Towards a Dual Account of Ellipsis Identity*

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1 Introduction

- Pre-theoretically, ellipsis involves unpronounced linguistic material. Some examples¹
 - (1) Sluicing: [Mary would like to see SOMETHING at the cinema]_A, but she just can't decide WHAT_i she would like to see t_i at the cinema (Ross (1969), Merchant (2001))
 - (2) Fragments:
 - a. Did Harry buy Chocolates for Susan?
 - b. No, WINE he bought t for Susan (Merchant (2005))
 - (3) Verb Phrase Ellipsis (VPE): John always [greets me with a smile]_A...I wish you would greet me with a smile too. (Sag (1976))
 - (4) Noun Phrase Ellipsis (NPE):
 John borrowed Bill's umbrella, and Susi borrowed Paul's umbrella
 (Lasnik and Saito (1994), Elbourne (2001))
- I assume that ellipsis involves silent syntactic structure². This can be modelled as e.g. deletion at PF (Merchant (2001) or non-insertion of

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 $^{^1}Notation:$ Strike through or angled brackets (<...>) indicates elided material; Antecedent sometimes explicitly identified as: [...]_A

²C.f. direct analyses of ellipsis constructions, whereby the interpretation of the e-site is established via semantic mechanisms (without mediation by silent syntactic structure). See e.g. Barker (in press) on *sluicing* and Jacobson (under review) on *fragments*. I am not concerned here with arguing against the direct analyses, but arguably the account of ellipsis identity

phonological material in a late insertion model of the grammar (Bartos (2000)).

• This talk will be concerned with the question of *ellipsis identity*. The e(llipsis)-site can't just mean anything, rather, the contents of the e-site must be *recovered* on the basis of a salient linguistic antecedent (A).

2 The Identity Question

- We capture the intuition that the e-site must be *recoverable* by positing an abstract identity relation R that must hold between the e-site and A.
- Question at the centre of this talk: What is the correct formulation of R such that it derives all and only the attested <A,E> pairs? (R should be descriptively adequate see Chomsky (1964) for discussion of levels of adequacy in linguistic theory).
- Problem with establishing observational adequacy, since the e-site is, by definition, unpronounced. No direct evidence for its contents. Formulation of the identity condition can only be assessed wrt. its descriptitive adequacy if the attested <A,E> pairs are known.
- The contents of the e-site must be inferred on the basis of indirect evidence.
- Clausal ellipsis especially revealing involves movement of a remnant from out of the e-site. Sluicing (e.g. (1) analysed by Ross (1969), Merchant (2001), Lasnik (2001), a.o. as involving wh-movement of the remnant out of the e-site with an indefinite correlate in A. Fragment answers (e.g. (2) analysed by Merchant (2005) as involving focus-movement of the remnant with contrastively focused correlate in A³. Both can be schematised as in (5):
 - (5) $[\dots correlate...]_A \dots remnant_i < \dots t...>$
- Some different kinds of evidence (see Merchant (2001)):
 - 1. Morpho-syntax of the remnant, e.g. case-marking...
 - 2. **Restrictions on movement**, e.g. evidence from preposition stranding, island (in)sensitivity.
 - 3. Interpretation

outlined in this talk is only statable within a *silent structure* framework. Contingent on its success, this can be considered an indirect argument in favour of silent structure.

³Thoms (2010), in developing an account of ellipsis licensing, argues that *all* cases of ellipsis crucially involve movement from out of the e-site. Regardless, clausal ellipsis is distinctive in that it tends to be licensed by A'-movement (wh-movement, focus movement), which is subject to systematic, and reasonably well-understood constraints.

- Another advantage of clausal ellipsis: Size of the e-site allows us to tease apart predictions made by competing accounts of ellipsis identity. More on this later.
- Approaches to ellipsis identity belong to one of three camps⁴:
 - 1. 'Strict' Syntactic Identity (Sag (1976), Fiengo and May (1994), Merchant (2008)): E and A must be structurally isomorphic.
 - 2. **'Loose' Semantic Identity** (Romero (1998), Merchant (2001): E and A must *mean* the same thing.
 - 3. A Dual Account (Rooth (1992)): E and A must mean the same thing AND be syntactically isomorphic.
 - Syntactic isomorphism can't be right, as we have very good evidence that some structural non-isomorphism between A and E must be allowed (looseness effects).
 - Semantic identity can't be right. It can't capture strictness effects (see, e.g. Merchant (2013) on voice mismatches; Hartman (2009) on relational opposites) loosening our identity condition to allow for nonisomorphism results in massive over-generation.
- Innovation in this talk: Ellipsis identity involves semantic identity⁵ and violable syntactic identity. All else being equal, E must be as isomorphic to A as possible. Deviation from isomorphism is possible to the extent that an isomorphic source would necessitate violating independently-motivated grammatical constraints, e.g. the ban on island-violating movement, otherwise non-isomorphism is blocked.

