

Parameterising Case: other evidence from Bantu

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Summary of the talk:

- Diercks (2012) claims that Case is parameterised and Bantu languages do not have [uCase]
- He has four arguments:
 1. no morphological case marking
 2. agreement with preverbal element in subject inversion, not with ‘nominative’
 3. NPs in Caseless positions, i.e. in non-finite clauses
 4. NPs in multiple Case positions, i.e. “hyperagreement”
- I show that arguments 2 and 3 work differently for some Bantu languages, arguing that these languages are compatible with the presence of [uCase].
- This “handout” is basically a draft of the paper: comments welcome!

1. Introduction

Case Theory is perhaps one of the most fundamental components of the Principles and Parameters framework, stating that every overt NP must have (abstract) Case. This is supposedly true for all languages, irrespective of whether a language shows morphological case marking on nouns or not. However, in the absence of morphological and syntactic effects of Case, do we need to postulate the existence of abstract Case?

The Bantu languages, spoken in sub-saharan Africa, form an interesting test field for this research question. Although they show a rich morphology, including prefixes indicating noun classes (aba- in (1) for class 2) and agreement on the verb (ba- for class 2), Bantu languages do not show any case morphology with a function comparable to the case systems we know from Latin, German, or Turkish. However, they *could* still have abstract Case, and, according to Case theory, they have Case.

Lusoga

- (1) a. Aba-saadha ba-gula ama-tooke.
2-men 2SM-buy 6-bananas
‘The men buy bananas.’
- b. Ba-gula ama-tooke.
2SM-buy 6-bananas
‘They buy bananas.’

In his paper ‘Parameterizing Case: evidence from Bantu’, Diercks (2012) shows that such a uniformly applying theory of abstract Case is not supported by data from Bantu languages. The idea that Case does not play a large role in the syntax of Bantu languages has been around implicitly for a great number of years, coming up in Perez’s [Harford] (1985) claim that Case is inoperative in Bantu languages. Diercks (2012) revives this analysis and makes the statement explicit in Minimalist terms. Case Theory specifies that every argument noun phrase has an uninterpretable Case feature (uCase) that must be checked in the derivation. The grammaticality of sentences is hence in part dependent on the positions in which NPs can check their Case. That is, if there is such a thing as Case. Diercks (2012) proposes that Case is subject to parameterisation: some languages do have Case, and others do not. Specifically, he

argues that “Bantu languages do not have uninterpretable Case features in their feature inventories” (p.254).

In a footnote, Diercks mentions that “such macroparametric claims must be tempered by allowing individual language differences” (p.254). As is to be expected in a language subfamily that covers around 500 languages (Nurse and Philippson 2003:2), there are indeed counterexamples. This paper examines Diercks’ claim, concluding that –although Case may be parameterised– microvariation within the Bantu language family shows that the parameter cannot be set for the whole language family. This raises interesting comparative and typological issues, such as how Case, Agree and movement/EPP are related.

Section 2 first explains Diercks’ claims and then discusses two arguments in favour of the absence of Case in Bantu languages: morphological marking and agreement in subject inversion. Section 3 shows that languages with Agreeing Inversion do not behave as Diercks predicts –that is, they are compatible with having nominative Case that is associated with subject agreement. Section 4 considers two more predictions made by Diercks and again shows that there are languages for which the predictions do not hold: NPs occurring in non-Case positions and NPs occurring in multiple Case positions. The conclusion raises more questions about macroparameters and parameterisation.

2. No Case in Bantu –arguments 1 and 2

2.1. Diercks’ claim

In Minimalism, the assignment of Case is reduced to an Agree relation, where NPs enter the derivation with an uninterpretable Case feature [uCase] that needs to be checked in the course of the derivation. If Case is a feature like any other grammatical feature, Diercks reasons, languages can vary in whether they have this feature, just like languages can select other features (like mood or evidentiality). Logically, this leads to the parameterisation of Case, where some languages do and some do not select [uCase] in their inventories. Diercks proposes the following macroparameter, holding for a language as a whole:

- (2) Case Parameter:
Uninterpretable Case features are/are not present in a language

For Bantu languages, the proposed setting is ‘no’.

- (3) Case Parameter setting for Bantu:
Uninterpretable Case features are not present

2.2. No morphological case

The first argument against the presence of abstract Case in Bantu is the fact that Bantu languages “display no morphological case –that is, noun phrases appear in the same form whether they are a subject, a primary object, a secondary object, or an oblique” (Diercks 2012:355). Even if there may not crosslinguistically be a one-to-one mapping between abstract Case and morphological case marking, there must be some relation (cf. Legate 2008), and with that premise the absence of morphological case marking supports the proposed parameter setting in (3).

For discussion of locative classes as gender rather than case, see Bresnan (1991). For discussion of tone cases in Western Bantu languages and why they are altogether different from traditional notions of case, see Schadeberg (1986), Blanchon (1998, 1999), and Kavari, Marten and Van der Wal (2012).

2.3. Dissociation of Case and Agree (argument 2)

If case is not marked on the noun (the dependent) it may be marked on the verb (the head -cf. Nichols 1992). The obligatory subject marking on the verb in Bantu languages is thus a good candidate to correlate with licensing case. If this is so, we would expect the subject marker to always agree with the logical subject, whether in canonical SVO sentences or in other word orders. This can be illustrated for English: in an expletive construction like (4b), the verb agrees with the postverbal nominative plural subject, and equally in the locative inversion construction in (4c).

- (4) a. The ghosts appear in the graveyard.
b. There are ghosts in the graveyard.
c. Into the graveyard floats a ghost.

In a language without Case, we would not expect there to be a similarly strict relation between agreement and the subject. Indeed, it is wellknown that subject agreement is more flexible in Bantu languages. Agreement on the verb is expressed on a prefix, referred to here as the subject marker. In a canonical SVO sentence, this subject marker agrees in class with the preverbal subject, but in subject inversion constructions we find different agreement patterns. For example, in Default Agreement Inversion, the subject marker on the verb can be in a default class: class 17 in (5) and not class 2 of the postverbal subject. In Locative Inversion it agrees with the preverbal locative NP, as in (6b,c).

