

- ‘The train has come.’
- b. [John-ga/*no kuru] nara/kara... (SJ)
 [John-ga/no kuru] nara/ken... (KJ)
 John-NOM/GEN come if/because
 ‘if/because John comes,...’

On the other hand, in both SJ and KJ, the genitive *no* subject of a clause cannot be followed by the accusative object, unlike the nominative *ga* subject. This is termed the transitivity restriction (TR) (Watanabe 1996; Hiraiwa 2005; Ochi 2017).

- (3) a. [John-ga/*no sono hon-o katta] mise (SJ)
 [John-ga/*no son hon-ba² koota] mise (KJ)
 John-NOM/GEN that book-ACC bought store
 ‘the shop where John bought the book’
- b. [John-ga/*no Mary-o hometa] koto (SJ)
 [John-ga/*no Mary-ba hometa] kotu (KJ)
 John-NOM/GEN Mary-ACC praised thing
 ‘the fact that John praised Mary’
- (4) a. John-ga/*no son hon-ba koota. (KJ)
 John-NOM/GEN hat book-ACC bought
 ‘John bought the book.’
- b. [John-ga/*no son hon-ba kaw] nara... (KJ)
 John-NOM/GEN that book-ACC buy if
 ‘if John buys the book,...’

This paper addresses how the TR in *ga/no* conversion should be explained by an independently necessary mechanism in grammar and explicates the Case/case valuation mechanism with respect to *ga/no* conversion in Japanese. First, I argue that the TR with the *no* subject should be attributed to the subject-in-situ generalization (SSG) in (5) and is derived from the labeling algorithm (LA) proposed by Chomsky (2013, 2015).

(5) The subject-in-situ generalization (SSG)

By Spell-Out, ν P can contain only one argument with a structural Case feature.

(Alexiadou and Anagnostopoulou 2007:31)

Then I present an analysis in which *ga/no* conversion in SJ and KJ is based on the same mechanism and the difference can be attributed to just one property of C; independent existence of [+N] in null C.

The paper is organized as follows. In section 2, I argue that the TR with the *no* subject in *ga/no* conversion is an instance of (5), presenting evidence for this claim and against a different analysis based on a morphological generalization. In section 3, I introduce the labeling algorithm proposed by Chomsky (2013, 2015) with its extension proposed by Maeda (2021), and demonstrate how (5) is reduced to labeling failure, and apparent counterexamples to the TR are also accommodated by the present analysis. Then I propose a Case/case valuation mechanism in light of the role of the Case valuation in labeling proposed by Saito

² *Ba* is the accusative case in KJ corresponding to *o* in SJ.

Next there are sentences involving subject honorifics in which the TR is not observed in both SJ and KJ.⁵

- (9) a. [sengetu Tanaka sensei-ga/no aratani hon-o dasa-re-ta] *(koto) (SJ)
 last month Prof. Tanaka-NOM/GEN newly book-ACC publish- H-PST thing
 ‘the fact that last month Prof. Tanaka newly published a book.’
- b. [sensyuu Yamada sensei-ga/no yuigonzyoo-o kaka-re-ta] *(riyuu) (SJ)
 last week Prof. Yamada-NOM/GEN will-ACC write -H-PST reason
 ‘the reason why Prof. Yamada wrote a will’
- (10) a. Sensyuu-wa Tanaka sensei-ga/no mata koogi-ba yasum-asi-ta. (KJ)
 last week-TOP Prof. Tanaka-NOM/GEN again lecture-ACC cancel-H-PST
 ‘Last week Prof. Tanaka cancel his lecture again.’
- b. [Yamada sensei-ga/no yuigonzyoo-ba kak-asu] nara... (KJ)
 Prof. Yamada-NOM/GEN will-ACC write-H if
 ‘if Prof. Yamada writes a will,...’

The fact that the accusative object appears in (9) and (10) even with the genitive subject as well as the nominative subject also goes against the generalization in (6) and makes the morphological approach dubious. This also seems to be a problem for the syntactic approach based on the SSG but I will argue that it is accommodated by the proposed syntactic analysis in Section 3. 1.