3 Looseness Effects and Non-Isomorphism

- I depart from much recent literature (e.g. Merchant (2008), Bošković (2011)), which assumes that island insensitivity under sluicing is due to some manner of e-site specific repair mechanism, such as deletion of a *-marked trace Merchant (2008).
 - (6) * $[_{CP}$ How fast does $[_{IP}$ Sarah $[_{vP}$ t^* own $[_{island}$ a t car]]]]

⁴Note that the distinction between *syntactic* and *semantic* formulations of the identity condition is only coherent if one entertains a silent-structure account of ellipsis; The only analytic option available to *direct* accounts (Barker (in press), Jacobson (under review)) is *semantic* identity.

⁵Following Rooth (1992), Romero (1998), and Merchant (2001), we adopt an account of semantic identity mediated by focus semantics: The e-site must be GIVEN relative to A (see Schwarzschild (1999). Arguably, this follows from independent constraints on *de-accented* material. If we conceive of ellipsis as being a particularly radical form of de-accenting, the semantic component 'comes for free', in a certain sense.

- (7) Sarah owns a fast car, but i don't know [CP] how fast < [IP] she [vP] t^* owns [island a t car]]]] >
- Null hypothesis: Nothing special about silent syntax (other than the fact that it is silent). There are many conceptual arguments to be made against the *-trace approach to repair⁶ (see Elliott (2013)), and it makes clearly wrong predictions wrt. to variability in the availability of 'repair' (see Barros et al. (to appear)).
- I follow Merchant (2001)⁷, Barros et al. (to appear), and Elliott (2013) in treating island-insensivity as diagnostic for kinds of non-isomorphisc sources we want our theory of identity to admit.
- Barros et al. (to appear) argue for the presence of *predicational sources* as in (8)a underlying apparent repair of left-branch and subject island violations⁸, e.g.:
 - (8) Mary married a TALL man, but i'm not sure...
 - a. ...[HOW tall]_i < the man that she married was t_i >
 - b. *...[HOW tall]_i < she married a t_i man >
- R should be sufficiently loose such that the attested A-E pair $<[Mary\ married\ a\ TALL\ man]_A/[The\ man\ that\ she\ married\ was\ t]_E>$ is allowed.
- Similarly for subject island evasion:
 - (9) a. A picture of SADDAM arrived yesterday.
 - b. No, Franco < the picture that arrived yesterday was of t > 0

The uninterpretable *-feature must be checked on the topmost copy for the sluicing derivation in (ii) to converge. Note however that there is a parallel with non-island-violating A-mvt:

(iii) The tall \max_{CASE} appears [the tall \max_{CASE} to have been kissed the tall \max_{CASE} (Nunes (2004))

PF-uninterpretable features on lower copies must be eliminated in the process of chain-reduction for the derivation in (iii) to converge. It is unclear why the *-feature should be exceptional.

⁶Consider, e.g. the derivation in (i) involving island-escaping movement in the starred-trace framework of Merchant (2008). Intermediate traces of island-escaping movement are marked with a PF-uninterpretable feature '*'. (ii) shows repair via sluicing.

⁽i) ...[CP Which language do they $[_{vP}]_{v}$ want to $[_{vP}]_{w}$ which language $[_{vP}]_{v}$ hire someone $[_{island}]_{v}$ who speaks which language $[_{vP}]_{v}$

⁽ii) ...[CP Which language do they [vP [v' want to [vP which language* [v' hire someone [island who speaks which language]]]]

⁷Merchant in fact only follows this logic for a certain class of islands.

