

# Unattested “possessum” case and constraints on Late Merge\*

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## 1 Introduction

- DP-internal possession crosslinguistically often involves marking the possessor with case.
- Possessors get many cases:
- ★ A separate genitive case for possessors (and potentially other nominals inside the DP).

### (1) *Tamil (Dravidian)*

- a. Kumaar Kamalaa-vaik kaatali-kkir-aan.  
Kumar Kamala-ACC love-PRES-3SG.M  
'Kumar loves Kamala.'

(Lehmann 1993:28)

- b. vaṇṇaan-ooṭa viiṭu  
washerman-GEN house  
'the washerman's house'

(Baker 2015:164, citing Asher 1982)

- ★ Ergative-genitive syncretism is well-known in the ergativity literature (see, a.o., Dixon 1994, Shklovsky 2005, Lander 2008, Polinsky 2016): Ch'ol (Mayan; Vázquez Alvarez 2011), Kalaallisut (Inuit; Fortescue 1984), Shipibo-Konibo (Panoan; Valenzuela 2003), Nalca (Mek; Svärd 2013), Abaza (Northwest Caucasian; Allen 1964), and more.
- ★ Accusative-genitive syncretism also fairly well-attested: Hebrew (Glinert 2005), Farsi (Mace 2003), Karajá (Macro-Jê; Ribeiro 2012), Moro (Kordofanian; Jenks & Sande 2017), Bole (Chadic; Gimba 2000), Jamsay (Dogon; Heath 2008), Juruna (Tupian; Fargetti 2001).

✘ A bigger issue: On the flip side, possessa do not appear in several (DP-internal) cases.

- We can imagine a hypothetical inverse case of Tamil (= Tamil'), with a special DP-internal case marking possessa.

### (2) a. *Tamil*

S [<sub>O</sub> Poss'r-GEN Poss'm]-ACC V

### b. *Tamil'* (= hypothetical “possessum” case)

S [<sub>O</sub> Poss'r Poss'm-Case]-ACC V

- We could even imagine such a case in which this “possessum” case is syncretic with ergative or accusative.
- **No case specifically for possessa:** No possessa counterpart of genitive is widely attested, as far as I'm aware.

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- **No corresponding syncretism:** No attested language where the possessum routinely appears in dependent case (Baker 2015).
- **Problem:** Mainstream approaches to case need to say something extra to rule out these possibilities.
- In short: Possessors can appear in several morphological cases crosslinguistically, but possessa never do — possessa are “allergic” to getting case within the nominal domain.
- The typical move made is that only DPs qualify as case targets (see, e.g., Baker 2015, Clem & Deal 2026), hence ruling out DP-internal case for the possessum. This is often taken to be axiomatic.
  - Why should it be that case only targets DPs?

**Proposal**

- (i) The typological gap of a separate possessum case and possessum-dependent case syncretism is due to the fact that case is a structure (Travis & Lamontagne 1992, Bittner & Hale 1996, Rezac 2004, i.a.).
- (ii) The mechanism enforcing the functional sequence holds of *all* Merge.

- This bears on two related questions:
  - ❶ Does countercyclic/Late Merge observe the same constraints as run-of-the-mill Merge?
  - ❷ What are these constraints?

**Roadmap:**

- §2: Limits on existing theories of case
- §3: Case is a structure
- §4: How this rules out “possessum” case and impacts for our understanding of Late Merge
- §5: Conclusion

## 2 On the limits of case theory

- Two main typological generalizations I want to highlight:
  - ❶ No attested language shows a pattern of possessa routinely appearing in dependent case (Baker 2015).
  - ❷ As far as I know, no languages show a dedicated case for possessa in general.<sup>1</sup>
    - ⇒ No Tamil’.
- (3) *Tamil’* (= hypothetical “possessum” case)
 

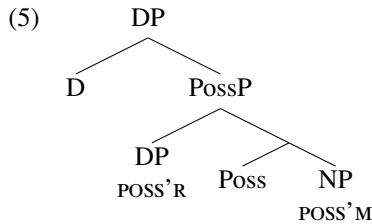
S [O Poss’r Poss’m-Case]-ACC V
- The above generalizations put together result in (4).