Furthermore, the following data strongly suggest that a syntactic approach is on the right track.⁶

- (11) a. [{seitotati-ga/*no} orokanimo kinoo {seitotati-ga/no} abareta] koto (SJ)
 students-NOM/GEN foolishly yesterday students-NOM/GEN went wild thing
 ‘the fact that students foolishly went wild yesterday’
 (Cf. Ochi 2016: 160)
- b. {Ame-ga/*no} ureshikakotuni {ame-ga/no} furi-yoru. (KJ)
 rain-NOM/GEN happily rain-NOM/GEN fall-Asp
 ‘Happily it is raining.’

The fact that the genitive subject cannot occur to the left of the high adverbs such as *orokanimo* ‘foolishly’ or *ureshikakotuni* ‘happily’ in (11) indicates that the positional difference between the nominative and the genitive subject is meaningful, and the genitive subject must reside in a lower position than the nominative subject. Therefore, I adopt the SSG in (5) as the correct generalization for the TR in *ga/no* conversion, and pursue a syntactic analysis of the TR assuming the genitive *no* subject is in *v*P*.⁷

⁵ The fact that the genitive subject is not allowed without the clause-external nouns in (9) indicates that subject honorifics are not the source of licensing the genitive case but the source of the amelioration effect of the TR in (9) and (10). Recall also that KJ allows the genitive subject even without the clause-external nouns but shows the TR effect. See the contrast between (2) and (4) in KJ.

⁶ As pointed out by one of the reviewers, this is the same line of argument as Miyagawa (2011) and Kornfilt and Whitman (2012).

⁷ One of the reviewers pointed out that sentences such as (i) that involve negation might suggest a high position of the genitive subject, contrary to the assumption here. However, the contrast in (ii) indicates that the genitive subject in (i) as well as in (iia) is not in TP but in a higher position licensed by D as represented in (iii), meaning the exam concerning all the students, which becomes clearer when we replace *zen’in* ‘all’ with *gonin izyo* ‘more than 5’ in (ii). This is not a case of *ga/no* conversion, which is our concern here.

(i) zen’in-no uke-nakat-ta siken all > Neg, *Neg > all (SJ)

3. The TR as a Failure of Labeling

3.1 The Labeling Algorithm

Chomsky (2013, 2015) argues that simple Merge freely applies and composes a two-membered set $\{\alpha, \beta\}$ without encoding a label of the projection. Assuming that labels are necessary for syntactic objects (SO) to be interpreted at interfaces, he proposes the labeling algorithm (LA) summarized in (12) based on minimal search (MS). The label is uniquely decided in (12a) while it cannot be in (12b) ('XP-YP problem'). He further suggests some strategies including (i) and (ii) to solve the problem, assuming that a moved element is ignored in the LA and the head of what remains will be the label of SO, and feature-sharing makes a label out of a XP-YP structure. In (13a), where the subject (*the boy*) stays in Spec- v^*P , the labeling failure of α occurs as a case of (12b). In (13b), however, the label of α is determined as a result of the movement of the subject, and the label of β will be $\langle \phi, \phi \rangle$ that the subject and T share.⁸

- (12) a. SO = {H, XP}, where H a head and XP not a head: H as the label.
 b. SO = {XP, YP}, where neither is a head:
 (i) if one raises, the head of the other will be the label. (movement strategy)
 (ii) if there is some shared prominent feature between XP and YP, the shared feature will be the label. (feature-sharing strategy)
- (13) a. $*[_{\beta} T [_{\alpha} \text{the boy } [_{v^*} [\text{met} [\text{the girl}]]]]]$ ($\alpha = ??$)
 b. $[C [_{\beta} \text{the boy } T [_{\alpha} \text{the boy } [_{v^*} [\text{met} [\text{the girl}]]]]]$ ($\alpha = v^*P^9$, $\beta = \langle \phi, \phi \rangle$)

Maeda (2021) extends this and argues that object/complement movement/ellipsis also saves SO from the labeling failure as subject movement does.

