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## Agreement in Russian Secondary Predicates\*

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#### Introduction

This paper will be concerned with the distribution of Case marking in Russian secondary predicates. I will particularly analyze Case alternations in simple matrix clauses and control configurations. I account for these facts by distinguishing NP-movement structures from the structures containing a null pronominal. This general topic is often referred to as the Second Dative. However, it is somewhat misleading because Dative Case marking happens to be very unproductive in secondary predicates in Russian, with a more general paradigm involving actually Instrumental Case.

Previous research done on the topic includes works by Franks and Hornstein (1992), Laurençot (1996) and Bailyn (2001) among others. In section II, I review briefly some of these accounts and point out the challenges they face. In section III, I propose a new approach to these facts by relying on an independent analysis of control developed by Hornstein (2001) where the standard obligatory control constructions are analyzed as involving NP-movement, while non-obligatory control configurations are argued to contain a null pronominal ( *pro*). In section IV, I account for the mysterious lack of Accusative Case on predicate adjectives in object control constructions. I propose that a specific timing restriction on licensing the Case of subject DPs vs. object DPs results in Instrumental on a secondary predicate instead of Accusative in these constructions. The analysis presents an argument for a Spec-Head checking relation rather than feature valuation via Agree.

## I. Case in Russian secondary predicates

Let us begin by carefully considering the relevant facts about Case in Russian secondary predicates. In the main clauses, a secondary predicate can be marked with Nominative (NOM) or Accusative (ACC) depending on which argument is modified, as shown in (1) and (2) respectively. In (1), the adjective *grustnyj* has the NOM Case, same as *Ivan*, the subject DP it modifies. In (2), *grustnogo* has the same ACC Case as *Ivana*, the object DP it modifies.

<sup>\*</sup> For the insightful discussion, I would like to thank the audiences at the ECO5 Syntax Workshop and the Student Conference at the University of Maryland where parts of this work were presented. I am very grateful to Željko Bošković, Steven Franks, Norbert Hornstein and Howard Lasnik for their helpful comments.

<sup>&</sup>lt;sup>1</sup> The following facts have been noted since Comrie (1974). The examples, however, are taken from Franks (1995) with slight modification.

- (1) **Ivan** prišel domoj grustn-yj / grustn-ym Ivan came home sad-NOM sad-INST 'Ivan came home sad'
- (2) Pavel vstretil **Ivana** grustn-ogo / grustn-ym Pavel met Ivan-ACC sad-ACC sad-INST 'Pavel met Ivan sad'

There is also an alternative Case marking to NOM and ACC available in these constructions, namely, Instrumental (INST). In (1) and (2), grustn-ym, with INST is perfectly acceptable.

Now consider examples in (3) and (4). In subject control configuration in (3), the secondary predicate behaves just like the one in the main clause, allowing both NOM and INST Case on the adjective. However, when it comes to object control, ACC is no longer available (4). Only INST Case is possible on a secondary predicate in the object control context (5).

- (3) **Ivan** ne xočet idti na prazdnik grustn-yj / grustn-ym Ivan not wants to-go to party sad-NOM sad-INST 'Ivan doesn't want to go to the party sad'
- (4) \*Pavel poprosil **Ivana** ne idti na prazdnik grustn-ogo Pavel asked Ivan-ACC not to-go to party sad-ACC 'Pavel asked Ivan not to come to the party sad'
- (5) Pavel poprosil Ivana ne idti na prazdnik grustn-ym Ivan-ACC sad-INST Pavel asked not to-go to party 'Pavel asked Ivan not to come to the party sad'

The questions that this set of data raises are the following. What is the nature of optionality between NOM and ACC on the one hand and INST on the other hand? And why does this optionality break down in the case of object control?

It turns out that the picture illustrating the latter point is more complex (or, perhaps, more complete). It is not only in the context of object control that the optionality breaks down. Other INST forcing contexts include infinitival clauses with an overt complementizer, as in (6), and non-obligatory control structures, as in (7).

(6) Ivan ulybalsja [čtoby ne vygljadet' grustn-ym / \*grustn-yj] Ivan was-smiling so-that not to-look sad-INST sad-NOM 'Ivan was smiling in order not to look sad'

(7) [Idti na prazdnik grustn-ym / \*grustn-yj ne interesno to-go to party sad-INST sad-NOM not interesting 'To go to a party sad is not interesting'

Thus, the issue becomes slightly more general. That is, why is structural case, like NOM or ACC, allowed freely in some contexts and not in the other?

