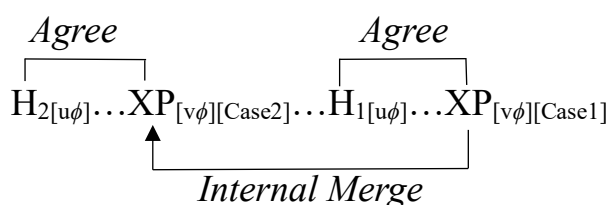# *Multiple Case Valuation and Its Implications*

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2. Multiple Case Valuation via Agree: English and Icelandic
2.1 Introduction

(1) The system of multiple Case valuation via Agree is schematically illustrated below.

$$\overset{\overset{\textit{Agree}}{\overbrace{\qquad\qquad}}}{H_{2[u\phi]}\dots XP_{[v\phi][Case2]}}\dots \overset{\overset{\textit{Agree}}{\overbrace{\qquad\qquad}}}{H_{1[u\phi]}\dots XP_{[v\phi][Case1]}}$$

Internal Merge

(2) **(i)** H_1 agrees with XP and the unvalued Case feature of XP gets valued.
(ii) XP undergoes IM into the edge of the phase head H_1 at Transfer. (Agree *only values* the unvalued Case feature of XP and the inactivation is suspended till the point when it undergoes Transfer.)
(iii) XP remains active and retains its ability to receive another Case value via further Agree.
(iv) H_2 agrees with XP and the Case feature of XP gets *revalued*.

(3) I argue that English instantiates the first possibility (3i) and Icelandic instantiates the second possibility (3ii).

(i) Case₂+Case₁
(ii) Case₂+**Case₁**

2.2 Case_NOM+Case_ACC: English Middles
2.2.1 Preliminaries

(4) English middles are formed by a transitive predicate.

a. Bureaucrats bribe easily.
b. The wall paints easily.
c. Chickens kill easily.
d. The floor waxes easily.   (Keyser and Roeper 1984: 384)

e. This vinyl floor {lays/*lies} in a few hours.
f. These mosquitoes {kill/*die} only with a special spray.
g. The engine {lifts/*rises} out easily.   (Fellbaum 1986: 2)

2.2.2 The Agent Theta-Role and Accusative Case

(5) There are two opposing views about the Agent theta-role.

(i) The Agent theta-role is lexically saturated (cf. Fagan 1988, 1992, marelj 2004, Ackema and Schoorlemmer 1994, 1995, 2006, among others).

(ii) The Agent theta-role is structurally present (cf. Stroik 1992, 1995, 1999, 2006, Hoekstra and Roberts 1993, Fujita 1994, Fujita and Matsumoto 2005, among others).

(6) Empirical evidence seems to argue for the latter position.

(i) Anaphors like _oneself_
a. Books about oneself never read poorly.
b. Letters to oneself compose quickly.
c. Arguments with oneself generally end abruptly.   (Stroik 1992: 129)

d. Books about herself read quickly for Mary.
e. *Books about oneself read quickly for Mary.
f. *Books about himself read quickly for Mary.
g. *Books about themselves read quickly for Mary.   (Stroik 1992: 136)

(ii) _For_-Phrases
a. That book reads quickly for Mary.
b. No Latin text translates easily for Bill.   (Stroik 1992:131)

(iii) Secondary predicates
a. This car fixes easily even unaided.
(cf. b. This car broke unaided.)   (Fujita and Matsumoto 2005: 118)

(7) It can be concluded that the middle verb syntactically projects its entire argument grid <u><Agent, Theme></u>.

(8) The middle verb retains the ability to assign accusative Case to its object.

English
This book just sells itself.   (Levin 1993: 84)

German
Dieses Buch   liest   *(sich)   leicht.
this book NOM   read   reflexive-pronoun-ACC   easily
'This book reads easily.'   (Steinbach 2002:1)

(9) The reflexive pronoun is not an adverbial element, but an argument of the verb.