<sup>1</sup>The closest I have found is the “construct state” found in many Afro-Asiatic languages. However, it is not immediately clear to me this is the type of “possessum” case we are looking for. In Hebrew, for example, construct state constructions—in which the possessum has a “dedicated” form and the possessor appears unmarked—have many syntactic parallels to English possession (Hazout 1991, Fassi Fehri 1993, Longobardi 1996): definiteness is only marked on the possessor (Glinert 2005:37, Danon 2008; cf. the definiteness effects of English -’s; Jackendoff 1977, Barker 1995), and in complex event nominals, the nominalized verb appears in the construct state (i.e., possessed) with arguments appearing with the same morphology as possessors (see Ritter 1991, Borer 1999, Siloni 2002). This suggests that Hebrew construct state is instead the *unmarked* form of the nominal, with other cases (including genitive) inducing a different form—this form just appears “unmarked” given its wide distribution. Indeed, work on Hebrew generally takes construct nouns to assign genitive to their possessors and such genitive is overt in Arabic (Danon 2008:876, 902).

(4) *Possessum Caselessness Generalization (take 1)*

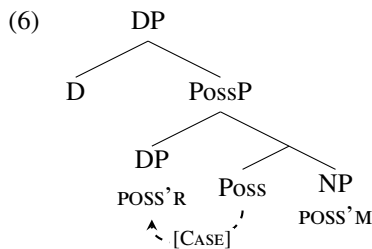
Possessa cannot be assigned Case within the nominal domain.

- Mainstream case theories can easily account for the vast amount of variance found in possessors: a dedicated genitive, possessor-dependent case syncretism, etc., fall out of these analyses.
- However, these theories are silent on the PCG: they all require additional machinery on top of case assignment in and of itself in order to account for these typological gaps.
- A presentational note: I adopt the structure of the DP in (5) (see Myler 2016 and citations therein).
  - ★ I crucially assume that the complement of Poss has  $\varphi$ -features due to the fact that it is at least a nP (Myler 2016), which is often taken as the locus of gender (see Kramer 2015), and may trigger hierarchy effects (Deal & Royer 2025). The fact that I refer to the complement of Poss as an NP throughout is not crucial.



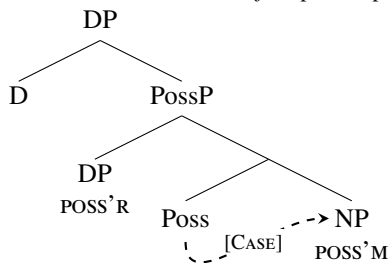
## 2.1 Structural case

- On a traditional structural case theory, Case is treated essentially as a *feature* assigned in the narrow syntax via a functional head.
- This makes genitive and ergative-genitive syncretism easy: Poss assigns inherent case to its specifier (Chomsky 1986, Baker 2015:165), with ergative markers arising out of the structural isomorphism between this relationship and the relationship between Voice and transitive subjects (cf. Coon 2010).<sup>2</sup>



- However, if we assume Case is a feature, it is unclear why possessum NPs would be unable to garner that feature throughout the course of the derivation.
  - For example, why couldn't Poss routinely discharge a [Case] feature to the possessum NP?
  - This would be the same style of inherent Case assignment as between adpositions and their complements (see Woolford 2006).

(7) *Unattested derivation of a special possessum case*



<sup>2</sup>Coon (2010) in fact goes a bit farther by proposing that the head introducing possessors and transitive subjects is the same.

⇒ We need something on top of Case assignment itself to capture the PCG under this view.

## 2.2 Dependent case

- Classical dependent case theory (Marantz 1991, Baker 2015) relying on the c-command relations of nominals in a particular domain to assign dependent case, with the dependent case assignment rule being parametrized between languages.

(8) *Configurational dependent case rule (based on Marantz 1991, Baker 2015)*

If a nominal XP c-commands a nominal YP in a domain Z, mark XP and/or YP with dependent case.