Tswana (Creissels 2011, adapted)

- (5) a. Basadi ba-opela mo-kereke-ng.
2.women 2SM-sing 18-9.church-LOC
'The women are singing in the church.'
- c. Mokereke-ng go-opela basadi.
18-9.church-LOC 17SM-sing 2.women
'in the church there are women singing'
- d. Go-opela basadi.
17SM-sing 2.women
'There are women singing.'

Chichewa (Bresnan&Kanerva 1989)

- (6) a. A-lendô-wo a-na-bwérá ku-mudzi.
2-visitor-2.DEM 2SM-RECPST-come 17-3.village
'Those visitors came to the village.'
- b. Ku-mu-dzi ku-na-bwérá a-lendô-wo.
17-3-village 17SM-PST-come 2-visitor-2.DEM
'To the village came those visitors.'
- c. Pa-m-chenga p-a-ima nkhandwe.
16-3-sand 16SM-PERF-stand 9.fox
'On the sand is standing the fox.'

So if not Case, what determines the agreement on the verb? The default agreement and Locative Inversion are part of a more general pattern where the subject marker agrees with

what ends up in the preverbal position, whether a patient (7), an instrument (8) or a wh-word (9).

Rundi (Ndayiragije 1999)

- (7) Ibitabo bi-á-som-ye Yohani.
8.books 8SM-PST-read-PERF 1.John
'JOHN read the books.'

Zulu (Zeller 2012)

- (8) a. U-John u-dla nge-sipunu.
1a-1a.John 1ASM-eat with-7.spoon
'John is eating with the spoon.'
- b. I-sipunu si-dla u-John.
7-7.spoon 7SM-eat 1a-1a.John
'John is using the spoon to eat.' (Lit. 'The spoon is eating John.')

Kilega (Carstens 2005: 220)

- (9) a. Bábo bíkulu b-á-kás-ílé mwámí bikí mu-mwílo?
2.DEM 2.women 2SM-T-give-PERF 1.chief 8.what 18-3.village
'What did those women give the chief in the village?'
- b. Bikí bi-á-kás-ílé bábo bíkulu mwámí mu-mwílo?
8.what 8SM-T-give-PERF 2.DEM 2.women 1.chief 18-3.village
'What did those women give the chief in the village?'

The intuition for these constructions is that agreement is independent of Case, but related to what ends up in preverbal position. Two similar proposals have been around to account for these patterns in agreement.

The first suggests that the head responsible for subject agreement not only has uninterpretable ϕ features which probe for any suitable goal, but it also has a movement trigger (EPP feature) which is responsible for moving the agreed-with goal to the specifier of that head. This is proposed by Collins (2004: 116) as the 'Agreement Parameter'.

(10) Agreement Parameter:

Let Agree (X, YP), where X contains the probe (uninterpretable phi-features) and YP contains the goal, then X has an EPP feature that is satisfied by YP.

Carstens (2005) phrases a very similar analysis in slightly different terms and proposes the Feature-linking Parameter, which links Agree to either EPP or Case.

(11) Feature-linking Parameter:

$u\phi$ has EPP as a subfeature in Bantu (and Case in Indo-European languages)

A second implementation of the idea is put forward by Baker (2008). He proposes an analysis in which languages are parameterised as to whether agreement is 'downward' (with a c-commanded element) or 'upward' (with an element c-commanding the agreeing head). The initial movement is triggered independently. A second parameter links agreement to Case. Bantu languages are set 'yes/no', which means agreement is 'upward' and independent of Case.

- (12) The Direction of Agreement Parameter:
F agrees with DP/NP only if DP/NP asymmetrically c-commands F.
- (13) The Case-Dependency of Agreement Parameter:
F agrees with DP/NP only if F values the Case feature of DP/NP or vice versa.

These proposals all derive the patterns illustrated above, where agreement is determined by the element that ends up in the linearly preverbal and structurally higher position, be that because of an EPP feature associated with Agree or because of independent motivation for movement.

These analyses correctly account for the consistent agreement with the preverbal element, but get into trouble when assuming a universal Case Filter: if every overt NP should be Case-licensed, how does the postverbal logical subject get its Case (e.g. uJohn in (8b))? Assuming that subject agreement indicates (nominative) Case checking, and noting that the logical subject in subject inversion constructions is not agreed with, it must be left with an uninterpretable [uCase] feature, which should cause the derivation to crash. As the inverted subject does not behave like an object (Bresnan and Kanerva 1989, Morimoto 2006, Salzmann 2011), e.g. it cannot be object-marked on the verb, we cannot assume a full reversal of grammatical functions.

Various proposals have been made for the Case checking of the postverbal logical subject which are discussed by Diercks (2012), and which I will only briefly touch upon here. Carstens (2005) suggests an analysis in which T agrees twice: the first time overtly with the element that it moves for EPP reasons (e.g., the locative in LI), and second time covertly with inverted subject to check its Case. Baker (2003) proposes that NPs without the so-called augment do not need Case checking, thus making an exception which predicts different behaviour dependent on morphology, and which seems to hold for Kinande.¹ Another alternative is given in Belletti (1988), where the inverted subject is assigned partitive case. Diercks (2012), on the other hand, comes up with what is in some way the easiest solution: there is no Case, so can stay in situ and there is no need for it to “be licensed”.

So far, we have seen arguments and data from various Bantu languages that support Diercks’ (2012) claim that Bantu does not have [uCase] features. Before presenting further arguments in favour of this claim, in the next section I present data on subject inversion that do not match the predictions made by this claim, although it does not invalidate the larger proposal that Case is parameterised.

