

Case, Topic Prominence and the Realization of Predication Structures*

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Abstract

Japanese permits major subject constructions where, in addition to the thematic (logical) subject, another DP (a major subject) occurs, while English does not exhibit the phenomenon. The availability of major subjects has been tied to topic prominence; topic prominent languages and subject prominent languages have different clausal structuring. In contrast with this, recent minimalism has advocated that linguistic variation is reducible to morphophonology, or externalization. In line with this latter conjecture, this paper proposes that Japanese and English differ in the Case assigning mechanism that determines the number of DPs to be externalized. The proposed parameter makes two predictions: (i) more than one DP can be assigned a Case in Japanese and not in English, and (ii) no Case can be assigned to any DPs in Japanese, while English should assign a Case to at least one DP. It will be demonstrated that these predictions are supported empirically.

Keywords: case, topic prominence, predication structure, parameter

1. Introduction

One of the features that characterizes Japanese is the availability of major subject constructions. (1) exemplifies this; in addition to the thematic (logical)

subject *musuko=ga*, there is an outer nominative-marked DP, *Taro=ga*, that lacks a thematic relation with the lexical predicate.

- (1) Taro=ga musuko=ga nyuugakusiken=ni sippaisita
 Taro=NOM son=NOM entrance.examination=to failed
 ‘(As for) Taro, his son failed the entrance examination.’
 (Fukui and Narita (2017: 61) with glosses modified)

In contrast, English is known as a typical subject prominent language (Li and Thompson (1976)) and does not permit major subject constructions. The English counterpart of (1) is ungrammatical as in (2).

- (2) *Taro, his son failed the entrance examination. (*ibid.*)

Previous studies have assumed that Japanese and English have different clausal structures; Japanese employs a topic-comment structure as a template for a clausal structure, whereas English clausal structures are based on the subject-predicate relationship (Li and Thompson (1976) and Masuoka (2017, 2021) among others). I call this kind of approach *the structure-based approach* to the topic/subject prominence. The structure-based approach posits different syntax for topic prominent languages and for subject prominent languages.¹

The structure-based approach seems to succeed in capturing the typological divergence in the clausal structure. However, it should be noted that not every Japanese sentence has a topic-comment structure, nor does every English sentence lack a topic-marking. Japanese *can* (*but does not need to*) mark a topic in addition to the thematic topic. English may hold a topic in a clause, but its realization is highly restricted, as described in Section 2. In short, the structure-based approach, which assumes completely different clausal templates, is too restrictive.

Recent views on the parameter in the minimalist enterprise also challenge the structure-based approach. While the structure-based approach puts the parameter within syntax, some authors have advocated that syntax is invariant across languages and parametric differences are localized to morphophonology. Such a view is explicitly stated in (3) and (4), for instance. (See also Tokizaki and Dobashi (2013).)

(3) *Strong Uniformity Thesis*

Principles of narrow syntax are not subject to parametrization; nor are they affected by lexical parameters. (Boeckx (2011: 210))

(4) *Universal Syntax and Parametric Phonology (USPP)*

Syntax is universal and phonology is parametric: languages are uniform, with variety restricted to phonological externalization. (Tokizaki (2016: 3))

Let us call this kind of approach to parameters *the externalization-based approach*.

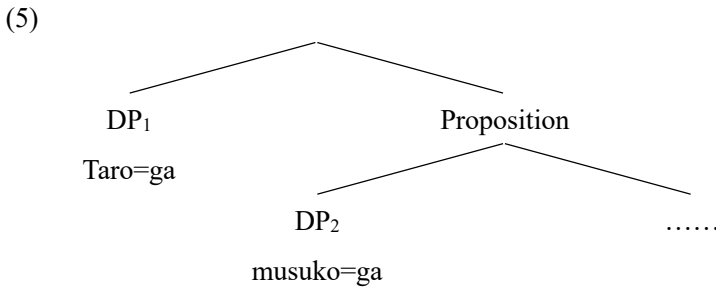
The aim of this paper is to formulate the externalization-based theory of topic prominence. Topic prominent languages and subject prominent languages differ in their externalization mechanisms with the narrow syntax uniform. Specifically, I will propose that the Case-related parameter is responsible for the typological differences. Japanese, a topic prominent language, can assign Cases to more than one DPs within a Case marking domain, and therefore it can hold two or more DPs within a clausal domain. Thus, Japanese clauses may contain a topic/major subject in addition to the thematic subject. In contrast, English can assign only one Case, permitting only one DP to be realized. Thus, English cannot externalize the topic DP and the thematic subject independently.