- In ergative-absolutive languages (= assign dependent case to the higher of two nominals in the clausal domain), reuse of the clausal dependent case rule within the DP immediately predicts ergative-genitive syncretism, since the possessor is the higher of two nominals in the DP domain (Baker 2015:168).

(9) a. *Clausal ergative*

$[_{CP} \dots DP_{SUBJ} [_{VP} \dots DP_{OBJ} \dots ] ] \Rightarrow [_{CP} \dots \boxed{DP.ERG} [_{VP} \dots DP \dots ] ]$

b. *Possessor ergative*

$[_{DP} \dots DP_{POSSR} [ POSS NP_{POSSM} ] ] \Rightarrow [_{DP} \dots \boxed{DP.ERG} [ POSS NP ] ]$

- If we can reuse dependent case rules from the clausal domain in the DP, configurational dependent case theory suggests we would see languages where possessa are routinely marked accusative.

!! This is nowhere attested (Baker 2015:172).

(10) a. *Clausal accusative*

$[_{CP} \dots DP_{SUBJ} [_{VP} \dots DP_{OBJ} \dots ] ] \Rightarrow [_{CP} \dots DP [_{VP} \dots \boxed{DP.ACC} \dots ] ]$

b. *Hypothetical “possessum accusative”*

$[_{DP} \dots DP_{POSSR} [ POSS NP_{POSSM} ] ] \Rightarrow [_{DP} \dots DP [ POSS \boxed{NP.ACC} ] ]$

- Similar arguments hold for more recent dependent case by Agree proposals (Clem & Deal 2026; see Appendix A).

⇒ Dependent case theories similarly need to say something extra to derive the PCG.

## 3 Diagnosing extra machinery: Case as a structure

- Given the PCG, what extra machinery is needed for mainstream case proposals to successfully rule out that unattested “possessum” case?

➤ Baker’s (2015:174–176) solution: referential indices. While all nominals count as case competitors, only the highest XP with a particular referential index may be a case undergoer. Two problems:

- ① His evidence is that some languages like Choctaw (Muskogean) only mark case once on complex nominals: at the edge, not at each subsequent nominal projection.

(11) ofi’ hómma’ yamm-at

dog red that-NOM

‘that red dog’ (unattested: \*ofi-yat hómma’ yamma) (Baker 2015:174, citing Broadwell 2006:50)

- \* However, many languages *do* have case concord (e.g., Indo-European, Balto-Finnic, Semitic, some Pama-Nyungan languages; Blake 1994:101) — the fact that some languages don’t does not support a view that only the largest XP with a certain index may receive case.

- ② Insofar as a referential index is something we can diagnose syntactically, case assignment is not limited to DPs with referential indices.
- > German shows a contrast between ‘strong’ and ‘weak’ definites, with ‘weak’ definites contracting with prepositions; ‘strong’ definites have been argued to have an index in their representation, while ‘weak’ ones do not (Schwarz 2009, Hanink 2017, Jenks 2018).
  - > Because direct objects are not introduced by prepositions, ‘strong’ (indexed) and ‘weak’ (non-indexed) German definites are homophonous as direct objects.
  - > If case assignment was dependent on referential indices, we would thus expect German definites to show optional accusative case—not true.<sup>3</sup>

(12) Ich      habe      **den/\*der**      Hund umarmt.  
 1SG.NOM have.1SG the.ACC/\*the.NOM dog   hug.PST.PTCP  
 ‘I hugged the dog.’

→ The PCG seems not to be about referential indices; rather it seems to be about DPs.

- Indeed, previous analyses typically assume of Case assume Case is limited to DPs (Chomsky 2000, Matushansky 2005, Danon 2006), allowing them to predict the PCG.
- However, we would want this to follow from first principles...

**Proposal:** I suggest that the PCG is evidence that **Case is a structure** (cf. Travis & Lamontagne 1992, Bittner & Hale 1996, Rezac 2004, Caha 2009, 2010, Deal 2025).

→ Case involves the addition of a KP superstructure.

