

Case Particle Omission and the Position of Objects in Japanese

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ABSTRACT. The current study makes a connection between Case particle omission and the syntactic position of object NPs in Japanese, focusing on the scope interactions between NPs with/without Case particles and scope-bearing elements such as *-dake* ‘only’, *-(rar)e* ‘can’, and *-na(i)* ‘not’. Specifically, I propose that an NP without the accusative Case particle *-o* can only appear in the canonical object position if V undergoes head movement to T, whereas when V fails to move, the object NP needs to be directly merged in a domain higher than T. This study also posits that NP-internal focus particles are scope-bearing elements and that head movement plays a role in complex head formation in addition to PF merger.*

Keywords: Case particle omission, head movement, scope, complex head formation

1. Introduction

Japanese noun phrases are marked with Case particles: Normally, the subject is associated with the nominative Case particle, and the object appears with the accusative Case particle, as shown in (1).

- (1) Taroo-ga ringo-o tabe-ta.
Taro-Nom apple-Acc eat-Past
‘Taro ate an apple.’

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In the colloquial form, the accusative Case particle *-o* in (1) can be dropped without changing meaning, as shown in (2).¹

- (2) (?)Taroo-ga ringo- \emptyset tabe-ta (yo).
 Taro-Nom apple- \emptyset eat-Past
 ‘Taro ate an apple.’

In (2), *ringo- \emptyset* ‘apple’ is interpreted as the object despite the fact that it is without a Case particle, and it has been suggested that a Case particle can be dropped under adjacency to a verb (Saito 1985; Takezawa 1987).

In this paper, I explore the scope effects of Case particle omission and the location of objects in Japanese in relation to complex predicate formation. I argue that objects without Case particles can only appear in canonical object position when the verb undergoes head movement to T, but are otherwise directly merged into the upper TP domain (e.g. Spec TP). In section 2, I briefly introduce the correlation between Case particles and semantic scope, first showing that Case particle omission alters the observed semantic scope of objects with Case particles, as illustrated by Shibata (2015a). I then present a puzzle where the otherwise available scope pattern disappears when a Case particle is dropped and when negation is present. In section 3, I aim to correlate the formation of complex heads and the position of objects without Case particles. In particular, I propose that objects that lack Case particles can only appear in a verb’s complement position when the verb undergoes head movement to T, yet when V-to-T movement is unavailable the object cannot be licensed in its canonical object position and must instead be directly merged into the upper TP domain. In that discussion, I show that the associated object position yields the observed semantic interpretations. In section 4, I address the issue of complex predicate formation and suggest that complex heads in

¹ Unlike the accusative Case particle, the nominative Case particle in (1) cannot be omitted. Thus, **Taro- \emptyset ringo-o tabe-ta* ‘Taro ate an apple’ is ungrammatical. In fact, Kuno (1973) argues that the Case particle-less subject in (i) is not an instance of a nominative NP, but realization of a topic-marker-less NP based on the fact that the subject in (i) does not have an exhaustive interpretation that nominative-marked NPs would have but rather functions as a topic (see also Saito 1985 for providing further arguments about the impossibility of nominative Case omission).

- (i) Boku- \emptyset kono hon- \emptyset kat-ta.
 I this book buy-Past.
 ‘I bought this book.’

(Kuno 1973: 223)

Japanese are derived both via PF-merger (Shibata 2015b) and head movement. In addition, I take the position that NP-internal DPs are scope-bearing elements like NP-external DPs, contrary to Hayashishita (2008) and Shibata (2015a, b). Section 5 concludes the paper.

2. Case and semantic scope

It has been pointed out and extensively studied in earlier works (e.g. Sano 1985; Tada 1992; Koizumi 1994; Saito and Hoshi 1998; Takano 2003; Bobaljik and Wurmbrand 2005) that Case affects semantic scope, as shown in (3a, b).²

- (3) a. Taroo-wa pan-dake-ga tabe-rare-ru. (obj > can; *can > obj)
 Taro-Top bread-only-Nom eat-can-Pres
 ‘It is only bread Taro can eat.’
- b. Taroo-wa pan-dake-o tabe-rare-ru. (?*obj > can; can > obj)
 Taro-Top bread-only-Acc eat-can-Pres
 ‘Taro is able to eat bread without eating anything else.’

