In defense of a universal: A brief note on case, agreement, and differential object marking*

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DRAFT Vienna, March 2017

Abstract

It has been held for some time that languages may show a divergence in their case and agreement alignment patterns. It is possible for a language to have an ergative-absolutive case alignment, but apparently nominative-accusative agreement, while nominative-accusative case with ergative-absolutive agreement is claimed to be unattested (Dixon, 1994). Proposed explanations of this universal (Bobaljik, 2008, Baker, 2008, 2015, Legate, 2008) exist and have implications for theories of case. This brief note defends the validity of the universal against alleged counter-examples in the recent literature (Wunderlich, 2012, Deal, 2015). The most striking apparent counter-examples are from Indo-Aryan (Magier, 1983), but turn out to rest on a conflation of differential object marking and accusative case. When the two are kept distinct (as I argue they must be), the counter-examples disappear, and the apparently challenging cases are seen to be the combination of two factors that must each be admitted in their own right.

1 Case and Agreement: A tetrachoric universal

It is well established that case and agreement alignment patterns may converge or diverge. Languages may show a nominative-accusative alignment or an ergative-absolutive alignment in both nominal morphology (case) and cross-referencing on the predicate (agreement), or they may show

^{*}This paper reports on a section of a larger project in progress. I am grateful to a number of audiences for feedback on the ideas here, including audiences at Amherst, McGill, UConn, Stanford, Arezzo, Brno, Leipzig, Frankfurt, Budapest and Harvard, and especially to Mark Baker, Rajesh Bhatt, Jessica Coon, Laura Kalin, and Susi Wurmbrand. My thanks also to Sushma Pokharel for generously sharing her knowledge of Nepali. I gratefully acknowledge funding from the John Simon Guggenheim Foundation for some of my work on agreement.

an ergative-absolutive case-marking pattern, but an apparently nominative-accusative agreement pattern. The Chukchi examples in (1) illustrate—case distinguishes transitive subjects (ergative) from {objects and intransitive subjects} (absolutive), while the agreement prefixes (boxed) distinguish (transitive and intransitive) subjects ("nominative") from objects ("accusative"):

a. γəm-nan γət tə-ł?u-γət
 1sg-erg 2sg.abs 1sg-see-2sg
 'I saw you.' (Skorik, 1977, 44)
 b. γəm tə-kətγəntat-γ?ak
 1sg.abs 1sg-run-1sg
 'I ran.' (Skorik, 1977, 19)

It is held to be a linguistic universal that the reverse mismatch is unattested (Dixon, 1994). For languages with morphological case-marking, only three of four logical possibilities are attested. Languages with no overt case marking may have either agreement alignment (just as there are many languages with each of the case-alignment patters that lack agreement).

(2)					
()	Agreement alignment \Rightarrow	Erg-Abs	Nov. Acc		
	Case alignment ↓	ERG-ABS	Nom-Acc		
	Erg-Abs	Basque, Inuit, Tsez	Warlpiri, Chukchi, Nepali		
	Nom-Acc	** unattested **	Russian, German, Icelandic		
	No case	Chol,	Itelmen, Bantu		

This may be restated as the universal in (3):

(3) No language has a nominative-accusative case pattern, but an ergative-absolutive agreement pattern.

Bobaljik (2008), Baker (2008, 2015), and Legate (2008) propose accounts of this tetrachoric universal, which share the idea that agreement may, but need not, depend on case-marking. In the version presented in Bobaljik (2008), the following statement derives (3):²

¹ The following abbreviations are used here:								
ABIL	abilitative	ABS	absolutive	ACC	accusative			
DAT	dative	DEM	demonstrative	DESID	desiderative			
DFLT	default	DOM	differential object marking	ERG	ergative			
EVID	evidential	F	feminine	FUT	future			
GEN	genitive	I,II,	class I,II,	IMPFV	imperfective			
INSTR	instrumental	LOC	locative	M	masculine			
MH	mid-honorific	NOM	nominative	NPST	non-past			
OB	object	OBL	oblique	PFV	perfective			
PL	plural	PST	past	$_{ m SG}$	singular			
SU	subject							

Nepali examples marked FM16 were collected during a field methods course at UConn in 2016; my thanks to Sushma Pokharel for her patience in sharing her language with us.