⁸Proposed sources sound somewhat cumbersome as overt continuations, given that we have spelled-out a definite description as the subject rather than an e-type pronoun to make the relation between the material in A and in E more perspicuous. It has been proposed that the two are underlyingly equivalent (Elbourne (2001))

- Merchant (2001), Barros et al. (to appear) also argue for a *short source* underlying relative clause island insensitivity under sluicing:
 - (10) They want to hire someone who_i [t_i speaks a Balkan language]_A, but i'm not sure...
 - a. Short source: ...WHICH ONE < they should speak t>
 - b. Isomorphic source: ...WHICH ONE < they want to hire someone who speaks t>

Assuming that it is the *relative clause* which acts as the antecedent for the short source in (10)b, it is not clear to what extent the short source counts as *non-isomorphic*, although it is clear that it deviates from its antecedent in certain respects, e.g. in containing an overt model *should*, and replacing the trace of the relative operator with an e-type pronoun.

4 Clefts and the Overgeneration Problem

- To capture *looseness* effects arising with islands, a semantic account of the identity relation R must be sufficiently permissive, such that non-isomorphism between A and E is allowed.
- If we follow this logic, it looks like we have to allow even more radically non-isomorphic sources: Namely, truncated cleft sources⁹ (in the sense of Mikkelsen (2007)) to satisfy R.
- Following Vicente (2008), Rodrigues et al. (2009) and van Craenenbroeck (2012) a.o. apparent circumvention of the ban on preposition-stranding under ellipsi diagnoses presence of non-isomorphic truncated cleft source. Vicente's data from Spanish:
 - (11) Que chica rubia ha hablado Juan $[PPt \ [P'con \ t]]$? What girl blonde has talked J. t with t? "Which blonde girl has Juan talked with?"
 - (12) Juan ha hablado con una chica rubia, pero no se QUAL J. has talked with a girl blonde, but not I.know which "Juan has talked with a blonde girl, but i don't know which"
- One piece of evidence for cleft source: P-less ellipsis remnant incompatible with también-modification:

 $^{^9}$ Merchant (2001) uses the term 'pseudosluicing' for such cases, but i consider this to be rather misleading terminology. I consider any construction involving clausal ellipsis licensed by movement of a wh-remnant to be a genuine case of sluicing - whether or not the ellipsis site is isomorphic to its antecedent is an independent question. I will reserve the term 'pseudosluicing' for constructions which are string-identical to sluicing, but which involve a phonologically null pro subject and null copular. See, e.g. Gribanova (2013)'s analysis of pseudosluicing in Uzbek.

- (13) Mauricio ha hablado con una chica rubia, y *(con) una M. has talked with a girl blonde, and (with) a chica pelirroja también girl red-haired also "Mauricio talked with a blonde girl, and a red-haired girl also."
- A theoretical argument that truncated cleft sources satisfy a widely-adopted semantic formulation of R: Merchant (2001)'s e-GIVEN $ness^{10}$.
 - (14) **e-givenness** Merchant (2001)

A expression E counts as e-GIVEN iff E has a salient antecedent A and, modulo \exists -type shifting:

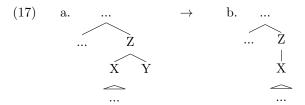
- a. $A \rightarrow F\text{-}clo(E)$
- b. $E \to F\text{-}clo(A)$
- We can follow Mikkelsen (2007) in assuming that the pronoun in a truncated cleft denotes a property of type $\langle e, t \rangle$, specifically, it is anaphoric to a salient *open expression*. Given this analysis, it becomes easy to see that a truncated cleft source will trivially satisfy identity, e.g.
 - (15) [Gordon helped someone at the party]_A, but i don't know who < it $_{<e,t>}$ was t>
 - (16) $[it_{\langle e,t\rangle}] = \lambda x$. Gordon helped x at the party
- \exists -clo(A) = f-clo(A) = \exists x s.t. Gordon helped x at the party
- \exists -clo(E) = \exists x s.t. Gordon helped x at the party
- f-clo(A) \leftrightarrow f-clo(E)
- Merchant (2001)'s identity condition is too permissive. If truncated clefts
 always satisfied identity, we would expect remnants in e.g. German to al ways be optionally nominative, which is a false prediction. Case-matching
 is incredibly robust. We want truncated clefts to be available as a repair
 strategy of some sort in other words, the identity condition cannot be
 absolute.

¹⁰Merchant (2001) provides multiple *empirical* arguments against truncated cleft sources under ellipsis, but ultimately does not address whether or not they satisfy e-GIVENness. If it turns out that truncated clefts do satisfy e-GIVENness, then empirical arguments are in a certain sense moot. If Merchant's arguments carry through, it follows that e-GIVENness is too permissive, and needs to be modified.