The paper is organized as follows. Section 2 clarifies what differs between Japanese and English. In section 3, I will propose a novel theory of Case that

determines the number of DPs to appear in each phase. Section 4 and Section 5 demonstrate that the current proposal can give a uniform explanation for a wide range of data. In section 6, I will comment on the structure-based approach to topic prominence. Section 7 is the conclusion.

2. What distinguishes Japanese and English?

Let us clarify what syntactic characteristics are crucial for licensing the major subject construction. The schematic structuring of the major subject construction is illustrated in (5). The major subject (*Taro=ga*) and the thematic, logical subject (*musuko=ga*) are independently introduced. Only the latter DP receives a theta-role.²



As we have already seen in (2), the structure of (5) is ungrammatical in English grammar.

Assume that DP₁ and DP₂ constitute a single chain; that is, DP₂ is a lower copy (or trace) of DP₁. Then, we will have an ordinary A-moved subject, as exemplified in (6a, b). In this case, both Japanese and English sentences are grammatical.

- (6) a. Taro=ga/=wa [ec_i nyuugakusiken=ni sippaisita]
 Taro=NOM/=TOP entrance.examination=to failed
- b. Taro failed the entrance examination.

I summarize the observations above in (7). In Japanese, DP₁ and DP₂ can either be independent DPs or constitute a chain. On the other hand, in English DP₁ and DP₂ have to be members of the same chain.

(7)

	[DP ₁ [DP ₂ ...]] (non copy)	[DP ₁ [<DP ₂ > ...]] (copy)
Japanese	✓ (major subject)	✓ (ordinary subject/topic)
English	*	✓ (ordinary subject)

This paradigm suggests that Japanese and English differ in the number of DPs that can be externalized independently. Japanese sentences can hold more DPs than English sentences can. In this regard, the difference in the nominal licensing mechanism seems to play a decisive role in determining the availability of major subject constructions. With the assumption that Cases are a property of nominals at externalization (cf. Chomsky (2021)), I propose that the relevant mechanism is about Cases; Japanese may assign Cases to more DPs and therefore permits major subject constructions. This approach no longer assumes different syntax for languages of different types. The next section will implement this intuition.

3. Assumptions and Proposal

Overt DPs are assumed to need to be licensed syntactically by receiving a Case. DPs with no Case are filtered out by Case Filter in (8).

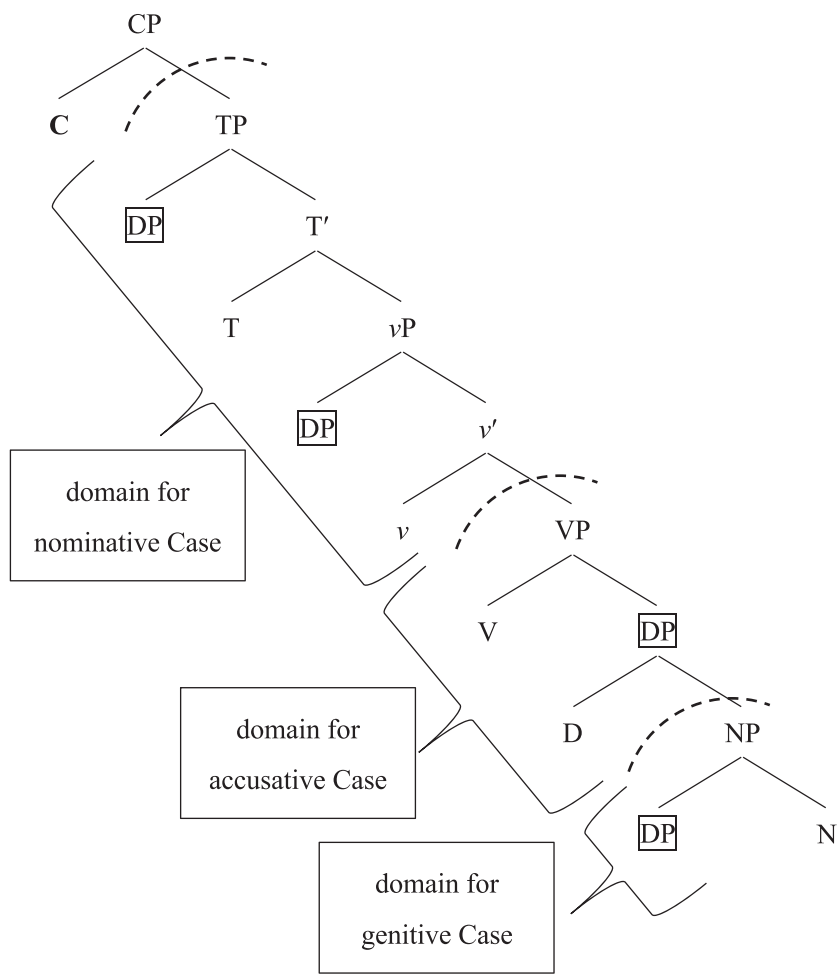
(8) Case Filter

*NP if NP has phonetic content and has no Case. (Chomsky (1981: 49))

As for the Case assignment, I propose the following domain-based Case assignment

mechanism. Assuming that *v*Ps, CPs, and DPs constitute phases (Chomsky (2000, 2001, 2008) and Citko (2014)), Cases are assigned at each phase. DPs belonging to *v*Ps are assigned an accusative Case. DPs in CPs are marked by a nominative Case. Similarly, DPs spelled-out at a DP phase will receive a genitive Case.