²Highest here is relativized to argument positions, and is unaffected by scrambling or A'-movement.

(4) Agreement is with the highest accessible NP (in a given domain).

Accessibility, for Bobaljik (2008) is determined by the (dependent) case hierarchy in (5) (Marantz, 1991, Baker, 2015)—if an NP with some case K on the hierarchy is accessible, then so are NPs bearing cases to the left of K:

(5) UNMARKED
$$\left\langle \begin{array}{c} \text{DEPENDENT} \\ \text{ACC} \\ \text{ABS} \end{array} \right\rangle \left\langle \begin{array}{c} \text{OBLIQUE} \\ \text{DAT} \\ etc... \end{array}$$

In a nominative-accusative case system, agreement under this view will always track the nominative subject in the first instance. The subject, bearing unmarked case, will always be accessible, and since subjects are higher than objects, it will always be the highest accessible NP.

In a language with an ergative case array, variation in accessibility will make a difference.⁴ If only NPs with unmarked case are accessible for agreement, then a canonical ergative agreement pattern will arise, as in Tsez (6). The subject of a transitive clause will be inaccessible, and the highest accessible NP will be the object.

(6) a. ziya b-ikâi-s
cow.III.ABS III-go-PST.EVID
'The cow left.'
b. eniyā ziya b-išer-si
mother-ERG cow.III.ABS III-feed-PST.EVID
'The mother fed the cow.' (Polinsky & Potsdam, 2001)

However, if NPs with dependent case (along with unmarked NPs) are accessible for agreement, then (4) will always pick out the subject, even if there is an ergative alignment. This yields the Chukchi pattern in (1), seen also in Nepali (below), and other languages. The core observation here is that a "nominative-accusative" alignment in agreement is equivalent to a subject-object contrast. Under (4) and (5), a subject-object pattern of agreement is in principle available regardless of case alignment type, but an ergative-absolutive alignment in agreement is only possible if it is dependent on an ergative-absolutive case alignment. The observed universal is thereby derived.

From this perspective, the fact that an ergative-absolutive agreement alignment is possible in the absence of overt case marking suggests the familiar conclusion that case marking need not be overt. Case marking may be "abstract" in the sense of phonologically unrealized, as has long been commonly assumed, but the overt morphology may not conflict with the underlying morphosyn-

³ Unmarked is a term of art here, designating the lowest case on the hierarchy—the case characteristic of the subject of an intransitive clause. While the UNMARKED case in this sense often bears no overt phonological mark, nothing in the theory equates the distinct senses of "(un)marked" and no commitment to UNMARKED = phonological zero should be read into this. Note also that Baker (2015, 69ff) presents Coast Tsimshian and Semelai as potential problems for reducing accessibility to (5), although his explanation of (3) remains broadly similar.

⁴This holds true whether variation in accessibility is determined by (5), or is relativized to individual cases, as in Baker (2015, 68), or is specific to the ergative, as in Legate (2008). At this level of generality, the differences among these three approaches are not relevant to this paper, since the purpose here is to defend the universal which all three attempt to explain.

tactic case alignment.

While there are various details and challenges to pursue, in this short contribution I limit remarks to engaging with a more fundamental empirical concern—the question of whether the universal is absolute (exceptionless) or merely a trend. If there are counter-examples to (3), these threaten any theory which derives it as a strong universal. Various authors have presented apparent counter-examples to (3), notably: Gildea & Castro-Alves (2010) on the Jê and Carib languages and Magier (1983), Patel (2007), Wunderlich (2012) on some Indo-Aryan languages (see also Deal, 2015). I review these here and argue that the conclusion is not warranted by the data presented there. The apparent counter-examples require some clarification regarding what counts as 'case', in particular drawing a distinction between core mechanisms of case-assignment and differential object marking, but that distinction turns out to be needed independently of the tetrachoric universal. Once that distinction is made, the universal stands, claims to the contrary notwithstanding.

