On Korean “Case Stacking”: The varied functions of the particles ka and lul

CARSON T. SCHÜTZE

Abstract

Korean exhibits a phenomenon that has been dubbed case stacking, in which the “nominative” particle ka is optionally suffixed to the subject in addition to the dative particle eykey. Numerous authors have claimed that “stacked” ka represents the realization of structural nominative case assigned to subject position, independent of inherent dative case. Under this view, ka-stacking provides prima facie evidence that structural licensing (a.k.a. abstract Case) can have a direct reflection in morphological case marking. In contrast, I give numerous arguments that stacked ka is not a case morpheme at all, but a discourse particle that can mark focus, and therefore provides no evidence for this view of licensing. I show that stacked ka patterns closely with other uses of “case” particles that reflect not case but discourse status. In particular, accusative lul, like ka, can be stacked on other case particles to mark focus. I suggest how other non-case uses of these particles, including the so-called “ECM” construction in Korean, can be unified while maintaining the widespread crosslinguistic generalization that inherent case, as found on dative subjects, blocks the checking of nominative case (and phi-features) between a subject and an Infl head. Similar “schizophrenic” uses of case morphemes in unrelated languages are also discussed. In the appendix, I consider the possi-

* Portions of this work appeared in an earlier form in Schütze 1996 and Schütze 1997. This paper owes its existence to my primary consultants. I would like to express my deep gratitude to Judy Yoo-Kyung Baek, for her endless patience during our elicitation sessions and her analytical insights, and to Sun-Ah Jun and Taehong Cho, for a great many judgments and helpful suggestions. Thanks to James Hye-Suk Yoon, Chungmin Lee, Yoonjung Kang, Hyang-Sook Sohn, Young-Sik Choi and Soo-Woong Ahn for additional judgments, and to Dianne Jonas and Susumu Kuno for helping me obtain some crucial references. I have benefited from comments by Jun Mo Cho, Christine Sungeun Cho, Noam Chomsky, Kai von Fintel, Edward Garrett, Donna Gerds, Jila Ghomeshi, Paul Hagstrom, Jim Huang, Joan Maling, Alec Marantz, Martha McGinnis, Orin Percus, Colin Phillips, Dong-Whee Yang, James Yoon, and audiences at the Prague meeting of ICKL, MIT, the University of Toronto, UC Irvine and UCLA. Thanks to John Frampton, two anonymous TLR reviewers, and four other anonymous reviewers for their input. I take sole responsibility for all errors. This research was supported in part by a UCLA Academic Senate grant.
Carson T. Schütze

The role of multiple specifiers in the analysis of “multiple case constructions” in Korean more generally.

1. Introduction

Since at least the introduction of Vergnaud’s Case Filter (cf. Chomsky 1981) into syntactic theory, it has been an important and controversial question how close the relationship is between abstract Case, which is assumed to license NPs, and morphological case, the overt form of case marking in the traditional sense. Korean exhibits a construction that seems prima facie to bear on this question in an interesting way. Korean appears to allow more than one case morpheme on a single NP in a simple sentence (Gerdt & Youn 1988 and references cited there). (1a) shows a canonical subject marked with the NOM particle ka; (1b) shows that the same predicate can also take a subject marked with the DAT particle eykey. (1c) shows these two apparent case particles co-occurring on the subject: NOM “stacked on top of” DAT.1 Another example of this paradigm is provided in (2).

(1) a. Nay-ka paym-i mwusepta.
   I-NOM snake-NOM fearful
b. Na-eykey paym-i mwusepta.
   I-DAT snake-NOM fearful
   I-DAT-NOM snake-NOM fearful
   ‘I am afraid of snakes.’ (J. Youn 1996: 110)

(2) a. Haksayng-tul-i ton-i philyohata.
   student-PL-NOM money-NOM need
b. Haksayng-tul-eykey ton-i philyohata.
   student-PL-DAT money-NOM need
   student-PL-DAT-NOM money-NOM need
   ‘The students need money.’ (Gerdt and Youn 1988: 160)

In almost every existing discussion of this “case stacking” construction, the ka in (1c) and (2c) is argued or assumed to be a case morpheme (Gerdt and Youn 1988; Gerdt 1991; Youn and Youn 1991; J. Youn 1996; Harbert and Toribio 1991; Hong 1991; Park 1991; O’Grady 1991; Youn 1995; Cho and Sells 1995;)

1. Following O’Grady (1991), Korean examples are transcribed using the Yale Romanization system, except that the high back rounded vowel is uniformly transliterated as wu. Since verbal morphology is largely irrelevant to the concerns of this paper, I often omit morphological decomposition of verb forms in order to make the glosses more readable.
Nakamura 1996; Börjars and Vincent 1997; D.-W. Yang 1999; Gerdzts and Youn 2000). Under this view, a DAT subject bears an inherent case that is not sufficient to license its appearance in subject position; it must additionally receive “structural” Case, which for subjects in Korean is NOM. The claim that has been made in various frameworks is that \textit{ka} in (1c) and (2c) represents the overt realization of the structural NOM feature and is thus identical to the \textit{ka} on the subject in (1a), but direct arguments for this claim are lacking. I argue that this is not the correct analysis of case stacking in Korean. I present data that point towards a treatment of stacked \textit{ka} as a focus particle rather than a case morpheme. This outcome supports claims elsewhere (e.g., Marantz 1991; Schütze 1997, and sources cited there) that the assumption behind the cited types of analyses should be rejected. That is, I claim that licensing an NP as the subject does not require bestowing it with a morphological NOM case feature. A stronger generalization can also be maintained in light of the analysis I argue for here: lexical/quirky and structural case features cannot be associated with the same NP. That is, an NP that is lexically marked as DAT by its predicate is not even eligible for structural (NOM or ACC) case. Korean would have been a counterexample to this generalization under a case stacking analysis, since the relevant NPs are lexically marked as DAT, and were claimed to be further marked with structural NOM. In contrast, under my proposal the only case feature borne by these NPs is DAT, and adding NOM to them is not even possible, let alone required – the additional \textit{ka} particle is not a reflection of case at all.

A related hypothesis in which Korean case stacking has also figured prominently is developed by J. Yoon (1996) (see also Lapointe 1998 for modifications to Yoon’s analysis of \textit{ka}-stacking in an LFG framework.). Yoon takes this phenomenon as a major piece of evidence for a revision of Chomsky’s (1986) Chain Condition, which prohibits multiple cases on a single NP chain. Yoon’s proposal is to replace it with a weaker constraint against multiple case assigners assigning case to the same \textit{position} in a chain, while allowing multi-case chains in which the different cases are assigned either to different positions or by the same assigner. Since my goal in this paper is primarily to explore the logically prior question of whether case stacking exists in Korean, I do not address Yoon’s broader theoretical claims here (see K. Lee 1996 for some discussion). However, it should be clear that if my conclusions are correct, the evidence for Yoon’s proposal is substantially weakened.

2. Although D.-W. Yang (1999) explicitly argues against my analysis as expounded in earlier versions of the present paper, and in favor of treating all uses of \textit{ka} as case, he proposes a distinction between “canonical” and “non-canonical” uses of case particles, the latter overlapping to a large degree with what I argue to be focus uses of \textit{ka}. See the end of section 2.

3. K. Lee (1996) argues against case stacking in the opposite way, claiming that NOM is real case in (1c) but DAT is a postposition and not a case. See section 6 for evidence that the subject of (1c) is not behaving like a PP.
It is important to note that many Korean speakers do not accept case stacking. This paper describes the speech of my three principal consultants, two from Seoul, the third from Kwangju in the Chonnam province, all of whom are linguists; unless otherwise noted, they agreed on the data and judgments as given here, including those cited from the literature. Some speakers may need to consider case stacking in particular contexts in order to accept it: one such context is provided in (3), cf. note 4; in addition, sentences like (14b) and (15b) below provide effective environments for highlighting the felicitous use of stacking.

(3) \text{Na-eykey-man-i paym-i mwusepta.}
\text{I-DAT-only-NOM snake-NOM fearful}

‘Only I am afraid of snakes.’ (J. Yoon 1996: 110)

One of my principal consultants finds case stacking difficult to accept in most situations unless a particle such as \text{man} ‘only’ or \text{kkaci} ‘even’ intervenes between the DAT and NOM markers, as in (3). In reporting a sentence as acceptable in this article, I therefore mean that two of my primary consultants accept it as written here and the third would accept it at least if one of these particles were inserted on the relevant NP.

Before proceeding, some other preliminaries should be mentioned. First, many interesting questions that we might want to ask about possible combinations of case particles in Korean are unanswerable because these particles are subject to morphological co-occurrence restrictions (Cho and Sells 1995; J. Yoon 1998). Descriptively speaking, there are four post-nominal particle slots relevant here, as schematized in (4): each particle is confined to a particular slot, and each slot can contain at most one particle at a time. Second, while I always refer to the NOM

---

4. J. Yoon (1996) describes the situation with respect to examples like (1) as follows: “Not all speakers accept stacking, and Psych verbs are optimal with first person subjects. Stacking data improve in acceptability if a quantitative particle … such as \text{-man} ‘only’ intervenes between the first and the second Case-marker [(3)], as this serves to highlight the focused nature of the Case-stacked NP. Case-stacked NPs in these examples are obligatorily interpreted as exhaustively focused.” See below for a more detailed exploration of these focus properties. (Since my consultants have no problem with non-first person subjects in the relevant constructions, my examples generally use proper names. Some speakers find that such examples improve when placed in the past tense.)