(9) Domain-based Case Assignment



Technically, I assume that each phasal head —C, *v*, and D— carries a Case feature and (multiply) Agree with the DPs within their spell-out domain (cf. Chomsky (2000,

2001, 2008), Hiraiwa (2001, 2005)).³

Based on this Case marking system, (10a) has the structure in (10b). The subject DP *she* belongs to the CP phase and receives a nominative Case. Similarly, the object DP *his writing*, which is in the vP domain, is marked by an accusative Case. Within the object DP phase, the possessor *his* is assigned a genitive Case.

- (10) a. She praises his writing.
 b. [CP C [TP she_[NOM] -es [vP v [VP praise [DP D [NP his_[GEN] writing]]]]]]]

It should be noted that if vP phases are absent, the domain for nominative Case assignment will be extended to the verbal domain. For example, unaccusative vPs, which Chomsky (2000: 106-107) regards as non-phases, are transparent for nominative Case assignment. Thus, internal argument DPs that stay in the complement of unaccusative VPs can be marked by a nominative Case, as illustrated in (11). A wavy line in (11b) underlines the domain for a nominative Case.

- (11) a. In the garden sat {they/*them}! (Levine (1989: 1045))
 b. [CP C [TP [in the garden] T [VP sit [DP they]]]]]

With the Case assigning mechanism above, let me propose a novel parameter that specifies the number of DPs that can receive a Case in each phasal domain. I propose *Case Uniqueness Parameter* in (12).

- (12) Case Uniqueness Parameter
 a. In English, one and only one Case is assigned within a single phase.
 (one-to-one correspondence between a phase and a Case)
 b. In Japanese, any number of Cases can be assigned within a single phase.
 (one-to-many correspondence between a phase and a Case)

According to this parameter, English requires a rigid one-to-one correspondence between a phase and Case. That is, in English, each phase assigns one and only one Case. On the other hand, Japanese is assumed to be flexible in that it can assign either two Cases or no Case. There is no limitation on the number of Cases to be assigned. Thus, any number of DPs can be realized within a single phasal domain.

I insist that (12) bears two predictions. First, English is predicted to prohibit multiple Case assignment while Japanese will permit more than one DPs to receive a Case within a single phase. Second, to ensure the one-to-one correspondence, in English each phasal domain must contain at least one overt, Case-marked DP, while Japanese is free from such a requirement. In the following two sections, I will examine these predictions.

4. One Phase with Two Cases

4.1. Multiple Nominative

As we have already seen in the opening section, Japanese allows major subject constructions while English does not. The relevant examples are repeated below.

- (13) Taro=ga musuko=ga nyuugakusiken=ni sippaisita
 Taro=NOM son=NOM entrance.examination=to failed
 ‘(As for) Taro, his son failed the entrance examination.’

(Fukui and Narita (2017: 61) with glosses modified)

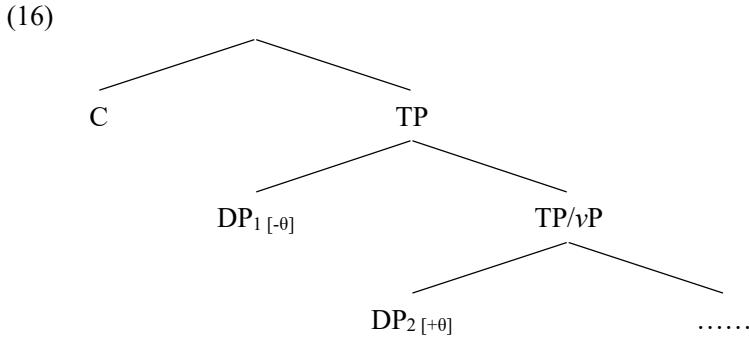
- (14) *Taro, his son failed the entrance examination. (*ibid.*)

Importantly, if the higher DP and lower DP constitute a copy relation, both Japanese and English sentences will be grammatical.

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- (15) a. Taro=ga/=wa [ec_i nyuugakusiken=ni sippaisita]
 Taro=NOM/=TOP entrance.examination=to failed
 b. Taro failed the entrance examination.