## II. A brief survey of previous accounts

In this section, I will present some previous attempts to capture these facts. I will also point out the problems each account faces.

One of the analyses of these phenomena is that of Franks and Hornstein (1992), where Case transmission mechanism plays a crucial role.<sup>2</sup> Consider their derivation of (1) in (8). PRO, an argument of the secondary predicate adjective in a small clause, transmits Case from the subject DP to the predicate adjective via a coindexation process. PRO is coindexed with its controller *Ivan* and with the predicate *grustnyj*. In this way, NOM Case is transmitted from the subject DP to the adjective.

(8) [Ivan<sub>1</sub> [<sub>VP</sub> [<sub>VP</sub> prišel domoj] [<sub>SC</sub> PRO<sub>1</sub> grustn-yj<sub>1</sub>]]] Ivan came home home sad-NOM 'Ivan came home sad'

First, the nature of this coindexation process and how it relates to Case is not exactly clear, making it appear somewhat ad hoc. Why would PRO be transmitting Case from the controller to the adjective? It is particularly puzzling since the hypothesized coindexation seems rather semantic in nature: the first link determines the semantic antecedent of PRO while the second link is the predication link (following Williams 1980), yet it is this coindexation that is argued to be responsible for Case marking.

The INST option on this analysis is achieved by a different structure, where there is no PRO as the argument of the secondary predicate, as in (9). There is no Case assigner of INST here and INST is treated as default Case.

(9)  $[Ivan_1 [v_P [v_P prišel domoj] [A_P grustn-ym_1]]$ 

There seems to be a Theta-Criterion problem with this analysis in that an adjective that requires an argument, such as PRO in (8), sometimes is allowed to appear without an argument.

Franks and Hornstein account for the lack of ACC with the object control by treating obligatory control PRO as an anaphor and non-obligatory control PRO as a pronominal. However, obligatory *object* control PRO is treated as an

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<sup>&</sup>lt;sup>2</sup> Cf. also Franks (1995) for the details of this analysis.

exception in that it is a pronominal and not an anaphor. The exceptional nature of this particular instance of PRO seems to undermine this analysis.

An alternative analysis is proposed by Laurençot (1996), where it is restructuring (or clause union) that results in the structural Case on the secondary predicate, following Comrie (1974). This is illustrated in (10), where the structure in (10a) becomes the structure in (10b) after restructuring takes place. The embedded CP and Agr<sub>S</sub>P get deleted, while TP is incorporated into the matrix V creating a complex predicate.

b. 
$$[VP [VV ]TP T VP]]$$

Laurençot then treats INST Case on the secondary predicate as an instance of the adjective agreeing with PRO bearing Null Case as in Chomsky and Lasnik 1993.<sup>3</sup> However, the problem of look-ahead arises. To get the NOM Case on the adjective, agreement with PRO (resulting in INST) would have to not take place until restructuring occurs.

Bailyn (2001) argues for quite a different analysis. He follows Maling and Sprouse (1995) in collapsing arguments and predicates with respect to the Case Filter. In other words, both arguments and predicates must license their Case during the derivation if the derivation is to converge. Specifically, Bailyn argues that structural Case (NOM/ACC) is checked by adjectives covertly in the same positions as it is checked by arguments. Notice that this approach requires multiple specifiers because multiple XPs will be checking their Case against the same head. For example, in (11), the secondary predicate *sad* and the subject *Ivan* would both be checking their NOM Case against I<sup>0</sup>. And under feature valuation approaches to feature checking (via Agree) as in Chomsky (2000), one would probably need multiple Agree in such cases, not a trivial matter.

(11) 
$$[_{IP} [_{AP} \text{ sad}]_1 [_{DP} \text{ Ivan}] I^0 [\text{came home } t_I]]$$

Bailyn then further proposes that predicates, in addition to being able to get structural Case, can also get inherent Case, licensed by some abstract predicate head Pred<sup>0</sup>, as in (12). INST on a secondary predicate is then analyzed as an instance if inherent Case licensed by some abstract Pred<sup>0</sup> heading the predicate. However, it is not entirely clear what the nature of this abstract head is and whether there is much independent evidence for it.