5. I have endeavored to confirm as many of the crucial judgments as possible with other speakers as well. However, as O’Grady (1991: 11) notes, “There is an unusual amount of disagreement among Korean-speaking linguists over the status of sentences involving a variety of grammatical phenomena … This fact is widely recognized by people working in the field and is a frequent source of frustration for many.” Direct disagreements with several important pieces of data from earlier versions of this paper are reported by Gerdts and Youn’s (2000) second author, Cheong Youn, who is from a part of Korea (Taegu) that none of my principal consultants come from.
particle as *ka*, it sometimes surfaces as the phonologically-conditioned allomorph *i*, as in (2a); similarly, I refer to other variable particles by their post-vocalic allomorphs. I gloss *ka* as ‘NOM’ throughout, for the sake of simplicity, without meaning to beg the question of the analysis. Similarly, I use the term “case particle” in this purely descriptive way.

(4) Nominal template

<table>
<thead>
<tr>
<th>Nroot</th>
<th>Postposition</th>
<th>Conjunctive</th>
<th>X-lim</th>
<th>Z-lim</th>
</tr>
</thead>
<tbody>
<tr>
<td>eykey</td>
<td>DAT</td>
<td>(k)wa</td>
<td>man</td>
<td>‘only’</td>
</tr>
<tr>
<td>hanthey</td>
<td>DAT</td>
<td>pwuthe ‘from’</td>
<td>etc.</td>
<td>i</td>
</tr>
<tr>
<td>kkey</td>
<td>HON.DAT</td>
<td>etc.</td>
<td>etc.</td>
<td>(l)ul</td>
</tr>
<tr>
<td>ey</td>
<td>DAT/LOCATIVE</td>
<td></td>
<td></td>
<td>(n)un</td>
</tr>
<tr>
<td>eyse</td>
<td>LOCATIVE</td>
<td></td>
<td></td>
<td>uy</td>
</tr>
<tr>
<td>(u)lo</td>
<td>DIRECTIVE</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>kkaci</td>
<td>GOAL</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>kkeyse</td>
<td>HON.NOM (subj)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The structure of the rest of this article is as follows. In section 2, I provide six arguments that the stacked particle *ka* does not share the properties of its true NOM case counterpart. I then give evidence in section 3 that stacked *ka* has the properties of a focus marker. Section 4 broadens the discussion by showing that “accusative” *nlul* also has both case and focus uses; the distribution of the two stacked particles is explored, and an account of this distribution is proposed. In section 5, this account is extended to nonstacked uses of *ka* and *nlul* that likewise do not seem to mark case, and some speculations about the source of this pervasive duality are put forth. The proposed dichotomy of particle uses is further supported in section 6 by contrasting stacking on NPs with true case marking on PPs. Section 7 considers the implications of the above findings in a cross-linguistic context. The appendix explores an additional kind of case construction in Korean that differs minimally but crucially from those in the main text and puts in relief the essential properties of case in this language.

6. The headings for the slots in (4) have been adapted from I. Yang (1972) by Sells (1995) and are arbitrary labels embodying no theoretical claims. I take no stance on how the co-occurrence restrictions imposed by these slots are implemented, but I do assume that the features underlying mutually exclusive co-habitants of a slot can co-occur in the syntactic representation. Additional principles must determine which morpheme surfaces when such a conflict arises, but details of those principles will mostly not be relevant here. I refer to the nominals on which these particles appear as NPs for ease of description. It is irrelevant for my purposes how many functional heads (D, K, etc.) they might contain, and whether any of the particles are best analyzed as realizations of such heads – see Cho and Sells 1995, J. Yoon 1995, Lapointe 1996, and works cited there for discussion.
2. Against case stacking

I enumerate six aspects of the distribution of stacked *ka* that are unexpected if it is merely the (optional) realization of a structural NOM case feature. It is important to note that these distributional arguments bear on the syntactic status of the stacked particle versus its unstacked counterpart, and are logically independent of the degree to which they may have similar semantic effects.

1. Sentences like (1c) require a specific prosody to sound felicitous: there needs to be an intonation phrase boundary after the subject. (The intonation pattern that reflects this is different across dialects, but typically the final syllable of the subject NP is lengthened and/or followed by a pause (Sun-Ah Jun, p.c.).) This requirement does not hold in (1a) or (1b). This suggests that there is something special about the discourse status of the subject in (1c). If stacked *ka* were simply a NOM case marker, one would need some additional theory to explain why only stacked *ka* triggers this prosodic effect. In contrast, if it is not a case marker, we can explain the prosody based on a theory of what stacked *ka* actually is, as I shall propose in the next section.

D.-W. Yang (1999) rejects this argument on the grounds that “any unmistakable Case particle may assume the focus function if it happens to get a marked stress or prosody” (emphasis added), but at the same time he confirms my characterization of the facts by saying that stacked *ka* “requires marked prosody” (emphasis added). My argument is based on the fact that only stacked *ka* demands this special prosody, rather than simply allowing it.

2. *ka*-stacking is completely optional, whereas NOM case is obligatory on the subject of a transitive clause when the case particle is present on the object, as in (5) (cf. Y.-j Kim 1990: 204, fn. 44). This contrast, confirmed by D.-W. Yang (1999), can be explained if stacked *ka* is conditioned by information structure; it requires a stipulation if stacked *ka* is NOM case.

(5) Minca-noon(ka) Yongho-lul mannasse.
M.-noon(NOM) Y-ACC met
‘Minca met Yongho.’

It is true that if one were to drop the ACC marker from (5), omission of *ka* would improve considerably; dropping just the ACC marker in a sentence like (5) is quite

---

7. Furthermore, it might lead one to suspect that the first NP in (1c) is left dislocated, with the actual subject being *pros*. However, case stacking is not limited to sentence-peripheral positions, so it does not require dislocation in general. Although in the rest of this paper I shall describe the relevant NPs as subjects for the sake of simplicity, the arguments herein are independent of how this issue resolves itself.

8. Dropping *ka* in (5) may be possible in very informal registers. However, Lapointe (1998) makes the further observation that case marker drop of the sort in (5) is worse in declaratives, as compared to exclamations, imperatives and interrogatives, whereas no such contrasts obtain for the omission of stacked *ka*. 
easy. This indicates that case marker drop is increasingly marked (or demands increasingly informal speech registers) as the distance of the NP from the verb increases, so that dropping more distant markers but not closer markers creates a register clash. Even if this is not the whole story about (5), the fact remains that dropping of stacked _ka_ is not subject to any restriction of this kind. The logic is therefore _not_ that droppability in certain environments is, in and of itself, an argument that something is not a case morpheme; rather, the point is the _contrast_ in behaviors within Korean.

3. Stacked and unstacked _ka_ can differently affect the distribution of subject honorification. NOM subjects must trigger honorific agreement on the predicate in Korean when they refer to an honored person (6a), but for some speakers, including two of my primary consultants, DAT subjects cannot trigger such agreement, as indicated by “%*” in (6b), and noted also by Y-j Kim (1990: 248, fn. 3). If stacked _ka_ were NOM case, it too should require honorific agreement, but in fact it disallows it for the consultants mentioned above (6c); that is, the subject in (6c) acts like a DAT subject and not like a NOM subject. (Speakers who accept honorific agreement for DAT arguments in general accept it in (6c) also.)

(6) a.  
K_ynosuni-m-i_  
Yenghi-ka  
mwusew-si-ta/*mwusep-ta.  
teacher-NOM Y-NOM fear-SH-DECL/*fear-DECL

‘The teacher fears Yenghi.’ [SH = subject honorific agrmt]

b.  
K_ynosuni-eykey_  
Yenghi-ka  
%mwusep-ta/%mwusew-si-ta.  
teacher-DAT Y-NOM fear-DECL/*fear-SH-DECL

‘The teacher fears Yenghi.’

c.  
K_ynosuni-eykey-ka_  
Yenghi-ka  
%mwusep-ta/%mwusew-si-ta.  
teacher-DAT-NOM Y-NOM fear-DECL/*fear-SH-DECL

‘The teacher fears Yenghi.’

The analysis of the contrast in (6a) versus (6b) is far from obvious, especially given that many speakers do not have it. One might speculate that it is related to the fact that in many languages with DAT (and more generally non-NOM) subjects, these cannot trigger phi-feature agreement on the predicate; perhaps some speakers analyze _si_ as an instance of grammatical agreement while others do not. The absence of a complete analysis does not affect the relevance of (6) for the treatment of stacked _ka_, however.

4.  
_k_a-stack_ing_ is not limited to subjects, but occurs also on locative (7), directional (8) and temporal adjuncts (9), etc., where structural NOM case should not be assignable – these elements fail subjecthood tests, as shown by Hong (1991). A structural case account of _ka_ in (1c) would thus demand a separate treatment of examples like (7–9).

(7)  
Cip-aneyse(-ka)  
Swunhi-eykey namphyen-i  
mwusepta.  
house-in(-NOM) S-DAT husband-NOM fears

‘In the house Swunhi fears her husband.’ (Gerdt and Youn 2000: 6)
(8) %Ku kulus-eyse-ka mul-i saynta.
   the bowl-from-NOM water-NOM leaks
   ‘Water leaks from the bowl.’ (Hong 1991: 153)

(9) Ecey-pwuthe(-ka) nalssi-ka cohaciessta.
   yesterday-from(-NOM) weather-NOM good.became
   ‘From yesterday the weather became good.’ (cf. J. Yoon 1987: 156)

Example (7) is also important because, unlike in (1), there is no alternative sentence where ‘house’ gets only NOM marking. This shows that stacking arises independently of possible case assignments; i.e., contra Hong’s (1991) claim, the option of stacking is not restricted to sentences where either of the stacked case markers could appear alone on the relevant NP.