2 Jê and Carib: Defining Case

The first purported counter-example to (3) serves as a reminder that there are different terminological traditions in the field. Deal (2015, xx) cites Gildea & Castro-Alves (2010), who say (p.159) that the Jê and Carib languages "are both counter to the expected universal patterns identified in the typological literature: no other cases have been identified in which case-marking is nominative while verbal cross-referencing is absolutive." Yet in none of the languages they consider do they understand "case-marking" to mean variation in the morphological form of a nominal (p.159). Rather their sense of "case" is broader, and encompasses alignment patterns reflected in the syntax more generally, for example in word order, or in the distribution of bound versus free pronouns. They focus on questions of which aspects of grammar show a nominative-accusative alignment and which an ergative-absolutive one, finding, for example, apparent nominative-accusative (i.e., subject-object) contrasts in word order, coexisting with ergative-absolutive agreement morphology. In a few of the languages they consider, including Canela (a language examined by both Bobaljik, 2008 and Baker, 2008 and considered with reference to the same patterns to be consistent with (3)), there is also a series of free pronouns that can occur only as subjects, such as first person wa in (7). Object pronouns, by contrast, are always bound (7c):

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(7) a. wa ha curi apê

1 FUT there work
'I will work there.'

b. po, wa i-te ih-curan

deer 1 1-PAST 3-kill
'It was a deer that I killed.' (lit: deer, I killed it.)

c. wapo te i-xec

knife PAST 1-cut
'The knife cut me.' (Popjes & Popjes, 1986, xx)
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It has long been understood that there are various properties that distinguish subjects from objects, even in languages that otherwise have ergative morphosyntax, notably including anaphor-binding,

imperatives, and complement control (see, e.g., Anderson, 1976, Dixon, 1994). While it is interesting that word order and the distribution of free versus bound pronouns follows a subject versus object orientation in these languages, the universal in (3) is, so far as I know, not understood by its proponents to intend this broader sense of case, but is instead limited to the relation between the morphological marking of nominal arguments, and how this correlates (or doesn't) with bound person marking on the predicate (agreement). For Canela, Baker and Bobaljik on the one hand, and Gildea & Castro-Alves on the other, come to opposing conclusions on the basis of the same data, apparently because they have adopted different terminological conventions.⁵

3 Indo-Aryan: Case and DOM

The Indo-Aryan languages display a range of different patterns of case and agreement (see Deo & Sharma, 2006, Bhatt, 2007 and Wunderlich, 2012 for overviews). Magier (1983), Patel (2007), Wunderlich (2012) and following them, Deal (2015) argue that some of these languages challenge (3). Magier (1983) appears to be the first to have noted the problematic pattern, in Marwari, and Wunderlich (2012) argues in particular on the basis of Indo-Aryan that there are no correlations between case and agreement, even within this branch of Indo-European.

Here, I contend that the issue arises due to a conflation of differential object marking and accusative case. When these are kept distinct, the counter examples lose their teeth, and (3) remains consistent with the available data, including Indo-Aryan.

