:**

Expletive *pro* was the norm for NSLs in the 80s, early 90s (Burzio 1986, Chomsky 1981, 1982, Rizzi 1982, a.o.), but later questioned and/or eliminated due largely to the Minimalist program (Alexiadou & Anagnostopoulou 1998, Manzini & Savoia 1997, 2002) and the eeriness of silent categories;

→ however, re-emerged recently with both empirical and conceptual support (Alboiu 2005, 2007, Cardinaletti 2004, Rezac 2004, Rizzi & Shlonski 2005, Torrego 1998).

Evidence for *pro* in the lexical array in Romanian:

(i) specificity requirement on preverbal subjects (Alboiu 2002, Cornilescu 1997, 2000, Dobrovie-Sorin 1994) => arguably Topics (unless contrastive Focus)

- irrelevant here whether CP- or IP-related (i.e., ‘subject of predication’, à la Cardinaletti 2004)

AND VS(O) inthetic sentences

=> *pro* as Spec,TP a good candidate, unless EPP feature satisfied by V-to-T movement (Alexiadou & Anagnostopoulou 1998)

(ii) Binding

- (11) a. După expoziție (i)-a fost înapoiat  
after exhibition (DAT.CL.3SG) -AUX.3SG been returned.3SG  
[pictorului său<sub>j</sub>]<sub>k</sub> [fiecare tablou]<sub>j</sub>.  
[painter-DAT his<sub>j</sub>]<sub>k</sub> [each painting]<sub>j</sub>-NOM  
'After the exhibit, each painting was returned to its own artist.'
- b. \*[Pictorului său<sub>j</sub>]<sub>k</sub> după expoziție i-a fost  
[painter-DAT his<sub>j</sub>]<sub>k</sub> after exhibition DAT.CL.3SG -AUX.3SG been  
înapoiat <[pictorului său<sub>j</sub>]<sub>k</sub>> [fiecare tablou]<sub>j</sub>  
returned.3SG [painter-DAT his<sub>j</sub>]<sub>k</sub> [each painting]<sub>j</sub>-NOM  
'After the exhibit, each painting was returned to its own artist.'

→ a null expletive in Spec,TP only solution; see (12)

- (12) [CP C [TP *pro*<sub>j</sub> T [DP-DAT POSS<sub>j</sub>]<sub>k</sub> DP<sub>j</sub> ...]  
[D,  $\# \phi$ ] [iT,  $\# D$ ,  $\# \phi$ ] [D, *i*  $\phi$ ,  $\# \text{Case:NOM}$ ]

Note: Datives don't passivize in Romanian => opaque domains

- For illustration, let's focus on Romanian infinitives and gerunds:

- (13) a. [CP \*(Pentru) a avea tu liniște], plecă.  
[CP \*(For) INF have 2.SG.NOM quiet] leave.PST.3SG  
'S/he left so that you can have peace of mind.'

b. Romanian uninflected / personal infinitives:

- [CP C *pro*<sub>j</sub> a-T DP<sub>j</sub> <v> ...]  
"P" [D,  $\# \phi$ ] [INF, v,  $\# D$ ] [ $\# \text{Case: NOM}$ , *i*  $\phi$ ]

→ Verb raising but only to T, as INF particle 'a' blocks T to C movement (see Alboiu 2002, Cornilescu 1997, Dobrovie-Sorin 1994, Motapanyane 1995, a.o. for discussion re: INF 'a')

BUT

(13a) shows **C has to be instantiated**

**Note:** Various authors assume P to be external to CP (e.g., Cowper 2002, Haegeman 1985, Ledgeway 1998, Motapanyane 1995, Raposo 1989). Possibly, but then we lose the symmetry with LHM. We'll go w/ the more parsimonious view (i.e., P within CP) --

Possible explanations for (overt) C:

- a need on C (Roberts & Roussou 2002 and references therein, Pesetsky & Torrego 2001, 2004), or

- a need of T to access Phase-related features (e.g., 'tense anchoring', as in Ledgeway 1998, Varlokosta 1994 or A-related features, as in Belletti 1990, Rizzi 1982).

