Why there is no such thing as Closest Conjunct Case[*]

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1.   Introduction

As is well-known in the typological and theoretical literature about ϕ-agreement, languages of the world exhibit a phenomenon usually referred to as *'Closest Conjunct Agreement'*. This term describes a situation where a (usually verbal) head shows linearity effects when agreeing with conjoined noun phrases. Rather than taking the ϕ-features of both conjuncts into consideration, only the features of the linearly closest conjunct are considered. A nice example of Closest Conjunct Agreement comes from Old Norse in (1). The clause-initial verb *hefi* agrees only with the first conjunct *ek* as it shows first person singular agreement. The features of the second conjunct, a third person plural noun phrase, are ignored.

(1)   Hefi   [ek ok mínir menn] haft alla þessa stund þat einu oss   til
        Have.1SG I   and my   men   had all this   time that only we.DAT to
        framflutningar.
        maintenance
        'All this time have I and my men had only this for maintanance.'
                              Old Norse: Nygaard (1966) as cited in Johannessen (1998:30)

Recent works have documented many cases of this phenomenon in various languages: Arabic (see amongst many others: Bahloul & Harbert 1992, Aoun et al. 1994), Biblical and Modern Hebrew (Doron 2000), Dutch (van Koppen 2005), English (Munn 1999), Brazilian Portuguese (Munn 1999) Hindi (Benmamoun et al. 2009, Benmamoun & Bhatia 2010, Bhatt & Walkow 2012), Tsez (Benmamoun et al. 2009), Irish (van Koppen 2007)) and various Slavic languages (Citko 2004, Bošković 2009, Murphy & Puškar 2015, Marušič et al. 2015b) and many others (see e.g. Johannessen (1998) and van Koppen (2007)).

Against this background, one might wonder whether we find the same kind of phenomenon with case marking, that is something like *Closest Conjunct Case*. The phenomenon would consist in a situation where amongst the conjuncts in nominal conjunction, only one receives a certain case whereas all the other conjuncts receive either a different case, some kind of default case or no case at all.

Since case marking and ϕ-agreement are often seen as two sides of the same coin functionally but also theoretically, we might even expect to find this phenomenon attested in the worlds languages. And in fact, even though Closest Conjunct Case has received a lot less attention than Closest Conjunct Agreement, the literature contains occasional remarks that it is in fact attested or at least expected given current theoretical assumptions (see e.g. (McCloskey 1986, Johannessen 1998, Walkow 2013). However, a thorough, in-depth case study of an instance of Closest Conjunct Case has not been done so far.

This short paper sets out to close this gap and investigate possible cases of Closest Conjunct Case in more detail. However, contrary to the claims in the literature, the claim here is that something like Closest Conjunct Case does in fact not exist. More specifically, I claim that the generalization in (2) holds:

(2) **Symmetry of Case in Conjunction (SOCIC):**
     Case is always evenly distributed amongst all of the conjuncts in nominal conjunction.

In the following, I will show that apparent counterexamples to (2) fall into three distinct classes each of which should receive an explanation that does not make use of asymmetric case assignment.

The second major goal of this paper is to pave the way towards a deeper understanding why the generalization in (2) holds in the first place. I will argue that given the current analyses of Closest Conjunct Agreement, (2) can be recast as a restriction on the modules in which case assignment applies. Unlike ϕ-agreement, case assignment is a purely syntactic operation. It will be shown that while this finding is problematic for standard theories of case assignment (e.g. Chomsky (1995) et seq), it falls out naturally under a number of more recent proposals of how case should be assigned.

The paper is structured as follows: In Section 2, I review possible cases of counterexamples to the generalization in (2). I will show, that they fall into three distinct classes and none of these three classes should be analyzed in terms of asymmetric case assignment in conjunction. Section 2.1 shows that some languages can have case marking attached to the whole conjunction phrase rather than to every single conjunct. Section 2.2 introduces the phenomenon of Suspended Affixation which deletes inflectional affixes on non-final conjuncts. Section 2.3 revisits some of the well-known facts about pronominal allomorphy triggered by the presence of a conjunction. In each of these cases, the surface string may seem like a violation of the generalization in (2) but we will see that there are good reasons to assume that the generalization is in fact obeyed.