- (14) In $\{_{\alpha} XP, \{_{\beta} Y, ZP\}\}$, the movement/ellipsis of ZP results in $\{_{\beta} Y, ZP\}$, where the only visible element for the LA is Y. In such a case, β is identified as the head Y. Accordingly, Y is visible to MS into $\{_{\alpha} XP, \{_{\beta} Y, ZP\}\}$, resulting in α being labeled Y.

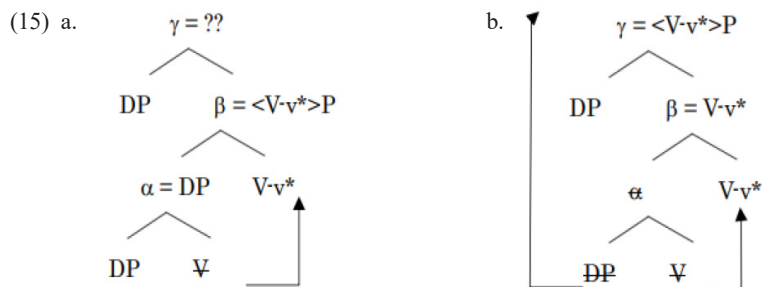
(Maeda 2021:94, slightly modified)

Specifically, putting the technical details aside, the analysis can be applied to the TR structure in Japanese as schematically represented in (15).

-
- all-GEN take-NEG-PST exam
 'the exam that all (the students) did not take'
- (ii) a. zen'in/gonin izyo-no sensyuu uke-nakat-ta siken all/more than 5 > Neg, *Neg > all/more than 5 (SJ)
 all/more than 5-GEN last week take-NEG-PST exam
 'the exam that all/more than 5 (students) did not take last week'
- b. sensyuu zen'in/gonin izyo-no uke-nakat-ta siken *?all/more than 5 > Neg, Neg > all/more than 5 (SJ)
 last week all/more than 5-GEN take-NEG-PST exam
 'the exam all/more than 5 (students) did not take last week'
- (iii) $[_{DP} \text{zen'in-no } [_{TP} \text{pro uke-nakat-ta}] \text{ siken}]$

⁸ Chomsky (2013, 2015) assumes that T in English is too weak to serve as a label by itself. Thus the labeling failure of β occurs in (13a) as well.

⁹ To be exact, the label should be $V-v^*P$ because of the movement (internal pair-Merge) of V to v^* , but v^*P will be used for convenience, if it is not relevant to the discussion.



With the assumption that the genitive *no* subject stays at Spec- v^*P , following Watanabe (1996) and Miyagawa (2011, 2012), the TR with the *no* subject, as observed in (3) and (4), is just attributed to the labeling failure of v^*P (g in (15a)) and if the object moves out of v^*P as in (8), the failure does not occur as in (15b).¹⁰

This analysis can account for the apparent counter-examples to TR in (9) and (10) repeated here as (16) and (17).

(16) a. [sengetu Tanaka sensei-ga/no aratani hon-o dasa-re-ta] koto (SJ)
 last month Prof. Tanaka-NOM/GEN newly book-ACC publish-H-PST thing
 ‘the fact that last month Prof. Tanaka newly published a book.’

b. [sensyuu Yamada sensei-ga/no yuigonzyoo-o kaka-re-ta] riyuu (SJ)
 last week Prof. Yamada-NOM/GEN will-ACC write-H-PST reason
 ‘the reason why Prof. Yamada wrote a will’

(17) a. Sensyuu-wa Tanaka-sensei-ga/no mata koogi-ba yasum-asi-ta. (KJ)
 last week-TOP Prof. Tanaka-NOM/GEN again lecture-ACC cancel-H-PST
 ‘Last week Prof. Tanaka cancel his lecture again.’

b. [Yamada-sensei-ga/no yuigonzyoo-ba kak-asu] nara... (KJ)
 Prof. Yamada-NOM/GEN will-ACC write-H if
 ‘if Prof. Yamada writes a will,...’

It is not unreasonable to assume that subject honorifics involve a functional head H between T and v^*P and the subject moves to Spec-HP for agreement as represented in (18a) (cf. Hasegawa 2006). Then the labeling problem in (18b) disappears because the labels of a and b are adequately determined based on the LA via the movement and feature-sharing strategies in (12b).