- I follow Rezac (2004) and Deal (2025) in assuming this KP superstructure can be inserted *late*: at least some nominals are not born KPs but become them, based on other properties of a given derivation.
- Under this view of Case, the PCG (4) is actually better stated as (13).

(13) *Possessum Caselessness Generalization (final)*  
 K cannot appear between Poss and NP.

## 4 Deriving the PCG

The PCG must be due to something in the **narrow syntax**:

- Under dominant Late Insertion models (e.g., Distributed Morphology; Halle & Marantz 1993), morphology happens too late to affect the ability of a nominal to receive Case.
  - ✧ As argued by Baker (2015:173), lack of a possessum case is not due to morphological “repainting”: languages with overt case stacking also lack a dedicated possessum case.

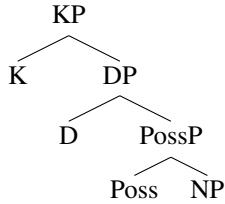
### Proposal

The mechanism enforcing the functional sequence blocks the appearance of K between NP and PossP.

- Specifically, K is crucially ordered above D on the sequence of functional projections.
  - This is why Case is limited to DPs.
- This builds on intuitions that K is the highest projection in the nominal extended projection (Travis & Lamontagne 1992, Bittner & Hale 1996).

<sup>3</sup>Thank you to Sara Fish for this judgment.

(14) *Functional sequence of nominals*



This additionally bears on two questions:

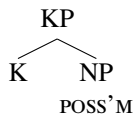
- > Does countercyclic insertion/Late Merge have the same constraints as regular Merge?
- > What are these constraints?

**Answer:** The mechanism enforcing the functional sequence must be respected *at all points* in the derivation.

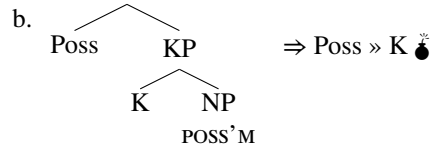
⇒ Functional sequencing constraints hold of both Merge and Late Merge.

- One derivation: Poss immediately Merges with KP. Immediately ruled out for violating the sequence of functional projections.
  - Not really surprising; we know standard Merge is regulated by the order of functional projections (Abels 2009:339, Williams 2009:372; cf. the cartographic school of syntax, Rizzi 1997, Cinque 1999, 2002, Cinque & Rizzi 2009)

(15) a.



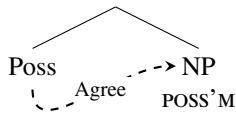
b.



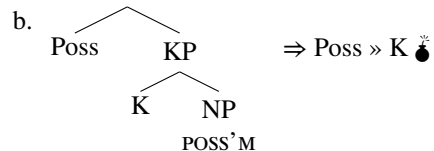
- Crucially, **Late Merge of K also rules out the derivation.**
- Previous work has shown that Late Merge allows nominals to escape binding constraints (Fox 2002, Takahashi & Hulseley 2009). → You can Move before you Merge.
- We thus might expect Late Merge to save derivations that would violate other constraints.
- Imagine an unattested “possessum” case derivation:
  - Poss is able to Agree with the possessum NP as long as that NP is a licit goal.
    - \* Poss is actually forced to form such an Agree operation under the most minimal assumptions about Agree (probe as soon as you merge; cf. the Earliness Principle of Rezac 2004:67; see also Richards 1999, Pesetsky & Torrego 2001).
  - Assuming Late Merge of K arises out of an Agree operation (Rezac 2004:283), Poss would be able to furnish the possessum NP with K.

(16) *Illicit derivation of a special possessum case*

a.



b.



⇒ The PCG shows us that Late Merge must respect the ordering of functional projections in order to rule out derivations like (16).

- ✧ Whatever constraints enforce the ordering of functional projections must be **respected at all points** in the derivation, both upon cyclic Merge and countercyclic Late Merge.<sup>4</sup>

## 5 Conclusion

- Given the wide array of case marking for possessors in DP-internal possession constructions across languages, we might expect a similar range to hold of marking for possessa in these contexts.
- On the contrary, no language (as far as I know) routinely uses either dependent case or a dedicated “possessum” case in DP-internal possession.
- I have argued that this typological gap suggests that **Case is a structure**, following [Travis & Lamontagne \(1992\)](#), [Bittner & Hale \(1996\)](#), and [Rezac \(2004\)](#), a.o., supporting the Possessum Caselessness Generalization.