In (3a, b) the object appears in either nominative or accusative Case. Although objects are marked with accusative Case in Japanese, stative predicates that include the potential morpheme *-(rare)* ‘can’ can optionally mark objects with nominative Case (Kuno 1973). As observed in the previous literature (e.g. Sano 1985; Tada 1992; Saito and Hoshi 1998; Takano 2003; Koizumi 1994; Bobaljik and Wurmbrand 2005), in (3a) the nominative object takes wider scope than the potential *-(rare)* ‘can’, while in (3b) the accusative object takes narrow scope in contrast to the nominative object, and each sentence yields a different interpretation.

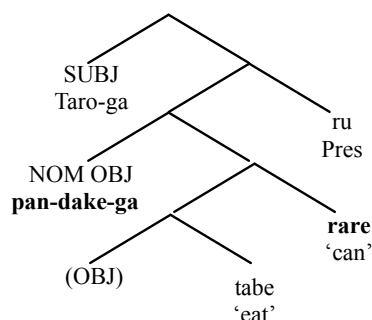
² Nomura (2005) points out that nominative objects can have narrow scope as well as wide scope in a sentence like (3a) if it is followed by a continuation, as shown in (i).

- (i) Taroo-wa pan-dake-ga tabe-rare-ru. Demo, tiizu-dake-mo tabe-rare-ru.
 Taro-Top bread-only-Nom eat-can-Pres. but cheese-only-also eat-can-Pres
 ‘Taro is able to eat bread without eating anything else. But he is also able to eat cheese without eating anything else.’

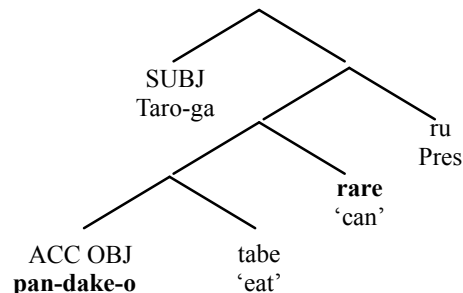
This seems then to suggest that for those speakers that allow a narrow scope reading of nominative objects, the canonical object position that is structurally lower than *-(rare)* ‘can’ is available. Although I leave aside the availability of narrow scope reading of the nominative object in this particular context, see Takahashi (2010) and Sugimura (2012) for an analysis based on the assumption that both nominative and accusative objects allow narrow scope readings.

Aside from differences in details among the previous studies, the consensus seems to be that nominative objects are structurally higher than *-(rar)e*, while accusative objects are lower than *-(rar)e* (e.g. Bobaljik and Wurmbrand's 2005 anti-reconstruction analysis; Tada's 1992 movement analysis; Takano's 2003 proleptic object analysis), as illustrated in (4a, b).

(4) a. *obj > can, *can > obj*



b. *can > obj, *obj > can*



Interestingly, the observed scope effect seems to disappear when the Case particle is omitted. In (5), the object without a Case particle has both wide and narrow scope with respect to the scope of *-(rar)e*.

- (5) Taroo-wa pan-dake tabe-rare-ru. (*obj > can; can > obj*)
 Taro-Top bread-only eat-can-Pres
 'It is only bread that Taro can eat.'
 'Taro is able to eat bread without eating anything else.'

In fact, Shibata (2015a, fn. 59) suggests that omission of a Case particle makes the otherwise less prominent reading more prominent, as shown in (6a, b).