In Section 3 I revisit the discussion and briefly discuss which theoretical consequences should be drawn from SOCIC generalization in (2). I will argue that the empirical findings in Section 2 strongly suggest that case assignment feeds into the computation of ϕ-agreement but not vice versa. Section 4 concludes.

2.   Apparent Counterexamples

In order to find counterexamples to the generalization in (2), we take a closer look at languages in which the case markers of conjoined DPs seem to differ morphologically.
As we will see, examples of this sort fall into three distinct classes, all of which can (and should) receive an answer that does not involve asymmetric case assignment.

2.1   &P-clitics

First, in some languages, it is possible to case-mark the whole &P (as in (3)). On the surface, this may create the impression of asymmetric marking (abstractly in (4)).

(3)   [Conj$_1$ & Conj$_2$]-CASE   (4)   *[Conj$_1$ & Conj$_2$-CASE]

However, there are various diagnostics that help us distinguish the two structures. A very simply diagnostic can be DP-internal concord. In order to tell apart (3) and (4), we can take a look at the case-marking of DP-internal elements such as adjectives. Take the following example from Estonian:

(5)   a.   Ta jook-sis jõe   ja puu-ni.
              3SG run-3SG river.GEN and tree-TERM
              'He went to the river and the tree.'   Estonian: Hasselblatt (2008)
       b.   Ta jook-sis jõe   ja suu-re   puu-ni.
              3SG run-3SG river.GEN and big-GEN tree.GEN-TERM
              'He went to the river and the big tree.'   Estonian: Triinu Viilukas (p.c.)

On the surface, example (5a) looks like a case of asymmetric case marking in nominal conjunction as the final conjunct seems to bear terminative case and the non-final one bears genitive. If we insert an adjective into the final conjunct as in (5b), we can tell that the actual structure is like the one in (6):

(6)   [Conj$_1$-GEN & Conj$_2$-GEN]-TERM

The terminative case, which is built on the basis of the genitive stem, can optionally cliticize to the whole conjunction phrase rather than to every conjunct.

However, especially in languages where the line between postpositions and case suffixes is somewhat hard to draw, often there is no DP-internal concord. In these cases, more diagnostics are needed to determine the scope of the case marker in question. Additional diagnostics include postnominal modifiers and the relative scope of other affixes.

&P-clitics are a relatively widespread phenomenon even though descriptive grammars often give just one example which is ambiguous between asymmetric case marking and &P-cliticization. More work is necessary to see whether one can find direct evidence for an analysis in terms of &P-clitics in each language. Other languages for which such an analysis has been motivated thoroughly are Udmurt (Weisser 2016), Hungarian (Trommer 2008), Hindi-Urdu (Butt & King 2005), Bodic languages (Noonan 2008) and many more.

So, to conclude, cases of &P-clitics do not violate the SOCIC Generalization because each conjunct bears the same case.

2.2 Suspended Affixation

The second phenomenon that can create the impression of asymmetric case assignment is Suspended Affixation. Suspended Affixation consists in the fact that, in some languages, it is possible to elide inflectional material on non-final conjuncts. When the elided affixes include a case marker, this can, on the surface look like asymmetric case marking:

(7)   [Conj$_1$-~~CASE~~ & Conj$_2$-CASE]   (8)   *[Conj$_1$ & Conj$_2$-CASE]

Suspended Affixation is found in a whole range of OV-languages in Eurasia such as Turkish (see e.g. Kornfilt 1996, Kornfilt 2012, Kabak 2007, Broadwell 2008), Japanese and Korean (Yoon & Lee 2005), Armenian and Ossetic (Erschler 2012) and Nivkh (Gruzdeva 1998). An example of Suspended Affixation from Ossetic is given in (9). The verb *tarstən* requires ablative case but on the surface, the ablative occurs only on the second conjunct.