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<sup>&</sup>lt;sup>3</sup> Laurençot actually argues that it is *Dative* that would be an instance of agreement with PRO, but her analysis deals with the least productive paradigm based on an adjective *odin* (*alone*). For the purposes of exposition, I am extending her analysis to a more general paradigm (with *INST* occurring in the same environments as *Dative* does). Note, however, that she supports her analysis by arguing for the presence of overt *Dative* infinitival subjects in Russian.

# (12) $[PredP Pred^0 [AP A]]$

Besides, there might be an empirical problem with this approach. If a secondary predicate raises from its original position to get the structural Case, we would expect binding Condition C violations to be obviated.<sup>4</sup> Thus, in (13), according to Bailyn (2001), [zlaja na Ivana] would raise to Spec,TP position to check NOM Case. This particular movement gets an r-expression Ivana out of the c-command domain of the pronoun ego. Hence, Condition C would not be violated and (13) is supposed to be an acceptable sentence. However, (13) is judged by my informants and myself as unacceptable on the reading where ego and Ivan are coreferential.

(13) Maša oskorbila ego<sub>1</sub> [zlaja na Ivana<sub>1</sub>] Maša insulted him angry-NOM at Ivan 'Maša insulted him<sub>1</sub> angry at Ivan<sub>1</sub>'

Landau (1999) provides an extensive development of a theory of control based on Agree. He explores a somewhat similar 'long-distance' phenomenon, namely, the interaction between universal quantifiers and past participles in Romance.<sup>5</sup> In the spirit of that analysis, one could suppose that the Russian secondary predicate Agrees with PRO and PRO then in turn Agrees with its controller. However, familiar problems seem to arise. Some sort of feature transmission mechanism is required. Besides, there seems to be some look-ahead: PRO can check the features of the secondary predicate only after it agrees with its controller (unless the result of the first application of Agree is somehow overridden by the later step). Even though I will not pursue this analysis further in this paper, a more careful investigation of the applicability this analysis to the Russian facts could be very fruitful.

In the following section, I will investigate a possibility of a new and, perhaps, natural solution to these old and interesting problems.

#### III. NP-movement analysis of secondary predication

A recent analysis of control by Hornstein (2001) will be an important foundation of my analysis of secondary predication in Russian. This intriguing analysis treats the traditional PRO as a trace of NP-movement, that is, A-movement. This means that obligatory control structures, as in (14), otherwise analyzed as containing PRO, undergo virtually the same derivation as raising structures, as in (15).

<sup>&</sup>lt;sup>4</sup> Binding Condition C disallows a referential expression to be c-commanded by a pronoun coreferring with that expression.

<sup>&</sup>lt;sup>5</sup> Cf. Landau (1999) for the details of that analysis.

<sup>&</sup>lt;sup>6</sup> Cf. Hornstein (2001) for many important details I am suppressing here in the interest of space.

- (14) John<sub>1</sub> tries [ $t_1$ ' to be  $t_1$  healthy].
- (15) John<sub>1</sub> seems [ $t_1$ ' to be  $t_1$  healthy].

As evidence for this analysis, Hornstein provides a number of diagnostics for movement which obligatory control structures successfully pass. The only remaining difference between the raising and the obligatory control structures is the number of theta-roles the moved argument gets in the derivation. Since raising verbs do not assign external theta-roles, John in (15) only receives a theta-role in its base position from the predicate *healthy*. However, in (14), since control verbs do assign an external theta-role, John gets one theta-role in its base position from healthy and another in its case position (matrix Spec,IP) from the predicate tries. Note that semantically there is nothing wrong if an argument receives multiple theta-roles: John in (14) is understood as precisely the agent of trying and the experiencer of being healthy.7 And syntactically, eliminating D-structure (a pretransformational level of representation where all theta-roles must be satisfied) from the theory on minimalist grounds leaves an open possibility for getting thetaroles in the process of the derivation via direct movement into theta-positions. Besides, by this analysis, Hornstein tries to simplify the theory by getting rid of an abstract element PRO with its quirky properties and a whole semantic module needed for its interpretation.

Hornstein (2001) also distinguishes obligatory control from non-obligatory control in that the latter does not involve NP-movement. Instead, small *pro* (a null pronominal) is generated as the subject of the embedded clause and it remains within that clause throughout the derivation. Importantly, non-obligatory control structures do not pass the same tests Hornstein uses to identify movement in the obligatory control structures.

Now let us see how Hornstein's analysis can help us understand the nature of Case alternations in Russian secondary predicates. As we can see from the data, the secondary predicate adjective most of the time has either the very same Case as the DP it modifies (NOM or ACC in (1) and (2) repeated below in (16) and (17)), or it can get INST. In other words, there is some sort of agreement between an argument and an adjective in Case or the adjective can get INST.