This pattern is predictable under the current proposal. Consider the following schematic structure.



If DP_1 and DP_2 are independently externalized (i.e. non-copies), DP_1 and DP_2 have to be Case-marked respectively. This means that within the CP phase, two Cases must be assigned. According to (12), such multiple Case marking is possible in Japanese and not in English. Thus, only Japanese permits major subject constructions. When DP_1 and DP_2 are copies, we only need one Case to license the nominal chain. In other words, the CP phase will include only one DP to be Case-marked. (12) permits this configuration both for Japanese and for English, as desired. This is how the current proposal derives the availability of major subject constructions in languages with or without topic prominence.

4.2. Multiple Genitive

The availability of major subject constructions is controlled by the Case uniqueness for CP phases. Analogously, Case uniqueness for DP phases has a

nontrivial consequence. Given that DP phases are a domain for the genitive Case marking, it is expected that Japanese permits multiple genitive marking while English does not. This prediction is empirically supported by the following contrast.

- (17) a. MIT(=de)=no sensyuu=no Chomsky=no sono koogi
 MIT(=at)=GEN last.week=GEN Chomsky=GEN that lecture
 ‘(lit.) MIT’s last week’s Chomsky’s that lecture’
 b. *MIT’s last week’s Chomsky’s that lecture.

(Fukui (1988: 257) with glosses modified)

4.3. Multiple Accusative

Finally, I would like to note that Japanese exhibits multiple accusative marking as well. Sugimoto (1986) reports that a non-theta-marked, accusative DP can appear in the clause in addition to the accusative-marked object DP. (18) contains two accusative-marked DPs: *fubuki=no naka=o*, which is not theta-marked object, and *sounansya=o*, which is a theta-marked object.

- (18) Fubuki=no naka=o sounansya=o sousakusita
 blizzard=GEN inside=ACC victim=ACC searched.for
 ‘(One) searched for the victim in the blizzard.’ (Sugimoto (1986: 297))

Sugimoto calls this additional accusative DP *a situational accusative*. Situational accusatives are not limited to the sentence with motion verbs. (19) is also grammatical.

- (19) Kurayami=no naka=o suitti=o sagasita
 darkness=GEN inside=ACC switch=ACC looked.for
 ‘(One) looked for the switch in the dark.’ (Sugimoto (1986: 297))

Relevant for the current discussion is the fact that accusative Cases, as well as nominative and genitive Cases, show multiple assignment patterns. Thus, every kind of phase —CPs, DPs and vPs— behaves in the same way in Japanese.

5. One Phase with No Case

5.1. Hyperraising

In this section, I would like to examine the second prediction from the currently proposed parameter in (12); that is, in English each phasal domain must contain at least one overt, Case-marked DP, while Japanese is free from such a requirement.

The first piece of evidence comes from the data regarding hyperraising (A-movement across the finite clausal boundary). In English, A-movement cannot cross the finite clause boundary as in (20b).

(20) a. I believe the dog is hungry.

*The dog is believed is hungry (by me). (Chomsky (1973: 237))

It is often assumed that hyperraising like (20) involves a successive cyclic movement through Spec, CP and thus leads to the illicit movement from A-bar position to A-position as illustrated in (21).

(21) * $[_{TP} \text{ the dog}_i \text{ is believed } [_{CP} t_i [_{TP} t_i \text{ is hungry}]]]$

However, this analysis is not applicable to Japanese. Ura (1994) observes that Japanese permits hyperraising. The relevant data is given in (22a).

- (22) a. Karera=ga_i kyoo=no kaigi=de (Mary=niyotte)
 thet=NOM today=GEN meeting=at (Mary=by)
 [t_i asita kuro=to] houkokusareta
 tomorrow come=COMP was.reported
- b. pro kyoo=no kaigi=de (Mary=niyotte)
 pro today=GEN meeting=at (Mary=by)
 [karera=ga asita kuro=to] houkokusareta
 they=NOM tomorrow come=COMP was.reported
 (Ura (1994: 66) with glosses modified)

In (22a), the embedded subject *karera=ga* moves to the matrix subject position. In terms of the availability of hyperraising, English and Japanese behave differently. Thus, hyperraising should be constrained by the mechanism that is subject to some crosslinguistic parameterization rather than a universal principle.

I argue that Case Uniqueness Parameter in (12) is responsible for the difference. The configuration of hyperraising is schematically illustrated in (23).

- (23) [CP₁ [TP₁ DP₁ [_{VP} ... [CP₂ [TP DP₂ ...]]]]]