3.1 Pattern I: Hindi

Hindi-Urdu (hereafter Hindi) is the most widely discussed Indo-Aryan pattern in the generative literature. The core Hindi postpositional case system is as in (8):

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(8) -ne ⇔ ERG (perfective only)
-ko ⇔ DAT (also DOM, see below)
Ø ⇔ elsewhere (NOM)
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In the perfective, Hindi has an ergative alignment, in which the transitive subject is marked -ne (as in (9a-b)). In the imperfective, ergative is not assigned and the subject is unmarked (i.e., NOM, (9c-d)). Cross-cutting the ergative/non-ergative split is a system of Differential Object Marking (DOM). The postposition -ko marks three classes of NP: recipients/goals; experiencer subjects (as in (10e)); and high-animacy/specific direct objects. In some literature, -ko is glossed "ACC", but this is misleading—its distribution is that of a prototypical DATIVE (recipients and experiencers), and the coopting of the dative for differential object marking is by far and away the most prevalent DOM strategy cross-linguistically (Bossong, 1985). A core argument that is neither ERG nor DAT is unmarked (NOM). As noted, this includes the subject in the imperfective, but it also includes direct objects that inanimate/non-specific, regardless of the case of the subject.

⁵Jason Merchant draws my attention to ongoing work by Adam Singerman on nearby Tupian languages, where more of a challenge may reside, although Singerman, personal communication, concludes that (3) is not defeated.

- (9) a. Raam-ne **RoTii** khaayii thii Ram(M)-ERG **bread(F)** eat.PFV.F.SG BE.PAST.F.SG 'Ram had eaten bread.'
 - b. siitaa-ne laRkii-ko dekhaa Sita(F)-ERG girl(F)-DOM see.PFV.M.SG 'Sita saw the girl.'
 - c. **siitaa** kelaa khaatii thii **Sita(F)** banana(M) eat.IMPFV.F.SG BE.PAST.F.SG 'Sita (habitually) ate bananas.'
 - d. **niina** bacce-ko uthaayegii **Nina(F)** child-DOM lift.FUT.F.SG 'Nina will pick the child up.'
 - e. siita-ko **larke** pasand the Sita(F)-DAT **boys** like be.PAST.M.PL 'Sita likes the boys.' (Mohanan, Mahajan, cited in Woolford, 1999)

The examples in (9) show the tense/aspect split for which Hindi is well-known: the perfective shows an ergative-absolutive alignment. It is often implied that the imperfective side of the split is nominative-accusative, but as we have just seen, this isn't really accurate. Hindi DOM occurs in both tense/aspects, and is not an accusative, but a dative. When DOM is factored out, the remaining pattern is indeed ergative-absolutive in the perfective, but in the imperfective, is better described as neutral (no marking of either subject or object).⁶ Recognizing the role of DOM in the system turns out to be important when we turn to the apparent challenge to (3), below.

In Hindi, case and agreement interact exactly as characterized by (4). (10) schematizes the data in (9), with the controller of verbal agreement indicated in bold. Once case is determined according to (8), the highest unmarked NP shows agreement. If there is no unmarked NP, then the predicate bears default masculine singular inflection.

(10)Perfective: SUBJ-ne OBJ-Ø V a. SUBJ-ne OBJ-ko V default b. Imperf.: c. **SUBJ-Ø** Obj-Ø V highest d. **SUBJ-Ø** OBJ-ko V Psych: e. SUBJ-ko **OBJ-Ø**

3.2 Pattern II: Nepali

Hindi represents one of the possible manifestations of (4). Nepali shows a slightly different pattern. Although the case marking is, in relevant respects, the same as (8), in Nepali, both nominative (unmarked) and ergative (dependent) subjects agree. Bickel & Yādava (2000, 347) characterize

⁶Legate (2008) approaches this differently, treating *-ko* as accusative, and seeing instead a nominative-accusative alignment in the imperfective (masked by the deletion of ACC in non-DOM contexts), and treating the perfective as a tripartite alignment pattern, of the sort familiar from Nez Perce and Antekerrepenhe, rather than an ergative pattern.

the situation as follows: "Where there are two nominative NPs in a Nepali clause, agreement is with the higher argument, just as in Hindi. Unlike in Hindi, however, there is no agreement with nominative objects. Instead, the verb agrees with the ergative A-argument:"

- (11) a. ma yas pasal-mā patrikā kin-ch-u.