3. All of Bantu?

Under these analyses, we would not expect the subject marker to agree with a postverbal element. Nevertheless, this is what we find in various Bantu languages –a finding that should actually not surprise us, considering the size of the Bantu language family. There is another quite wide-spread inversion construction, which I call Agreeing Inversion. This construction is encountered or strongly suspected to exist in Ngoni, Dciriku, Ndengereko, Mwera, Ngindo, Matengo, Matuumbi, Makwe, Makonde, Makhuwa, Koti and Shangaci.² In this paper, I mostly illustrate for Makhuwa and Matengo, as these are the languages I have the clearest data for. Unlike in the other subject inversion constructions, in Agreeing Inversion the subject marker is determined by the subject despite its postverbal position.

¹ Note that this is the exact opposite of what Halpert (2012) proposes for Case checking in Zulu.

² Leaving aside for the moment languages that have Agreeing Inversion in addition to other subject inversion constructions (cf. Marten and Van der Wal 2013).

Makwe (Devos 2004:316)

(14) Yaámbi | aida nyóóka |
now 1SM.come.PRI 1.snake
'And then a snake came.'

(15) Unkupúúna | upéépo |
11SM.PROG.blow 11.wind
'The wind is blowing.'

These languages do not have locative inversion like the Bantu languages described by Baker, Carstens and Diercks; the subject marker does not agree with the preverbal locative, but must seek agreement with the postverbal subject.³

Makhuwa⁴

- (16) a. Aléttó a-náá-phíyá wakisírwa.
2.guests 2SM-PRES.DJ-arrive 16.island
'The guests arrive on the island.'
- b. Wakisírwá a-náá-phíyá alétto.
16.island 2SM-PRES.DJ-arrive 2.guests
'On the island arrive guests.'
- c. *Wakisírwá wa-náá-phíyá alétto.
16.island 16SM-PRES.DJ-arrive 2.guests
int. 'On the island arrive guests.'

Matengo (Yoneda 2011:770)

- (17) a. Máhimba ga-a-tam-iti mu-kítengu.
6.lions 6SM-PAST-live-PF 18-7.forest
'Lions lived in the forest.'
- b. *Mu-kítengu mu-a-tam-iti máhimba.
18-7.forest 18SM-PAST-live-PF 6.lions
Intended: 'In the forest lions lived.'
- c. Mu-kítengu ga-a-tam-iti máhimba.
18-7.forest 6SM-PAST-live-PF 6.lions
'In the forest lions lived.'

Similarly, impersonal (passive and active) constructions do not have default agreement, but the subject marker still agrees with the subject.

³ Note that this is independent of the ability of locative DPs to trigger agreement, as shown in i for Makhuwa.

i. Mpááni mú n-núú-nanar-átsa.
18.inside 18.DEM.I 18-PERF.PERS-mess.up-PLUR
'Inside here (it) is all messy.'

⁴ The Makhuwa data were collected during fieldwork on Ilha de Moçambique in the north of Mozambique in 2005, 2006 and 2008 as part of the NWO project 'Word order and morphological marking in Bantu'. Makhuwa is P31 in Guthrie's (1948) classification of the Bantu languages.

Makhuwa

- (18) Wa-phony-aly-ááwé owaání, tsi-nú-mwíyy-íyá éthú tsootéene.
 16-arrive-PERF.REL-POSS.1 home 10SM-PERF.PERS-steal-PASS 10.things 10-all
 ‘When she arrived home, everything was stolen.’

And likewise, there is no default agreement for weather verbs, but agreement with the subject.

Matengo (Yoneda, p.c.)

- (19) Ki-bi kipepu. (20) Ji-kunik-a ihjula.
 7SM-be.PERF(CJ) 7.coldness 9SM-rain-(CJ) 9.rain
 ‘It is cold; Coldness exists.’ ‘It is raining; Rain rains.’

In Makhuwa we do find a sort of alternative subject marker *o-* for some weather verbs (21), and in cases when there is no subject, as in the impersonal passive of an unaccusative verb (23). It is difficult to establish in what class the agreement is, because *o-* is the subject prefix for classes 1,3,14,15, and 17; hence the question mark in the gloss. Nevertheless, I think it is telling that this default agreement only shows up in cases where there is no clear subject to determine the agreement, and when that subject hence does not need to check its Case.

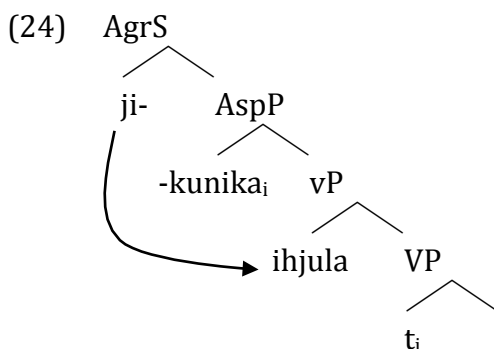
Makhuwa

- (21) oviha ‘to be hot’ a. o-náá-víha ‘it is hot’
 oriirya ‘to be cold’ b. o-náá-rírya ‘it is cold’

- (22) DJ E-náá-rúpá epúla!
 9SM-PRES.DJ-rain 9.rain
 ‘It is raining!’

- (23) o-nuu-khw-iyá
 ?-PERF.PERS-die-PASS
 ‘there has been/occurred a death’

We can conclude that subject agreement in these languages with Agreeing Inversion is, first, not random; and second, not linked to an element ending up in preverbal position. So what determines agreement in these languages? If subject agreement is neither tied to Direction nor to Case, Baker’s (2008) parameters in (12) and (13) are effectively set ‘no, no’. Baker (2008:170) notes that “Agreement in [no-no] languages is not random and unconstrained. The easiest answer would be to say that T simply probes downward in the pre-movement structure, agreeing with the first NP it finds – the thematic subject in spec, vP- regardless of how it gets case or whether it moves.” The tree in (24) illustrates this for the Matengo example (20).