(18) a. [_{TP} [_β Subj [_α Subj [_{VP} Obj V] v^*] H] T] ($\alpha = v^*P$, $\beta = \langle \text{hon}, \text{hon} \rangle$)
 b. [_{TP} [_α Subj [_{VP} Obj V] v^*] T] ($\alpha = ??$) (cf. (15a))

3.2 Case Valuation and Labeling

Now recall (13b), where the label of β is decided as $\langle \phi, \phi \rangle$ by feature-sharing in English. However, if Japanese lacks ϕ -feature agreement as argued in the literature (see Saito 2016, 2018 and the references therein), the labeling of the landing site seems to be a problem, unlike the

¹⁰ For an argument that scrambling does not make the sentences involving the TR better in SJ, see Nishioka (to appear) for an analysis which attributes this to an independent intervention effect by the scrambled object for checking the inherited [uCase] feature on T, which does not happen in KJ. Or it might be attributed to the defectiveness of C in the amalgam $\langle C-N \rangle$ in (26b). I leave this matter for the future work.

case of (18a). Saito (2016, 2018) proposes an insightful analysis based on the role of Case to solve the problem. Putting details aside, I reinterpret his proposal as (19).

(19) Case valuation of DP makes the DP disqualified as the label of the set.

(cf. Saito 2016, 2018)

Due to (19) the labeling failure of b in (20a) and b and g in (20b) can be saved and the label of b and g will be yielded as T (-*ta*) (conventionally, TP) because the subject DP and the object DP in Spec-TP are disqualified to be the label. However, we must crucially suppose the difference between the *ga* and *no* subjects with regard to the applicability of (19) in order to capture the TR in (20c) with the labeling analysis as argued in 3.1.

- (20) a. [_β John-ga [_α John-ga [_{v*P} hon-o kaw]]-ta] (α = v*P, β = TP)
 John-NOM book-ACC buy-PST
- b. [_γ hon-o [_β John-ga [_α John-ga [_{v*P} hon-o kaw]]-ta] (α = v*P, β, γ = TP)
 book-ACC John-NOM buy-PST
 ‘John bought a book.’
- c. * [_β [_α John-no [_{v*P} hon-o kaw]]-ta] mise (α = ??, β = TP)
 John-GEN book-ACC buy-PST store
 ‘the store where John bought books’

Therefore, I assume that the genitive subject is not Case valued when the LA applies at the timing of Transfer and propose (21) as the Case/case valuation system in Japanese.

- (21) a. Valuation by direct merger with a Case-assigning head (V selected v*/P)
 b. Valuation through MS as a shared feature of XP-YP structure when LA applies (cf. Saito 2018)
 c. Valuation by an accessible (i.e. closest c-commanding) case-assigning head in the morpho-phonetic component after Transfer (cf. Epstein, Kitahara, and Seely 2022, Hayashi 2022)

Accusative Case is valued through direct merger in syntax as in (21a) and nominative Case is valued as a shared Case feature with T in Spec-TP when the LA applies as in (21b). This is why both nominative and accusative Case valuation functions to serve as a disqualifier in the LA as stated in (19). On the other hand, the genitive subject in v(*)P undergoes valuation in (21c) and (19) does not apply because Case is not valued when the LA applies. This system retains the TR as a labeling failure in conformity with the assumption in (19). Actually, (21c) applies generally to the subject/object in other places than the complement of transitive verbs or Spec-TP at the timing of Transfer. (16) and (17) exemplify this. More potential cases of (21c) will be discussed in the next section.

4. The Mechanism of *Ga/No* Conversion

Now in this section I present the mechanism of *ga/no* conversion with necessary assumptions.¹¹ I also extend this analysis to multiple nominative and nominative object constructions and argue that the valuation of the second nominative in these constructions falls under (21c).

¹¹ The proposed mechanism is, in a sense, a hybrid of two dominant analyses of *ga/no* conversion by Miyagawa’s (2011, 2012, 2013) D-licensing and Hiraiwa’s (2001, 2005) C-T licensing analysis in that it assumes the genitive subject is valued in v(*)P à la Miyagawa (to be exact, in a lower position than T in my analysis) and [+N] in C plays a crucial role for this à la Hiraiwa. However, the proposed analysis deals with data that the two previous analyses cannot.