=> Clearly indicative of a syntactic relationship

*Crucially:* assume (overt) C denotes clause-typing and feature transmission to proxy head  
 → C-T relationship (or, more generally, C-I)

Next:

(14) a. [<sub>CP</sub> (Tu) fiind (tu) gata], am și pornit.  
 [<sub>CP</sub> 2.SG.NOM be-GER 2.SG.NOM ready] AUX.1PL also started  
 ‘Once you were ready, we started on our way.’

b. Romanian gerund adjuncts with VS linearization:

[ <sub>CP</sub> C	<i>pro</i> <sub>j</sub>	Asp	DP <sub>j</sub>	< <i>v</i> > ...]
<b>v-GER</b>	[D, $\emptyset$ ]	[< <i>v</i> -GER>, $\emptyset$ ]	[ $\emptyset$ Case: NOM, $i\phi$ ]	

→ as observed by Motapanyane (1995), gerunds precede clitics (while infinitives follow them),  
 so lexical verb moves to a C head, carrying along the GER feature merged in Aspect  
 → LHM but no P, as expected

*Remarks on linearization:*

- (i) phasal infinitives observe strict VS
- (ii) phasal gerunds: (S)V(S)

Is this a problem? Shouldn't we expect strict VS given that null expletive occupies Spec,TP?  
 Not necessarily --

Recall that Romanian preverbal subjects are interpreted as topic =>  
 Assume a more expanded left-peripheral domain (à la Rizzi 1997, 2004), as in (15)

(15) Romanian gerund adjuncts with SV linearization:

[ <sub>CP</sub> C <sub>High</sub>	DP <sub>j</sub> -Top	C <sub>Low</sub>	<i>pro</i> <sub>j</sub>	Asp	<DP <sub>j</sub> >	< <i>v</i> >...]
	[ $\emptyset$ Case: NOM, $i\phi$ ]	[ <b>v-GER</b> ]	[D, $\emptyset$ ]	[< <i>v</i> -GER>, $\emptyset$ ]	<[ $\emptyset$ Case: NOM, $i\phi$ ]	

**Note** that absolute participial constructions can be construed as a sub-type of the gerund construction, where a *be*-GER is replaced by a null Aspectual head. The CP adjunct in (16a) is semantically equivalent to (16b).

(16)a. [<sub>CP</sub> Odată (fata / ea) Ø deșteptată (fata / ea)], ...  
 CP once (girl-the.NOM/she) ASP awoke. PRTC.FSG, (girl-the.NOM/she)

b. [<sub>CP</sub> Fiind (fata / ea) <fiind> deșteptată (fata / ea)], ...  
 CP be-GER (girl-the.NOM/she) ASP awoke. PRTC.FSG, (girl-the.NOM/she)

=> assume that the unaccusative vP in (16a) is selected by a null Aspectual head which lacks the GER specification. Consequently, no head movement to C can ensue and a stative adverb is inserted for clause-typing, as seen for infinitives. Case-licensing is not affected.

## 5. Variation within NELs

- Macro-parameter: NEL (e.g. Romanian) versus non-NELs (e.g. English)
- Micro-parameteric variation: NOM – ACC variation expected b/c null expletive is a necessary but insufficient condition

=> conditional should not be turned into a biconditional: null expletives are a necessary but insufficient condition for guaranteeing exclusive NOM thematic subjects in a certain L

Main empirical claims:

- *uninflected* phasal domains permit NOM subjects only in Ls with null expletives
- *as long as* null expletive satisfies T's EPP => structural ACC subjects are illicit

- Ancient Greek (AG)

(17) a. [PRO            filantropon            einai] dei  
 PRO.ACC    friendly-ACC-3SG    to-be    must-3SG  
 'One needs to love people.' (Isokrates, II:15. AG, Sevdali 2005: 137)

b. Fe:mi [se                    men egno:kenai            peri    touto:n]  
 say-I    you-ACC            to know-PRF                    about these-GEN]  
 [eme                    de suneire:kenai            tais sais epithumiais]  
 [me-ACC            to go along-PRF            the your wishes-DAT]  
 'I say that since you knew about these things, I went along with your wishes.' (Isokrates, *Ad Philippum III*, 3:3-4. In Sevdali 2005: 134)

- evidence that these infinitives are CPs: their subject and adjunct status

**Note** while *pro* expletive is available to AG, it is only expected in the derivation in the presence of lexical subjects. If the subject is null (i.e., 17a), the DP is not relevant for discourse properties, so will not trigger *pro* in the lexical array; hence the ACC value on PRO, visible on the adjectival predicate.