(i) Condition on Case adjacency
a. This book sells itself here.
b. *This book sells here itself.   (Tokizaki 1998: 244)

(ii) Difference of meaning
a. This book sells itself.
b. This book itself sells. (But its cassette doesn't.)   (Tokizaki 1998: 243-244)

cf. an adverbial reflexive⇒the meaning does not change

a. Mary has come to recognize this herself.
b. Mary herself has come to recognize this.   (Tokizaki 1998: 244)

(10) It can be concluded that the middle verb assigns an external theta-role (i.e., Agent) and retains the ability to assign accusative Case to its object.

2.2.3 Derivation

(11) Various attempts have been made to motivate the movement of the object.

(i) The verb does not assign Agent theta-role to the subject position⇒The verb does not assign accusative Case, either (cf. Keyser and Roeper 1984, Carrier and Randall 1992).

(ii) Agent Demotion⇒The verb does not assign accusative Case (cf. Stroik 1992, 1995, 1999).

(iii) A special functional head μ (above vP) absorbs accusative Case (cf. Fujita and Matsumoto 2005).

(12) We need not posit any special mechanisms whereby the middle verb's ability to assign accusative Case is "absorbed." The derivation of the middle is illustrated below.

a. This book reads easily.

b.
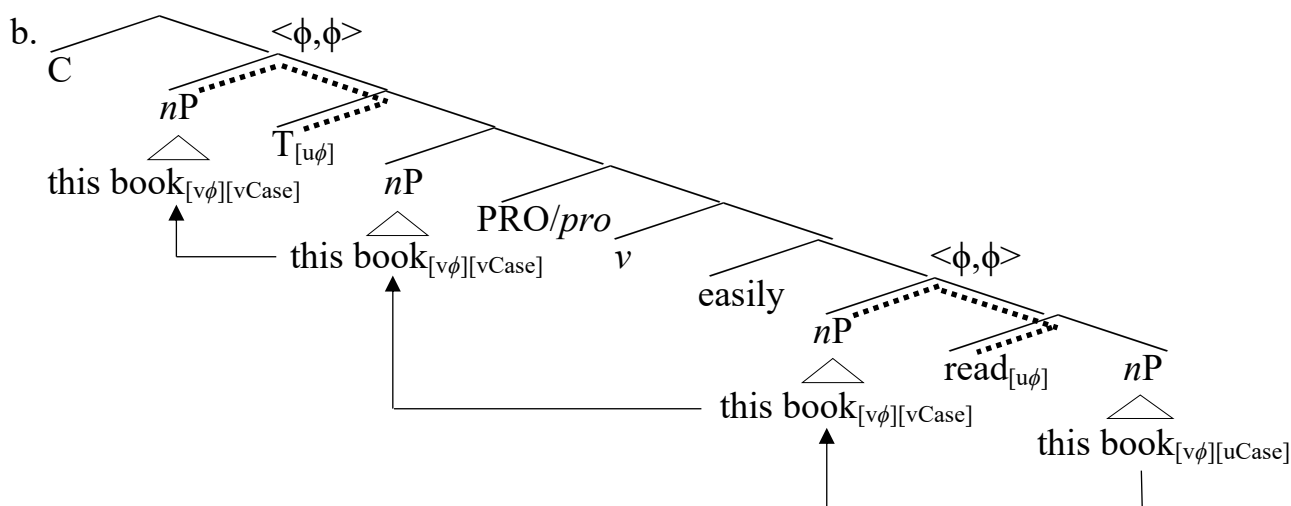
(13) **Assumptions:**

    (i) The external argument is PRO/*pro* (cf. Stroik 1992, 1995, 1999, Hoekstra and Roberts 1993). It is inert in English and does not have formal features (cf. Ikawa 2013).

    (ii) Adjuncts like *easily* are invisible to LA and the label of the set {*easily*, VP} remains <ϕ,ϕ> (cf. Hornstein 2009, Oseki 2015).

(14) **Derivation:**

    (i) The object undergoes "raising" into "SpecVP" and the unvalued Case feature gets valued via Agree (i.e., Minimal Search).[1]

    (ii) At Transfer of VP, the *n*P undergoes IM into the edge of *v*. (This makes it possible for the *n*P to remain active.)