In hyperraising, DP₁ and DP₂ constitute a single chain, thus need only one Case. If DP₁ is the target of Case marking, for instance, CP₂ will fail to find a DP to receive a Case. According to Case Uniqueness Parameter, such a failure to assign a Case is illicit in English. Thus, hyperraising is ruled out in English. In Japanese, in contrast, phases do not have to assign any Case to DPs. Phases are permitted to assign no Case. Thus, hyperraising configuration is no longer problematic in Japanese. In short, the proposed parameterization for Case uniqueness produces a desirable prediction for the availability of hyperraising.

5.2. Null Argument

Another notable difference between English and Japanese is whether null arguments are permitted or not. Japanese, known as a kind of pro drop languages, exhibits a null argument as in (24), where the matrix subject and object are not explicitly expressed but implicitly interpreted.

- (24) John=ga kita=node ai ni itta
 John=NOM came=since see to went
 ‘Since John came, (I) went to see (him).’

(Kuno (1973: 17) with glosses modified)

The English counterpart of (24) should contain an overt pronoun as in (25a). If the pronoun appears in a covert form, ungrammaticality will result as in (25b).

- (25) a. Since John came, *I* went to see *him*.
 b. *Since John came, went to see.

(Kuno (1973: 16) with glosses modified)

Interestingly enough, Ura (1994) points out that there is a typological correlation between the availability of hyperraising and the availability of null arguments, as stated in (26).

- (26) Generalization:

If a language allows hyper-raising to take place, then it also allows “null subject”. And, if a language disallows “null subject”, then it also disallows hyper-raising. (Ura (1994: 66))

This generalization suggests that the same factor underlies these two phenomena;

Case Uniqueness Parameter may determine the availability of null arguments.

I insist that the use of a null argument prevents the phase from finding a DP to receive a Case and therefore is prohibited in English. For example, if the subject DP is a null pronoun, the CP phase will fail to assign a Case, leading to ungrammaticality.⁴ In Japanese, which can fail to assign Cases, the use of null arguments will cause no problem. This is how Case Uniqueness Parameter derives the (un)availability of null arguments.

5.3. Distribution of PRO

In relation to null arguments, Case Uniqueness Parameter has an implication for the distribution of PRO. It is widely known that PRO only appears in the subject position of nonfinite clauses. PRO cannot appear in the finite clause (= (27b)) nor can it be in the object position (= (28b)).

- (27) a. John expected to win.
 b. *John expected (that) would win. (Landau (2013: 80))

- (28) a. Richard_i tried [PRO_i to catch Molly].
 b. *Molly_i tried [(Richard) to catch PRO_i]. (Landau (2013: 108))

The distribution of PRO has been characterized by the PRO theorem in (29).

- (29) PRO is ungoverned. (Chomsky (1981: 191))

Though the PRO theorem is descriptively adequate, it is undefinable under the minimalist syntax, which has eliminated the notion of government (Chomsky (1995)). Therefore, we have to derive the distribution of PRO in a different manner.

I propose that Case Uniqueness Parameter in (12) plays a role. Consider the

schematic clausal structure like (32).

$$(32) \quad [_{CP} C [_{TP} DP_1 T [_{vP} v [_{VP} V DP_2]]]]]$$

Let us assume that both CP and vP are phases (i.e., Case-assigning categories). Then, both DP₁ and DP₂ should be present and receive a Case. Next, consider that C is finite and thus phasal, but v is a nonphase (e.g., unaccusative). Then, either DP₁ or DP₂ will be assigned a nominative Case and externalized. Third, suppose that C is nonfinite (i.e., nonphase) while v is a phase. This amounts to the usual infinitival structure. In this case, DP₂ should be assigned a Case and realized overtly, while DP₁ has to be null, for it lacks a Case. In other words, DP₁ has to be PRO. Finally, assume that neither C nor v are phases. Then, no DPs are externalized. In this case, the implicit DP will be the only (internal) argument that the unaccusative verb selects, that is, the subject DP. In summary, whether C and v are phasal or not, the DP that can lack a Case will always be a subject of a nonfinite clause. This means that a null argument can only appear in the subject position of the infinitival clause. This limitation can predict the same distribution of PRO as (29) does.

Whereas the PRO theorem is derived from the binding condition, which is universally assumed, we derive the distribution of PRO from the parameter. This means that the distribution of PRO will not be uniform across languages, but subject to crosslinguistic variations. I would like to show that this prediction is correct.