5. Stacked and unstacked ka behave differently with respect to a particular kind of quantifier floating (Q-float). Floated numeral quantifiers generally agree with their head noun in case in Korean, as shown for NOM in (10). 9 (11a) shows case agreement with a DAT subject, which is allowed for some speakers (Hong 1991: 53, fn. 32; Cho and Sells 1995, fn. 17; Ahn and Lee 1994, fn. 3; Urushibara 1991 marks the relevant example “?”); others disallow Q-float from datives altogether.

Both of these examples have a word order property that distinguishes them from another sentence type that is also often referred to as Q-float: in (10) and (11) the quantifier is not only to the right of the head noun but it is separated from that head noun by another sentential constituent (an adverb in (10), the object in (11)). The generalizations in the rest of this paragraph apply only to this “long distance” Q-float and are not reproduced if the quantifier immediately follows the head noun of the subject. If stacked ka reflected morphological NOM case features, then speakers who accept (11a) should allow a NOM quantifier to agree with a stacked ka subject, at least as one option. However, this is not so: as (11b) shows, such a quantifier must be DAT. It is possible to have stacked ka on the quantifier in addition to DAT, as in (11c), but this, like other stacked uses of ka, does not represent NOM case. This claim is supported by the possibility illustrated in (11d), where ka is stacked on the quantifier but does not appear on the subject at all: thus, ka cannot be agreeing with the head noun in (11d), and thus need not be doing so in (11c) either. (The symbol “%” in (11) is a reminder that many speakers do not allow this

9. Some speakers, including one of my primary consultants, strongly prefer including the classifier on the floated numeral, as noted by Gerds (1987); e.g., they prefer sey-myeng-i over seys-i in (10), and similarly for subsequent Q-float examples. This does not interact with the points of interest here.

10. Hong finds that DAT on a floated quantifier is grammatical but redundant; it is improved by “adding delimiters as in [(i)], putting a stress on either element, putting a pause between two elements.”

(i) Nay-ka chinkwu-tul-hanthey-nun seys-hanthey card-ul ponayessta.
   I-NOM friend-PL-DAT-CONTR three-DAT card-ACC sent
   ‘I sent greeting cards to three friends.’ (Hong 1991: 53)
kind of Q-float at all, so for them all four examples are bad, while for others, only the starred alternative in (11b) is bad.)

(10)  
\( \text{Haksayngtul-i ec} \text{ey seys-i tenasssta.} \)  
students-NOM yesterday 3-NOM left  
‘Three students left yesterday.’

(11)  
\( \% \text{Haksayngtul-eykey ton-i seys-eykey philyohata.} \)  
students-DAT money-NOM 3-DAT need  
‘Three students need money.’

\( \% \text{Haksayngtul-eykey-ka ton-i seys-eykey}\#i philyohata. \)  
students-DAT-NOM money-NOM 3-DAT/#NOM need  
‘Three students need money.’

\( \% \text{Haksayngtul-eykey-ka ton-i seys-eykey-ka philyohata.} \)  
students-DAT-NOM money-NOM 3-DAT-NOM need  
‘Three students need money.’

\( \% \text{Haksayngtul-eykey ton-i seys-eykey-ka philyohata.} \)  
students-DAT money-NOM 3-DAT-ka need

The generalization is the following: A genuine case on a head noun licenses the presence of the same case on an associated floated quantifier; stacked \( \text{ka} \), not being a case marker, does not license NOM on a floated quantifier (11b); stacked \( \text{ka} \) on a quantifier, not being case, need not be licensed by \( \text{ka} \) on a head noun (11d).

6. Stacking can apply to NOM subjects too. Consider (12).

(12)  
\( \text{Sensayngnim-tul-kkeyse-man(-i) kulen il-ul hasipnita.} \)  
teacher-PL-HON,NOM-only(-NOM) that.kind work-ACC do  
‘Only teachers do such work.’ (Sells 1995: 294)

This sentence contains a predicate that takes a NOM subject, but because the subject is an honored person, the honorific NOM marker appears on it. This morpheme happens to occur in the same morphological slot as the DAT eykey (cf. (4)), and therefore can in principle co-occur with \( \text{ka} \), which it does in (12). Thus, by analogy to the case stacking analysis of eykey-ka, the same logic would lead us to conclude that (12) involves NOM stacked on NOM. However, there is no reason to believe there are two NOM assigners available in this clause. Furthermore, as indicated, the NOM particle following man is optional, just like \( \text{ka} \) when it is stacked on eykey, a property that is not expected of true case marking in transitive clauses with \( \text{lul} \) present on the object (cf. (5)). Thus, (12) provides independent motivation for a non-NOM use of \( \text{ka} \).

Let us recapitulate what this series of arguments has shown. At a minimum, stacked \( \text{ka} \) and unstacked \( \text{ka} \) cannot be analyzed as the same morpheme, by which would be meant that they both always correspond to the same underlying morphosyntactic feature(s). On such a view there would be no way of capturing their differing behaviors except by pure stipulation. On a restrictive view of case, the arguments lead naturally to the conclusion that stacked \( \text{ka} \) is not a manifestation of
case; alternatively, one could suggest that both kas are (NOM) case, but of different kinds, as D.-W. Yang (1999) does. But in the absence of any crosslinguistically motivated theory about a second species of case, such a move seems to me to add terminological confusion without any concomitant gain in explanation, so I do not pursue it.

3. In favor of a focus treatment

I now present evidence pointing towards a treatment of stacked ka as an indicator of focus, in line with observations made by J.-Y. Yoon (1989), Suh (1992), Hong (1991: 147, fn. 15) and D.-W. Yang (1999). I demonstrate this by showing that case stacking is possible in environments that are independently identifiable as focus environments on syntactico-semantic grounds, and – crucially – impossible in environments that are independently identifiable as not being focus environments. This is of course not to claim that stacking is required in focus environments; rather, the generalization is that stacking can be used as one of the ways of expressing focus. In contrast, it is observed, for example by J. Yoon (1996), that bare NOM subjects like those in (1a) and (2a) may, but need not, receive a focus reading. Note that I am not asserting that the distribution of unstacked case particles has no effects on focus interpretation; such effects are well documented. Rather, the logic is as follows. Having established that stacked ka is a different syntactic entity from unstacked ka, we should not expect that their semantic consequences are identical, and indeed they are not: as we shall see, there are readings of sentences in which unstacked ka is possible but stacked ka is impossible. (See also note 34 for comparison with Japanese.)

Therefore, it is necessary to establish independently the semantic properties of the stacked particles. The following observations are relevant for establishing that stacked ka is a focus marker.

1. Stacking can occur on wh-phrases, as in (13).

11. Some speakers accept stacking on a wh-phrase more readily in a context where the possible answers have been enumerated or are already contextually salient, as in (i).

(i) a. Q: Chelswu, Yenghi, Swunhi cwung-ey mwakwu-eykey-ka
   C Y S among-LOC who-DAT-NOM
   ton-i money-NOM manhni?
   ‘Among Chelswu, Yenghi and Swunhi, who has a lot of money?’

   C-DAT-NOM money-NOM has.much
   ‘Chelswu has a lot of money.’ (J. Yoon, p.c.)
On Korean “Case Stacking” 203

(13) *Nwukwu-eykey-ka Mary-ka mwusepni?*  
    who-DAT NOM M-NOM fear.Q  
    ‘Who is afraid of Mary?’

2. Stacking is possible on the answer to a subject wh-question, at least for my primary consultants (some speakers find this odd):

(14) a. Q: *Nwukwu-eykey ton-i kulekhey manhni?*  
    who-DAT money-NOM so has.much Q  
    ‘Who has such a lot of money?’

b. A: *Chelswu-eykey-ka ton-i kulekhey manchi.*  
    C-DAT-NOM money-NOM so has.much  
    ‘Chelswu has such a lot of money.’

3. Stacking can occur in correction contexts:

    S-DAT C-NOM like.seems  
    ‘Swunhi seems to like Chelswu.’

    no Y-DAT-NOM C-NOM likes  
    ‘No, Y enghi likes Chelswu.’

4. Stacking is compatible with overt focus markers such as ‘only’. We saw this in (3), repeated as (16a), and for a NOM subject in (12); (16b) shows that this possibility extends to full NP subjects and is equally available with the honorific DAT marker.

    I-DAT only-NOM snake-NOM fearful  
    ‘Only I am afraid of snakes.’

    K professor-HON.DAT-only-NOM students-NOM  
    kuliwu-si-ta.12  
    miss-HON-DECL  
    ‘Only Prof Kim misses his students.’ (J. Yoon 1996: 111)

5. Since Korean has been argued to be a multiple focus language by Choe (1995), as in (17), we expect that multiple *ka*-stacking should be possible, and that is correct: the sentence in (18) receives a double focus reading.

(17) *Na-nun ECEY KU CHAYK-UL sassta.*  
    I-TOP yesterday the book-ACC bought  
    ‘I bought THE BOOK YESTERDAY.’ (Choe 1995: 280)

12. As noted above, two of my primary consultants disallow honorific agreement with DAT subjects, but they accept this sentence without the honorific.
There are two more complex sets of facts that lend further credence to the claim that ka has a use as an indicator of focus. First, ka-stacking is obligatory on the complement to the negated copula anila: in the first clause of (19), omitting stacked ka is ungrammatical, even for some speakers who do not otherwise allow ka-stacking at all. In fact, all complements of anila obligatorily take ka, as shown in (20). The obligatoriness of plain ka in (20) is standardly described as obligatory NOM case assignment, but if I am right that stacked ka in (19) is not case, then that cannot be the right analysis. Further evidence for this is that my primary consultants find that omitting ka in such sentences is more strongly ungrammatical than omitting ka from a NOM direct object such as those in (1). I suggest that what is actually going on in (20) as well as (19) is obligatory focus marking, triggered by the presence of negation. (Cf. Horvath (1995), who argues that Neg is a focus assigner in Hungarian; see also Marantz 1993.)