    (iii) The *n*P moves into "SpecTP" and the Case feature of it gets *revalued* via Agree with T.

(15) **Labeling:**

    (i)   {V, $t_{\text{this book}}$}: label = **V**

    (ii)   {this book, {V, $t_{\text{this book}}$}}: label = **<ϕ,ϕ>**

    (iii) {easily, {this book, {V, $t_{\text{this book}}$}}}: label = **<ϕ,ϕ>**

    (iv) {*v*, {easily, {this book, {V, $t_{\text{this book}}$}}}}: label = ***v***

    (v)   {PRO/*pro*, {*v*, {easily, {this book, {V, $t_{\text{this book}}$}}}}}: label = ***v*** (At Transfer of VP, *this book* undergoes IM into the edge of *v*. Transfer reduces the set {this

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[1] Middles like (9iia) in which a reflexive pronoun appears will be compatible with the movement approach if we follow Hornstein (2001), Kayne (2002), and Tonoike (2008) in assuming that the genitive parts of the reflexives are the "trace" left behind after the movement of the possessor to a higher position, though the exact details remain to be worked out. For relevant discussion, see Stroik (2006).

book, {PRO/*pro*, {*v*, VP}}} into the set {this book, {PRO/*pro*, {*v*}}}. If a singleton set is equivalent to its member, the set {this book, {PRO/*pro*, {*v*}}} will be regarded as the set {this book, {PRO/*pro*, *v*}}. Thus, the label of the set {PRO/*pro*, *v*} will be determined to *v*.

(vi) {this book, *v*}: label = **v** ({this book, {PRO/*pro*, *v*}} ⇒ {this book, {*v*}} ⇒ {this book, *v*})

(vii) {T, {this book, *v*}}: label = **T**

(viii) {this book, {T, {$t_{\text{this book}}$, *v*}}}: label = **<ϕ,ϕ>**

(ix) {C, {this book, {T, {$t_{\text{this book}}$, *v*}}}}: label = **C**

(16) **Evidence against lexical approaches: Resultative Predicates**

    a. New seedlings water *t* flat easily.
    b. Those cookies break *t* into pieces easily.
    c. My running socks don't scrub *t* clean easily.
    d. Permanent press napkins iron *t* flat easily.   (Carrier and Randall 1992: 218)

2.2.4 What Happens at the Interfaces?

(17) I will consider some "possible" stages of the derivation and make sure that the proposed system does not generate unwanted derivations.

(i) What if *this book* does not undergo IM into the edge of *v*? ⇒ The result is ungrammatical!

    a. This book reads easily.
    b. {T, {PRO/*pro*, {*v*, {easily, {this book, {V, $t_{\text{this book}}$}}}}}}

➢ PRO/*pro* is inert and we cannot encode agreement features (cf. Ikawa 2013). Therefore, T has nothing to agree with since *this book* has already undergone Transfer. Consequently, the unvalued ϕ-features of T cannot be valued, causing the derivation to crash.[2]

(ii) What if *this book* undergoes IM into the edge of *v before* the external

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[2] One might wonder why an expletive pronoun *it* cannot be inserted into "SpecTP." It should be noted, however, that the use of the expletive pronoun *it* is not that free. Radford (2009) offers the following generalization about the use of the expletive pronoun.

(i) An expletive can only be merged as the highest argument of a verb with no external argument.

                                (Radford 2009: 298)

As observed in 2.2.2, the middle verb projects its external argument. Thus, the expletive pronoun *it* cannot be merged as the highest argument of the middle verb.

argument is merged? ⇒ If *this book* moves into "SpecTP," the result is grammatical![3]

a. This book reads easily.
b. {T, {PRO/*pro*, {this book, {*v*, {easily, {$t_{\text{this book}}$, {read, {$t_{\text{this book}}$}}}}}}}}}

➤ Upon completion of the *v*P phase, Transfer reduces the set {this book, {*v*, VP}} into the set {this book, {*v*}}. ({this book, {*v*}} = {this book, *v*}) Then, PRO/*pro* is merged, forming {PRO/*pro*, {this book, *v*}}. Here, if *this book* undergoes IM into "SpecTP" at Transfer, it agrees with T. Then, the derivation converges. But if it does not undergo IM into "SpecTP," T will have nothing to agree with.