First, it has been pointed out that in Japanese, control phenomena can be found even in the finite clause. (31) is an example of finite control. Importantly, the embedded clause with a PRO subject exhibits a tense alternation between the nonpast form (*-ru*) and the past form (*-ta*).

$$(31) \quad \text{Ken}_i=\text{wa} \quad [\emptyset_i \text{ Tokyo}=\text{ni} \text{ i-}\{\textbf{ru/ta}\}] \quad \text{koto}=\text{o} \quad \text{kookaisi-ta}$$

$$\text{Ken}=\text{TOP} \quad \text{Tokyo}=\text{at} \quad \text{be-NPST/PST} \quad \text{COMP}=\text{ACC} \quad \text{regret-PST}$$

(Akuzawa and Kubota (2025: 151) with glosses modified)

The fact that Japanese exhibits a finite clause control sharply contrasts with the ungrammaticality in (27). This contrast suggests that the distribution of PRO obeys the parameterization.

In addition, in Japanese PRO may appear in the object position as well. Traditionally, arbitrary PRO in Japanese has been assumed to be limited to the subject position as in (32) (see also Kageyama (1993)), but Takami and Kuno (2006) present counterevidence. Under an appropriate context, arbitrary PRO can be employed as an object.

- (32) a. PRO_{arb} Taima=o kau koto=wa kinzirete iru
 PRP_{arb} marijuana buy COMP=TOP forbidden be
 ‘for PRO_{arb} to buy marijuana is forbidden.’
 b. *Kodomo=ga kau koto=wa kinzirete iru
 children=NOM buy COMP=TOP forbidden be
 ‘‘for children to buy PRO_{arb} is forbidden.’’

(Kuroda (1983/1992: 242))

- (33) PRO_{obj} damasu=gurai=nara damasareru=hoo=ga
 PRO_{obj} deceive=GURAI=if be.received=rather.than=NOM
 ii=desu=yo
 good=COP=PRT
 ‘I’d rather be deceived than deceive others.’

(Takami and Kuno (2006: 171))

The grammaticality of (33) contrasts with the ungrammaticality of (28b). Again, it can be said that PRO exhibits different distribution between English and Japanese.

The crosslinguistic divergence of the PRO distribution is somewhat surprising and unpredictable under the traditional PRO theorem, which is derived by the universal principle of UG, binding conditions. Instead, the current analysis based on Case Uniqueness Parameter in (12) can handle the crosslinguistic variation of PRO distribution.

5.4. Availability of Case Alternation

One of the characteristics of Japanese is the availability of Case alternation in finite clauses. For example, the embedded subject of perception verbs exhibits a nominative/accusative alternation as in (34a, b).

- (34) a. Yamada=wa [Tanaka=ga baka=da]=to omotteita
 Yamada=TOP [Tanaka=NOM fool=is]=COMP was.thinking
 ‘Yamada thought that Tanaka was a fool.’
- b. Yamada=wa Tanaka=o [baka=da]=to omotteita
 Yamada=TOP Tanaka=ACC [fool=is]=COMP was.thinking
 ‘Yamada thought Tanaka to be a fool.’

(Kuno (1976: 23-24) with glosses modified)

Similarly, the subject of adnominal clauses shows a nominative/genitive alternation as in (35),

- (35) Taro=ga/no kita hi
 Taro=NOM/=GEN came day
 ‘the day when Taro came.’ (Ochi (2017: 663) with glosses modified)

It is worth noting that English does not permit such Case alternation in finite clauses. Neither accusative marking nor genitive marking is possible, as illustrated in (36)

and (37).

(36) *Mary believes him (that) is an honest boy (Kaneko (1988: 287))

(37) a. the day when he came

b. *the day when his came

In terms of the current view on Case assignment, this difference is no longer unpredictable. If the subject of the finite clause is marked by an accusative or genitive Case, then the embedded CP will miss the DP that will receive a nominative Case. Such a situation is permissible in Japanese under the proposed value for the Case Uniqueness Parameter in (12). On the other hand, missing a nominative-marked DP is not tolerable in English. This is why English does not show the Case alternation that Japanese permits.

So far, I have demonstrated that Case Uniqueness Parameter provides a uniform explanation for a series of differences between English and Japanese. As far as the current discussion goes on the right track, the proposed parameterization will be empirically supported.

6. Comments on Structure-based Approach

I have defended Case Uniqueness Parameter, which can account for the topic prominence of Japanese. Given that Case is now assumed to be a property of externalization (Chomsky (2021)), we no longer need different syntax for English and for Japanese. With this analysis in mind, I would like to reconsider the previous structure-based approach to topic prominence and show that the current approach can accommodate the intuition of the previous works in a somewhat modified form.

Here, I will examine in detail a series of work done by Masuoka (1987, 2000, 2017, 2021), among others. Masuoka formulates a predication type theory, according

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to which sentences are classified into two types: one describing an event and the other describing an entity having a property. The former is an event predication, and the other is a property predication.⁵ (38) exemplifies event predications and (39) exemplifies property predications.