(9)   alan   əma dəw-əj   tarstən
        Alan.NOM and you-ABL be.afraid-PAST.1SG
        'I am afraid of Alan and you.'   Digor Ossetic (Erschler 2012, 157)

First, I want to briefly address the frequently asked question of whether Suspended Affixation is not just phrasal cliticization. However, it can be shown quite easily that it is not. Unlike with phrasal cliticization, the suspended affixes are really part of the second conjunct. They participate in morphophonological processes such as stress assignment, vowel harmony etc. in very much the same way as non-suspended affixes. Also, and this is probably the most straightforward argument against an analysis as phrasal clitics, we find examples where material that unambiguously belongs to the second conjunct can appear outside of the suspended case marker. Take the following examples from Japanese and Mari:

(10)   Hon issatsu to   pen-o   nihon kau.
        book one   and pen-OBJ two   buy
        'I will buy one book and two pens.   Japanese: Johannessen (1998)

(11)   Üder mej-en   uše-m   den tej-en   süm-ešte-t.
        girl 1SG-GEN mind-1SG and 2SG-GEN heart-INESS-2SG
        'The girl is in my mind and in your heart.'
                                        Meadow Mari: Guseva & Weisser (submitted)

In (10), the numeral-classifier complex has undergone extraposition to a position following the case marker. This example cannot be analyzed as phrasal cliticization because, as the translation indicates, the numeral takes scope over the the second conjunct only. The same holds for the possessive marker in Meadow Mari in (11), which appears outside of the case marker but takes scope only over the second conjunct.

However, cases of Suspended Affixation can also be shown to not involve asymmetric case assignment. There are a number of arguments against this hypothesis. First, we can observe that in basically all languages that make use of Suspended Affixation, other categories can be suspended along with case:

(12)   köy,   kasaba ve   kent-ler-imiz-den
        village town   and city-PL-1PL.POSS-ABL
        'from our villages, towns, cities.'   Göksel & Kerslake 2005, p.458

In (12), only the final conjunct is marked for plurality, a first person plural possessor and ablative case but nonetheless all conjuncts are interpreted as if they were too. If we assume that the ablative case in (12) is assigned asymmetrically to the last conjunct only, we would have to assume that number marking and possessor agreement would have to apply asymmetrically as well. And this seems like an implausible assumption.

Second, we observe that the suspended affixes can trigger stem allomorphy on the non-final conjuncts. (13) and (14) are two examples from Mari and Ossetic:

(13)   Pörjeng   memna den nunem   už-eš
        Man.NOM us.??? and them.ACC sees-3SG
        'The man sees us and them.'
                Meadow Mari (Guseva & Weisser 2015)

1PL.NOM	me
1PL.GEN	memna-n
1PL.ACC	memna-m
1PL.DAT	memna-lan

(14)   dɐw/*du   ema alan-ej   tɐrsun.
        you-OBL/NOM and Alan-ABL be.afraid.1SG
        'I am afraid of you and Alan.'
                Digor Ossetic (Erschler 2012)

2SG.NOM	du
2SG.OBL	dɐw
2SG.DAT	dɐw-ɐn
2SG.ABL	dɐw-ɐn

In both cases, we can see that the suspended affixes trigger stem allomorphy. In Mari, we see that if the accusative suffix is deleted, still the accusative stem of the pronoun is chosen. Similarly in Ossetic where deletion of the ablative does not result in a use of the nominative pronoun but rather the oblique stem of the pronoun is chosen. The Mari case in (13) is particularly telling because the resulting form is not part of the pronominal paradigm at all. It is simply the accusative form of the pronoun with the accusative suffix deleted. This strongly suggests that Suspended Affixation is in fact a deletion operation (as argued by Erschler 2012, Guseva & Weisser submitted) rather than asymmetric assignment/marking.