- (6) a. Taroo-wa subete-no orenzi-o tabe-nakat-ta.
 Taro-Top all-Gen orange-Acc eat-Neg-Past
 Lit. 'Taro didn't eat all the oranges' (prominent: *obj > Neg*)
 b. Taroo-wa subete-no orenzi tabe-nakat-ta.
 Taro-Top all-Gen orange eat-Neg-Past
 Lit. 'Taro didn't eat all the oranges' (prominent: *Neg > obj*)
 (Shibata 2015a: 256)

In (6a), the object is overtly Case-marked and its wide scope reading over the negation is preferred; thus, the sentence by default means that Taro ate none of the oranges. In contrast, in

(6a), the object lacks a Case particle and the prominent reading is reversed from the one in (6a); accordingly, the sentence by default means that Taro did not eat all of the oranges (but ate some).³ If Shibata's observation in (6a, b) is extended to the contrast between (3a, b) and (5), it is no surprise that the otherwise unavailable reading in (3a, b) emerges in (5) because the omitted Case particle can either be nominative or accusative.

Curiously, however, the otherwise available wide scope reading of the object in (7a) disappears in (7b).

- (7) a. Taroo-wa pan-dake-o tabe-nakat-ta. (obj > neg; neg > obj)
 Taro-Top bread-only-Acc eat-Neg-Past
 'It is only bread that Taro did not eat.'
 'Taro did not eat bread without eating anything else.'
- b. Taroo-wa pan-dake tabe-nakat-ta. (obj > neg; ?*neg > obj)
 Taro-Top bread-only eat-Neg-Past
 'It is only bread that Taro did not eat.' (see Shibata 2015 a, b)

In (7a), the object with a Case particle can take either wide or narrow scope with respect to the scope of negation (see Koizumi 1994), but in (7b), the object without a Case particle must take wide scope and its narrow scope reading disappears. Why, then, is it that the object can take ambiguous scope in (5) but not in (7b)?

In section 3, I offer an account where the position of an object is conditioned by the availability of head movement (cf. Sugimura 2012) and is different depending on whether an object is overtly marked with a Case particle or not.

3. Object position and head movement

In section 2, I showed that Case particle omission alters semantic scope, based on Shibata's (2015a) observation, and further illustrated that in some contexts otherwise available readings disappear. In this section, I explain the relevant contrast in scope by proposing the following:

³ Shibata (2015a) acknowledges that there are variations of the interpretive preferences in (6b) among speakers.

(8) *Proposal*:

- a. NPs without the Case particle *-o* can only appear in the canonical object position if V undergoes head movement to T.
- b. When head movement is not available, the object NP needs to be directly merged into the domain higher than T (e.g. Spec TP).

(8a) indicates that V-to-T raising can license an object NP *in-situ* without *-o*, while (8b) suggests that V failing to raise to T cannot do so, in which case the object needs to be directly merged into the TP domain (cf. Takano 2003 for an object directly merged into Spec VP; see also Matsui 2009 and Sugimura 2012 for the correlation between V's head movement and the object position).^{4,5} Note that the proposal in (8a, b) is based on the assumptions in (9):

(9) *Assumptions*:

- a. V-raising may occur in Japanese when an NP lacks a Case particle.
- b. V can move to T via *v* and *-(rar)e* 'can' and thus create a V-*v-rare*-T complex.⁶
- c. V does not undergo head movement when Neg is present (cf. Kishimoto 2007).^{7,8}

⁴ In Sugimura (2012), I argue that V-to-T movement extends the domain for Case-agreement and, when head movement is available, the object can stay in its canonical object position, but when head movement is blocked, the object needs to be directly merged at a position higher than *-(rar)e* but below T.

⁵ See also Sugimura (2018) for a correlation between head movement and structural realization in the *V-te* V and *V-ni* V constructions in Japanese.

⁶ Note that the assumption in (9b) goes against Kishimoto's (2007) claim that V-to-T movement does not occur in general. While I support Kishimoto's argument that V-to-Neg movement does not occur, I take the position that V-to-T movement may occur when object NPs are without Case particles.

⁷ Kishimoto (2007) argues that Neg undergoes head movement to T when it appears before T and that adding a focus particle to Neg would yield an illegitimate complex head *V-Neg-Foc-T, making (i) ungrammatical.

(i) *John-wa konna-hon-o yoma-naku-sae/mo ar-u.
 John-Top such-book-Acc read-Neg-even-also be-Pres
 'John does not even/also read such books.'