In (17b), the subject DP is contrastively focused (following Sevdali 2005) and again *pro* is absent as it cannot satisfy the uD feature on the Focus head, so lexical DP in Spec,FocP is valued ACC

=>

(18) a. infinitives with *pro*  
 [CP C    PRO            T                    <PRO>            v    AP ....]  
           [D,  $\emptyset$ ]            [INF, v,  $\#D$ ]    [ $\#Case$ : ACC,  $i\phi$ ]    [ACC]

b. infinitives with focused subjects  
 [CP C    [<sub>FocusP</sub> DP<sub>i</sub>                    Focus            T            [<sub>VP</sub> <DP<sub>i</sub>>    ....]]  
           [ $\#Case$ : ACC,  $i\phi$ , FOC]    [ $\#D$ ]

Recall that C transmits its EPP / uD feature to its proxy head (i.e., T in 18a, Focus in 18b)

- Old Italian (OI)

Mensching (2000): OI infinitives permitted both ACC and NOM subjects; *however*, preverbal subjects mostly ACC, while postverbal subjects strictly NOM.

Crucially, both (4a) and (4b) are CP domains: an adjunct and a subject clause, respectively  
Assuming that discourse conditions determined how EPP was checked =>

- (19) a. infinitives with *pro*  

[CP C	<i>pro</i> <sub>j</sub>	T	DP <sub>j</sub>	v	....]
	[D, uφ]	[INF, v, #D]	[#Case: NOM, iφ]		

  
 b. infinitives without *pro*  

[CP C	DP <sub>i</sub>	T	<DP <sub>i</sub> >	v	....]
	[#Case: ACC, iφ]	[iT, #D]		V	

Note, that in pple, postverbal NOM DP in (19a) can topicalize, so unsurprisingly some preverbal subjects are NOM (Mensching mentions 2 such examples in his data => marginal, as expected).

## 6. Empirical Predictions

This analysis:

→ suggests a dissociation between Case-licensing and Case values, along the lines of Marantz (2000) and Schütze (1997),

→ predicts Ls with identical Case values for both subject and object DPs given that NOM and ACC values are det'd compositionally and not by C and v\*, respectively.

(i) ACC on both subject and object: Imbabura Quechua, a Nominative-Accusative SOV language, shows Accusative marking on both the subject and the object in desiderative clauses.

- (20) a. Ñuca-Ø      can-da      ricu-ni/\*-ngui.  
 I-NOM      you-ACC      see-1SG/-2SG  
 'I see you.'
- b. Ñuca-ta      can-da      ricu-naya-n/\*-ni/\*-ngui  
 I-ACC      you-ACC      see-DES-IMP/-1SG/-2SG  
 'I would like to see you.'  
 (Cole & Jake 1978:74)

(ii) NOM on both subject and object: Newfoundland English data and Japanese (Ura 2000)

- (21) a. **She** pushed **I** / me down.  
 b. Pass **he** / him over to me.      (Ruth King, p.c.)

- (22) Joe-**ga**      unagi-**ga**      suki/kirai-da.  
 Joe-NOM      eels-NOM      likes/dislikes-COP  
 'Joe likes/dislikes eels.'      (Japanese, Ura 200:107)

## 7. Conclusions

- Phi-features (agreement):
  - property of C in finite phases
  - property of null expletive
  - NOT a property of v\* or non-finite C
  - *crucial role in Case valuation*
- Case checking (= syntactic licensing) guaranteed at Spell-Out
  - a property of the phase
- Case values
  - NOT specific to C-T & v\*-V
  - dependent on the presence of a Probe & its properties
    - NOMINATIVE value, *iff* the Probe is specified as [*u*D, *u*φ]
    - ACCUSATIVE value, *iff* the Probe is specified as [*u*D]

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