Second, let us consider indefinite subjects. (21a), with an indefinite DAT subject, is ambiguous between existential and specific readings. However, when ka is stacked on the subject, as in (21b), it becomes unambiguous: it can only be specific. (This observation is confirmed by D.-W. Yang (1999).) Similarly, ka-stacking disambiguates against an existential and towards a generic reading of a bare plural subject, as in the stacked (22c) versus the ambiguous (22a and b).
   some-person-DAT Y-NOM likes
   ‘Someone likes Yenghi.’ [existential or specific]

   some-person-DAT-NOM Y-NOM likes
   ‘Someone likes Yenghi.’ [specific only]

(22) a. *Sopangswu-eykey kyewul palam-i mwusepta.*
   fireman-DAT winter wind-NOM fear
   ‘Firemen are afraid of the winter wind.’ [existential or generic]

b. *Sopangswu-ka kyewul palam-i mwusepta.*
   fireman-NOM winter wind-NOM fear
   ‘Firemen are afraid of the winter wind.’ [existential or generic]

15. Suh (1992) claims that plain NOM on the subject of a stage-level predicate disambiguates towards
   the existential reading. If so, this would only strengthen my argument that stacked *ka* is not NOM.

   fireman-DAT-NOM winter wind-NOM fear
   ‘Firemen are afraid of the winter wind.’ [generic only]

Note how hard it would be for a case treatment of the *ka* in (22c) to get this result: adding *ka* to the ambiguous (22a) actually removes a reading that the NOM-subject version (22b) has. This indicates that, in addition to the distributional differences noted in section 2, stacked and unstacked *ka* do not have identical interpretive properties either. What we need for (21)–(22) is an account under which stacked *ka* requires its host to be outside the domain of existential closure.

The necessity of specific or generic interpretation of indefinites is a property usually associated with *topicalized* elements (e.g., É. Kiss 1995: see Choe 1995 and C. Lee 1996, 1998 for the properties of topic constructions in Korean). Thus, if stacking were really marking topicalization, the facts in (21)–(22) would follow straightforwardly. But there are several reasons to doubt that a topic treatment is the right analysis. First, we have already seen that stacking does not *have* to imply topichood: if it did, then stacking should be bad on *wh*-phrases, contra (13). Also, Choe (1995) claims that Korean does not allow multiple topicalization (23).

(23) *Chelswu-nun ku chayk-UN/*un ecey sassta.*
   C-TOP the book-CONTR/*TOP yesterday bought
   ‘Chelswu bought THE BOOK yesterday.’ (Choe 1995: 285)

If this is correct then the existence of multiple stacking as in (18) also shows that stacking cannot uniformly mark topichood. Additionally, stacking is often *incompatible* with topichood. For instance, (22c) is a possible answer to the question *Who fears the winter wind?*, where *firemen* in the response will be the focus, but it is *not* a possible answer to a generic question like *Tell me about firemen*, whereas
(22a) (and less felicitously (22b)) can answer that question. This reinforces the claim that the stacked element can be a focus and cannot be a topic. Given that, one way to explain (21)–(22) is to follow Choe (1995) in proposing that Korean has an A-bar focus position above IP to which foci (at least subject foci) must move by LF, and to require in addition that reconstruction from that position be impossible, at least for quantifier interpretation. Then it follows that foci must be outside the nuclear scope at LF and therefore cannot undergo existential closure. I leave it for future research to establish whether there is independent support for such an approach.

4. Distribution of ka and lul stacking

4.1. Stacked lul also is not case

Before we can undertake a specific account of ka as a focus marker, we need to consider a set of facts about the distribution of lul, the ACC particle. As it turns out, lul also has a secret life as a marker of focus, stacked on other case markers. In (24) it appears stacked on a DAT marker of a goal phrase, where it too induces a focus reading (J. Yoon 1996) and needs to be followed by an intonation phrase boundary.

16. Choe (1995, fn. 10) discusses Korean scope interactions involving focally-stressed indefinite NPs, whereby both subjects and objects tend to get wide scope (i.e., referential) interpretations, independent of surface word order. Her suggested explanation is that at LF, the focus position is higher than the “quantifier position.” She also proposes (fn. 15) that left-dislocated elements are above topics.

17. As noted by Marantz (1993), fronted and clefted foci in English obey the same specificity requirement as topicalized elements, providing motivation for the claim in the text:

(i)
  a. *NO ONE he saw, but EVERYONE he heard.
  b. *It’s SOMEONE/NO ONE that he saw.
  c. *(SOMEONE/NO ONE), John is sure to marry before he’s 50.

18. Parallel to example (1) with which we began, this sentence also has a variant with only ACC on the indirect object:

(i)  Swunhi-ka Yenghi-lul chayk-ul cwuesstu.
    S-NOM Y-ACC book-ACC gave

The possibility of replacing DAT with ACC depends on the choice of verb, and is highly marked for some speakers (O’Grady 1991). See below for comments on the status of this use of lul. Sun-Ah Jun (p.c.) finds that (24) with two ACC markers, and many other examples with multiple ACC-marked constituents, are mostly spoken-language phenomena.

19. Gerdts and Youn (2000) report that the stacked version of sentences like (24) sounds better if the two particles are contracted into the more colloquial form eykeyl.
On Korean “Case Stacking” 207

(24) Swunhi-ka Yenghi-eykey(-lul) chayk-ul cwuessta.
     S-NOM Y-DAT(-ACC) book-ACC gave
     ‘Swunhi gave Yenghi the book.’

What I claim, then, is that ka and lul are each ambiguous between a case marker
and a focus marker (cf. J.-Y. Yoon 1989, 1990, who treats the noncase particles as
secondary theta-role markers and/or emphatic focus markers; see also Sohn 1994).
The arguments that stacked lul should be analyzed not as a case marker but as a
focus marker parallel those given for ka above:
1. Stacked lul is optional (24).
2. It clearly appears on non-direct objects, as in (24), even when the ACC direct
   object is consuming the structural ACC case. In (27) and later examples below it
   appears on an adjunct.
3. While ACC case can appear on a quantifier floated from an ACC object as in
   (25), a floated quantifier cannot take ACC marking in agreement with stacked lul
   (26a), even for speakers who allow Q-float from DAT NPs, as in (26b).

     I-NOM book-ACC yesterday three-ACC read
     ‘I read three books yesterday.’ (O’Grady 1991: 211)
        S-NOM student-PL-DAT-ACC 3-ACC talk did
        (‘Swunhi talked to three students.’)
    b. %Swunhi-ka haksayng-tul-eykey-lul seys-eykey iyaki hayssta.
        S-NOM student-PL-DAT-ACC 3-DAT talk did
        ‘Swunhi talked to three students.’

4. Stacked lul is possible on the answer constituent of a goal wh-question like
   Who did Swunhi give the book to?, as in (24).
5. Multiple stacked luls are possible for multiple foci, as in (27):

     J-NOM S-DAT-ACC Y-LOC about-ACC talk did
     ‘John talked to Swunhi about Yenghi.’
6. Stacked lul blocks the existential reading of an indefinite (28b).

        J-NOM some-person-DAT book-ACC gave
        ‘John gave someone a book.’ [existential or specific]
        J-NOM some-person-DAT-ACC book-ACC gave
        ‘John gave someone a book.’ [specific only]20

20. See note 28 for a related observation.
4.2. Choice of ka versus lul stacking

This raises the obvious question of what the relationship is between stacked ka and stacked lul: they are not in free variation. In all of the stacking examples we have seen so far, if one were to replace ka with lul or vice versa, the result would be ungrammatical, as shown in (29), in contrast to (24). 21

(29) *Swunhi-ka Chelswu-eykey-ka chayk-ul cwuessta.
S-NOM C-DAT-NOM book-ACC gave
(‘Swunhi gave Chelswu a book.’)

One key observation is that subjects, whether DAT or NOM, always take ka as their stacked particle; where we find variation between ka and lul is on complements and adjuncts. A second observation, seen in (30), is that some property of the main predicate is then relevant to the choice between ka and lul, since the same PP in the same position takes ka with ‘become good’ but lul with ‘ban’. 22

  yesterday-from-NOM weather-NOM good.became
  ‘From yesterday, the weather became good.’ (J. Yoon 1987: 156)

b. Ecey-pwuthe-lul cengpwu-ka swuip-ul
  yesterday-from-ACC government-NOM imports-ACC
  kumcihayssta.
  banned
  ‘From yesterday, the government banned imports.’

Note that (30a) contains an intransitive predicate, while (30b) has an ACC complement. Also, (31a) takes a NOM complement and takes stacked ka, whereas (31b) takes an ACC complement and disallows stacked ka.

21. There are some apparent exceptions to the mutual exclusivity of the ka and lul options, involving adjuncts in clauses whose predicate assigns ACC. Thus, the complete paradigm corresponding to (30) can be as in (i).

  yesterday-from-ACC/NOM government-NOM imports-ACC banned
  ‘From yesterday, the government banned imports.’

  yesterday-from-NOM/ACC weather-NOM good.became
  ‘From yesterday, the weather became good.’ (Urushibara 1997: 532)

I do not pursue the detailed analysis of such examples here. However, as will become clear below, the cases available in each sentence are just those expected under my account. What requires further exploration is just the fact that the adjunct in (ia) has a choice of particle.

22. One of my consultants does not accept (30b).
On Korean “Case Stacking” 209

(31)  a. **Swunhi-eykey cip-eyse-ka** Chemswu-ka **mwusepta.**  
S-DAT house-in-NOM C-NOM fears  
‘Swunhi fears Chemswu in the house.’  

b. **Swunhi-ka** cip-eyse-ka Chelswu-lul poassta.  
S-NOM house-in-NOM C-ACC saw  
(‘Swunhi saw Chelswu in the house.’)