(Kishimoto 2007: 250)

⁸ Matsui (2007) argues that V-to-T raising through Neg in fact exists based on the realization of NPI-licensing in Japanese, while Kishimoto (2007) argues against V-to-T movement in general.

(9a) is indirectly in line with Fukui and Takano's (1998) claim that the absence of V-to-*v* raising triggers overt Case particles in a language while the presence of V raising does not.⁹ Although Japanese is a language that has overt Case particles, I assume that V can undergo head movement when the Case particle is absent. (9b) indicates that V undergoes successive head movement to T through *v* and *-(rar)e*, creating a complex head. (9c) is supported by the fact that focus particles cannot adjoin between complex heads derived via head movement (Kishimoto 2007).¹⁰ That focus particles cannot generally appear between complex heads is shown in (10a, b).

- (10) a. *zidoosya-syuuri-sae/mo*
 automobile-repair-even/also
 'even/also automobile repair'
- b. **zidoosya-sae/mo-syuuri*
 automobile-even/also-repair
 'automobile-even/also-repair'

(modified from Kishimoto 2007: 253)

In (10a), the focus particles *-sae* 'even' or *-mo* 'also' can appear at the right edge of the entire N-N compound *zidoosya-syuuri* 'automobile repair', but the compound in (10b) is ungrammatical when the focus particle appears between the components of the complex head.

Bearing this in mind, consider (11a, b), where the focus particle can appear at the right of the main verb *yom(i)* 'to read', breaking up the V-T sequence.

⁹ However, the crucial part of Fukui and Takano's (1998) analysis of linearization is that the absence of verb head movement in Japanese would correctly predict the SOV order of the language, and, on the other hand, the presence of verb head movement would predict the SVO order of English. If head movement is available when the object lacks a Case particle, as the current study proposes, that suggests that Japanese would have the SVO order when the object is without a Case particle, which is obviously not the case. Thus, the current proposal is not completely in line with Fukui and Takano (1998) and requires further elaboration.

¹⁰ In Sugimura (2012), I assume with Matsui (2009) that although focus particles block head movement, verbs can otherwise undergo head movement when a given condition is met.

- (11) a. John-wa hon-o yomi-**sae/mo** si-na-i.
 John-Top book-Acc read-even-also do-Neg-Pres
 ‘John does not even/also read books.’
 (see Kishimoto 2005)
- b. John-wa konna-hon-o yomi-**sae/mo** su-ru.
 John-Top such-book-Acc read-even-also do-Pres
 ‘John even/also reads such books.’
 (Kishimoto 2007: 251)

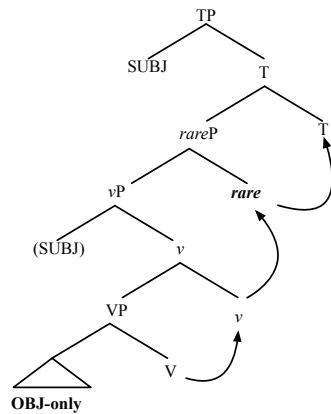
The negative morpheme *-na* appears in (11a) but not in (11b). Given Kishimoto’s (2007) analysis, the grammaticality of (11a, b) indicates that the verb has not undergone movement to T and therefore the focus particle does not break up the V-T sequence (see also Kishimoto 2005). In addition, since the verb has not undergone head movement to T, the dummy verb *s* ‘do’ is inserted into T to realize the Tense morphology on T.

Departing from Kishimoto (2007), however, I claim that V can undergo head movement to T when an object is without a Case particle and when negation is absent. With the proposal in (8a, b) and the assumptions in (9a-c) in hand, let us see how the contrast in scope ambiguities between (5) and (7b) is explained, repeated below.