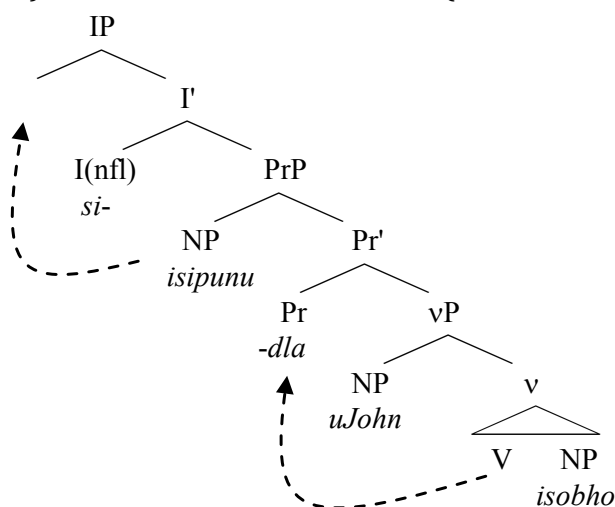
Whether this is indeed what happens depends in part on what analysis we adopt for Locative Inversion and for preverbal adverbs in general. A long-standing debate for Locative Inversion is how the locative DP can be raised over the subject, as the subject is higher in the structure than the locative and therefore closer to the probing head (T, or AgrS) that spells out as the subject marker. Hence, agreeing with and raising the locative while leaving the subject in-situ violates the Minimal Link Condition (Chomsky 1995, 2000, cf. Rizzi's 1990 Relativized Minimality). There are two ways around this problem.

The first is that the probe and goal (T and locative) are more specified, for example having an additional [topic] feature, and a full match between the two is required. That is, it is not enough for a goal to partially check the features of the probe, for example only match in number but not gender. If our probe T is specified not just for $u\phi$, but also for topicality, then only a goal that would have a [topic] feature would fully match the probe's specifications. All inversion constructions in Bantu have the function of highlighting the subject, either because it is newly presented (as inthetic sentences) or because it is focused (as in answers to questions and contrastive contexts). This entails that the subject in an inversion construction will never be specified as [topic] and hence that it is not a fully matching suitable goal, which allows the probe T to continue its search and agree with the lower locative if this is specified as [topic].

In this approach, the variation between languages with Locative Inversion and Agreeing Inversion would be whether the probe T is specified for [topic] or not. If it is, we find agreement with whichever element is topical (as in the languages Diercks describes); if it is not, T will agree with the first downward goal, which is the subject (as in the languages with Agreeing Inversion).

The second approach to circumvent the locality problem in Locative Inversion proposes that the locative is in fact in a higher position than the subject when T probes. This could be because the locative has moved to the escape hatch of the vP phase,⁵ or because it was generated in a projection higher than vP (e.g. Zeller 2012 & to appear, proposes PrP as the position where the inverted element originates in Instrument Inversion and (semantic) Locative Inversion). Hence, no extra features need to be postulated for the derivation of Locative Inversion, as the closest goal will be the locative and not the subject.

(25) Zulu instrument inversion (Zeller 2012:144)



⁵ Notice that assuming equidistance of the locative and the subject in specvP only postpones the problem and some other feature is still needed to either identify the locative in LI or identify the subject in AI.

This automatically results in the opposite picture of that in the first approach, because Agreeing Inversion is now no longer obvious to derive. This is because the locative (or instrumental, or...) can presumably intervene between AgrS and the logical subject in these languages as well, so an unrestricted downward probe will encounter the locative rather than the subject as its closest goal in a sentence like (17c), here repeated as (26), and we predict the subject marker to agree with the locative, rather than with the lower subject.

- (26) Mu-kítengu ga-a-tam-iti máhimba.
 18-7.forest 6SM-PAST-live-PF 6.lions
 'In the forest lions lived.'

As this is clearly not the case, there must be something else that uniquely identifies the logical subject as the only viable goal for subject agreement. A quite natural candidate for that unique identifier is nominative Case. Only the subject would have nominative Case and would hence be the only fully matching goals for the Case-specified probe T. To conclude, Case is quite a natural feature to account for the agreement pattern in languages with Agreeing Inversion. This would set Baker's (2008) Case Dependency Parameter to 'yes' for these Bantu languages.

4. Case positions –arguments 3 and 4

Diercks (2012) advances two further arguments for the absence of Case in Bantu languages. If a language does not have [uCase] features, he remarks, we make two predictions for the distribution of overt NPs: A. We expect NPs to be grammatical in non-Case-marking positions (argument 3), B. We expect NPs to appear in more than one Case-marking position (argument 4). These are discussed in turn, first illustrating Diercks' arguments and then testing in the languages with Agreeing Inversion.

4.1. NPs as subjects of non-finite complements

If Case checking is associated with a finite T head, according to Case Theory overt NPs should not be allowed in non-finite clauses. This is a well-known fact in languages that have (abstract) Case, as Diercks (2012) illustrates for English: the non-finite T in the infinitive clause cannot license the subject, which hence needs a Case-checking complementizer 'for', as in (27).

(Diercks 2012: 257,258)

- (27) a. It is possible *(for) Michael to call Tegan. [INF]
 b. *(For) Michael to call Tegan would be a good thing. [INF]

Similarly, the restrictions on raising have been explained in terms of Case: the subject of a non-finite clause should raise to check its Case (28b,c), whereas the subject of a finite clause need not, and in fact cannot raise (28d).

- (28) a. It seems that John is happy [FIN]
 b. *It seems John to be happy [INF]
 c. John seems to be happy [INF]
 d. *John seems that is happy [FIN]

If Case does not play a role in the syntax of a language, Diercks argues, we should find overt NPs as subjects of non-finite sentences, a prediction that holds true for the languages he looks at. Like in English, the subject of a finite complement clause can be overt, as in (29a). Unlike English, however, the subject is also allowed to appear in a non-finite clause as in (29b), without a Case licenser like a preposition.