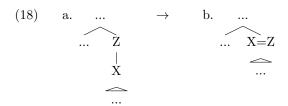
5 The Accommodation Algorithm

5.1 Accommodating an Antecedent

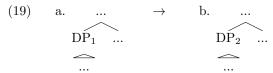
- Following Fox (1999), Craenenbroeck (2012) and Thoms (2013) i propose that an Accommodated Antecedent (A') for an e-site may be derived from A, and that the e-site must satisfy syntactic identity relative to A or A'.
- Following specifically Thoms (2013), A' is derived from A on the basis of the operations outlined by Katzir (2007) for generating structural alternatives, which are as follows:
 - 1. **Deletion**: Removing edges and nodes.



2. Contraction: Removing an edge and identifying its nodes.



3. Substitution: Substituting a terminal for another terminal of the same category; Substitution of a structure for another structure, given a suitably restricted substitution source (i.e. an as complex or less complex structure Katzir (2007), Thoms (2013) for details).



(Where DP_2 is a member of the substitution source.

• An A' is derived from A via repeated iterations of operations 1-3. Each operation in the accommodation procedure is *costly*. All else being equal, accommodation is *avoided*. Given that in order to satisfy the identity condition, an e-site must be syntactically identical to A or A', this derives the *blocking generalisation*:

(20) The Blocking Generalisation:

Given a salient linguistic antecedent α , two possible ellipsis sites β and γ , where both β and γ are GIVEN relative to α : β blocks γ if $N_{\beta} < N_{\gamma}$, where N = The number of steps necessary to derive an accommodated antecedent for the ellipsis site from β via the accommodation algorithm. If β violates any independent grammatical constraints, γ may be accommodated, so long as there is no other GIVEN ellipsis site δ such $N_{\delta} < N_{\gamma}$.

• In plain English: Given two possible e-sites that - both of which satisfy GIVENness, and neither or which violate any independent grammatical constraints, choose the one for which it is least costly to arrive at an accommodated antecedent.

5.2 Optimising the E-Site

• We could implement the same idea within an Optimality-Theoretic (OT) framework. The e-site is optimised relative to the antecedent, which acts as the input. Various candidate e-sites are evaluated relative to faithfulness constraints based on Katzir (2007)'s operations for deriving structural alternatives. The more a candidate violates these faithfulness constraints, the less faithful it is. Grammatical constraints are ranked above faithfulness constraints, allowing non-isomorphic candidates to emerge when an isomorphic candidate would violate, e.g. a high-ranking constraint on movement.

(21) [John likes someone]_A, but i don't know who [...]_E

[John likes someone] $_A$	CHAIN-UNIF	PRINC-C	*DEL	*CNTR	*SUB
a. who_i [john likes someone _i]	*!	*			
b. who _i [he likes someone _i]	*!				*
c. who _i [he likes t_i]					*

 As far as i can see, the accommodation vs. optimisation approaches are strongly equivalent, but the OT approach has the conceptual advantage of allowing us to eliminate the intermediate level of the 'accommodated antecedent', which is arguably a theoretical artefact. Rather, the antecedent is copied-in to the e-site and accommodated directly.

6 Accommodation and Strictness Effects

6.1 Relational Opposites

• Hartman (2009) points out that the absence of readings involving relational opposites presents a problem Merchant (2001)'s identity condi-

tion e-GIVENness (and by extension GIVENness, which is weaker than e-GIVENness).

- (22) John will [beat someone at chess] $_{VP_A}$, and then Mary will...
 - a. \checkmark ...
beat someone at chess> $_{VP_E}$
 - b. *...<lose to someone at chess> $VP_{E'}$
- (23) **e-givenness** Merchant (2001)

A expression E counts as e-GIVEN iff E has a salient antecedent A and, modulo \exists -type shifting:

- a. $A \rightarrow F\text{-}clo(E)$
- b. $E \to F\text{-}clo(A)$
- \exists -clo(VP_A) = f-clo(VP_A) = \exists x s.t. x will beat someone at chess
- \exists -clo(VP'_E) = f-clo(VP'_E) = \exists x s.t. x will lose to someone at chess
- f-clo(VP_A) \leftrightarrow f-clo($VP_{E'}$): Whoops!
- Violable syntactic identity makes the problem go away. Although E' satisfies GIVENness, an accommodated antecedent A' for E' cannot be derived via the accommodation algorithm, as it involve additional lexical material (the preposition 'to'). Since E fails to violate any independently motivated grammatical constraints, E blocks the accommodation of A' in any case.
- Of course, the unavailability of E' is easy to account for under strict syntactic identity, but the point to make here is that our formulation of R handles some well-known problems for semantic identity whilst allowing for looseness effects elsewhere.