 1SG.NOM DEM.OBL store-LOC newspaper.NOM buy-NPST-1SG

 'I buy the newspaper in this store.'
 - b. mai-le yas pasal-mā patrikā kin-ē. (*kin-yo)
 1SG-ERG DEM.OBL store-LOC newspaper.NOM buy-PAST.1SG buy-PAST.3SGM
 'I bought the newspaper in this store.'

However, (Bickel & Yādava, 2000, 348) go on to show that nominative objects are not in principle inaccessible to agreement. If the subject is dative, rather than ergative, then the subject is inaccessible and the object agrees:⁷

(12) ma-lāī timī man par-ch-au. (*par-ch-u)
1SG-DAT 2MH.NOM liking occur-NPST-2MH occur-NPST-1SG
'I like you.'

Nepali thus manifests (in the perfective) the attested mismatch in (2): an ergative-absolutive case pattern, but a subject (versus object) orientation in its agreement. In Bobaljik (2008), I characterized the difference between Hindi and Nepali as a simple difference in where the cut-off for accessibility is drawn on the dependent case hierarchy:

Both languages: Highest accessible NP governs agreement.

3.3 Pattern III: Standard Gujarati

Standard Gujarati patterns with Hindi, rather than Nepali, in that ergative is inaccessible to agreement. Thus a transitive subject agrees in the imperfective, but the object agrees in the perfective (14a-b).

(14) a. sita-e kāgal vāc-yo Sita(F)-ERG letter(M) read-PFV.M.SG 'Sita read the letter.' (Wunderlich, 2012, 5)

But Gujarati differs from Hindi in the interaction of DOM with agreement. Whereas in Hindi, DOM bleeds agreement, in Gujarati, it does not:

⁷It is, of course, open to debate whether apparent dative subjects are truly subjects—a topic on which there is an extensive literature.

- (15) a. sita-e raj-ne payav-yo
 Sita(F)-ERG Raj(M)-DOM harass-PFV.M.SG
 'Sita harassed Raj.'
 b. raj-e sita-ne payav-i
 - b. raj-e **sita-ne** payav-i Raj(M)-erg Sita(F)-DOM harass-PFV.F.SG 'Raj harassed Sita.' (Wunderlich, 2012, 5)

This is not a matter of dative case (Gujarati -ne) being accessible for agreement. As expected, the DOM marked in Gujarati is the regular dative, used also for recipients, etc. But while DOM marked objects trigger agreement in exactly the configuration where an unmarked direct object would be the highest accessible NP, true datives do not. (16) shows the failure of a dative subject to trigger agreement.

(16) Kišor-ne **chemistry** bhaṇ-v-i ha-t-i Kišor-DAT chemistry.F study-DESID-M.SG be-PFV-F.SG 'Sheela received/found the book. (Mistry, 1997, 429)

Mistry (2004, 10-11) also provides the following minimal pair, showing the difference in agreement between dative qua DOM and a selected dative.⁸

- (17) a. šilaa-thi **raaj-ne** (naa) jagaaD-aa-y-o Sheela-INSTR Raj-DOM (not) wake-ABIL-PFV-M.SG 'Sheela could (not) wake Raj.
 - b. šilaa-thi **raaj-ne** (naa) maL-aa-y-[ũ] Sheela-INSTR Raj-DAT (not) meet-ABIL-PFV-DFLT 'Sheela could (not) meet Raj. (Mistry, 2004, 29)

What Standard Gujarati (and similar languages) teach us is that DOM is, in effect, a layer of morphological marking distinct from core case assignment. This is consistent with accumulating evidence that in at least some languages, DOM is a morphological, rather than a syntactic, process (see Keine & Müller, 2008, Glushan, 2010, Kalin & Weisser, 2017). For example, Kalin & Weisser (2017) observe that in many languages, the two members of a coordination are treated independently by the DOM rule. This sets DOM apart from other case marking, which treats the conjoined NP as a whole. In Nepali, DOM appears to be far more strongly preferred on animate direct objects than on inanimates. In a conjunction of an animate and an inanimate, each NP is evaluated independently, and thus it is possible to selectively mark either conjunct, as in (18a). So far as we can tell, this is not possible for other types of case assignment in which the more familiar pattern

⁸The subject is instrumental because this a modal construction. Gujarati shows a difference between masculine singular agreement and default agreement.