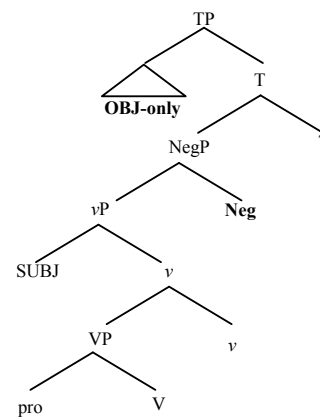
- (5) Taroo-wa pan-dake tabe-rare-ru. (obj > can; can > obj)
 Taro-Top bread-only eat-can-Pres
 ‘It is only bread that Taro can eat.’
 ‘Taro is able to eat bread without eating anything else.’
- (7) b. Taroo-wa pan-dake tabe-nakat-ta. (obj > neg; ?*neg > obj)
 Taro-Top bread-only eat-Neg-Past
 ‘It is only bread that Taro did not eat.’
 (see Shibata 2015 a, b)

As proposed in (8a) and (9a, b), the object that lacks a Case particle in (5) can appear in the canonical object position because V undergoes head movement to T, illustrated in (12a). In contrast, because of (8b) and (9c), the object in (7b) must be directly merged into the upper TP domain, like Spec TP, because negation is present and therefore head movement is blocked, as shown in (12b).

(12) a. V-to-T head movement is available



b. V-to T head movement is not available



In the structure in (12a), corresponding to (5), the object without a Case particle is in the verb’s complement position. Given (9a, b), V undergoes head movement to T via *v* and *-(rare)e* creating the complex head, which in turn allows the object to stay in its original position, as proposed in (8a). As a result, in (5) the object can take narrow scope with respect to *-(rare)e*. Alternatively, the object can be directly merged into the upper TP domain, from which the object takes wide scope.¹¹ In (12b), the structure that corresponds to (7b), V does not undergo head movement because Neg is present, due to (9c), which in turn forces the object to be directly merged into the upper TP domain (e.g. Spec TP, see Koizumi 1994; Miyagawa 2001 for moving the nominative object to Spec TP; see also Takano’s 2003 proleptic object analysis, which base-generates the object in Spec VP) because of (8b).¹² Consequently, the object

¹¹ Another possibility is that the object undergoes QR (Takahashi 2010) and takes wide scope. I leave this possibility open.

¹² One immediate concern about this proposal, as addressed by Satoshi Oku (p.c.), is that it is not clear how the object in the upper TP domain is assigned a theta-role. One possibility is that the object is interpreted through binding a *pro* in its canonical object position (Takano 2003), however another possibility is that the object is interpreted as a topic and it establishes the so-called aboutness relationship (Saito 1985) with the rest of the clause. The overt object and the *pro* associated with the topic are assigned theta-roles by the verb. The latter option and its suggestive examples below are owed to Satoshi Oku (p.c.).

- (i) [Sinbun-wa [Taroo-wa *pro* Asahi-o yom-u]]
 newspaper-Top Taro-Top Asahi-Acc read-Pres
 ‘As for newspapers, Taro reads Asahi (Newspaper).’

necessarily takes wide scope with respect to negation in (7b). Note that the surface word order in (7b) is the subject-verb-object order, which means that the subject must move above the object in (12b). Here, I assume with Miyagawa (2001, 2003) that the object can move to Spec TP, and also assume with Saito (2009), Miyagawa (2010), Shibata (2015b), and Oseki and Miyamoto (2018) that the subject can be located above TP, without going into details about these assumptions.

To see the correlation between the verb's head movement and the absence of Case particles, let us now apply Kishimoto's (2007) adjoining-focus-particle test to our cases of interest in (13a, b).

- (13) a. (?)Taroo-wa kono pan-ga/o tabe-rare-**mo/sae** su-ru.
 Taroo-Top this bread-Nom/Acc eat-can-also/even do-Pres
 'Taro is able to even/also eat this bread.'
- b. (??) Taroo-wa kono pan- \emptyset tabe-rare-**mo/sae** su-ru.
 Taroo-Top this bread eat-can-also/even do-Pres
 'Taro is able to even/also eat this bread.'

In (13a), the object appears with a Case particle, and the focus particle *-mo* 'also' or *-sae* 'even' can break up the V-T sequence by attaching to the right of V-*rare* complex.¹³ Given Kishimoto's (2007) claim, this means that the verb has not undergone head movement to T in (13a). In (13b), the object is without a Case particle, and the focus particle is attached to the V-*rare* complex, leaving T in isolation.¹⁴ This means that the verb has not undergone head movement to T in (13b) either, and that as a consequence the object is necessarily merged into the upper TP domain, in accordance with (8b). This in turn suggests that the object in (13b)

(ii)[Pan-wa [Taroo-wa *pro* mimi-o tabe-rare-na-i]]
 bread-Top Taroo-Top crust-Acc eat-can-Neg-Pres
 'As for bread, Taro cannot eat its crust.'