Digo (Diercks 2012:260, referring to Steve Nicolle)

- (29) a. I-na-wezekana kukala Mike a-nda-muiha Tegan.
 9SM-PRES-possible that 1.Mike 1SM-FUT-call 1.Tegan
 'It is possible that Mike will call Tegan.'
- b. I-na-wezekana Mike ku-muiha Tegan.
 9SM-PRES-possible 1.Mike INF-call 1.Tegan
 'It is possible (for) Mike to call Tegan.'
- c. Chahi i-na-wezekana mutu ku-olagb-w-a kpwa sababu ya
 maybe 9SM-PRES-possible 1.person INF-kill-PASS for reason of
 mutu mnono sana.
 1.person 1.good very
 'Maybe it is possible [for] a person to be killed because of a very good person.'

For Makhuwa, subject raising predicates are difficult to find, or perhaps simply absent. However, other *preliminary* data from Makhuwa show that subjects of infinitival clauses need to be object-marked in the matrix clause, suggesting the necessity of exceptional case marking.⁶ These data also show that the optative (or subjunctive) tense does license NPs, suggesting subjunctive T is finite and does assign Case to its subject. They also suggest that object marking in Makhuwa assigns Case, which would mean that the Case parameter is a macroparameter holding for all relevant heads in this language.

Makhuwa

- (30) a. Ntsáná Alí aahí-ń-tthun-íhá Peétúró osómá eliívúru tsáwe.
 yesterday Ali 1SM.PAST.PERF.DJ-1OM-want-CAUS 1.Pedro 15.read 10.books 10-POSS.1
 'yesterday Ali allowed Pedro to read his books.'
- b. *Ntsáná Alí aahí-ń-tthun-íhá Peétúró a-som-é eliívúru.
 yesterday Ali 1SM.PAST.PERF.DJ-1OM-want-CAUS 1.Pedro 1SM-read-OPT 10.books
 'yesterday Ali allowed Pedro that he read books.'
- (31) a. *Ki-m-pheela namarokolo okhuma. -OM INF
 1SG.SM-PRES.CJ-want 1.Hare 15.exit
 'I want Hare to leave.'
- b. Mwi-ni-m-pheela namarokolo okhuma? +OM INF
 2PL.SM-PRES.CJ-1OM-want 1.Hare 15.exit
 'Do you want Hare to leave?'
- c. Mwi-m-phéélá namárókolo a-khum-é? -OM OPT
 2PL.SM-PRES.CJ-want 1.Hare 1SM-exit-OPT
 lit. 'Do you want (for) Hare that he leave?'
- d. *Mwi-ni-ń-phéélá namárókolo a-khum-é? +OM OPT
 2PL.SM-PRES.CJ-1OM-want 1.Hare 1SM-exit-OPT

⁶ Especially the tone marking on (31) a. and b. is still to be checked and hence the examples lack tone marking. Examples (30) and (31) in general need confirmation from other speakers.

In Matengo, I have not been able to find any raising-to-subject predicates, and straightforward passive constructions of raising-to-object verbs cannot be made either (as in ‘John is believed to have eaten fish’). However, an NP subject in an infinitive complement of a raising-to-object predicate is ungrammatical.

Matengo

- (32) a. *M-bala imbui kula manyaae.
 1SG.SM-want 9.goat 15.eat 6.grass
 int. ‘I want (the) goat to eat grass.’
- b. M-bala ímbui kúula.
 1SG.SM-want 9.goat 15.eat
 ‘I want to eat goat’ / ‘I want goat to eat’
 * ‘I want the goat to eat.’

Instead, a subjunctive verb must be used in the lower clause, which does have an agreeing subject marker and is presumably finite.

Matengo

- (33) a. Mbala imbúí ji-kulâ mány'ááé.
 1SG.SM-want 9.goat 9SM-eat 6.grass
 ‘I want (the) goat to eat grass.’
- b. Mbala imbúí ji-kuláaje.
 1SG.SM-want 9.goat 9SM-eat
 ‘I want (the) goat to eat.’

Unlike in Makhuwa, however, this cannot be “fixed” by object marking on the higher verb, even if OM is possible in general.⁷ This suggests that for Matengo, the subject marker is related to Case (i.e. T checks nominative), but the object marker is not (i.e. v/AgrO does not check accusative).

Matengo

- (34) a. *Ni-ji-pala imbui kula manyaae.
 1SG.SM-9OM-want 9.goat 15.eat 6.grass
 int. ‘I want (the) goat to eat.’
- b. Ni-jí-pala imbúí j-aka-kúla mány'ááé.
 1SG.SM-9OM-want 9.goat 9SM-NFUT-eat 6.grass
 ‘I want the goat to eat grass.’

Instead, a finite (presumably subjunctive) verb must be used in the lower clause.

Matengo

- (35) a. Mbala imbúí ji-kulâ mány'ááé.
 1SG.SM-want 9.goat 9SM-eat 6.grass
 ‘I want (the) goat to eat grass.’

⁷ The difference seems to be in specificity/definiteness: with OM you select a specific goat, or there is only one goat.

- b. Mbala imbúí ji-kuláaje.
 1SG.SM-want 9.goat 9SM-eat
 'I want (the) goat to eat.'

4.2. NPs in non-finite sentential subjects

Another environment in which we find non-finite clauses is when they function as the subject of a sentence. In (36), the clause 'to win the game' is non-finite and should hence not check the Case of the subject within that clause, 'Sammy'. This can be seen in the English translation, where the preposition 'for' is needed to license the subject NP. The fact that such a prepositional licenser is not needed in Lubukusu is an argument to say that the subject NP does not need to be case-licensed and hence to argue for the absence of Case.