- (38) Kodomo=ga nikkori waratta
 child=NOM broadly smiled
 ‘The child smiled broadly.’

(Masuoka (2017: 107) with glosses modified)

- (39) Nihon=wa yamaguni=da
 Japan=TOP mountainous.country=COP
 ‘Japan is a mountainous country.’

(Masuoka (2017: 109) with glosses modified)

Masuoka argues that event predications typically lack a topic, as in (38). On the other hand, property predications have the following structuring and thus inherently require the presence of a topic within a sentence. In other words, property predications typically form a topic-comment structure.⁶

- (40) [topic (the entity part) + comment (the property part)]

(Masuoka (2017: 109))

Masuoka further argues that, as a topic prominent language, Japanese uses the structure of property predications as a template for clausal structuring. Thus, this template is employed in constructing various sentence types such as a multiple subject/topic sentence (= (41)) and a topicalized event predication sentence (= (42) and (43)).

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- (41) Zoo=wa hana=ga nagai
 elephants=TOP trunk=NOM long
 ‘As for elephants, their trunks are long.’

(Masuoka (2017: 110) with glosses modified)

- (42) Watasi=wa kesa roku=zi=ni me=o samasita
 I=TOP this.morning six.o’clock=at eye=ACC awoke
 ‘I woke up at 6 this morning.’

(Masuoka (2017: 111) with glosses modified)

- (43) Hanako=wa musume=ga zyozi=o syussansita
 Hanako=TOP daughter=NOM girl=ACC gave.birth.to
 ‘As for Hanako, her daughter gave birth to a girl.’

(Masuoka (1987: 70))

All of these sentences have the topic-comment structure in (40) that characterizes the property predication. This view on the clausal structuring is in line with Li and Thompson’s characterization of topic prominent languages whose clausal composition is based on a topic-comment structure.

Though Masuoka’s analysis is intuitively plausible, it is unclear how the event predications and property predications are interrelated and to what extent they are differentiated. For example, Masuoka characterizes (42) and (43) as event predications and at the same time as having a structure of property predications. His classification seems not to be exclusive nor exhaustive. Moreover, even though Japanese is assumed to use (40) as a template, it also exhibits a pure event predication sentence like (38). So, it is elusive when the template of (40) is used and when it is not employed. Thus, Masuoka’s analysis is somewhat problematic.

I would like to reformulate his intuition in a different fashion. As has been

assumed throughout the paper, let us assume that every language is uniform with respect to the form of topic-comment structures (or predication structures in general). That structure is schematized in (45), which is proposed in Sakamoto (2025).

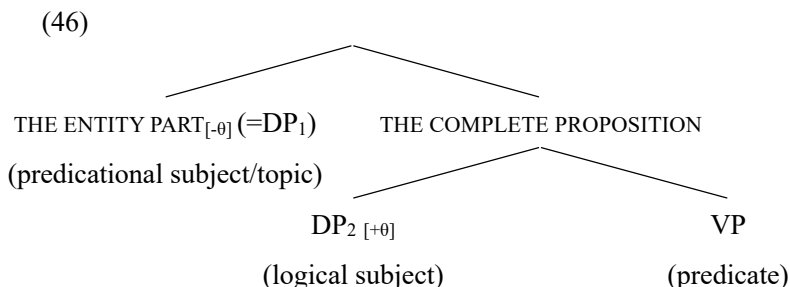
(45) Structure of Property Predication:

[[the entity part] + [the complete proposition (the property part)]]

(Sakamoto (2025: 113))

Sakamoto (2025) argues that the presence or absence of the structure in (45) is orthogonal to the temporal status of the predicate (i.e., the stage-level vs. individual-level distinction in the sense of Carlson (1980)). Thus, we can formulate a cross-classification.

Under this analysis, property predication structures are assumed to have the following structure.



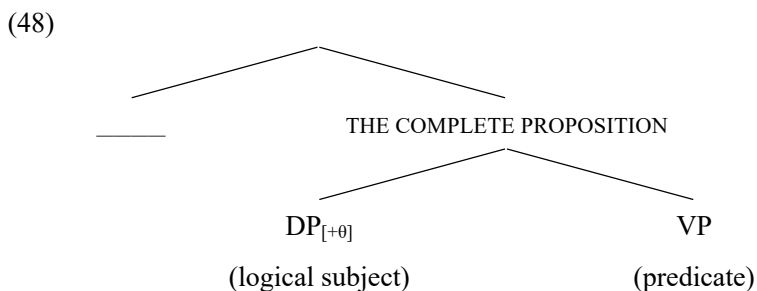
If the entity part is identical to the logical subject and the predicate is an individual-level predicate in the sense of Carlson (1980), we will obtain a typical property predication like (38). The predicate can be stage-level, as illustrated in (47), which Masuoka classifies as a property predication.