In the proposed structure in (12b), I posit a *pro* in the canonical object position, assuming that the interpretation of the base-generated object is established through binding along the lines of Takano (2003), but I acknowledge that the precise interpretive mechanism and the nature of this base-generated object need to be worked out in the future research.

¹³ Some speakers find (13a) a little odd, if not ungrammatical.

¹⁴ To some speakers, (13b) becomes slightly more deviant compared to (13a), if not ungrammatical.

must take wide scope with respect to *-(rare)e* ‘can’, and the prediction seems to be borne out in (14).

- (14) (?)Taroo-wa kono pan-dake- \emptyset tabe-rare-**mo/sae** su-ru.
 Taroo-Top this bread-only eat-can-also/even do-Pres
 ‘It is only this bread that Taro is able to even/also eat.’
 (obj > can; ?*can > obj)

In contrast, the Case-marked NPs in (15a, b) have consistent scope interpretations with (3a, b), repeated below: The nominative object takes wide scope, as shown in (15a), while the accusative object takes narrow scope, as shown in (15b).

- (15) a. (?)Taroo-wa kono pan-dake-ga tabe-rare-**mo/sae** su-ru.
 Taroo-Top this bread-only-Nom eat-can-also/even do-Pres
 ‘It is only this bread Taro is able to even/also eat.’
 (obj > can; *can > obj)
- b. (?)Taroo-wa kono pan-dake-o tabe-rare-**mo/sae** su-ru.
 Taroo-Top this bread-only-Acc eat-can-also/even do-Pres
 ‘Taro is able to even/also eat this bread without eating anything else.’
 (?*obj > can; can > obj)

- (3) a. Taroo-wa pan-dake-ga tabe-rare-ru. (obj > can; *can > obj)
 Taro-Top bread-only-Nom eat-can-Pres
 ‘It is only bread Taro can eat.’
- b. Taroo-wa pan-dake-o tabe-rare-ru. (?*obj > can; can > obj)
 Taro-Top bread-only-Acc eat-can-Pres
 ‘Taro is able to eat bread without eating anything else.’

The fact that the presence of a focus particle does not affect the scope of the object suggests that objects with Case particles are not affected by the unavailability of head movement, which means that the object does not call for the verb’s head movement in order to appear in the canonical object position. This contrasts with the behavior of Case particle-omitted objects, which rely on the verb’s head movement to T in order to appear in V’s complement position.

In section 4, I turn to the issue of complex head formation in Japanese in relation to the scope of objects and the order of morphemes inside NPs.

4. Complex head formation, order of morphemes and scope

In section 3, I proposed that object NPs without overt Case particles can only appear in the object position when the verb undergoes head movement to T via *v* and *-(rar)e*, and that when Neg is present head movement of the verb is blocked. These proposals in turn bring about the question of how complex predicates are formed in Japanese, which will be explored in this section.

Complex predicates are generally assumed to be formed either via PF-merger (e.g. Marantz 1984) or head movement (e.g. Baker 1988) in the literature.¹⁵ Shibata (2015a, b) pursues the PF-merger analysis of complex predicate formation in Japanese based on the observation that the object necessarily takes wide scope with respect to negation in a sentence like our earlier example in (7b), repeated below.

- (7) b. Taroo-wa pan-dake tabe-nakat-ta. (obj > neg; ?*neg > obj)
 Taro-Top bread-only eat-Neg-Past
 ‘It is only bread that Taro did not eat.’