(iii) What if the object in a regular transitive sentence undergoes IM into the edge of *v*? ⇒ The result is ungrammatical in English, but grammatical in the Scandinavian languages.[4]

a. John reads this book.
b. {T, {this book, {John, {*v*, {$t_{\text{this book}}$, {V, $t_{\text{this book}}$}}}}}}}

➤ If *this book* undergoes IM into "SpecTP," it agrees with T and the Case feature of it gets revalued as nominative. But, if so, the subject *John* would remain Case-less, causing the derivation to crash.

➤ In contrast, if *John* undergoes IM into "SpecTP," it agrees with T and the Case feature of it gets valued as nominative. However, the result is ungrammatical, as shown below.

c. *John this book reads.

➤ But note that the occurrence of an object at the edge of *v*, clearly excluded in English, is possible in the Scandinavian languages.

Icelandic
d. Nemandinn   las   ekki   bókina.
   student-the   read   not   book-the

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[3] I would like to thank Takaomi Kato for bringing this possibility to my attention. Kato et al. (2014) argue that in the derivation of *who does John love*, the *wh*-phrase *who* undergoes IM into the edge of *v before* the external argument is merged. See Kato et al. (2014) for further discussion.

[4] Note that the properties of "object shift" in the Scandinavian languages are in fact very complicated. For an overview of the nature of "object shift," see among others Thráinsson (2001) and Vikner (2006).

'The students didn't read the book.'

e. Nemandinn las **bókina**ᵢ ekki   tᵢ

'The students didn't read the book.'   (Thráinsson 2001: 148)
(*bókina* 'the book' is moved in front of negation *ekki* 'not' (which resides in
"SpecVP") and presumably stays at the edge of *v*.) (cf. Chomsky 2001, Gallego
2013).

➢ **Holmberg (1986):**
"Object shift" is possible only if the main verb is finite and has moved out of the
verb phrase (i.e., *v*P).

・English does not have V-to-T movement ⇒ "object shift" is impossible

・Icelandic has V-to-T movement ⇒ "object shift" is possible

➢ Note that there is a way to make the sentence **John this book reads* grammatical
in English. It will be grammatical if *this book* undergoes further IM into the edge
of C (i.e., an instance of topicalization).

f. {this book, {C, {John, {T, {$t_{\text{this book}}$, {t_{John}, {v, {$t_{\text{this book}}$, {V, $t_{this book}$}}}}}}}}}
g. This book, John reads.

2.3 Case$_{\text{NOM}}$+Case$_{\text{ACC}}$: Icelandic *Tough*-Constructions

(18) In Icelandic, when a nominal phrase receives two Case values, the *first* Case value
received will be realized/retained morphologically (cf. Bejar and Massam 1999,
Yoon 1996, Jónsson 1996, Svenonius 2005, Narita 2007). I will argue that *Tough*-
Constructions (TCs) in Icelandic instantiate such a possibility.

a. **Þennan leik**   var   erfitt   að   PRO   dæma   __.
   this.ACC game.ACC   was   difficult.DFLT   to   referee.INF
   'This game was difficult to referee.'

b. Var   **þennan leik**   erfitt   að   PRO   dæma   __?
   was   this.ACC game.ACC   difficult.DFLT   to   referee.INF
   'Was this game difficult to referee?'   (Sigurðsson 2016: 180)

➢ In (18b), *þennan leik* 'this game' is located in "SpecTP" and structural accusative
Case is preserved (cf. Wood 2015).

2.3.1 A/A' Properties

(19) Sigurðsson (2016) argues that the derivation of Icelandic TCs involves movement

from an A'-position into an A-position (cf. Wood 2015).