⁹Differential object marking may be used on inanimates such as *kitaab* 'book', to mark something like specificity:

⁽i) raam-le kitaab(-laai) Dekh-yo Ram-ERG book-DOM see-PAST.3SG 'Ram saw a/the book.' (FM16:465-466)

emerges: the possibilities are to mark both conjuncts, or to mark the second conjunct alone, as in (18b), which presumably represents a single instance of the postposition having scope over the whole coordinated NP:

(18) a. raam-le [ma-laai ra mero kitaab] Dekh-yo
Ram-ERG [1SG-DOM and my book] see-PAST.3SG
'Ram saw me and my book.' (Kalin & Weisser, 2017)
b. stiaa-le [raam-(laai) ra hari-]-*(laai) kitaab Di-eki th-ii
Sita-ERG [Ram-(DAT) and Hari-]-DAT book give-ASP AUX-3SGF

'Sita gave Ram and Hari a/the book.' (FM16:248-250)

Kalin & Weisser (2017) interpret these facts, and parallels in a number of languages, to indicate that DOM cannot be (universally) seen as a reflex of movement of marked objects in the syntax (as in one prominent family of approaches to DOM), since that would require otherwise illicit movement out of a coordination in (18a). What is more narrowly important for present purposes is that DOM seems to systematically contrast with all other types of case marking on this property, reinforcing the view that it is not a part of the same system.

Returning to Gujarati, we already knew (from Hindi) that differential object marking cross-cuts (and is thus independent of) the core alignment patterns. What we learn in addition from Gujarati versus Hindi is that languages may vary as to whether or not DOM renders an NP invisible for the purposes of agreement. Unlike genuine datives, an object that bears the dative case marker by virtue of being differentially marked may behave for the morphosyntax of agreement as if it were unmarked.

3.4 Pattern IV: Marathi

Marathi shows another pattern whereby surface forms can be misleading. Where DOM versus Ø-marking of objects in Gujarati shows a morphological distinction that is ignored by the syntax, Marathi shows the opposite—a syntactic distinction for agreement that largely lacks a morphological reflex.

Marathi is described as a language that is losing ergative case. The morphological distinction is, for example, neutralized in first and second person pronouns. Nevertheless, the underlying morphosyntactic distinction between pronouns in ergative and nominative functions is still reflected in the agreement system. In the imperfective, the subject agrees, but in the perfective, the subject is inaccessible and the object agrees, as shown in (19):

(19) a. mī sita-lā bagh-to

1SG.ABS=ERG Sita-DOM see-PRES.M.SG
'I see Sita.'
b. mī ek chimnī baghit-lī

1SG.ABS=ERG one sparrow(F) see-PFV.F.SG
'I saw a sparrow.'

There is, of course, nothing unfamiliar about the idea that not all morphosyntactic distinctions have

an overt phonological manifestation. In Icelandic, nominative subjects agree, while in the presence of a dative subject, the nominative object agrees. This is true even for those classes of nouns that show no morphological distinction between nominative and dative. (20) thus parallels (19) in this regards:

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(20) a. Þór og Sif lásu bókina.
[Thor and Sif].NOM read.3PL book.THE.ACC
'Thor and Sif read the book.'
b. Þór og Sif { líkar /*líka } bókin
[Thor and Sif].DAT like.3SG /*like.3PL book.THE.NOM
'Thor and Sif like the book.' (Höskuldur Þráinsson, p.c.)
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And we may recall from the outset that there are languages with no overt case-distinctions, but with an ergative-absolutive agreement pattern. For these, I simply followed convention in assuming that case may be 'abstract' in the limited sense of unpronounced. To the extent Marathi has lost ergative case morphology, it patterns with this independently attested class of languages.