Lubukusu (Diercks 2012:261)

- (36) Sammy khu-khila ku-mw-inyawe o-kwo khu-la-sanga-sya mawe.
 1Sammy INF-win 3-3-game DEM-3 15SM- FUT-please-CAUS mother
 'For Sammy to win the game will please his mother.'

The same construction is not possible in Matengo: although an infinitive can be the subject, an overt NP belonging to that infinitive is not licensed. The sentence is either interpreted with the NP as a vocative (38a), or repaired by inserting a preposition (38b).

Matengo

- (37) a. Kúula sáape.
 15.eat good
 'To eat is good.'
- b. *Áídan kúula sáape.
 Aidan 15.eat good
 int. 'For Aidan to eat is good.'
- (38) a. Áídani, kúula sáape.
 Aidan 15.eat good
 'Aidan, eating is good!'
- b. (Ni-holalé) kwaka Áídan kúula sáape.
 (1sg.sm-think) for Aidan 15.eat good
 '(I think that) For Aidan to eat is good'

I do not yet have concluding evidence for Makhuwa infinitival subject clauses. Related evidence shows that Makhuwa has another strategy, where the infinitive behaves like a noun⁸ and its subject appears with a possessive (39a), that is, it can be said to have genitive case. Alternatively, the subject can appear with the connective (39b), which functions like a preposition ('of').

- (39) a. O-cáwá w-áwé Folóra o-kí-tsívéla.
 15-run 15-POSS.1 1.Flora ?-1SG-please
 'Flora's (way of) running I like.'

⁸ This is a general fact about infinitives in Bantu languages, which formally belong to noun class 15 and can hence be seen as true nouns.

- b. O-cáwá w-a Folóra ti w-oóréera.
 15-run 15-CONN 1.Flora COP 15-good
 'Flora's running is good.'
- (40) a. O-téká w-aw' enúpa Zainále ti w-oóréera.
 15-build 15-POSS.1 9.house 1.Zainal COP 15-good
 'Zainal's (way of) building a house is good.'
- b. O-ték-íya w-áyá enúpa y-a Zainále ti w-oóréera.
 15-build-PASS 15-POSS.2 9.house 9-CONN 1.Zainal COP 15-good
 '[The house of Zainal]'s being built is good.'

4.3. NPs in passives

Although Diercks (2012) does not discuss passives, there is a prediction to be made here as well. In a language without Case, we expect NPs to appear without explicit Case licensors, such as prepositions. This seems to hold for the presence/absence of 'for' in the examples above, but not for the agent NP in a passive sentence. This is indeed the case in Luganda, as the agent can appear overtly without any extra marking.

Luganda (Pak 2008:361)

- (41) a. Abaana ba-a-sanga ekitabo.
 2.children SM2-PST-find 7.book
 'The children found the book.'
- b. Ekitabo ky-a-sang-ibwa abaana.
 7.book SM7-PST-find-PASS 2.children
 'The book was found by the children.'

One could even say that canonical passives are not expected to appear at all in a language without Case,⁹ but rather a sort of topicalisation structure without demotion of the subject (cf. Bostoen and Mundeke 2012, Makasso and Hamlaoui 2013). This is what we find in Matengo, which does not have a morphological passive. Instead, a subject inversion construction is used (42a), or a 3rd plural functional passive (42b).

Matengo

- (42) a. Ju-lap-ui Jóoni.
 1SM-hit-PERF 1.John
 'John hit (her).' / 'she was hit by John.'
 Swahili translation 'Amepigwa na John.'
- b. A-télik-i cháai.
 2PL.SM-cook-PERF 7.tea
 'Tea was made.' lit. 'They cooked tea.'

So far, the other evidence for Matengo shows that it does not behave as we would expect a caseless language to do, so the absence of a proper passive may seem unexpected under the assumption that passives are related to Case. The other pattern is also encountered: languages that confirm to Diercks' predictions for caselessness, but nevertheless have a passive with a by-phrase. In fact, many Bantu languages only allows an overt agent with a

⁹ Thanks to Michelle Sheehan for this thought.

passive if it is expressed in a PP equivalent to the English ‘by’-phrase. This can be seen in Diercks’ “caseless” language Lubukusu (43), as well as the languages brought to the fore in the present paper (44).

Lubukusu (Diercks 2010:296)

- (43) Ba-sasi ba-bol-el-wa nende Sammy mbo
 2-parents 2SM-say-APPL-PASS by 1.Sammy that
 ba-keni ba-a-rekukha.
 2-guests 2SM-PAST-leave
 ‘The parents were told by Sammy that the guests left.’

Makhuwa

- (44) íi, koo-vár-íya ni khwátte!
 ii 1SG.SM.PERF.DJ-grab-PASS by 1.fox
 ‘Ii, I am caught by the fox!’

This shows us that there is only a monodirectional implication: if agents of passives can be expressed without a preposition, this forms an argument to say the language does not have Case, but if a language does use prepositions, something else may be at hand. In particular, this observation may point to the difference between canonical passives and the (morphological) passive in Bantu languages: the Bantu passive appears to be a purely derivational valency-changing construction which effectively removes the agent-phrase altogether (“radical demotion”). If this is true, then the occurrence of a by-phrase can be claimed to have a different function altogether: it introduces another theta-role, rather than licensing Case.

An indication that prepositions play a role in the licensing of arguments is their use with instrumentals, and the possibility to drop the preposition when the verb is applicative (thereby promoting the instrumental to become an argument of the verb). In (45a) the instrument is not part of the valency of the verb and it needs to be introduced by the preposition *ni*, whereas in (45b) the applied verb selects another argument and the instrument does not need a preposition.

Makhuwa (Van der Wal 2009:72,73)

- (45) a. Amíná o-n-rúw’ eshimá *(ni) nkhóri.
 1.Amina 1SM-PRES.CJ-stir 9.shima with 3.spoon
 ‘Amina prepares shima with a spoon.’
 b. Amíná o-n-rúw-él’ eshimá nkhóri.
 1.Amina 1SM-PRES.CJ-stir-APPL 9.shima 3.spoon
 ‘Amina prepares shima with a spoon.’