➢ **A'-properties**
 (i) Reconstruction
 Context: It is easy to trust one's friends but…
 ?...ég tel   **óvini sínum**   vera   erfitt   að PRO treysta __.
   I believe enemy.DAT self.DAT be.INF difficult.DFLT   to   trust.INF
       '…I believe it is difficult to trust one's enemy.'   (Sigurðsson 2016: 183)

 ・Biding of the moved nominal phrase (by PRO) is not ungrammatical.

 (ii) Preposition stranding
 a. Ég tel   **Vigdísi**   vera   mikilvægt   að tala   vel um __?
   I   believe Vigdís.ACC be.INF   important.DFLT   to talk.INF well of
   'I believe it is important to talk well about Vigdís.'   (Sigurðsson 2016: 184)

 b. *Ég tel   **Vigdísi**   vera   oftast   talað   vel um __.
    I believe Vigdís.ACC   be.INF   most.often talked   well of
                                (ibid.; cited from Maling and Zaenen 1985: 156)

 ・Prepositions in Icelandic can only be stranded by A'-movement.

 (iii) Successive-cyclic movement
 Af hverju er   **þessa kenningu$_i$**   ekki hægt   [$_{CP}$ t$_i$ að PRO   reyna
 why   is   this.ACC theory.ACC   not possible.DFLT   to   try.INF
 [$_{CP}$ t$_i$ að PRO   afsanna   t$_i$]]?
         to   disprove.INF
 'Why is it not possible to try to disprove this theory?'   (Sigurðsson 2016: 186)

 ・The nominal phrase *þessa kenningu* 'this theory' moves successive-cyclically
   through phase boundaries.

➢ **A-properties**
 (i) Yes/No questions
 Context: A says to B: "You said that it was important to avoid this woman over
 there, but…" (pointing to another woman)
  ... er **þessa konu**   ekki mikilvægara   að forðast?
    is   this.ACC woman.ACC not   more.important   to   avoid.INF
 '…isn't this woman more important to avoid?'   (Sigurðsson 2016: 182)

・Since *er* 'is' is located in C, *þessa konu* 'this woman' is located is "SpecTP."

(ii) ECM

Ég hef alltaf talið **þennan mann** vera mikilvægt að forðast.
I have always believed this.ACC man.ACC be.INF important.DFLT to avoid.INF
'I have always believed this man to be important to avoid.'

(Sigurðsson 2016: 182)

(iii) The Definiteness Effect

a. *það er **þennan misskilning** mikilvægt að forðast.
   EXPL is this.ACC misunderstanding.ACC important.DFLT to avoid.INF

b. það er **suma men** mikilvægara að forðast en aðra.
   EXPL is some.ACC men.ACC more.important to avoid than others.ACC
   'Some people are more important to avoid than others.'

(Sigurðsson 2016: 182-183)

c. Það hefur *þessi köttur/*köttur Péturs verið í eldhúsinu.
   EXPL has this cat /cat Péturs been in the.kitchen

d. Það hafa nokkirir kettir/sumir kettir verið í eldhúsinu.
   EXPL has some cats/some.of.the cats been in the.kitchen

(Vangsnes 2002: 48)

・In (c-d), the associate subject resides in the "intermediate position," which is identified as "SpecTP" (cf. Bobaljik and Jonas 1996). In that position, definite noun phrases are not allowed, while indefinite noun phrases are allowed. The same definiteness effects are observed in (a-b).

2.3.2 Derivation

(20) Following Sigurðsson (2016), I assume that the nominal phrase moves from within the infinitival clause to the subject position of the matrix clause. But Sigurðsson's (2016) assumption and mine differ with respect to Agree.

➤ **Sigurðsson (2016)**
   Only nominative DPs can value T's ϕ-features.

➤ **My assumption**
   Case-valued nominal phrases can agree with T.

(21) The following example shows that the accusative-valued nominal phrase agrees

with T.

> þessi   leikur   var erfiður   að   dæma.
> this.M.NOM.SG game.M.NOM.SG was difficult.M.NOM.SG to referee.INF
> 'This game was difficult to referee.'   (Sigurðsson 2016:181,fn.6)

➢ In Icelandic TCs, quite markedly, nominative Case is realized morphologically (cf. Thráinsson 2007, Wood 2015). I take this to be an indication that nominative Case valuation takes place in Icelandic TCs.