Finally, we can observe that processes that affect the phonological shape of the affixes can bleed Suspended Affixation in some languages. In Turkish, for example, vowel harmony and consonant assimilation can change the surface form of the affixes significantly. As reported by Kornfilt (2012), this can lead to degradedness or even ungrammaticality of Suspended Affixation for many speakers of Turkish. In (15), we see that the ablative marker of the noun *sis* ('rain') is *ten* whereas the ablative marker of the noun *yağmur* ('fog') is *dan*. For many speakers, it is degraded or impossible to suspend affixes that are relatively distinct phonologically.

(15) sis-ten (16) %sis ve yağmur-dan
rain-ABL rain and fog-ABL
'Because of the rain' 'because of the rain and the fog'

Turkish: F.Nalbant (p.c.)

This receives a straightforward explanation under an ellipsis account because we know that phonological similarity or identity has an effect on the well-formedness of ellipsis. But under an approach that presupposes asymmetric assignment of the ablative marker to the second conjunct, facts like (16) are mysterious. There is no conceivable explanation why phonological processes such as vowel harmony should have an effect on symmetry or asymmetry of case assignment.

So, to conclude, I have shown that Suspended Affixation should neither be conceived of as phrasal cliticization, nor as asymmetric assignment/marking. Rather, it should be conceived of as a relatively late phonological deletion process that deletes inflectional material at the right edge of non-final conjuncts in very much the same way that Right-Node-Raising in the clausal domain (see Kornfilt (2012) for the same analogy).

Under this assumption, cases of Suspended Affixation do not violate the SOCIC generalization because syntactically, case marking is symmetric. It is only due to a postsyntactic deletion process that this symmetry cannot be observed on the surface.

2.3 Pronominal Allomorphy

Finally, there are cases involving pronouns to be considered. In some languages, an arbitrary set of pronouns surfaces as allomorphs when adjacent to the conjunction. This kind of allomorphy may create the impression of asymmetric case marking. Examples of this sort come from English (17) and Italian (18).

(17) a. *Him and I* are fighting. Parrott (2009)
b. He says he saw *John and I* last night.
c. *She and him* will drive to the movies.
d. He thought that I was coming between *he and his wife* Johannessen (1998)

(18) Io e te/*tu andremo insieme a Roma.
I.SUBJ and you.OBJ/SUBJ go.FUT.1PL together to Rome.
'You and I go to Rome together.' Johannessen (1998)

Other examples are found in Danish (Parrott 2009) or certain dialects of Norwegian (Johannessen 1998). According to analyses by Emonds (1986), Sobin (1997), Parrott (2009), conjoined pronouns in English bear object case underlyingly and only in some arbitrary cases, the output forms are overwritten by superficial allomorphy rules. Sobin (1997) gives a number of criteria to identify these cases of allomorphy. The first criterion he calls *arbitrariness* and refers to the fact that these cases of allomorphy are never systematic and not all pronouns participate in these kinds of alternations. In English, it is only the first per-

son singular pronoun that can appear in the nominative after a conjunction.[1] In Italian, it is only the second person singular pronoun which exceptionally occurs in the object form when following the conjunction. Second, Sobin notes that these cases of allomorphy require a certain directionality. The first person singular pronoun can occur in the nominative in English only when following the conjunction, not when preceding it.

(19)   a.   Peter and I are going to the movies.
         b. ??I and Peter are going to the movies.

Third, Sobin observes that these cases of allomorphy require strict adjacency. When the immediate adjacency between the conjunction and the pronoun is interrupted, for example by inserting an adverb, choosing the allomorph is often degraded.

(20)   ?*Peter and probably I go to the movies.

Finally, Sobin lists two more tests, namely the overextension criterion which gives rise to examples like (17d) and the insensitivity to hierarchical structures. In (21), the pronoun itself is not the second conjunct, it is merely contained in the second conjunct. However, since it is still linearly adjacent to the conjunction, this is sufficient to trigger the choice of the allomorph.