### (17) *Possessum Caselessness Generalization*

K cannot appear between Poss and NP.

- I have proposed that the PCG arises due to constraints on the ordering of functional projections: **constraints on the functional sequence apply across-the-board, at all stages** of the derivation.
- Two extensions:
  - Gives us a better idea of what constraints exist on Late Merge.
  - Gives us some direction for probing what the conditions enforcing the functional sequence are.

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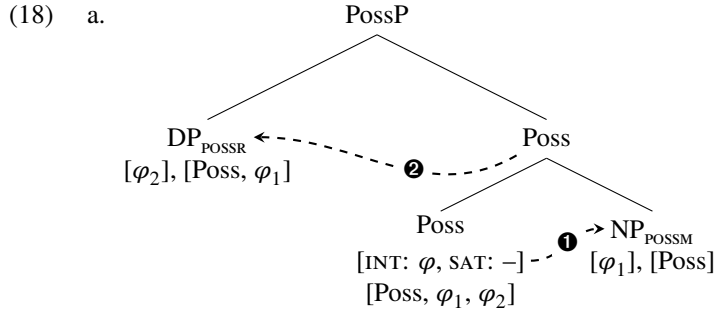
<sup>4</sup>So what do these constraints on the functional sequence look like? Some options are an interface condition on Merge ([Starke 2001:154](#), [Adger 2003](#)), or the functional sequence being a primitive of (a given) language, reflective of cognition rather than linguistic capacity, but I don’t take a strong stance here. See Appendix B for some thoughts on a selection-based alternative.

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## A Limits of dependent case by Agree

- Agree-based dependent case (Clem & Deal 2026): Dependent case is the morphological exponence of two sets of  $\varphi$ -features on a single nominal, derived via bi-directional feature copying. These two sets of  $\varphi$ -features can appear on different nominals based on probe location:
  - A probe above both nominals Agrees with the lower second  $\Rightarrow$  accusative
  - A probe on the head whose specifier is the higher nominal Agrees with the higher nominal second (via reprojection)  $\Rightarrow$  ergative
- A probe on Poss immediately predicts dependent case-genitive syncretisms (see Deal & Royer 2025 on ergative-genitive in particular):<sup>5</sup>

<sup>5</sup>Note that this predicts both ergative-genitive and accusative-genitive syncretism because the probe location in the clause is independent of



b. *Dependent case VI* (Clem & Deal 2026)

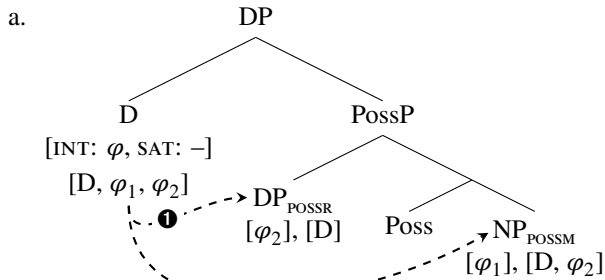
ERG/ACC ↔ [φ] / \_ [φ, D]

c. DP\_POSSR at Spell Out: [[φ, D, ...], [POSS, φ]] ↔ DP.ERG or DP.ACC

- However, this account also needs something extra to derive the PCG. There is a head—namely D—that could host a probe that would Agree with the possessum second.

> Predicts a language where possessa routinely get dependent case.

(19) *Derivation for unattested “possessum accusative” via dependent case-by-Agree*



b. *Dependent case VI* (Clem & Deal 2026)

ACC ↔ [φ] / \_ [φ, D]

c. NP\_POSSM at Spell Out: [[φ, N, ...], [D, φ]] ↔ DP.ACC

## B An alternative solution(?) with selection

- The PCG could also be taken as evidence that, while Merge may apply late, selection is *inherently early*.
  - Say we define Merge as an operation regulating selection, like in Merchant’s (2019) definition below.