(22) The derivation of Icelandic TCs proceeds as follows.

> a. Var **þennan leik**   erfitt   að   PRO   dæma   __?
>   was this.ACC game.ACC difficult.DFLT to   referee.INF
>   'Was this game difficult to referee?'   (Sigurðsson 2016: 180)

b.

c.

d.
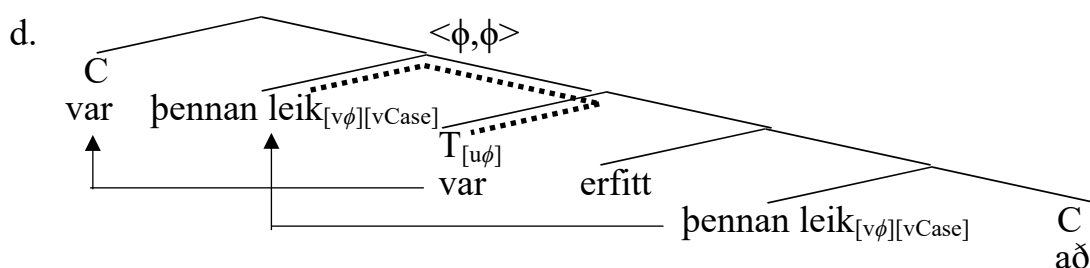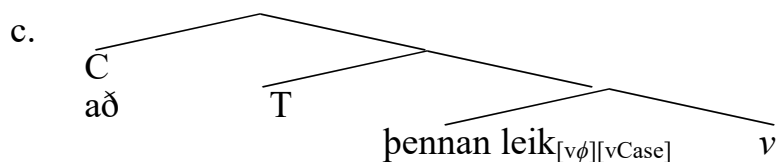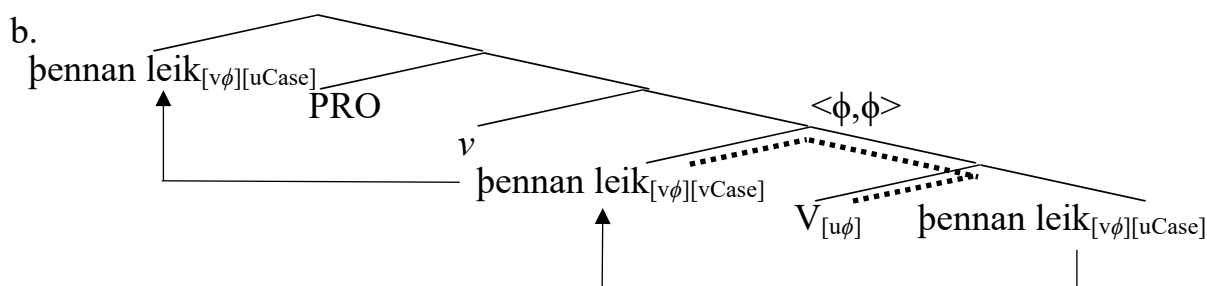
➢ **Derivation:**
   (i) The object *þennan leik* 'this game' moves successive-cyclically into the edge of the embedded C.[5] At Transfer of VP, the object gets valued as accusative.

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[5] I assume that the Icelandic infinitive marker að 'to' belongs to C (cf. Sigurðsson 1989 and Wood 2015).

(ii) The object *þennan leik* 'this game' moves into the matrix "SpecTP" and agrees with T. It gets revalued as nominative.
(iii) *Var* 'be' moves into C.

➢ **Labeling:**

    (i)   {V, þennan leik}: label = **V**

    (ii)   {þennan leik, {V, $t_{\text{þennan leik}}$}}: label = **<ϕ,ϕ>**

    (iii)   {v, {þennan leik, {V, $t_{\text{þennan leik}}$}}}: label = v

    (iv)   {PRO, {v, {þennan leik, {V, $t_{\text{þennan leik}}$}}}}: label = v (Transfer reduces the set {þennan leik, {PRO, {v, VP}}} into the set {þennan leik, {PRO, {v}}}. If a singleton set is equivalent to its member, the set {þennan leik, {PRO, {v}}} will be regarded as the set {þennan leik, {PRO, v}}. Thus, the label of the set {PRO, v} will be determined to v.