3.5 Pattern V: Marwari, Kutchi Gujarati

All of this brings us to the final pattern. Consider, first in the abstract, what a language would look like if it combined the properties of patterns III and IV. That is, like Marathi, it has lost ergative morphology, but retained the underlying distinction as far as that feeds into agreement, but like Gujarati (and unlike Hindi), DOM does not bleed agreement. Schematically, this would show the pattern in (21):

In the imperfective, the subject agrees, but in the perfective, there is an ergative-absolutive alignment—the object agrees, because the (underlyingly ergative) subject is inaccessible. Yet because the ergative case exponent has been lost, the only overt morphology which would be described as case marking is the DOM morpheme on the object. Precisely this pattern arises in Marwari (Magier, 1983), Kutchi Gujarati (Grosz & Patel-Grosz, 2014) and some neighbouring varieties, and has been taken (Magier, 1983, Wunderlich, 2012, Deal, 2015) to counter-exemplify the universal in (3):¹⁰

¹⁰Grosz & Patel-Grosz (2014) present a different interpretation of the Kutchi Gujarati and Marwari patterns, which also may avoid the challenge to (3). Noting, following (Bhatt, 2005, 800-1) that subject and object agreement differ in some of the languages under considertation in that only subject agreement is for person, while agreement with the object is for number and gender, but not person, they draw an analogy to the difference between subject-verb agreement and participle agreement, as in Romance. If (3) does not restrict participle agreement, and the object agreement in Indo-Aryan is analogous to participle agreement, then the facts discussed here neither support nor challenge (3). See also Bhatt & Walkow (2013) for another difference between subject and object agreement in Hindi, regarding the behaviour of closest conjunct agreement.

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a. Reena kutro(-ne) mar-th-i [imperfective]
Reena(F) dog-DOM hit-IMPFV-F
'Reena used to hit a/the dog.'
b. Reena kutro(-ne) mar-y-o [perfective]
Reena(F) dog-DOM hit-PFV-M
'Reena hit a/the dog.' (Grosz & Patel-Grosz, 2014, 7)
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The crux of the matter lies in the nature of DOM. Detractors of the universal take DOM to be accusative, in the sense relevant to (3), contending that the distribution of Ø versus DOM in (22) is a nominative-accusative pattern. But we have already seen independent reasons to doubt this. On the strength of pattern IV (and languages such as Chol in (2)) we have already recognized that not all syntactically relevant case-distinctions are overtly marked. More importantly, the marking of the object in (22) is not in an obvious sense accusative: DOM is a cross-linguistically common extension of dative case to specific and/or high-animate objects—a process that is independent of the core case alignment pattern (as we saw in Hindi) and which sometimes, but not always, bleeds agreement. Indeed, once we acknowledge (as above) that patterns III and IV are consistent with (3), then pattern V in (22) is expected with no additional assumptions.

Note finally that there is slender evidence that the vestiges of the underlying ergative versus nominative contrast in the subjects remain in Marwari independent of agreement. Discussions of case in Indo-Aryan often focus on the postpositions, such as those in the examples discussed here, which attach to the entire NP. However, some classes of words show a further two-way morphological distinction, in which the 'direct' form occurs when the nominal element is not governed by a postposition, and the oblique form occurs when the nominal is governed by a postposition, regardless of what postposition it is. Hindi examples (from Anand & Nevins, 2006) are given here:

(23)			some	good	boy		Case/P
	NOM	[koi	acchaa	laRkaa]	
	ERG	[kisii	acche	laRke]	-ne
	DAT	[kisii	acche	laRke]	-ko
	INST	[kisii	acche	laRke]	-se

The limit of this pattern is suppletion in pronouns, where there is one pronominal stem in the (unmarked) nominaitive and a completely unrelated stem that occurs with all other cases/postpositions.¹¹

Selected Marwari third person pronouns are given in (24), from Magier (1983). As can be seen, for both the proximate and distal pronouns, there is one root in the nominative, but a suppletive root that occurs with any postposition. (There is moreover a gender distinction in the nominative, lost in the obliques).