(21)   For Mary to be the winner and [$_{SC}$ I the loser] is unfair.   Sobin (1997)

Only if case marking in conjunction is underlyingly symmetrical and the asymmetry is the result of postsyntactic allomorphy rules, then the behavior of the pronouns in conjunction in English and Italian is explained. If the occurrence of the subject form *I* were an instance of real syntactic case marking rather than simple pronominal allomorphy, then, for example, the adjacency requirement as well as the directionality requirement were completely mysterious. I therefore conclude that cases of this sort are best explained if we follow Emonds (1986), Sobin (1997), Parrott (2009) and assume that case marking is underlyingly symmetric but that symmetry is blurred by postsyntactic rules of allomorphy selection. Thus, these cases of pronominal allomorphy do not violate the SOCIC Generalization.

Finally, we have to take a closer look at the marking of pronominal subjects in Irish. Based on examples like (22), McCloskey (1986) claimed that Irish is an instance of Closest Conjunct Case.

(22)   Chuaigh se-isean   agus e-isean   'na   bhaile.
        go.PAST 3SG.SUBJ-CONTR and 3SG.OBJ-CONTR home
        'He and he went home.'   McCloskey (1986)

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[1] Sobin (1997) lists two other allomorphy rules which change the two third person singular pronouns to the subject form (*he* or *she*) when *preceding* the conjunction.

In (22) the subject form of the pronoun is found only on the first conjunct whereas the default or object form is found on all non-initial conjuncts. This, at first sight, looks like an instance of Closest Conjunct Case.

However, a closer look reveals that Irish is also an instance of allomorphy. The only difference to the cases in English and Italian is that this kind of allomorphy is triggered by the adjacency of the verb and not by the conjunction (see also Carnie (1995) and Harley (2000) for the same conclusion). We can show this by using similar tests as before. For example, when the immediate adjacency is interrupted by an intervening adverb, the subject form is not licit. (23a) shows that it is not possible for an adverb to intervene in between the verb and a pronoun in its subject form. However, with a regular noun phrase that does not distinguish between the subject form and the object form, the sentence is well-formed.

(23)   a.   *Chuartaigh, ar ndóigh, siad   an bád.
             search.PAST of course   3PL.SUBJ the boat
             'They of course searched the boat.'
        b.   Chuartaigh, ar ndóigh, na saighdiúirí an bád.
             search.PAST of course   the soldiers   the boat
             'The soldiers of course searched the boat.'   Chung & McCloskey (1987)

A second test that can be used is copula drop. In some cases, speakers of Irish can drop the copula and when it is dropped, the subject form is no longer possible. This shows that it is indeed the case that the subject form requires immediate adjacency to a verb that is phonologically present.

(24)   a.   Cén aois atá sé?
             what age is 3SG.SUBJ
        b.   Cén aois é?
             what age 3SG.OBJ
             'What age is he?'   (Ó Siadhail 1989, p.215)

Finally, when the subject undergoes Heavy-NP-Shift, it is no longer adjacent to the verb and as a result, the subject form is no longer licensed.

(25)   Tháinig t_1 isteach ina dhiaidh sin [iad   sin a bhí le daoradh   chun báis]$_1$
        Came   t into   after   DEM 3PL.OBJ DEM C were condemned to   death
        'Those who were to be condemned to death came in after that'   Harley (2000)

All of these tests show that the alternation between subject and object form is not solely conditioned by the grammatical function of the argument. Adjacency to a phonologically present verb is a necessary condition for the subject form to appear. I conclude that Irish is also an instance of allomorphy based on adjacency rather than a case of asymmetric case assignment.

3.   Theoretical Implications

In the previous section, the following generalization has been established:

(26) **Symmetry of Case in Conjunction (SOCIC):**
   Case is always evenly distributed amongst the conjuncts in nominal conjunction.