    (v)   {þennan leik, v}: label = v ({þennan leik, {PRO, v}} ⇒ {þennan leik, {v}} ⇒ {þennan leik, v})

    (vi)   {T, {þennan leik, v}}: label = **T**

    (vii)   {þennan leik, {T, {$t_{\text{þennan leik}}$, v}}}: label = **<ϕ,ϕ>**

    (viii)   {C, {þennan leik, {T, {$t_{\text{þennan leik}}$, v}}}}: label = **C**

(23) Following Bejar and Massam (1999), Yoon (1996), Jónsson (1996), Svenonius (2005), Narita (2007), I assume that in Icelandic when a nominal phrase receives two Case values, the first one received will be realized/retained morphologically.[6]

(24) Note that the null operator (i.e., Op) movement approach (cf. Chomsky 1977, Hicks 2009) would have difficulty explaining the derivation of Icelandic TCs because under the null operator approach the accusative object would have to be based-generated in the matrix subject position, as illustrated below.

[TP *n*P T … [AP A [CP Op$_i$ to PRO verb t_i]]]

predication   *Op movement*
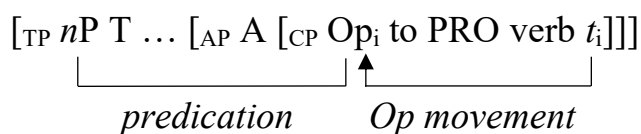
(25) It is more straightforward to assume that the object is moved from the embedded object position into the matrix subject position without recourse to the null operator.

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[6] There is firm empirical grounding for relating agreement on T and nominative Case. Given this, it would not be implausible to suppose that agreement on T is effectively nullified when nominative Case is not realized morphologically, hence the default form of T (see Bejar and Massam 1990, Yoon 1996, Narita 2007 for some relevant discussion).

2.4 A Note on Improper Movement

(26) It is widely assumed that movement from an A'-position into an A-position is banned as improper movement (cf. Chomsky 1973, Obata and Epstein 2011).

(27) Sigurðsson (2016) proposes that in Icelandic TCs, T inherits not only ϕ-features but also an A'-feature (i.e., focus or topic) from C. If so, "SpecTP" can be seen as a mixed A/A' position. This means that the movement into this position can be regarded as (partly) A'-movement (cf. Longenbauch 2017). Thus, the general ban on improper movement can be circumvented.

(28) The following example shows that T can sometimes inherit an A'-feature from C.

What kinds of gifts$_i$ are there rules about [$_{CP}$ t$_i$ who can give t$_i$ to whom]?

(Chung and McCloskey 1983: 708)

(29) As Sigurðsson (2016) notes, however, a better understanding of *when* T can have both ϕ-features and an A'-feature is needed.[7]

2.5 Case Resolution Strategies

(30) There are three possibilities to consider.

   (i)   **Case$_2$**+Case$_1$: The *last* Case value received is realized morphologically.
   (ii) Case$_2$+**Case$_1$**: The *first* Case value received is realized morphologically.
   (iii) **Case$_2$**+**Case$_1$**: *All* the Case values received are realized morphologically.

(31) In languages where the Case morphology is agglutinative (i.e., languages where a nominal stem is separate from the inflection), it is in principle possible to adopt (30iii) as a Case resolution strategy.[8]

Korean
a. Cheli-**hanthey-ka**   ton-i   isse.
   Cheli-**DAT-NOM**   money-NOM have
 'Cheli has money.'

b. Swunhi-ka   Yenghi-**hanthey-lul** chayk-ul   cwuesse.
   Swunhi-NOM Yenghi-**DAT-ACC**   book-ACC gave
   'Swunhi gave Yenghi the book.'   (Levin 2017: 448)

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[7] For an alternative approach to the issue of (im)proper movement, see for instance Mizuguchi (2014).