Thus, the generalization is that predicates that assign ACC require *lul* as the stacked particle on a nonsubject, while those that do not assign ACC require *ka* as the stacked particle. This generalization straightforwardly covers almost all the examples of stacking seen in previous sections, as the reader can verify. The only apparent exceptions involve stacked *lul* with a predicate consisting of the light verb *ha* ‘do’ plus a noun complement with no case particle, e.g., (27). Those can be assimilated to the generalization by noting that *ha* does assign ACC to its complement in other sentences; therefore, what is relevant is not just the case actually assigned by the predicate, but also the case that is assignable by it. This is summarized in (32).

(32) Distribution of stacked particles (Version 1)  
If a constituent XP allows case stacking, its stacked particle will be  

a. *lul* if XP is a nonsubject in a clause whose predicate is an ACC-assigner;  

b. *ka* if XP is a subject, or a nonsubject in a clause whose predicate is not an ACC-assigner.

Further examples confirming this generalization with respect to arguments appear in (33)–(35); multiple word orders are illustrated in order to show that the linear position of the element with stacking does not affect the choice between *ka* and *lul*.

(33)  a. **John-i Mary-eykey-lul chayk-ul cwuessta.**  
J-NOM M-DAT-ACC book-ACC gave  
‘John gave Mary the book.’  

b. **Mary-eykey-lul John-i chayk-ul cwuessta.**  
M-DAT-ACC J-NOM  

23. There are instances in which DAT arguments, as well as adjunct PPs, allow stacking of neither *ka* nor *lul*. These additional restrictions on stacking may be associated with the choice of main predicate and/or the semantics of the constituent; for example, Jun Mo Cho (p.c.) suggests that among DAT complements only delimiters allow *lul*-stacking. Describing and explaining these restrictions is beyond the scope of the present paper, and this is the reason why (32) and subsequent versions of the proposal begin with an *if*-clause. Here my goal is to explain stacking wherever it is possible, assuming that this explanation is substantially independent of the explanation of the restrictions.
   M-DAT-NOM J-NOM
   (J-Y. Yoon 1990: 102)

   K-DAT-NOM that person-NOM kind
   ‘That person is kind to Kyenga.’

b. %Ku salam-i Kyenge-eykey-ka chincelhayssta.24
   that person-NOM K-DAT-NOM kind

   M-NOM Y-DAT-ACC won.over
   ‘Minca won over Yongho.’

   Y-DAT-ACC M-NOM won.over

c. Minca-ka Yongho-lul ikiessta.
   M-NOM Y-ACC won.over

The availability of stacked *lul in (35 a and b) results from the fact that the predicate ‘won over’ *can* assign ACC case, as it does in (35c).

Example (36) provides further confirmation that adjuncts conform to (32). As with arguments, surface position does not affect the choice of stacked particle on adjuncts.

(36) a. Swunhi-ka cikum-pwuthe-ka mwuncey ita.
   S-NOM now-from-NOM problem is
   ‘From now on Swunhi has the problem.’

b. Cikum-pwuthe-ka/*lul Swunhi-ka mwuncey ita.
   now-from-NOM/*ACC S-NOM problem is

Here, ‘problem’ is not and cannot be marked for any case; this is a general property of positive copular sentences, and explains why stacked *lul is unavailable. This is the reason that (32b) is stated in terms of unavailability of ACC assignment rather than availability of NOM assignment – *ka is the default stacked particle, available when the predicate assigns no case at all.

4.3. Analysis

The statement in (32), which distinguishes subjects, suggests that structural domains are relevant to the choice of particle. Additional support for this approach

24. Only one of my three primary consultants finds (34b) acceptable.
On Korean “Case Stacking” 211

comes from an observation by Kim and Maling (1993), namely that certain ad-
verbial expressions display scope contrasts as a function of the (optional) particle
they take:25

(37)  a.  Tol-i entek alay-lo twu pen-i kwullessta.
       stone-NOM hill bottom-to 2 times-NOM rolled
       ‘It happened twice that a stone rolled down the hill.’ [wide scope]
       b.  Tol-i entek alay-lo twu pen-ul kwullessta.
       stone-NOM hill bottom-to 2 ACC rolled
       ‘The (same) stone rolled down the hill twice.’ [narrow scope]
       (Kim and Maling 1993: 371)

ACC on the adverb marks scope over just the predicate, while NOM marks scope
over the entire clause. Thus, I refine (32) as follows:

(38)  Distribution of stacked particles (Version 2)
If a constituent XP allows case stacking, its stacked particle will be
   a.  lul if the predicate is an ACC assigner and XP is in the domain of the
       predicate;
   b.  ka otherwise.

By “in the domain of the predicate,” I mean that the head of XP’s A-chain must
be within VP. This captures the facts as follows. Subjects raise out of the VP by
A-movement, so they are never eligible for lul-stacking. Complements never raise
out of the VP by A-movement, so they must take lul if the predicate is an ACC
assigner, ka if the predicate is a NOM assigner.

Let us now consider how (38) can be implemented. I shall employ two focus
positions, one associated with IP, the other associated with VP; for concreteness,
suppose the focus positions are IP- and VP-adjoined, whereas case-checking posi-
tions are specifiers. Multiple adjunction to these phrases is possible, with a multi-
ple focus interpretation. The relevant parts of the structure are schematized in (39),
where the predicate is an ACC assigner. (39) is not the structure for any individ-
ual sentence; it illustrates the positions of all relevant constituent types: focussed
adjuncts (XP₁ and XP₂) and focussed arguments (NPᵢ and NPᵢ). The precise base
positions of the arguments are not important.

25. Many other types of adverbials do not behave the same way, and not all speakers allow both
choices in (37). One of my primary consultants accepts only (37b), and finds it scopally ambigu-
ous. Unlike stacked lul, the lul in (37b) apparently does not need to be licensed by a predicate that
can assign ACC. See Kim and Maling 1993 and Wechsler and Lee 1996 for further observations
and analyses.
This is the same structure arrived at by J.-Y. Yoon (1989, 1990) based mostly on a different set of facts; Yoon does not discuss stacking on subjects. See Horvath 1995 for the claim that multiple focus positions in a single language are a parametric option. Choe (1995) has already argued for a designated focus position above the subject in Korean. I follow Choe in assuming that focus positions may be occupied by S-structure or by LF in Korean, to explain why surface word order in case stacking sentences is fairly free.

As indicated in (39), IP-focus is marked by ka, and VP-focus is marked by lul if the verb can assign ACC (ka otherwise). This can be derived under a view where a head must license a focus feature by checking. Indeed, Horvath (1995) proposes such a theory, treating focus assignment as formally very similar to case assignment, and V and I are two of the possible checkers of the focus feature in her system; Choe (1995) also assumes focus is licensed by a head, and raises the possibility (fn. 4) that Korean has two focus positions. Given V and I as focus licensors, VP-internal elements (e.g., goal objects) are blocked from IP-adjunction (where they would incorrectly be marked with ka) because a focus must be licensed by the closest focus licensor, and VP-adjunction is always a possible focus licensing position; this rules out ungrammatical sentences like (29) as violations.
of Relativized Minimality (Rizzi 1990), because they would involve skipping the V focus to get to the I focus.

A treatment in terms of focus-licensing heads as in (39) allows us to reduce the two-part statement in (38) to a single generalization:

(40) Distribution of stacked particles (Version 3)
If a constituent XP allows case stacking, its stacked particle will correspond to the case assignable by XP’s focus-licensing head.26

For purposes of (40), the focus-licensing heads are V and I; V may assign ACC or NOM depending on the predicate (see above) and I is always able to assign NOM; (40) presupposes that only focus-licensed phrases exhibit stacking.

5. Extension to other “case marking” constructions

An analysis of the kind I have proposed extends straightforwardly to two other constructions where the case particles behave in un-caselike ways without being stacked on other case markers.27 (Such a unification is also suggested by J.-Y. Yoon (1989), and for one of these constructions by Nakamura (1996) in a different framework.)28

5.1. The “ECM” construction

Several authors have already proposed that so-called “ECM” constructions in Korean, which involve lul appearing on an embedded subject, as in (41), demand a treatment of this lul wherein it is not an ACC case marker (contra Yoon and Yoon 1991; J. Yoon 1996). Arguments against a case analysis anything like English ECM include the following:29

26. Here I avoid stipulating ka as the default, on the assumption that in a positive copular sentence like (36) VP is missing altogether, so I is the only focus-licensing head.

27. There is a large literature on each of these constructions, so I do not discuss all their properties here.

28. Nonstacked lul on an indirect object, which alternates with eykey in many instances (cf. note 18), might also profitably be treated as a non-case use of lul. (D.-W. Yang (1999) groups it with stacking as a “non-canonical” case use.) Urushibara (1997) reports that such indirect objects are interpreted as focused by her consultants, and that some speakers allow only the specific reading of an indefinite indirect object marked with nonstacked lul. This would suggest that we are indeed dealing with the focus particle rather than true ACC case. However, my consultants, like Urushibara’s, diverged greatly in their reaction to the target sentence (like (28b) but without eykey), so caution is advised.

29. See Massam 1985 for discussion and analysis of constructions with similar properties in a wide variety of languages.
1. As shown in (41), *lul*-marking on the embedded subject occurs in finite embedded clauses that can contain overt tense marking, where we have every reason to believe that NOM is always assigned, and these clauses must contain an overt complementizer such as *ko*, so they cannot be mere IPs. Also unlike English ECM, *lul* and the NOM case marker are generally in free variation.