- (46) Enúp’ éélá yoo-ték-él-íyá ekaáli
 9.house 9.DEM.I 9SM.PERF.DJ-build-APPL-PASS 9.lime
 ‘this house is built with lime’

4.4. NPs in multiple agreement

Diercks’ (2012) fourth argument is that caseless languages should allow NPs in more than one Case position. This is because of the presumed activity that is associated with [uCase]. In the probe-goal agreement system, an uninterpretable feature makes a goal active, and the goal is required to be ‘active’ to be visible for the probe. This is known as the Activity Requirement. The relevant feature that makes an NP active and hence renders it suitable as goal for

agreement and movement, is assumed to be Case, at least for Indo-European languages (Chomsky 2001).

- (47) The Activity Requirement: each participant in an Agree relation must have an unchecked uninterpretable feature.

Under standard assumptions, an uninterpretable feature is deactivated as soon as it is valued (by Agree). This entails that if a language has Case, and if an NP agrees, its Case feature is checked and the NP rendered inactive. This in turn means that NPs with checked Case are not available for further movement and agreement. Moreover, they cannot move through/to multiple Case positions, which supposedly explains the grammaticality of the raising construction in (48): the NP 'John' is licensed in the finite lower clause (a) and can therefore not raise to be the subject of the higher clause (b).

- (48) a. It seems [that John is happy].
 b. *John_i seems [that t_i is happy].

This is not the pattern found in some Bantu languages, Diercks (2012) shows, where NPs can be agreed with several times. Thus, NPs agree with multiple verbs in complex tenses (auxiliary & main verb), as in (49) and (50), and in 'hyperraising' constructions illustrated in (51) and (52).

Swahili (Carstens 2011:722)

- (49) Juma *a-li-kuwa* *a-me-pika* *chakula*.
 Juma 1SM-PAST-be 1SM-PERF-cook 7.food
 'Juma had cooked food.'

Kilega (Carstens 2011:722)

- (50) Nzogu *zí-kili* *z-á-twaga* *maswá*.
 10.elephant 10SM-be.still 10SM-ASP-stampede 6.farm
 'The elephants are still stampeding over the farms.'

Lusaamia (Carstens and Diercks to appear)

- (51) Efula *yi-bonekhana* *i-na-kwa* *muchiri*.
 9.rain 9SM-appear 9SM-FUT-fall tomorrow
 'It seems that it will rain tomorrow'

Lubukusu (Carstens and Diercks to appear)

- (52) Chisaang'i *chi-lolekhana* *chi-kona*.
 10animal 10SM-seem 10SM-sleep.PRES
 'The animals seem to be sleeping.'

Apparently, after the first operation of Agree on the lower verb, which should check uCase, the NPs in these constructions are still eligible for further operations. This argues against the role of Case as an activity feature. If the Activity Condition holds, there must be some other uninterpretable unchecked feature that makes NPs active in these languages.¹⁰ Carstens (2005, 2011) proposes that Gender is the relevant activity feature in Bantu, arguing that it functions as an uninterpretable but valued but activity feature on the subject, allowing it to

¹⁰ Alternatively we could argue that the Activity Condition is somehow irrelevant, for Bantu or in general (see Nevins 2004, Bošković 2007). I will leave this hypothesis to one side.

enter into more than one Agree relation.¹¹ This suggestion is implemented by Diercks (2012) and Carstens and Diercks (to appear) claiming that it is not just that Case does not play a role (but is present, as Carstens 2005 still assumes), but that it is effectively absent in these languages. I refer the reader to the mentioned works for a full explanation of how Gender can be an activity feature, and will here only concentrate on its effects for the parameterisation of Case.

Surprisingly, this seems to work no different in the languages with Agreeing Inversion, where we also find complex tenses. This might seem unexpected, because if these languages have Case, the [uCase] feature on the DP would be deactivated in the first instance of agreement and could hence not be a goal for further agreement.

Makhuwa

- (53) Vánóki-hááná ki-thel-áka.
 now 1SG.SM-have 1SG-marry-DUR
 'Now I have to marry.'

Makwe (Devos 2004:283)

- (54) Nguúwo ji-w-elé ji-ni-nyáúuka.
 10a.clothes 10SM.be. PAST.PERF 10SM.PRES.PERF.be:dirty
 'The clothes were dirty.'

Matengo (Yoneda 2000:200)

- (55) Tw-a-ba tu-gon-ile.
 1PL.SM-PST-be 1PL.SM-sleep-PERF
 'We were sleeping, (when he arrived).'

However, just as for the Swahili hyperactivity, multiple agreement could also in these languages be accounted for by [Gender] as the activity feature. This does not form a clear argument against the presence of Case: after all, nothing restricts a language from having uninterpretable valued [Gender] as well as uninterpretable [Case], even if this is somewhat uneconomical from a theoretical perspective.

Before resorting to such doubling of activity features, we need to have a close look at the actual instances of complex tenses in order to see whether the verbs involved are all potential Case checkers and the NP was really in multiple Case positions. Specifically, I suspect that the Makhuwa complex tenses may not be the same as the ones Carstens discusses, because the second verb in a complex tense is very often an infinitive or a durative situative verb form. Infinitives do not have an agreeing subject marker, are by definition not finite and as such unable to value and deactivate the Case on the subject. This is illustrated for the 'not yet' auxiliary *-tthi* and the future auxiliary *-row'* (go) in (56), which both take an infinitive complement.

Makhuwa

- (56) Ki-hi-ná-tthí omúmúlá, ki-n-r' óvara ntéko.
 1SG.SM-NEG-AUX 15.rest 1SG.SM-PRES.CJ-go 15.grab 3.work
 'Before resting (lit. having not yet rested), I will work.'