[8] I would like to thank Ryoichiro Kobayashi for helpful discussion.

Cuzco Quechua

Pi-**qpa-ta**-n$_i$ muna-nki [t$_i$ platanu ranti-mu-na-n-ta]
who-**GEN-ACC**-AF want-2 bananas buy-NML-3-ACC
'Who do you want to buy bananas?' (Lefebvre and Muysken 1988: 161)

(32) On the other hand, in languages where the Case morphology is fusional (i.e., languages where a nominal stem is not separate from the inflection), either (30i) or (30ii) is usually chosen as a Case resolution strategy.

(i) Case$_2$+Case$_1$
English, Greek, Niuean, Hungarian…

(ii) Case$_2$+Case$_1$
Icelandic, Persian, Tongan…

Persian
Nominative Case is retained.
a. In Lazem æst-Ø [ke **to** be-ræv-i anja].
 it necessary is-3SG that you SUB-go-2SG there
 'It is necessary for you to go there.'

b. **to**$_i$ lazem æst-Ø [ke e$_i$ be-ræv-i anja].
 you necessary is-3SG that SUB-go-2SG there
 (Lit.) 'You are necessary to go there.' (Yoon 1996: 135; see also Dazzi 1993)

Tongan
Ergative Case is retained (though the verb *lava* should assign absolutive Case).
a. 'E lava [ke temate'i **'e he mahina** 'a e la'a].[9]
 UNS can COMP shut ERG the moon ABS the sun
 'It is possible for the moon to block out the sun.'

b. 'E lava **'e he mahina**$_i$ ['o tamate'i e$_i$ 'a e la'a].
 UNS can ERG the moon COMP shut ABS the sun
 'The moon is likely to block out the sun.'

(Yoon 1996: 136; see also Chung 1978)

(33) Norwegian, though it is a fusional language, chooses (30iii) as a Case resolution strategy (cf. Bejar and Massam 1999). In Norwegian, multiple Case valuation is resolved *syncretically*.

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[9] UNS stands for unspecified tense-aspect-mood.

a. **Per**ᵢ **hadde de trodd** [**t**ᵢ [**t**ᵢ ville komme forsent]]
Peter had they thought would arrive too late
'Peter had thought they would arrive too late.'

b. **{*jeg, *du,   *vi}**ᵢ hadde de trodd [**t**ᵢ [**t**ᵢ ville komme forsent]]
{*I,   *you.SG.NOM, *we} had they thought would arrive too fast

c. **{*meg, *deg,   *oss}**ᵢ hadde de trodd [**t**ᵢ [**t**ᵢ ville komme forsent]]
{*me,   *you.SG.ACC, *us} had they thought would arrive too fast

d. **dere**ᵢ   hadde de trodd [**t**ᵢ [**t**ᵢ ville komme forsent]]
you.PL.NOM/ACC had they thought would arrive too fast
(Bejar and Massam 1999: 67; see also Taraldsen 1981)

(34) The proper noun is allowable because it is underspecified for nominative and accusative. But this construction is ungrammatical when the topicalized subject is any of the pronouns in (33b-c). (33d) is grammatical because the second-plural pronoun *dere* 'you' is syncretic for nominative and accusative.

(35) In Norwegian topicalization, multiple Case valuation results in grammaticality just in case there is no morphological conflict between the stacked Case values (cf. Bejar and Massam 1999).

2.6 Conclusion

(36) I have argued that English and Icelandic fall within the theory of multiple Case valuation via Agree and that English chooses (36i) as a Case resolution strategy, whereas Icelandic chooses (36ii) as a Case resolution strategy.

   (i) **Case₂**+Case₁: The *last* Case value received is realized morphologically.
   (ii) Case₂+**Case₁**: The *first* Case value received is realized morphologically.
   (iii) **Case₂**+**Case₁**: *All* the Case values received are realized morphologically.

(37) Yoon (1996) states that the language-specific nature of Case resolution strategies is expected because there is no UG principle which requires a structural Case assigned earlier to be maintained throughout the derivation.

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