6.2 Voice Mis-matches

- We follow Merchant (2013) in assuming that voice mis-matches are disallowed under sluicing, but allowed under VPE:
 - (24) Sluicing:

 *Someone hit Mary, but i don't remember by whom < she was hit t>
 - (25) VPE: The problem was to have been looked into, but obviously nobody did < look into it >
- Assuming e-GIVENness, (25) is the expected case, whereas ungrammaticality of (24) is unexpected, given that X V-ed Y is presumably in a bi-directional entailment relation with Y was V-ed by X. Violable syntactic identity to the rescue!

- We partially adopt the analysis in Merchant (2013), i.e, the e-site in VPE is lower than the functional head encoding VOICE, whereas in sluicing, the e-site contains the VOICE head, as schematised below:
 - (26) Sluicing ... [... [voiceP VOICE_i ...] ...]_A ... remnant ... < [IP ... [voiceP VOICE_j ...] ...] >
 - (27) $VPE \\ \dots \left[\ \dots \ \left[\ \dots \ \left[\ \dots \ \right]_A \ \dots \ \right] \ \dots \ \right] \ \dots \ \left[\ \dots \ \left[\ \dots \ \left[\ \text{voiceP VOICE}_j \ \dots \right] \ \dots \ \right] \\ < \dots \ > \dots \ \right] \ \dots \right]$
- In the (good) VPE case we are dealing with two isomorphic VPs. In the (bad) sluicing case, since the e-site is larger, we are dealing with non-isomorphism. Accommodation of the voice mismatch source is blocked, since there is a more isomorphic source that satisfies semantic identity, i.e. the voice-matching source.
- Note crucially that the presence of a PP remnant in (24) (repeated here as (28) is not enough to justify accommodation of a non-isomorphic voice-mismatch source, despite the fact that it leads the derivation to crash. Competition must be between *e-sites*. The e-site *must* be active in (28), since the active source satisfies semantic identity, and is maximally isomorphic. There are a number of possible factors underlying the ungrammaticality of (28), e.g. the PP remnant fails to satisfy the EPP requirement of the active source. Whatever the reason (28) is hypothesised to be bad for the same reason as (29)
 - (28) *Someone hit Mary, but i don't remember who by < t hit Mary >
 - (29) *By whom hit Mary?
- We don't incorrectly predict that island-violating movement shouldn't be sufficient to trigger accommodation. We don't have to inspect the e-site external remnant to determine that an isomorphic e-site in such cases violates independent constraints on the grammar. Assuming A'-movement is successive-cyclic, the presence of movement from out of an island within the e-site justifies accommodation of a non-isomorphic island evasion source. Same point can be made for anti-locality.

6.3 Accommodation and Case Connectivity

• Case-connectivity completely robust cross-linguistically (unlike PSG, see Rodrigues et al. (2009), Vicente (2008), Craenenbroeck (2012)).

- Case-connectivity facts favour strict syntactic formulation of R, but there are theoretical and empirical arguments that cleft sources should be allowed. Allowing cleft sources, we make (false) prediction that the remnant should (at least optionally) pattern morphosyntactically with a cleft pivot.
 - Question: Is violable syntactic identity enough to derive the robust connectivity facts?
 - Answer: Yes, case-matching sources block cleft sources. Another instantiation of blocking generalisation.
- Following Haeberli (2001), suppose there are features in the narrow syntax associated with morphological case (m-case)¹¹. Consider the following two sentences in English and German respectively:
 - (30) Lena kissed [DP the young man]
 - (31) Lena küsste [DP] den jungen Mann $]_{[acc]}$ L. kissed the young man
- Evidence that something like this must be true: Case-matching in freerelatives for morphological, but not abstract case (note English translations all grammatical):
 - (32) Lena hasst [wen Klaus geküsst hat]_[acc]
 L. hates who.ACC K. kissed has
 "Lena hates who Klaus kissed."
 - (33) *Lena würde nie helfen wen Klaus geküsst hat $]_{[dat]}$ L. would never help who.ACC K. kissed has "Lena would never help who Klaus kissed."
 - (34) Lena würde nie helfen [wem Klaus geholfen hat] $_{[dat]}$ L. "Lena would never help who Klaus helped." would never help who.DAT K. helped has
- German has productive m-case; English doesn't. Case-marked DPs are associated with abstract m-case feature in the narrow syntax¹².
- In languages where morphological case is sufficiently productive¹³, all DPs possess m-case features underlyingly, even those without any overt real-

 $^{^{11}}$ Haeberli (2001) argues specifically against the existence of abstract case features in the narrow syntax, for languages without productive m-case. I remain agnostic on this point.