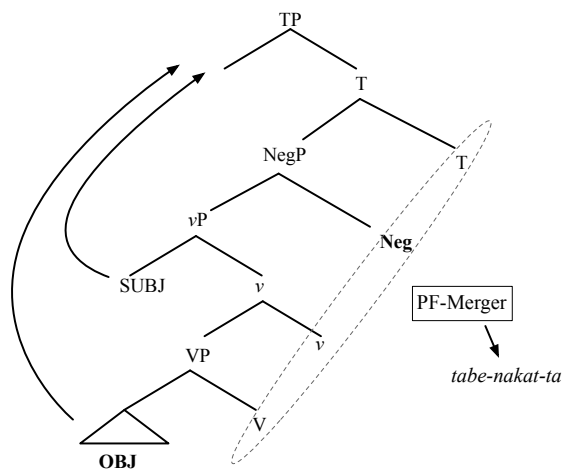
(see Shibata 2015 a, b)¹⁶

Shibata (2015b) argues that the fact that the object must take wide scope is accounted for if the complex predicate *tabe-nakat-ta* ‘eat-Neg-Past’, or the V-*v*-Neg-T complex, is formed via PF merger, as illustrated in (16). Shibata further claims that PF merger is implemented under what is called “structural adjacency” defined in (17), as opposed to PF-merger under linear adjacency.

¹⁵ Another option is a direct head-head merger approach such as one proposed by Saito and Hoshi (1998) and Saito (2012).

¹⁶ Shibata (2015a, b) in fact argues that the NP-internal *-dake* ‘only’, as well as other focus particles, are not scope-bearing elements, following Hayashishita’s (2008) claim. I will return to this issue shortly in this section.

(16) *Shibata's (2015b) PF-merger analysis*



(17) Structural Adjacency

X and Y are structurally adjacent iff there is no overt Z which is c-commanded by X and c-commands Y.¹⁷

(Shibata 2015b: 164)

In (16), if both the object and the subject remain in their original positions, they would block the V-v-Neg-T complex from being formed via PF-merger because those heads would not be structurally adjacent, as per (17). This in turn forces the object as well as the subject to move to the TP domain so that the PF-merger can apply; consequently, the object necessarily takes

¹⁷ Shibata's (2015b) definition of 'structural adjacency' actually has two possible versions, one of which is adapted in (17) and the other is defined as follows:

(i) X and Y are structurally adjacent if and only if there is no overt Z which is asymmetrically c-commanded by X and asymmetrically c-commands Y.

(Shibata 2015b: 146)

If structural adjacency is defined in terms of asymmetrical c-command, as described in (i), instead of plain c-command, stated in (17), then the reason for an object to move should be attributed to another factor. Otani (2020) in fact addresses this issue and assumes that a verb is decomposed into the categorizing head *v* and a root, and that an object is positioned as a complement to the root of a verb. Consequently, the object is asymmetrically c-commanded by the verb in this configuration and is then forced to move to a higher position.

wide scope over negation in (7b).^{18,19} Shibata (2015b) points out that the head movement analysis cannot account for the obligatory wide scope of the object in (7b) because nothing would block head movement from applying and forming the V-*v*-Neg-T complex, which would wrongly predict that the object can stay *in-situ* and take narrow scope. In this manner, Shibata (2015b) argues for the PF-merger analysis of complex predicate formation in Japanese.

However, the current study has identified the need to allow head movement of V in order to account for the narrow scope reading of the object without a Case particle, as in the case of (5), in combination with the proposal in (8a). The availability of head movement then suggests that PF-merger is not the only option for complex head formation in Japanese. At the same time, however, when head movement is not available, as in the case of (7b) and (12b), PF-merger should be the way to form the V-*v*-Neg-T complex.

Another point to note is that if PF-merger via structural adjacency were the only way to form complex predicates in Japanese, it would seem rather mysterious how the object's narrow scope is possible in (7a), repeated below.

- (7) a. Taroo-wa pan-dake-o tabe-nakat-ta. (obj > neg; neg > obj)
 Taro-Top bread-only-Acc eat-Neg-Past
 'It is only bread that Taro did not eat.'
 'Taro did not eat bread without eating anything else.'