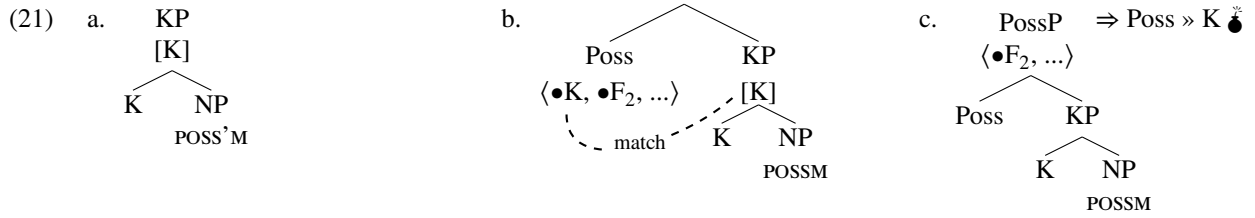
(20) Merge( $\alpha, \beta$ ) (Merchant 2019:326)

For any syntactic objects  $\alpha, \beta$ , where  $\alpha$  bears a nonempty selectional list  $\ell = \langle \bullet F_1, \dots, \bullet F_n \rangle$  of selectional features, and  $\beta$  bears a categorial feature  $F'$  that matches  $\bullet F_1$ , call  $\alpha$  the head and

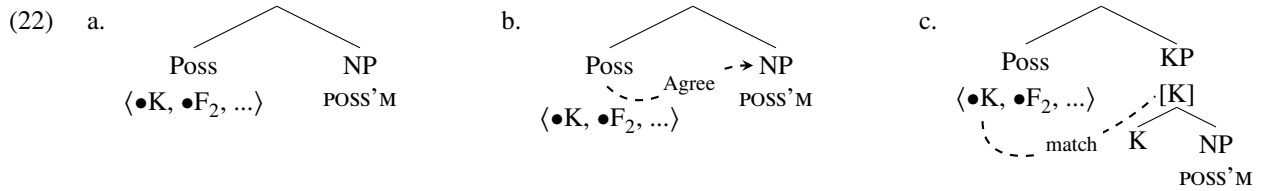
- let  $\alpha = \{\gamma, \{\alpha - \ell, \beta\}\}$ , call  $\gamma$  the projection of  $\alpha$ , and
- if  $n > 1$ , let  $\ell = \langle \bullet F_2, \dots, \bullet F_n \rangle$ , else let  $\ell = \emptyset$ , and
- let  $\gamma = \begin{bmatrix} \text{CAT} & [\text{cat}(\alpha)] \\ \text{SEL} & [\ell] \end{bmatrix}$

- Suppose we have a syntactic object Poss which has a selectional feature  $\bullet K$  in its selectional list.
- In cases like (21), though K has a categorial feature K that matches the  $\bullet K$  in the selectional list of Poss, this Merge is ill-formed because it violates the ordering of functional sequences.

presence/absence of a probe on Poss. Any language can have a probe on Poss furnishing the possessor with two sets of  $\varphi$ -features, thus inserting the same dependent case VI that exposes this configuration in the clause. However, languages will differ on probe location in the clausal domain, and thus where the dependent case VI is inserted in the clause may be on the transitive subject (thus possessor and transitive subject share dependent case—ergative) or on the object (thus possessor and object share dependent case—accusative).



- We might then expect that perhaps selection for K could be delayed: Poss holds onto its  $\bullet K$ , triggering Late Merge of it to circumvent the ordering of functional projections (22).



- However, this derivation must also be ill-formed to derive the PCG.  $\Rightarrow$  Selection cannot be delayed!
- But if both of the derivations in (21–22) are ill-formed, why would learners ever posit Poss selecting for K in the first place?
  - Seeing as learners would be able to surmise that both K and Poss are in the nominal extended projection, it seems likely that they would take the inability of Poss to select for K to signal something about the ordering of functional projections, rather than about selection per se...