We have seen that once we control for (i) ellipsis and (ii) pronominal allomorphy, case marking can be shown to be symmetrical. In both cases, several tests have been put forward (or taken from the literature) to show that each of these phenomena can be treated as a constant that can be taken out of the equation. With respect to the question raised in the title of this paper, we can thus state that (26) implies the validity of (27):

(27) **Non-existence of Closest Conjunct Case:**
    Case assignment is not subject to linearity effects in the same way that agreement is.

(27) leaves us with a mismatch. Case assignment between the verb and both of the conjuncts of its subject is symmetrical but ϕ-agreement between the same participants is not. This is exemplified in (29).

(28)   a.   Qara$^\gamma$a   [Saliyaa wa Sumar]   l-qiṣṣa
            read.3.FEM.SG Alia.FEM and Omar.MASC the-story
            'Alia and Omar read the story.'   Standard Arabic: Aoun et al (1994:207)

   b.   [... V+T ... [$_{\&P}$ Subj$_1$ & Subj$_2$] Obj]
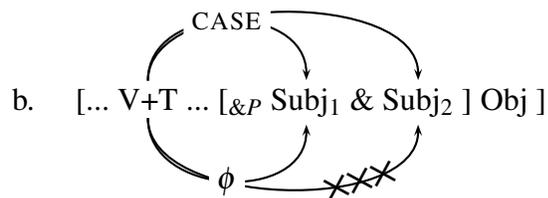
Crucially, the SOCIC in (2) states that this mismatch always goes in one and the same direction. Case is always symmetric whereas ϕ-agreement is not. Given the standard theory of case and ϕ-agreement, this result is quite surprising. Standardly, ϕ-agreement is the basic syntactic operation. A head lacking ϕ-features probes down into its c-command domain. If it finds a suitable goal, it receives values for its features and, in addition, it may assign case to this goal. In other words, ϕ-agreement is the underlying operation and case assignment can proceed only on the basis of an already established ϕ-agreement relation. It is clear that this story does not work for the example in (28). We see clearly from the agreement morphology on the verb that T has never established a ϕ-agreement relation with the second conjunct (Subj$_2$). Nevertheless Subj$_2$ bears the regular subject case, i.e. nominative.[2]

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[2]Note that this mismatch cannot be solved by assuming something like the Case Filter because (i) still there is no way how to get the relevant case feature onto Subj$_2$ *and* (ii) we would have no way to allow for the numerous cases where DPs inside of a coordination phrase are shielded from any kind of case-marking whatsoever.

In order to find an alternative explanation for why there is no such thing as Closest Conjunct Case, we might take a quick look at existing analyses of Closest Conjunct Agreement. A number of recent papers put forward the idea that linearity effects in CCA are due to the fact that ϕ-agreement can, at least in part, apply in the postsyntactic module (i.e. after linearization) (see e.g. Bhatt & Walkow (2012), Marušič et al. (2015b,a), Willer-Gold et al. (2016).)

In doing so, one can keep the assumption that the syntax operates only on the basis of hierarchical structures. In addition, one gains an explanation of why agreement with conjoined noun phrases targets the closest conjunct in some cases and sometimes the conjunction phrase as a whole. If ϕ-agreement takes place in the syntax, it targets the whole &P but if it applies on PF (or after linearization), then it targets the closest conjunct.

(29)   Distributed Agree
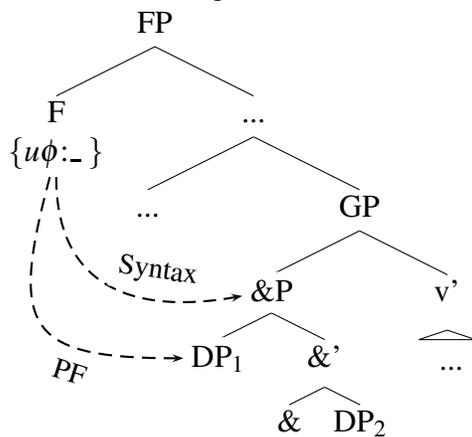
If this solution is on the right track, we can, given the established generalization above, formulate the following corollary: Case assignment is a purely syntactic operation whereas ϕ-agreement can, at least in part, be postsyntactic. (30) illustrates this finding:

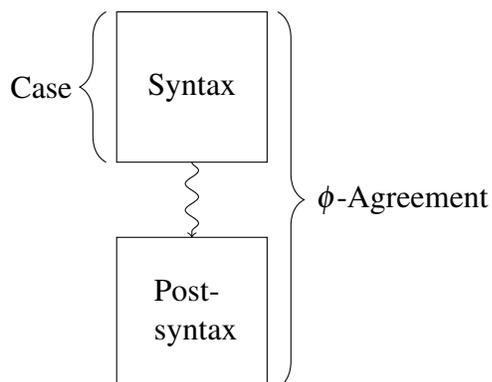(i)   Us and them are gonna rumble tonight.   English: Schütze (2001)

(ii)   a.   para tú   y   yo
              for   you.NOM and I.NOM
        b.   para ti   / para mi
              for   you.ACC / for   I.ACC   Spanish: Johannessen (1998)

(30)   Distribution of Case Assignment and ϕ-Agreement across modules:

Based on this corollary, we can put forward a simple Order-of-Operations argument. The SOCIC Generalization can be explained by saying that case assignment is restricted to a subpart of the grammar that applies on the basis of hierarchical structure only (i.e. syntax). We thus have direct evidence that case assignment precedes ϕ-agreement in many cases. This in turn suggests that, if we want case assignment and ϕ-agreement to be related, then it is empirically more adequate to assume that ϕ-agreement tracks case assignment and not vice versa.

This finding can be implemented in various ways.[3] One possibility that has been explored in a number of recent works would be to invert the direction of the Agree mechanism (see e.g. Baker (2008), Wurmbrand (2014), Zeijlstra (2012), Bjorkman & Zeijlstra (submitted), Smith (2015)). Rather than requiring the probe to c-command the goal, one could require it to be c-commanded by the goal. As a result, the primary direction of Agree would be upward. Consequently, case assignment would be the primary relation since the head probing for case is located below the goal. All the conjuncts in nominal conjunction would probe upward independently and all of them would find the same case assigner, which then results in a symmetrical case marking pattern. As for ϕ-agreement, one could assume further that ϕ-agreement is parasitic to already established case relations and can take place either in the syntax or on PF. This would entail the possibility of parametrizing between resolved agreement and CCA.

Another way to implement the SOCIC Generalization and the resulting corollaries makes use of so-called *Dependent Case* accounts (e.g. Marantz (1991), McFadden (2004), Bobaljik (2008), Preminger (2014)). According to these accounts case is assigned on the basis of a configuration involving a certain number of arguments. Crucially, this configuration is defined in terms of syntactic structure and c-command, so the SOCIC Generalization falls out as expected under these accounts.[4] And as with the accounts above, it is possible to take the case assignment configuration as input for the computation of ϕ-agreement as sketched by Bobaljik (2008).

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[3]See Weisser (2017) for a more elaborate discussion of the implementation of the SOCIC generalization.

[4]Note that since the number of arguments in *Dependent Case* approaches plays a crucial role in the assignment algorithm, so some additional assumptions are necessary to accomodate conjunction of arguments in these theories.

4. Conclusion

The main goal of this short paper was to provide the empirical foundation for the following generalization:

(31) **Symmetry of Case in Conjunction (SOCIC):**
     Case is always evenly distributed amongst the conjuncts in nominal conjunction.

I have argued that all apparent counterexamples are either due a misanalysis of the underlying syntactic structure (in the case of &P-clitics) or due to the application of morphophonological processes (allomorphy or ellipsis). Once we take these processes out of the equation, the SOCIC generalization holds.

   I have argued further that this finding is most naturally explained by assuming that case assignment is a purely syntactic process whereas ϕ-agreement can be syntactic or postsyntactic. This casts doubt on theories which view ϕ-agreement as a more basic operation on which case assignment can be parasitic. And it suggests that case assignment can factor into ϕ-agreement but not vice versa.

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