(41)  
\[ \text{John-} \text{NOM} \text{ Mary-} \text{NOM/ACC} \text{ yeyppu-} \text{PAST-DECL-COMP} \text{ believes} \]
\[ 'John believes that Mary was pretty.' (J.-S. Lee 1991: 317) \]

2. The *lul*-marked element need not be the subject of the embedded clause, it can be virtually any constituent, provided it is at the beginning of that clause; in (42) it is an adverb.

(42)  
\[ \text{John-} \text{NOM} \text{ ecey-} \text{ACC} \text{ nalssi-} \text{NOM/ACC} \text{ chwuwessta-} \text{COMP} \text{ sayngkakhayssta.} \]
\[ 'John thought that yesterday the weather was cold.' (J. Yoon 1987: 156) \]

(See J. Yoon 1987 for additional discussion and arguments for the nonsubjecthood of “ECM”ed elements.)

3. A floated quantifier associated with the “ECM”ed subject can be NOM even when that subject itself is marked with *lul* (for many speakers, though not for my principal consultants), i.e., this *lul* does not trigger obligatory case agreement (C. Lee 1989: 479; O’Grady 1991: 220; Y.-S. Kang 1993; Gerdts 1987).

(43) a.  
\[ \text{John-} \text{NOM} \text{ haksayng-} \text{ACC} \text{ seys-} \text{NOM/ACC} \text{ chencay-la-} \text{COMP} \text{ mitessta.} \]
\[ 'John believed three students to be geniuses.' \]

b.  
\[ \text{Halmeni-} \text{TOP} \text{ sonca-} \text{ACC} \text{ ney-myeng-} \text{NOM} \text{ chakhata-} \text{COMP} \text{ mitessta.} \]
\[ 'Grandmother believed four grandsons to be good.' (Y.-S. Kang 1993: 343) \]

4. An idiom chunk cannot be “ECM”ed, unlike in English (J.-S. Lee 1991), suggesting that something other than a simple change of case marking is going on when *lul* replaces *ka* as in (44b).
On Korean “Case Stacking” 215

(44) a. **Hankwaksalam-tul-un cakun kochwu-ka mayp-ta-ko mitunta.**
Korean-PL-TOP small pepper-NOM hot-DECL-COMP
believe
‘Koreans believe that small men are stronger.’ [idiomatic meaning]
‘Koreans believe that small pepper is hotter.’ [literal meaning]
b. **Hankwaksalam-tul-un cakun kochwu-lul mayp-ta-ko mitunta.**
Korean-PL-TOP small pepper-ACC hot-DECL-COMP
believe
‘Koreans believe that small pepper is hotter.’ [literal meaning only]
(J.-S. Lee 1991: 318)

5. “ECM” can apparently operate long-distance:

(45) **Na-nun ku cel-ul[i] motun haksayng-tul-i [ti Sinla sitay-ey cieciessta-ko] malhalila-ko sayngkakhanta.**
I-TOP the temple-ACC every student-PL-NOM S dynasty-in was.built-COMP answer-COMP think
‘I think that every student will answer that the temple was built in Sinla dynasty.’ (Hong 1991: 40)

These observations have already led some linguists to suggest that “ECM” *lul* is actually a focus particle (cf. J.-S. Lee 1991; J. Yoon 1987). J.-M. Yoon (1989: 372) claims explicitly that “ECM” *lul* induces a focus (exhaustive listing) interpretation, citing additionally the fact that indefinites get only a specific reading in this environment (see also Hong 1990; cf. C. Lee 1989 for exceptions).

(46) **Chelswu-nun etten-salam-ul pwuca-la-ko sayngkakhanta.**
C-TOP some-person-ACC rich-COMP thinks
‘Chelswu thinks that somebody is rich.’ [specific only] (J.-M. Yoon 1989: 372)

I claim that “ECM” is really just another instance of *lul* being used to mark focus. This immediately explains why it is optional, why it is not restricted to infinitival clauses, and why it is not restricted to subjects. A focus analysis also explains why this use of *lul* is incompatible with idiom chunks; their nonreferential nature makes it impossible to construct the contrast set that focus would require. 30 “ECM” *lul* meshes easily with my analysis of stacking, because the verbs taking “ECM” complements are ACC assigners, as shown in (47).

---

30. Focus-inducing constructions in English are also incompatible with idiom chunks: *It’s the bug that the cat is out of,* *What has hit the fan is the shit,* etc.
Let us therefore extend (40) beyond stacking to focus-adjunction in general, so that it will apply to any focused constituent adjoined to the matrix VP (cf. J.-Y. Yoon 1990). If the verb is an ACC assigner, an adjoined element in that position will be marked with \( \text{lul} \). To make this apply in “ECM” sentences, we need only posit that the “ECM”ed constituent is adjoined to the matrix VP. In fact, there is independent evidence from word order and other tests (see Hong 1990; J. Yoon 1996) that the “ECM”ed constituent is in the matrix clause at S-structure, e.g., the adverb placement in (48a), which is unavailable when the embedded subject is NOM (48b).

(48) a. \( \text{John-un} \ Mary-\text{lul}, \text{elisekkeyto}, \text{yenglihata-ko} \) \\
\( \text{M-ACC} \text{foolishly intelligent-\text{COMP}} \) \\
\( \text{sayngkakhanta.} \) \\
'thinks' John foolishly thinks that Mary is intelligent.'

b. *?\( \text{John-un} \ Mary-\text{ka}, \text{elisekkeyto}, \text{yenglihata-ko} \) \\
\( \text{M-NOM} \text{foolishly intelligent-\text{COMP}} \) \\
\( \text{sayngkakhanta.} \) \\
(J. Yoon 1996: 117)

J. Yoon (1996) argues that the “ECM”ed element cannot be base-generated in the higher clause, but must be moved there from the lower clause. \(^{31}\) Under the proposed analysis, in a sentence like (48a) both true NOM case (from downstairs Infl) and VP-focus-marking are trying to be realized on Mary, but since they occupy the same morphological slot, only one can be pronounced, and it is \( \text{lul} \). \(^{32}\) However, the underlying NOM assignment shows itself in the availability

\(^{31}\) An anonymous TLR reviewer raises a potential problem for this treatment of “ECM,” given that earlier it was necessary to demand that a focus be licensed by the closest focus licensor. The particular situation there involved VP-internal nonsubjects that cannot skip VP and undergo focus-adjunction to IP. In the current situation if “ECM” literally involved moving the “ECM”ed constituent from a base position within the embedded IP to adjoin to the matrix VP, this ought to be blocked because the embedded IP would have been a closer focus licensor. But suppose instead that the “ECM”ed constituent is actually base generated above the embedded IP, as a left dislocation associated with a null \( \text{pro} \) (for arguments) or as a high adverbial (for adjuncts). Then movement of this constituent to adjoin to the matrix VP will not cross any other potential focus licensors. The case facts in (43) and (49) can still be captured on the assumption that left dislocations are required to agree in case with their associated arguments.
of NOM on the floated quantifiers in (43) above. If the lower subject happens to be DAT, as in (49), then there is no morphological competition and both case and focus marking surface on the NP.

(49) a. John-un Chelswu-eykey-lul ton-i manhta-ko
   J-TOP C-DAT-ACC money-NOM much-COMP
   mitmunta.
   believes
   ‘John believes Chelswu to have lots of money.’ (Yoon and Yoon 1991: 418)

b. John-un Chelswu-eykey-lul ton-ul pilyecwuessta-ko
   J-TOP C-DAT-ACC money-ACC lent-COMP
   mitmunta.
   believes
   ‘John believes that he lent money to Chelswu.’

Note that the proposed unification of “ECM” with case stacking makes a further prediction: given that we need to allow multiple focus-adjunctions to VP for multiple stacking, as in example (27) above, we might expect that multiple “ECM”ed constituents should also be possible, and this is correct.

(50) John-i hakkyo-eyse-lul Mary-lul ceyil-ila-ko
    J-NOM school-LOC-ACC M-ACC number.1-be-COMP
    malhayessta.
    said
    ‘John said that it is at school that Mary is Number One.’ (J.-Y. Yoon 1990: 133)

We know that lul on Mary must be coming from the matrix clause because the embedded predicate is not an ACC assigner.

5.2. A “multiple nominative” construction

There has been a great deal of literature in Korean (and Japanese) syntax devoted to so-called multiple nominative constructions (MNCs), constructions that allow more than one NOM NP to surface in a single clause. There are several distinct subtypes of MNC, only some of which are relevant to the concerns of this article. In this section, I suggest that the “generic topic” MNC can be unified with case

32. I assume that this choice is made in the morphological component. The data underdetermine the precise nature of the principle at work, e.g., whether there is a simple hierarchy of markedness of the morphemes in a given slot, or whether the spell-out of a focus feature might take priority over the spell-out of a case feature.

33. This example is marginal at best for some of my consultants.
stacking and “ECM” as a non-case use of the particle ka. J.-M. Yoon (1989) and Hong (1991) also suggest a unification of “ECM” and MNCs; Suh (1992) proposes that NOM in this kind of MNC is not case but focus. In the appendix, I mention some other types of MNC that pattern rather differently, with interesting theoretical consequences.

The generic topic construction is characterized by the fact that the two NOM NPs do not stand in a part-whole or inalienable possession relationship (unlike the majority of MNCs, whose meaning is generally consistent with a genitive reading), and the “topic” need not bind an empty position or coreferential pronominal within its associated clause. Prototypical examples are given in (51).34

(51) a. Enehak-i chwuyck-i elyepta.
    linguistics-NOM employment-NOM difficult
    ‘As for linguistics, getting a job is difficult.’ (Y.-S. Lee 1990: 207)

b. Phayngki-ka 747-i khuta.
    airplanes-NOM 747-NOM big
    ‘As for airplanes, the 747 is big.’ (J. Yoon 1987: 139)

c. Kkoch-i cangmi-ka mwul-i mani philyohata.
    flower-NOM rose-NOM water-NOM much need
    ‘As for flowers, roses need a lot of water.’