- (47) ano hito=wa izen jimoto=no
that person=TOP previously local=GEN
marasontaikai=de yuusyoosita
marathon.tournament=at won.the.first.prize
'That person previously won the first prize in the local marathon
tournament.'

(Masuoka (2021: 7))

When the entity part and the logical subject do not form a chain, the major subject/topic sentence like (41) will result. With the entity part distinct from the logical subject and the predicate being a stage-level, we will obtain sentences like (42) and (43).

If the clausal structure lacks the entity part (or a topic), a pure event predication structure will be obtained as in (48).



Sentences with the structure in (48) and a stage-level predicate are exemplified by (38). In addition, the predicate can be individual-level. The relevant example is given in (49).

- (49) Ie=ga doomugata=da
house=NOM dome.shaped=is
‘The house is dome-shaped.’ (Shinya (2014: 121))

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The table in (50) summarizes the considerations above.

(50)

	Having a structure in (40)		Lacking a structure in (40)
	$DP_1 = DP_2$	$DP_1 \neq DP_2$	
stage-level predicate	(47)	(42), (43)	(38)
individual-level predicate	(39)	(41)	(49)

From this viewpoint, Masuoka's template theory can be restated as follows: Japanese sentences can (but need not) have the topic-comment structure in (40). Event predication sentences can be extended by externally merging an additional DP to form a topic-comment structure (= (41), (42), and (43)). This extension employs the property predication structure in (40), which Masuoka takes as a template.

Turning to English, a subject prominent language, it can also employ the topic prominent language as long as DP_1 is identical to DP_2 as discussed in the previous sections of this paper. Due to a lack of English counterparts to (41), (42), and (43), it seems that English does not frequently use a topic-comment structure (but in fact it has sentences that topicalize an argument). I guess this is why previous works have assumed that English is not a topic prominent language. Though English lacks major subject constructions, it does have the same topic-comment structure. The only difference between English and Japanese is whether the topic can be independently externalized with no chain relation with the logical subject. This is how the current analysis recaptures Masuoka's intuition and classification. As far as the current reformulation is tenable, we no longer need to postulate different syntax or templates for languages of different types; English and Japanese share the same topic-comment

structure with the Case-related externalization mechanism parameterized.

7. Conclusion

This paper has addressed the issue of why Japanese, a topic prominent language, permits major subject constructions while English, a subject prominent language, does not. To answer this question, I proposed Case Uniqueness Parameter formulated in (51), which determines the number of DP to be realized independently.

(51) Case Uniqueness Parameter

- a. In English, one and only one Case is assigned within a single phase.
(one-to-one correspondence between a phase and Case)
- b. In Japanese, any number of Cases can be assigned within a single phase. (one-to-many correspondence between a phase and Case)

Roughly speaking, Japanese may externalize more DPs than English can, which characterizes the topic prominence of Japanese. It has also been demonstrated that Case Uniqueness Parameter derives other typological differences (i.e. the availability of hyperraising and null arguments) as well, and that the intuition behind Masuoka's structure-based approach can also be captured. Under the analysis, we postulate a universal syntactic structure for all languages with externalization parameterized. Thus, the current analysis provides empirical support for the view that parameters are localized to externalization.

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Notes

1) Strictly speaking, Li and Thompson (1976) argue that topic prominent languages *prefer* a topic-comment structure, but its employment is not obligatory. There may arise a question of how syntactic analyses can accommodate such a tendency or preference. This paper will account for this preference by assuming that topic prominent languages can (but subject prominent languages cannot) make full use of predication structures.

2) Following Saito (2017, 2024), Fukui (2017), Sakamoto (2025, 2026) among others, I assume that DPs may lack theta-roles as long as they receive other appropriate interpretations, such as predication.

3) This analysis is in line with Chomsky's (2008) view that phases are "the locus of determination of structural Case and agreement for object and subject." (Chomsky (2008: 155)).

4) The analysis amounts to deriving the effect of Inverse Case Filter (cf. Bošković (1997, 2002), among others), which requires each Case assigner to assign Cases, by the value of Case Uniqueness Parameter.

5) It should be noted that the term of predication is used ambiguously. The current paper uses this term to refer to the subject-predicate (or the topic-comment) relationship. On the other hand, Masuoka's predication refers to the act of describing events verbally. Only property predications involve the predication in the first sense (see also Kageyama

(2006) and Sakamoto (2025) for relevant discussion).

6) The entity part of the property predication may be a focus of the sentence. Such cases correspond to the exhaustive listing =*ga* sentences in Japanese (cf. Kuno (1973)). See Sakamoto (2025) for the argument supporting this view.

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