¹¹See Smith et al. (2016) on pronominal suppletion cross-linguistically; in the terms used there, the Indo-Aryan pronouns show an ABB...pattern.

As is to be expected, the oblique pronominal stems normally occur only with a postposition, and are unacceptable on their own, as in intransitive subject position (25a) or as transitive subject in an imperfective (25b):

a. vo / *un kāle aṭhe pūggo.
he / he.OBL here yesterday arrived
'He arrived here yesterday.'
b. vo / *un ero pãānī nīī pīve.
he / he.OBL such water not drink.IMPFV
'He doesn't drink such water.' (Magier, 1983, 312)

However, exactly where the account above would posit an unexpressed ergative postposition, i.e., as transitive subjects of perfective clauses, the oblique stem of the pronoun can be used:¹²

(26) a. vo / uṇ rām-ne pakaṛiyo
he / he.OBL Ram-DOM grabbed.PFV
'He grabbed Ram.' (Magier, 1983, 315)
b. vo / uṇ kãī kariyo?
he / he.OBL what do.PRF
'What did he do.' (Magier, 1983, 312)

These pronouns thus behave exactly as expected if there is a null ergative postposition, with the standard Indo-Aryan distribution. In other words, independently of the facts of agreement, the grammar of Marwari, though having lost the affixal exponent of ergative case, nevertheless must have such a category at a more abstract level. The pronominal suppletion facts converge, then, to support the analysis that invokes a phonologically null ergative case.

4 Conclusion

The relationship between case and agreement alignment patterns remains a strong contender for the status of a linguistic universal. A venerable observation, (3) withstands scrutiny, once care is taken to be precise about the descriptive terms. Notably, we acknowledge that not all case-like marking of direct objects constitutes "accusative" case—a distinction must be drawn between accusative (which, as in German or Russian, marks direct objects, but not goals/recipients) and differential object marking, an extension of the dative case (used for goals/recipients and experiencers) to a subset of direct objects, namely those high on an animacy/specificity scale. DOM is a common

¹²This apparently does not extend to nominal alternations.

process cross-linguistically, that cross-cuts, and thus is evidently independent of, patterns of case alignment. It is easy to see why it would be tempting to describe the Marwari or Kutchi Gujarati pattern in (21) as a nominative-accusative case pattern, but in light of the overall typological survey of Indo-Aryan, it is clear how it arises as the conjunction of theoretical elements that are independently needed. One might speculate that if (3) is truly a consequence of UG principles, as argued in Bobaljik (2008), Baker (2008, 2015) and Legate (2008), then the Marwari type pattern may be unstable. Having overt exponents for ergative case presumably makes the (rules referencing the) abstract category ergative easier to acquire, and losing the morphology may thus prime subsequent morphosyntactic change. As it happens, there are Indo-Aryan languages, of which Bengali is an oft-cited example, that have not only lost (overt) ergative case, but have also lost all evidence of ergativity, and have a subject-object agreement pattern throughout. In any event, the theory referenced above makes a clear prediction: that the case pattern in Marwari cannot be reanalyzed by a subsequent generation as a garden-variety accusative, losing its DOM property, while simultaneously retaining the ergative-absolutive agreement alignment in the perfective. Such a pattern, in distinction to the actual pattern in (21), would indeed bring down the universal. On the understanding that by constraining language acquisition, UG constrains language change, such a change is predicted to be impossible.

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