As the conventional name suggests, many analyses have held that NOM on these elements reflects a genuine case feature, perhaps assigned/checked by Infl. Here I argue, partly following work cited above, that this is incorrect. Other analyses might say that ka here is case, but it arises either by case concord with the true NOM subject or because NOM is the default case in Korean. Both of these possibilities are excluded, however, by the fact that this construction can be embedded in the “ECM” construction discussed in section 5.1, and when this happens, the first NP can be ACC while the second is NOM (52b); the reverse is not possible. Neither of the alternative analyses of this MNC provides any source for the ACC in (52b), since ACC is not the default case in Korean, and it cannot arise by concord since the associated subject ‘Koreans’ is not ACC.

34. In this use, as in some of its uses on ordinary subjects, Korean ka bears obvious syntactic and semantic similarities to Japanese ge – see Heycock and Lee 1990 and sources cited there. Heycock (1994a, 1994b) argues against a focus analysis of ge in Japanese (contra Diesing 1988), and in favor of treating multiple ge-marked phrases as being “subjects of predication” in A-positions; she proposes that the partial correlation between ge-marking and focus results indirectly from a conspiracy of other features of the relevant sentences. Even if hers turns out to be an appropriate analysis for some uses of unstacked ka in Korean, however, Heycock’s arguments do not bear on stacked uses of ka and lul, which have no counterpart in Japanese. (Although ge can occur on PPs functioning as true subjects, it is ungrammatical on other PPs even when they are focussed and sentence-initial (Heycock 1994b: 269); as we have seen, stacked ka occurs in such environments in Korean.) Furthermore, the existence of multiple ACC constructions in Korean (also nonexistent in Japanese) that share properties of multiple NOM constructions favors the sort of unification suggested in the text.
On Korean “Case Stacking” 219

(52) a. L.A.-ka hankwusalam-i ceyil manhi santa.
    L.A.-NOM Koreans-NOM most live
    ‘As for L.A., it has the largest Korean population.’ (Hong 1990: 219)
b. Minswu-ka L.A.-lul hankwusalam-i ceyil manhi santako
    M-NOM L.A.-ACC Korean-NOM most live
    saysngkakhanta.
    thinks
    ‘Minswu thinks that as for L.A., it has the largest Korean popula-
    tion.’ (Hong 1991: 39)

The most plausible view is then that the first instance of NOM in the examples in
(51) and (52a) is not case at all, but rather is like stacked ka in being a realization
of certain discourse properties in a domain above the VP of its clause, while lul
in (52b) is like stacked lul and “ECM” lul, serving a parallel function within an
ACC-assigning VP.

Turning now to the semantics of this construction and the features underlying
this use of ka and lul, it has been observed that sentences like those in (51) are
felicitous only if the remainder of the clause is “about” or “sufficiently character-
zizes” the initial NP, as illustrated by comparing (52a) with (53a), where the fact
that my brother lives in L.A. does not characterize the city. As noted by Hong
(1990), this requirement carries over to the “ECM” construction (53b).

    L.A.-NOM my brother-NOM live
    (‘As for L.A., my brother lives (there).’)
    I-TOP L.A.-ACC my brother-NOM live believe
    (‘I believe that as for L.A., my brother lives (there).’) (Hong 1990:
    220, 222)

Additionally, (51b) can occur as an answer to a question like Tell me about air-
planes. This is crucially different from stacked ka, which as we saw in section 3
is infelicitous in such a context. Specifically, the present use of ka can mark an
element that is not focused. These facts, plus the flavor of the standard translation
with as for, which identifies a topic (Portner and Yabushita 1998), indicate that the
“generic topic” uses of ka and lul indeed involve topic marking rather than focus
marking.

We can incorporate “ECM” and generic topic uses of lul and ka with an ex-
ansion of generalization (40), now removing specific mention of stacking and
assuming that topics, like foci, are licensed by heads.

(54) Distribution of discourse particles (Final Version)
    If a constituent XP can be marked as topic or focus by a case particle, that
    particle will correspond to the case assignable by XP’s focus- or topic-
    licensing head.
Here, the focus- and topic-licensing heads are again assumed to be V and I. It is important to remember the general picture into which (54) fits (cf. section 2): *ka* and *lul* can constitute the expression of two different kinds of underlying features: genuine case features, whose properties fit a crosslinguistically justified theory of case, and discourse status (or information structure) features, whose properties fit a crosslinguistically justified theory of topic and focus. (54) embodies a claim about which particles are used in which syntactic contexts to express the latter features, and the claim is that this choice is related to properties of the heads that also govern the expression of the former features.

The suggestion that different noncase uses of *ka* and *lul* have very different, even mutually incompatible uses (focus versus topic) may seem unappealing until one recalls one other fact about topic and focus marking in Korean, namely that both of these functions can be signaled by the particle *nun* (cf. (23) above) – see Choe 1995 and C. Lee 1998 for extensive discussion. Remember as well that these three particles share the same morphological slot, cf. (4). (The other occupants of this slot are *to* ‘also’ and *(i)lato* ‘even’, which could increase the likelihood that all its occupants would be construed as potentially focus-related.) It is then not so surprising that they should also share a certain range of semantic functions, because the appearance of one of them on a given NP prevents the appearance of another. This means that, for example, case features are not visible on an NP marked as a topic or focus by *nun*. One can imagine that in situations where case marking is crucial for making the meaning clear, topichood or focushood would have to be expressed without the use of *nun*, perhaps using prosody, in which case *ka* and *lul* would be appearing in topic and focus environments, so their association with these features would not be purely accidental.  

6. NP subjects versus PP subjects

I have been assuming throughout that DAT subjects are NPs with a DAT case feature, rather than PPs whose head is *eykey*. At this point I briefly justify this assumption, because it is important for the conclusions I draw in section 7 about case systems cross-linguistically, and it turns out to provide additional support for my analysis of case stacking. I give two pieces of evidence, one based on Q-float, the other based on a contrast between NP and PP arguments.

---

35. These speculations should not be taken as a hypothesis about the specific historical development of this phenomenon. I have not attempted to trace the history of the uses of these particles, but only to suggest that the synchronic analysis I have pursued is more natural when viewed from this perspective.
6.1. **DAT can be a case morpheme**

Contrary to most claims in the Korean literature (e.g., O’Grady 1991; Urushibara 1991; Gerds 1987; Kuh 1987), I argue that at least certain instances of DAT are case markers. (Y-j Kim 1990: 170ff makes this claim, as does Hong 1991; Sells 1995 argues against a syntactic interpretation of most standard arguments about DAT; Cho and Sells 1995 claim there is no independently identifiable category of postposition in Korean.) Urushibara (1991) cites numerous facts in support of her claim that DAT must be a postposition in Korean, but most of these follow from the morphological template in (4), and thus hold equally of the honorific NOM kkeyse, which has never been treated syntactically as a postposition. Some of Urushibara’s data show that certain instances of DAT may indeed be postpositions, but she does not apply all the diagnostics to the full range of uses of DAT.

One standard assumption (cf. Shibatani 1977; Miyagawa 1989) about the difference between NPs and PPs is that Q-float should be disallowed out of PPs. This holds for Korean, at least for “long-distance” Q-float where another constituent intervenes between the head noun and the numeral quantifier (cf. section 2 above). Importantly, while DAT allows Q-float for some speakers, as noted above, be it from a subject (55a) or a goal (55b), postpositions do not. This is shown for ulo ‘into’ in (57a) and ulopwuthe ‘from’ in (57b), contrasting minimally with the bare NP in (56). Thus I claim that these latter two morphemes, unlike eykey, in fact head PPs.

(55) a. %Haksayngtul-ekey ton-i seys-ekey philyohata. [=11a)]
    students-DAT money-NOM 3-DAT need
    ‘Three students need money.’

b. %Nay-ka ai-tul-eykey chay-ul seys-eykey cwuessta.
    I-NOM child-PL -DAT book-ACC 3-DAT gave
    ‘I gave a book to three children.’

(56) Cip-ul kyengchal-i twu-chay(-lul) twulekassta.
    house-ACC police-NOM 2-CL(-into) entered
    ‘The police entered two houses.’

    house-into police-NOM 2-CL(-into) entered
    (‘The police entered (into) two houses.’)

    house-from police-NOM 2-CL-from came.out
    (‘The police came out of two houses.’)

6.2. **True PPs can get “real” (obligatory) case**

Under my account, it would not be surprising if a true PP in subject position did get real NOM case, on the assumption that PPs do not inherently bear case features and
Carson T. Schütze

hence do not block structural case assignment (cf. Schütze 1997; see Sadakane and Koizumi 1995 for this claim in Japanese). This is true in the following examples; note that (58) uses a subject PP headed by the postposition (u)lo, which was shown to disallow Q-float in (57a) above:

(58) Pang-an-ulo-*ka* macnun panghyang ita.
    room-in-to-*ka*(NOM) right direction is
    ‘Into the room is the right direction.’

(59) Cengwen-eyse-*ka* Swunhi-ka censim-ul mek-un kos ita.
    garden-LOC-*ka*(NOM) S-NOM lunch-ACC eat-REL place is
    ‘In the garden is the place where Swunhi ate lunch.’

(60) Cikum-pwuthe-*ka* mwuncey-lul yaki hanta.
    now-from-*ka*(NOM) problem-ACC cause does
    ‘From now on causes a problem.’ (D.-W. Yang 1999: 636)

(61) Keki-lul kanuntey-nun, Sewul-lopwuthe-*ka* cohayo.
    there-ACC go-TOP S-from-*ka*(NOM) good
    ‘In order to go there, (it is) good (to go) from Seoul.’
    (Urushibara 1997: 538)

We can show that it is the PP in (58) that is the subject, not panghyang, because a NOM marker on panghyang is ungrammatical, a property of complements to the copula in Korean, as we saw in (36).