The fact that the object can take narrow scope in (7a) suggests that the object can stay in its original position, which conflicts with Shibata's (2015b) PF-merger analysis because the object would disrupt the structural adjacency between V and *v* due to (17) and therefore be forced to move to a higher position. This in turn predicts that the object must take scope over negation, contrary to fact.

In fact, Shibata's (2015a, b) stance on NP-internal focus particles is that they are not scope-bearing elements and therefore examples like (7a), where the focus particle *-dake* 'only' is inside an NP, as opposed to those like (7b), where it is external to NP, are not of concern for

¹⁸ Shibata (2015a, b) in fact assumes that focus particles such as *-dake* 'only' are acyclically inserted into the object after the object moves to a higher TP position for a semantic reason, which successfully yields the unambiguous wide scope of *-dake* 'only'.

¹⁹ Shibata (2015b) also points out the possibility of a (quantified) object forced to move for a semantic reason (due to a type-mismatch). See Shibata's (2015b) analysis for details.

Shibata (2015a, b). Shibata takes this view based on Hayashishita's (2008) observation, as shown in (18).

- (18) a. John-wa Kimura-sensei-ni-dake email-de soodan-si-ta. (NP-external *-dake*)
 John-Top Prof. Kimura-Dat-only e-mail-by consult-do-Past
 'It is only Prof. Kimura that John consulted with by e-mail.'
- b. John-wa Kimura-sensei-dake-ni email-de soodan-si-ta. (NP-internal *-dake*)
 John-Top Prof. Kimura-only-Dat e-mail-by consult-do-Past
 'John consulted only with Prof. Kimura by e-mail.'

(Hayashishita 2008; Shibara 2015b)

According to Hayashishita (2008), (18a) is felicitous under the situation where John consulted with someone other than Prof. Kimura by means other than email (e.g. by phone) as long as Prof. Kimura is the only person John consulted by email, whereas (18b) is not felicitous in the same situation and must instead have the interpretation that Prof. Kimura is the only person John consulted with and that was done by email. Hayashishita and Shibata point out that this is surprising if the NP-internal focus particle *-dake* in (18b) is a scope-bearer because it should be within the scope of the adjunct *e-mail-de* 'by email', which would incorrectly predict the unavailable reading. Thus, based on the contrast between (18a) and (18b), they reach the conclusion that NP-internal focus particles are not scope-bearing elements.

In contrast, the present study necessarily takes the position that NP-internal focus particles are indeed scope-bearing elements, as long as the contrast between NP-internal focus particles and NP-external focus particles stands, contrary to Hayashishita (2008) and Shibata (2015a, b).²⁰

²⁰ In fact, the contrast between (18a) and (18b) does not seem to be robust, especially when a continuation follows, as shown in (i).

- (i) John-wa Kimura-sensei-dake-ni email-de soodan-si-ta.
 John-Top Prof. Kimura-only-Dat e-mail-by consult-do-Past
 'John consulted only with Prof. Kimura by e-mail.'
- Hokano sensei-ni-wa denwa-de soodan-si-ta.
 Other professors-Dat-Top phone-by consult-do-Past
 'As for other professors, he consulted by phone.'

5. Concluding remarks and remaining issues

The current study has shown that the structural position of objects is tied to V's head movement to T (see also Sugimura 2012), based on Shibata's (2015a) observation that object NPs without Case particles alter semantic scope. This proposal has, however, departed from Shibata (2015a, b) and Hayashishita (2008) in assuming that NP-internal focus particles are scope-bearing elements, and differed from Shibata (2015b) in proposing that complex predicates are not solely derived via PF-merger but are also formed via head movement.²¹

Several issues remain: One is that it is not clear why there is optionality in complex predicate formation (i.e. head movement or PF-merger) and why the position of an object is dependent on the availability of head movement. Another issue is that it is not clear why objects without Case particles cannot stay in their original position and need to move; that is, it is not clear what it is that licenses objects without Case particles and how that mechanism is different from the way that objects with overt Case particles are licensed. This work has thus only set the research question to be explored in the future research.

²¹ I have not considered another possibility where complex predicates are formed in the syntax via direct merge along the lines of Saito and Hoshi (1998) and Saito (2012), an alternative worth being explored.

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