(16) **Ivan** prišel domoj grustn-yj / grustn-ym Ivan came home sad-NOM sad-INST *'Ivan came home sad'* 

<sup>8</sup> There are, of course, contexts in which INST is the only option. I will return to those later on.

<sup>&</sup>lt;sup>7</sup> Consider also reflexivity in *John shaved*.

(17) Pavel vstretil **Ivana** grustn-ogo / grustn-ym Pavel met Ivan-ACC sad-ACC sad-INST 'Pavel met Ivan sad'

Given this, I would like to investigate the possibility of analyzing the instances of an adjective agreeing in Case with the argument it modifies as a result of NP-movement. The derivation of a simple clause with a secondary predicate agreeing with the subject in NOM would then proceed, as in (18). The subject is base generated as merging directly with the predicate adjective and then A-moving to the NOM Case position Spec,TP via VP, where it gets its theta-role from the verb.

(18) 
$$[TP DP T [VP t' V [t Adj]]]$$

Then subject obligatory control clauses with NOM Case on the adjective would have a very similar derivation, only with more steps of A-movement, as in (19). The subject DP starts out again as the direct argument of the predicate adjective and then moves to the theta-position in the embedded VP, then to the embedded TP to satisfy the EPP requirement of T<sub>0</sub>, then to the theta-position in the matrix VP and, finally, to the NOM Case position in matrix Spec,TP. Notice that this is a good instance of successive cyclic A-movement.

(19) 
$$\left[ \text{TP DP T}^0 \right]_{\text{VP}} t''' V^0 \left[ \text{TP } t'' T^0 \right]_{\text{VP}} t' V^0 \left[ t \text{ Adj } \right]$$

Such an analysis would make the predication relation very local. The adjective is in a very local relation with its argument, directly merged with it. Hence, no special mechanism of coindexation is needed to capture the interpretation, and syntactic agreement facts.

What about the option of having INST Case on the secondary predicate, as also shown in (16) and (17)? I suggest that the other part of Hornstein (2001)'s analysis is very relevant in determining where the mysterious INST comes from in these contexts. Recall that there is another structure that Hornstein explores: having a null pronominal as the subject of a non-finite clause. It is plausible that something similar is going on in the structures with INST we are exploring here. Specifically, INST could be a result of a null pronominal (*pro*) being the subject of a small clause, as shown in (20). The control clause with a secondary predicate marked for INST would then have as its structure the one in (21).

(20) 
$$\left[ {_{TP}} \, DP \, T^0 \left[ {_{VP}} \, t \, V^0 \left[ {_{SC}} \, \, \textbf{pro} \left[ {_{AP}} \, Adj^0 \, \right] \right] \right] \right]$$

(21) 
$$\left[ {_{\text{TP}}} \, DP \, \text{T}^0 \, \left[ {_{\text{VP}}} \, t^{\, \prime \, \prime} \, \text{V}^0 \, \left[ {_{\text{TP}}} \, t^{\, \prime} \, \text{T} \, \left[ {_{\text{VP}}} \, t^{\, \prime} \, \, \text{V} \, \left[ {_{\text{SC}}} \, \, \, \text{\textbf{pro}} \, \left[ {_{\text{AP}}} \, \text{Adj}^0 \, \right] \right] \right] \right]$$

<sup>9</sup> Here I follow the work of Lasnik (2002, 2003) presenting evidence for the EPP.

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By locality, Case agreement of the adjective with the higher DP is precluded, resulting in the adjective agreeing in Case with *pro*. INST Case then is the result of an adjective agreeing in Case with a null category. This part of the analysis is reminiscent of the account of Laurençot (1996) of INST Case. She argues, however, that INST is the result of the adjective agreeing with PRO bearing Null Case. On my approach to control, given what we have said above about the nature of the NOM and ACC Case agreement, it cannot be PRO but rather *pro*. The idea is that whatever Case *pro* might have is realized as INST on the agreeing category which is phonologically realized.

As for the interpretation, *pro* would be interpreted through coreference with the matrix subject, if there is one, otherwise, we get the case of regular non-obligatory control, where, as correctly predicted, only INST is possible (22).