The durative situative has an agreeing subject marker, but it functions more as converb (i.e. an adverbial verb form) than an independent verb. That is, this verb form cannot occur in a

¹¹ The DP remains active as a goal precisely because it is uninterpretable but valued; that is, the Agree relation cannot value and deactivate Gender and hence the goal remains active (Carstens 2011).

main clause by itself and is comparable to a gerund, as shown in (57). If this is the case in (53) as well, this may not be true agreement, but rather a sort of concord.

Makhuwa

- (57) Aa-khálá y-uúpúwel-aká wiírá...
 2SM.PERF.DJ-stay 2SM-think-DUR.SIT COMP
 ‘They thought: “...” (lit. they stayed thinking that...)

This is reminiscent of the situation found in languages which clearly do have Case. Baker (2008:210) shows that IE languages can also have double agreement, but this “only happens when the lower verb is an adjective-like participle, which agrees with the subject in number and gender but not in person”. “Participial heads do not value the case of the NP that they agree with. Thus they do not compete with the finite T associated with the auxiliary verb in this respect, so nothing prevents that T from both assigning case to and agreeing with the NP.”

Instances of ‘be’ followed by a verbal-looking form also turn out not to be what they may seem: the tonal pattern on the second verb in (58b) shows that this actually functions as an adjective.

Makhuwa

- (58) a. Ekokhólá tsoo-vél-íya.
 10.rubbish 10SM.PERF.DJ-sweep-PASS
 ‘The rubbish was swept.’
- b. Ekokhólá ts-aá-rí ts’ oó-vél-íya.
 10.rubbish 10SM-PAST-be 10.CONN 15-sweep-PASS
 ‘The rubbish was swept.’ (lit. was of being swept)

For Makhuwa, we are left with cases like the following, which I do not fully understand, but of which I do know that they are relatively infrequent. For the other languages with Agreeing Inversion it seems that there is true multiple agreement, which points out that Case cannot be the (only) feature that makes DPs active goals.

Makhuwa

- (59) Nléló n-aa-rí ni-hi-ná-tthí ophíya.
 still 1PL-PAST-be 1PL-NEG-CE-do 15.arrive
 ‘We still haven’t arrived (yet).’
- (60) Álé aa-rááná aa-vírúw-átsa.
 2.DEM.III 2SM.PERF.DJ-bring 2SM.PERF.DJ-become.angry-PLUR
 ‘They became angry.’

In summary, in languages with Agreeing Inversion NPs are not licensed in non-Case positions, unlike the languages Diercks cites. That is, his third argument does not provide evidence for the absence of Case in all the Bantu languages. With respect to the fourth argument, it does appear to be possible for NPs to undergo multiple agreement, which could be explained in a number of ways: the Activity Requirement can be argued not to hold here, or not to exist at all; Case is relevant for licensing but not for activation; or there could be a second or alternative activity feature that does not get deactivated, such as Gender.

5. Conclusion & Further research

Even though there are good arguments to parameterise Case, as Diercks shows, it is to be expected that this does not hold as a parameter setting for a whole language family. I have shown that there are arguments to make a case for Case in Bantu languages with Agreeing Inversion. The available data for the languages with Agreeing Inversion constructions like Matengo and Makhuwa are not incompatible with an analysis in which abstract nominative Case determines the subject agreement on the verb, thereby accounting for

1. the consistent agreement with the logical and grammatical subject, irrespective of its position in the sentence,
2. the absence of Locative Inversion and Default Agreement Inversion, while allowing for –or even predicting– the default agreement in cases where there is no nominative element such as
3. (21) and (23);
4. the ungrammaticality of NPs in non-finite clauses.

Furthermore, if these languages have abstract Case, then we are changing Baker’s parameter setting to ‘yes’ for the Case dependency parameter, but how about the other parameter? I argue (Van der Wal 2012) that the languages with Agreeing Inversion are of two types: one in which the agreeing subject is always moved, that is, T has a movement trigger or EPP feature (Makhuwa) and one in which the subject stays in situ (Matengo).

$u\phi$	+ Case	- Case
+ EPP	Makhuwa	“Bantu”
- EPP	“Indo-European” Matengo	

A challenge for further research are the languages in which both Agreeing Inversion and Locative or Default Agreement Inversion are possible, such as Swahili, Lubukusu or Dciriku.

Another question is what triggers movement of the subject (and other elements) to a preverbal position in the [-EPP] languages. Restricting myself to Bantu, I suggest that this could be either an optional EPP feature on T/Agr which by virtue of interface economy has some impact on the interpretation, or an obligatory EPP feature related to a [topic] or [-focus] feature (cf. Miyagawa 2010).

A last issue to be addressed is whether we need a microparametric setting for different heads concerning Case. Specifically, T may not be associated with Case, but the v-domain could be. Halpert (to appear) claims that a Licensing projection checks Case in Zulu, accounting for the licensing of subject-to-object raising and the distribution of augmentless nouns. Carstens and Mletshe (2012) propose for Xhosa that if v is defective, so is T. Case in their analysis is assigned by a FocP, explaining the obligatorily narrow focus interpretation of S in VSO order. Another indication for the presence of Case on some low head (which may or may not be v, and may or may not be related to OM) could be that ‘hyperactivity’ is not seen for object markers. i.e. objects are not marked on complex conjugations (‘I be-him still-him see-him’).

Going outside of Bantu, we should first get a clearer picture of what does or does not constitute evidence for or against Case, and then test other languages, particularly the ones that do not show overt morphological marking of Case (analytic languages like Chinese, Kwa, creoles).

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Abbreviations and symbols

Numbers refer to noun classes, or to persons when followed by SG or PL

APPL	applicative
CJ	conjoint verb form
DEM	demonstrative
DJ	disjoint verb form
DUR	durative
LOC	locative
OM	object marker
OPT	optative
PASS	passive
PERS	persistive
PLUR	plurative
SM	subject marker

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