¹²Here, m-case features are unary primitives. I do not necessarily commit myself to this analysis however, and in fact these unary features should ideally be further decomposable (see, e.g. Bierwisch (1967). This should not affect our general analysis.

¹³What counts as 'sufficiently productive' is an empirical question which we won't be exploring here, but learnability considerations presumably come into play.

isation of morphological case, such as proper names (c.f. Craenenbroeck (2012)):

- (35) Lena küsste Heinrich $_{[acc]}$ L. kissed Heinrich
- An example from German showing how accommodation account can derive interaction between case-matching and the PSG, given some auxiliary assumptions. Consider the following pattern of acceptability judgements:
 - (36) Lena hat mit jemandem geredet, aber ich weiss nicht mit L. has with someone.DAT talked, but i know not with wem who.DAT "Lena talked with someone, but i don't know with whom"
 - (37) *Lena hat mit jemandem geredet, aber ich weiss nicht L. has with someone.DAT talked, but i know not wem who.DAT "Lena talked with someone, but i don't know whom"
 - (38) *Lena hat mit jemandem geredet, aber ich weiss nicht L. has with someone.DAT talked, but i know not wer who.NOM
 - "Lena talked with someone, but i don't know who"
- Consider again the blocking generalisation:
- There is an e-site compatible with (37) which requires zero (or close to zero) steps to derive a fully isomorphic antecedent via the accommodation algorithm, which is additionally GIVEN. Note that i am assuming that m-case features are present on traces of movement (uncontroversial if we adopt a copy-theoretic approach to movement (Nunes (2004)).
- BUT (39) involves an (unrepaired! c.f. Bošković (2011)) anti-locality violation (Abels (2003)), and therefore does not count for blocking. Consider next (40):
 - (40) $\langle \text{er was } t_{[nom]} \rangle$ he was t

- (40) is again GIVEN and violates no grammatical constraints, but it crucially requires accommodation of m-case [NOM] features, via substitution from the lexicon. We have to assume that case-features are not part of the substitution source of A.
- Craenenbroeck (2012) makes the putative generalisation that in languages with productive morphological case, the PSG CANNOT be circumvented via a cleft source, whereas in languages without productive morphological case, it can (we've seen this in Spanish). The approach developed here derives this generalisation ¹⁴.

7 Conclusion

- An account incorporating *violable* syntactic identity empirically superior to approaches assuming *absolute* identity can capture strictness effects, and crucially looseness effects *without* over-generating.
- One theoretical advantage of our approach: We do not need to stipulate two distinct restrictions on GIVEN material. Under Merchant (2001)'s analysis, de-accented material must be GIVEN whereas elided material must be e-GIVEN. GIVENness involves uni-directional entailment (from E to A), whereas e-GIVENness involves bi-directional entailment. Merchant's primary motivation for positing a more restrictive version of GIVENness for elided material is to capture some of the strictness effects which we have been considering, e.g. to block so-called *implicational bridging* under ellipsis.
- By adopting violable syntactic identity, we render this dichotomy unnecessary. Both de-accented and elided material are subject to the same semantic condition, but ellipsis is additionally subject to a (costly) accommodation/optimisation requirement. An ellipsis site involving implicational bridging necessitates retrieval of new material from the lexicon, which is blocked, since an isomorphic source is independently available. What we end up with is both a simpler and empirically superior theory of ellipsis identity.

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 $^{^{14}}$ Although note that the proposal here departs from Craenenbroeck (2012) somewhat. Van Craenenbroeck claims that even in languages with productive m-case, cleft sources can be used to circumvent the PSG when the remnant is not overtly case-marked. My impression is that judgements of the crucial examples from German are somewhat murky (Klaus Abels, p.c.). See also Nykiel (2012)

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