(22) Idti na prazdnik grustn-ym / \*grustn-yi ne interesno to-go to party sad-INST sad-NOM not interesting 'To go to a party sad is not interesting'

Notice further that pro has its own set of  $\varphi$ -features that must agree with the antecedent of that pro. Hence, even though there is no Case agreement between the adjective and the matrix DP in the structure with pro, there should be some agreement in  $\varphi$ -features. The prediction is born out. The example in (23) shows that there is obligatory agreement in gender. The same is a true of number and person agreement.

(23) Devočka prišla domoj \*grustn-ym / grustn-oj girl-NOM,sg,fem. came home sad-INST,sg,ms. -INST,sg,fem. 'The girl came home sad.'

There is more evidence for the null pronominal analysis of INST given in (24), demonstrating that the structures containing split antecedents are only acceptable with INST on the adjective and are ill-formed with NOM.

narjadnymi/ (24)Pavel ubedil Ivana pojti večer \*narjana dnyje Pavel persuaded Ivan to-go to party dressedpl, up,pl,INST NOM

'Pavel persuaded Ivan to-go to party dressed-up'

Now, why is it only INST that is allowed on the adjective when there is an overt complementizer present between the adjective and the argument, as was shown in (6)? I suggest that it is due to the intervening status of the complementizer (cf. Bošković 1996). Hence, A-movement across it, if it is to obey locality, will result in improper movement, movement from an A-position to

an A-position via A'-position. This clearly would not be a problem for A'-movement out of such domains, since no improper movement would arise there. Thus, the general idea is that, if movement is disallowed, the pronominalization option kicks in, resulting in INST on the adjective.

#### IV. Accusative Case

I will now turn to an interesting puzzle presented by the facts in the object control context. Consider the object control examples in (4) and (5), repeated below as (25) and (26). ACC Case is not allowed on the adjective in this structure, only INST is available. However, NOM is allowed in the subject control context in (3).

- (25) \*Pavel poprosil **Ivana** ne idti na prazdnik grustn-ogo Pavel asked Ivan-ACC not to-go to party sad-ACC 'Pavel asked Ivan not to come to the party sad'
- poprosil idti (26) Pavel prazdnik Ivana ne grustn-ym na Pavel asked Ivan-ACC sad-INST not to-go party to 'Pavel asked Ivan not to come to the party sad'

I would like to suggest that the lack of ACC in the object control contexts, instead of being strange, might actually be telling us something important about the nature of Case licensing on secondary predicates. Specifically, I would like to propose (27). The intuition behind (27) is that a secondary predicate adjective cannot agree in Case with a DP that has an uninterpretable Case feature.

(27) A secondary predicate can agree in Case with the argument it modifies only when that argument has its Case checked.

Observe that subjects always must get their Case checked overtly because of the EPP requirement. However, situation can be different for non-subjects. If an object DP has not checked its Case overtly (by the time of spell-out), the secondary predicate cannot show up with overt ACC Case. Agreement cannot take place with an element that has not checked its own Case yet. Instead, agreement with the adjective will take place in LF because that is where the relevant DP checks its ACC Case. Overtly, we can only see INST in this context and not ACC (agreeing Case with the ACC DP).

This delay of Case checking of the object seems to be more compatible with the theory involving Spec-head checking configuration rather than feature valuation via Agree. It is more plausible to say that getting into a particular configuration can be delayed rather than that a particular geometrical relation in the phrase marker can be delayed.

It is now possible to elaborate more on the nature of INST Case with secondary predicates. As we have seen so far, INST seems to be available in two specific instances: when a secondary predicate agrees in Case with a

phonologically null category *pro* and when the DP it agrees with does not check its Case overtly. Both instances seem very much related in that they both exhibit some property of being 'null' Case-wise in the narrow syntax: phonetically null in the instance of *pro* or having uninterpretable Case by the end of the narrow syntax cycle when covert Case checking is involved. It is slightly different from saying that INST is simply a default Case (a notion of some Case that can be assigned if no regular Case licensing can be done). One would actually want to avoid the default of Case as it would be difficult to have any Case Filter violations at all, given that the default Case can always cover up the violation. My idea of INST is rather different in that it is actually a result of agreement with another category, it just happens to be a null category or the agreement takes place in LF.<sup>10</sup>

Now, recall that ACC is not always disallowed with secondary predicates. ACC is a valid option for an adjective in the simple matrix clause, as was shown in (2), repeated below in (28).