4.1 Assumptions and Proposal

I assume (22) in addition to (21) to explicate the mechanism of *ga/no* conversion.

(22) a. A parametric difference between KJ and SJ:

Whether null C has [+N]; yes in KJ, no in SJ

b. Distinction between Case checking and valuation. (cf. Bjorkman and Zeijlstra 2019)

c. Feature inheritance occurs from a phase head optionally. (Chomsky 2007, 2008)

The most crucial assumption for the difference between KJ and SJ is (22a). In classical Japanese, adnominal forms of predicates can be used even in root clauses. Kinsui (1995) suggests that this is a result of merging a null C, which can be interpreted as the indication of freer occurrence of [+N] in C in classical Japanese. With the decline of the phonological distinction between the end form and adnominal form of predicates, it is hard to detect the existence of [+N] in C in modern SJ. However, verbal adjectives and copulas still retain this distinction in SJ as seen in the contrast in (23a) and (24a). In other words, the forms of these words are dedicated obediently to the existence of [+N], and (24a) suggests that null C in root clauses does not have [+N] in SJ. In contrast, in KJ, the same adnominal form as (23b) is used even in this case in (24b), which indicates that null C in KJ still has [+N] by itself.

(23) a. *kireina/benrina* heya (adnominal form) (SJ)

b. *kireika/benrika* heya (adnominal form) (KJ)

clean/useful room

‘clean/useful room’

(24) a. *Kono heya-wa kirei/benri da.* (end form) (SJ)

b. *Kon heya-wa kireika/benrika.* (same form as adnominal form) (KJ)

this room-TOP clean/useful

‘This room is clean/useful.’

Moreover, KJ, unlike SJ, allows nominalized exclamatory sentences with *-sa* nominalization as in (25), which also suggests the existence of [+N] in C in KJ, given the exclamatory force is involved in C.

(25) a. **Waa, tuki-no utukusi-sa!* (SJ)

b. *Waa, tuki-no utukusi-sa!* (KJ)

Oh, moon-Gen beautiful-SA

‘Oh, how beautiful the moon is!’

I also assume (22b); Case checking as formal licensing that happens in Syntax based on Agree, and Case/case valuation that is required in the morpho-phonetic component, which can be done at the same time as Case checking before Transfer as in (21a, b) or separately after Transfer as in (21c). (22c) is an assumption following Chomsky (2007, 2008). The mechanism that I propose for *ga/no* conversion based on the assumptions in (21) and (22) is summarized in (26), which can be illustrated in (27) and (28) for KJ and SJ, respectively.

(26) a. Nominative is checked and valued by T in accord with (21b), i.e. when LA applies.

b. Null C in KJ has [+N] by itself, while null C in SJ does not. Null C in SJ obtains [+N]

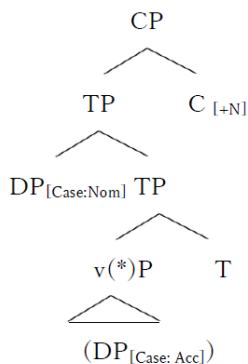
through the incorporation of a head nominal, making a <C-nominal> amalgam.¹²

c. In KJ, [+N] in C is optionally inherited by T.

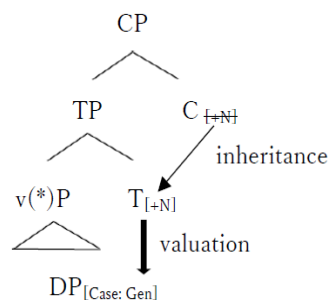
d. In SJ, formal features of the amalgam <C-nominal> are optionally inherited by T, and as a result, T acquires [+N].¹³

e. Genitive (*no*) is valued by T with [+N] in accord with (21c), i.e. in the morpho-phonetic component.