(28) Pavel vstretil **Ivana** grustn-ogo / grustn-ym Pavel met Ivan-ACC sad-ACC sad-INST 'Pavel met Ivan sad'

I suggest that this is because, in this instance, the DP and the adjective actually form a constituent, namely, a small clause. Further, there is some evidence that subjects of small clauses must raise overtly (which I will present shortly). If DP raises overtly to check its ACC Case, given (27), this would explain why ACC shows up on the adjective in this particular context. This is the logic of the argument.

First, we would like to establish that the object DP and the adjective do, in fact, form a constituent here. The example in (29) shows that we cannot separate the DP and the adjective with the PP *na stantsii* and maintain ACC Case on the adjective. Thus, object NP and the adjective form a constituent, hence the normal agreement obtains.

(29) Pavel vstretil Ivana na stantsii grustnym/ ??grustnogo Pavel-NOM met Ivan-ACC at station sad-INST 'Pavel met Ivan at the station sad'

Hence, the structure of (28) with ACC seems to be as follows (by the time of Spell-out).

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<sup>&</sup>lt;sup>10</sup> Another possibility would be to have default Case being available only for the elements that themselves are not subject to the Case Filter. In other words, the Case Filter violations would be enforced if an element must check its Case (like, arguments). However, elements which only agree in Case with other Case bearers, like adjectives, could potentially have default Case.

(30) Pavel vstretil Ivana [SC t grustnogo]
Pavel-NOM met Ivan-ACC sad-ACC

'Pavel met Ivan sad'

There is some evidence from Kayne (1985) supporting the idea that subjects of small clauses must raise out of the small clause to check their Case overtly. Consider the paradigm in (31).

- (31) a. I made John out [ t to be a liar].
  - b. I made out [John to be a liar].
  - c. I made John out [ t a liar].
  - d. \*I made out [John a liar].

Based on the position of the DP *John* with respect to the particle *out* in this verb-particle construction, we see that subject raising is optional out of the infinitival clause, since *John* may precede or follow the particle in (31a) and (31b). However, this is not the case with small clauses. (31c) and (31d) show that *John*, the subject of a small clause, must raise out of the small clause overtly, with the sentence with it remaining in situ being unacceptable. This supports our analysis of (28) as in (30), involving a small clause. <sup>11</sup>

We can further test this analysis with the structures involving multiple secondary predicates. Consider (32a) and (32b). Here, the first adjective *grustnym* belongs to the embedded clause, while the second one *narjadnym* is part of the matrix clause.

- (32) a. Pavel poprosil Ivana [ne prihodit' na prazdnik grustn-ym] narjadn-ym Pavel asked Ivan-ACC not to-come to party sad-INST dressed-up-INST 'Pavel asked Ivan not to come to the party sad, and Ivan was dressed up at the time of asking.'
  - b. \*Pavel poprosil Ivana [ne prihodit' na prazdnik grustn-ym] narjadn-**ogo** Pavel asked Ivan-ACC not to-come to party sad-INST dressed-up-ACC 'Pavel asked Ivan not to come to the party sad, and Ivan was dressed up at the time of asking.'

The unacceptability of (32b) can be explained in exactly the same way as (29). That is, the adjective and the DP do not form a constituent, therefore ACC is disallowed on the adjective and only INST is possible.

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<sup>&</sup>lt;sup>11</sup> I assume that the verb *meet* would discharge its theta-role to the argument *John* in Spec, VP, the position into which this argument moves to. Semantically, it is unproblematic, since *John* <u>is</u> in fact the argument of the adjective and the verb at the same time.

#### V. Conclusions

I have explored the possibility of analyzing Case in Russian secondary predicates by distinguishing NP-movement structures from the structures involving a null pronominal (*pro*). Specifically, I proposed that the Case markings on the adjectives that match the Case on the arguments, even if those arguments may appear quite far away from the adjectives as in control constructions, are actually a result of the argument being base generated very locally to the adjective and then moving to the surface position. INST Case is a result of either the adjective agreeing with a phonologically null category, or a result of the argument DP checking its Case covertly.

I have also proposed a specific timing restriction on licensing the Case on secondary predicates, which captures the distribution of ACC in object control structures. A secondary predicate can agree with the DP it modifies only when that DP checks its Case against a Case checking functional head.

This approach provides a new diagnostic for overt vs. covert object raising. Namely, INST forcing contexts indicate that the object has not raised to check Case overtly. An additional consequence is also the argument for Spechead checking relation as opposed to Agree.

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