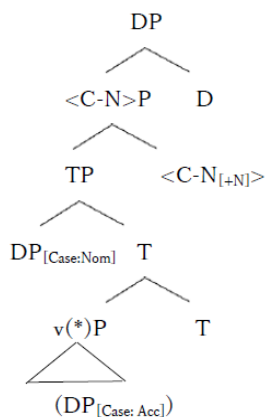
(27) **KJ** a. Without inheritance of [+N]



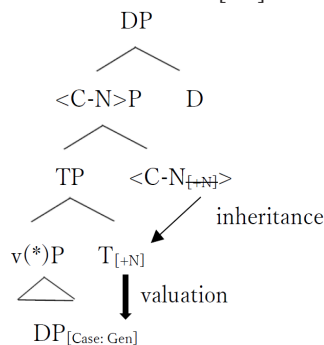
b. With inheritance of [+N]



(28) **SJ** a. Without inheritance of [+N]



b. With inheritance of [+N]



4.2 Multiple Nominative and Nominative Object Constructions

Japanese has multiple nominative and nominative object constructions, which are exemplified in (29) and (30), respectively.

¹² Putting technical details aside, here I am just assuming that the features of the head nominal as well as the inheritance potential of the phase head C remain intact.

¹³ One of the reviewers pointed out that in a derivation in which the subject DP moves to Spec-TP, and [+N] is retained at <C-N>, the genitive subject might be licensed without violating the TR. However, this never happens in the present analysis because the subject DP at Spec-TP would be valued as nominative, according to (21b). The real issue should be the timing of the inheritance of [+N]. I assume that it occurs at the timing of Transfer and does not affect (21b), due to the licensing of [+N] (possibly with [uCase]) by the upper head (D/P). I leave the discussion for another occasion.

- (29) a. John-ga se-ga takai. (SJ)
 John-NOM height-NOM tall
 ‘John is tall.’
- b. Kumamoto-ga basasi-ga umai. (SJ)
 Kumamoto-NOM raw horsemeat-NOM delicious
 ‘It is Kumamoto where raw horsemeat is delicious.’
- (30) a. Mary-ga nihongo-ga hanas-eru. (SJ)
 Mary-NOM Japanese-NOM speak-can
 ‘Mary can speak Japanese.’
- b. Taro-ga ratengo-ga yom-eru. (SJ)
 Taro-NOM Latin-NOM read-can
 ‘Taro can read Latin.’

In the sentences corresponding to (29) and (30) in KJ and in adnominal clauses both in SJ and KJ, the second nominative can be replaced with the genitive *no*.

- (31) a. [John-ga se-no takai] *(koto) (SJ)
 [John-ga se-no takaka] (kotu) (KJ)
 John-NOM height-GEN tall thing
 ‘(the fact that) John is tall.’
- b. [Kumamoto-ga basasi-no umai] *(koto) (SJ)
 [Kumamoto-ga basasi-no umaka] (kotu) (KJ)
 Kumamoto-NOM raw horsemeat-GEN delicious thing
 ‘(the fact that) it is Kumamoto where raw horsemeat is delicious.’
- (32) a. [Mary-ga nihongo-no hanas-eru] *(koto) (SJ)
 [Mary-ga nihongo-no hanas-eru] (kotu) (KJ)
 Mary-NOM Japanese-GEN speak-can thing
 ‘(the fact that) Mary can speak Japanese.’
- b. [Taro-ga ratengo-no yom-eru] *(koto) (SJ)
 [Taro-ga ratengo-no yom-eru] (kotu) (KJ)
 Taro-NOM Latin-GEN read-can thing
 ‘(the fact that) Taro can read Latin.’

The valuation of the genitive in KJ and SJ here can be also captured by the mechanism represented in (27b) and (28b), respectively, with the addition of the nominative subject in Spec-TP, which does not affect the proposed mechanism based on (21).¹⁴

¹⁴ One of the reviewers pointed out that the sentences such as (i) might cause a problem for the present analysis. However, the initial genitive subject is not a case of *ga/no* conversion but the genitive of the phrase modifying the external nominal, meaning ‘concerning Taro’, which will be made clearer by the contrast between (iia) and (iib). See also footnote 7.

- (i) Taro-no huransugo-ga hanas-eru koto (SJ)
 Taro-GEN French-NOM speak-can thing
 ‘the fact that Taro can speak French’
- (ii) a. Taro-no futuka mae-ni huransugo-ga hanas-e-ta koto(-o sitteiru ka?) (SJ)
 Taro-GEN two days ago French-NOM speak-can-PST thing-ACC know Q
 ‘(Do you know) the fact that Taro could speak French two days ago(?)’
- b. *?futuka mae-ni Taro-no furansugo-ga hanas-e-ta koto(-o sitteiru ka?) (SJ)
 two days ago Taro-GEN French-NOM speak-can-PST thing-ACC know Q
 ‘(Do you know) the fact that Taro could speak French two days ago(?)’

This also suggests a possibility that the second nominative in (29) and (30) is valued in a lower position than T (possibly in unaccusative vP). In independent clauses in SJ, T does not have [+N], and if the DP is located below T and is not valued as accusative through merger with V selected by v*, it should be valued as nominative by T, according to (21c). This is verified by the use of indeterminate pronouns with separate *mo*.¹⁵ Kishimoto (2001) argues that indeterminate pronouns such as *dare* ‘who’ and *nani* ‘what’ must be in the domain of *mo* to serve as negative polarity items (NPIs) and this is the origin of the contrast in (33).

- (33) a. Taroo-wa [nani-o kai]-mo si-nakat-ta. (SJ)
 Taroo-TOP what-ACC buy-mo do-NEG-PST
 ‘Taroo did not buy anything.’ (Kishimoto, 2001: 600)
- b. *Dare-ga [Hanako-o home]-mo si-nakat-ta. (SJ)
 who-NOM Hanako-ACC admire-mo do-NEG-PST
 ‘Nobody admired Hanako.’ (Kishimoto, 2001: 600)

If this analysis is on the right track, the acceptable sentences in (34B) and (35) justify the proposed case valuation mechanism in (21). The indeterminate nominative subject/object (*nani-ga* ‘what-NOM’, *nanigo-ga* ‘what language-NOM’) should be in the domain of *mo*, which is evidently lower than T.

- (34) (In a context where delicious foods in each prefecture are discussed and after some special foods from some prefectures are named.)
- A: Tokuni oisii mono-ga nai no-wa doko-no ken kana?
 particularly delicious thing-NOM NEG C-TOP where-GEN prefecture Q-Prt
 ‘I wonder which prefecture has no particularly delicious food.’
- B: Saga-ga [nani-ga oisiku]-mo nai-yo. (SJ)
 Saga-NOM what-NOM delicious-mo NEG-PRT
 ‘It is Saga that has no particularly delicious food.’
- (35) (In a context where who can speak foreign languages in a group of students is talked about, and after the names of some students are picked out)
- (Dakedo,) John-ga [nanigo-ga hanase]-mo si-na-i yo. (SJ)
 however John-NOM what language-NOM speak-mo do-NEG-PRES PRT
 ‘(However,) John cannot speak any foreign languages.’

5. Conclusion

In this paper the mechanism of nominative/genitive valuation observed in *ga/no* conversion in Japanese has been explored. After confirming that the TR observed with the genitive subject in the *ga/no* conversion is a syntactic phenomenon, I argued that the TR should be attributed to a case of labeling failure in the LA proposed by Chomsky (2013, 2015). Based on the analysis of the TR, I have proposed the mechanism of *ga/no* conversion with a parametric difference between SJ and KJ concerning the existence of [+N] in C (i.e., by itself in KJ, and via the head nominal incorporation in SJ), and demonstrated how the nominative and genitive cases are valued in SJ and KJ. A possible position of the second nominatives in the multiple nominative and nominative

¹⁵ See Moritake (2022) for a similar argument based on Kishimoto (2022) for a low position of nominative objects in Japanese.

object constructions is suggested as an implication of the proposed analysis, which is verified by the use of the analysis proposed by Kishimoto (2001). The explication of the technically detailed mechanism of the noun incorporation of C as well as the Case/case valuation system in light of cross-linguistic perspectives are left to future study.

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