(62) *Pang-an-ulo-ka* macnun panghyang-i ita.
    room-in-to-*ka* right direction-NOM is
    (*‘Into the room is the right direction.’*)

The examples in (58–61) differ from focus stacking in two crucial respects: 1) ka is obligatory, just like regular NOM case on transitive subjects in the configuration of (5) above; and 2) there is no special prosody associated with the initial constituent in these sentences. (60) contrasts crucially with (63), which contains the same PP but as an adjunct, not as the subject.

(63) Cikum-pwuthe(-ka) Swunhi-ka mwuncey ita.
    now-from(-ka)*(NOM) S-NOM problem is
    ‘From now on Swunhi has the problem.’

Here, ka is optional. This shows that there is nothing about the identity of the PP that would condition obligatory versus optional ka. Thus, there are true instances of ka as a NOM case morpheme stacking on another particle (58–61), but they still are not “case stacking” literally, because the preceding particle is not a case morpheme but a postposition.

The same argument has been made independently by Urushibara (1997), using lul marking on complement PPs:
On Korean “Case Stacking” 223

(64)  
\[ \text{Keki-lul kanuntey-nun, Sewul-lopwuthe-\text{*(lul)} thaykhata.} \]
  there-ACC go-TOP S-from-\text{*(ACC)} choose
  ‘In order to go there, (I) choose (to go) from Seoul.’
  (Urushibara 1997: 538)

She adds the observation that these PPs can occur as old information in the answer to a wh-question, hence they do not have to be focused.

(65)  
\begin{align*}
  \text{a. Q: } & \text{Nwu-ka Sewul-lopwuthe-lul thaykhayssni?} \\
  \text{who-NOM S-from-ACC chose.Q} \\
  \text{‘Who chose (to go) from Seoul?’}
\end{align*}

\begin{align*}
  \text{b. A: } & \text{Nay-ka Sewul-lopwuthe-lul thaykha\text{yssta}.} \\
  \text{I-NOM S-from-ACC chose} \\
  \text{‘I chose (to go) from Seoul.’} \quad (\text{Urushibara 1997: 538})
\end{align*}

The contrasts demonstrated in this section thus reinforce the need for two different analyses of \text{ka} and \text{lul} to account for their two sets of behaviors.

7. Conclusions

I have proposed a focus analysis for stacked \text{ka} and \text{lul} in order to explain numerous facts about their syntactic and semantic distribution. This analysis extends straightforwardly to cover two other constructions involving these particles that I have argued do not involve case. This means that sentences like (1c) in Korean are not literally instances of morphological case stacking. Let me now mention why this is a desirable result. If \text{ka}-stacking on DAT subjects were really structural case, it would imply that structural licensing of an NP in subject position means bestowing it with the morphological case feature canonically associated with that position (NOM), and that in general an NP can simultaneously bear multiple morphological case features, such as DAT and NOM. In particular, it would imply that an NP can bear both a lexical/quirky case and a structural case feature (assuming, with the rest of the literature, that subject DAT is a lexical case). But well-known facts from languages such as Icelandic (Thráinsson 1979) show that these conclusions cannot be correct in general. In Icelandic, subjects are canonically NOM and trigger person and number agreement on the finite verb, as in (66a). However, certain psychological predicates assign DAT case to their subjects (66b). These DAT subjects can appear in all and only the structural positions where NOM subjects can appear, but they can never trigger person or number agreement on the verb; furthermore, NOM case can appear on an object in Icelandic just in case the subject is DAT, and when this happens, the verb agrees in number with that NOM object, as in (66b).

(66)  
\begin{align*}
  \text{a. Við \text{furftum} vinnu.} \\
  \text{we(NOM) needed(1PL) a-job(ACC)} \\
  \text{‘We needed a job.’}
\end{align*}
b.  Mér líka þessir bílar.
   me(DAT) like(3PL) these cars(NOM-PL)
   ‘I like these cars.’

The most obvious characterization of these facts is that DAT case on a subject blocks a certain feature-checking relationship between the subject and a functional head – namely, the relationship responsible for agreement and NOM case assignment – and concomitantly allows this relationship to be established with a non-subject, other factors permitting. Thus, it is plausible that universally, lexical case features block the kind of feature-checking relationship required for morphological NOM case assignment and subject-verb agreement. My analysis of Korean “case stacking”, unlike case-based accounts, is compatible with this view, removing the need to posit parametric variation on this point. Structural licensing, however it actually works, is not the same as, nor does it depend on, morphological case assignment, as has been argued by Marantz (1991), Schütze (1997), and in numerous works cited in the latter. In particular, licensing a subject does not imply assigning NOM case to it.

This is not to say that genuine case stacking in a broader sense, that is, the appearance of multiple case morphemes on the same NP, does not exist. There are some clear instances of this, for example, those discussed by Dench and Evans (1988), Wordick (1982), Nordlinger (1998), and in Plank 1995, where even more than two case markers can co-occur. These differ crucially in character from the sort of multiple case assignment envisioned by J. Yoon (1996) for Korean, however: each case is related to a different syntactic domain, and within each domain only a single case is assigned. That is, true multiple case behaves more like “concord” in the sense used to describe, for example, case marking in NPs in Latin, where adjectives within NP are marked for the case that the NP as a whole receives, but are presumably not themselves being assigned that case directly by some element within the NP. Rather, the case feature of a dominating constituent can “trickle down” and be realized on its dependents.

It is nevertheless striking that Korean’s non-case use of case particles is not unique. For instance, Ghomeshi (1997) observes numerous traits in the distribution of the Persian morpheme -rā that are reminiscent of Korean facts discussed above. She demonstrates that this morpheme can appear on any NP adjoined to VP, including objects, adverbials, and “as for” topics, but it cannot appear on subjects or on topics generated above subject position. Furthermore, it can occur more than once in a single clause. This leads her to a proposal quite similar to the one made here for lul, treating -rā as a morpheme generally available to elements in the VP domain, perhaps via adjunction, and marking their discourse status.

Tibetan, which is generally described as having a split-ergative case system based on aspect, allows its Erg morpheme to do double duty as a focus marker (Garrett 1998 and references cited there). Interestingly, as in Korean, its distribution in this focus use is sensitive to many of the same factors that govern its
appearance as a true case marker. In particular, the kinds of subjects that can take focus Erg are a superset of those that can take true Erg case in the perfective. Garrett’s (1998) fieldwork shows that in nonperfective clauses, Erg is optional on the subject, and when added it introduces an exhaustive focus reading. (In contrast, true case uses of Erg show more limited and variable omissibility.) Also, focus Erg, unlike Erg case, requires special prosody, with the marked constituent being emphasized (Tournadre 1991). Focus Erg is common on answers to wh-questions, and can occur on wh-phrases themselves. Adding the Erg marker may bias towards the specific reading of an indefinite subject (Garrett 1998). It has also been observed that the Tibetan dative marker la can apparently be used as a focus marker, perhaps at the VP level, analogous to Korean lul.

More generally, the non-case uses of case particles in Korean can be seen as instances of the widespread phenomenon whereby the presence versus absence of case morphemes often reflects semantic features other than those that are part of the case system per se (cf. Adger 1994), for instance, definiteness/specificity with Turkish ACC. It is worth asking why this “two-faced” behavior of case morphemes should be found time after time in unrelated languages. I speculate that the answer lies partly in an observation brought to the fore in recent work by Chomsky (1995). In chapter 4 of the cited work, Chomsky argues that the distinction between interpretable and uninterpretable features plays a crucial role in determining the syntactic behavior of elements that could enter feature-checking relationships. What is relevant here is that case is unique among the features discussed, in that both the feature on the checker and the feature on the checkee are uninterpretable. (By contrast, subject-verb agreement involves phi-features that are uninterpretable on the verb but interpretable on the subject.) This means that if corresponding pairs of case features (checker and checkee) could be omitted from a syntactic derivation entirely, the same (interpretable) LF should result as if they had been left in. Putting it in more familiar terms, the syntactic features that underlie structural case morphemes have no direct impact on the meaning of a sentence in this model. We might expect this superfluity to make the morphemes that realize these features susceptible to being co-opted by the language into marking some semantically relevant information, or to simply being dropped when they are not needed for functional purposes such as disambiguation. Both of these outcomes are attested in Korean, as well as in many other languages.

What is intriguing about the Korean facts, however, is that the morphemes ka and lul continue to serve as genuine case morphemes in addition to their function as discourse particles. One might feel that a more appealing conclusion would be that these morphemes actually never realize case features at all, so that no “dual nature” need be invoked. Such a move strikes me as untenable, however. Re-

36. Of course, in some situations a case morpheme must appear in order for a morphologically well-formed word to be produced. This does not necessarily mean that a syntactic case feature was present, however (see Schütze 1999).
call that several of the arguments in sections 2 and 4 against analyzing stacked
*ka* and *lul* as case markers were based on the fact that in their stacked use they
behave differently in purely syntactic terms from genuine case uses of those same
morphemes – in particular, with respect to optionality, honorific agreement, and
*Q*-float. Thus, even if we concede that there are no hard-and-fast criteria for what
should count as a “genuine” case system, internal to Korean there are two differ-
ent sets of principles governing the distribution of *ka* and *lul*. I have deliberately
avoided any strong commitment as to the mechanical implementation of either of
these systems, because my main point is independent of and logically prior to any
attempt to address that question. It should be clear what the crucial properties of
the systems must be, however. In addition to the tight relationship between a head
such as *V* and its arguments, there is some other mechanism in the language that
connects the case feature(s) of that head to all the elements in a fairly large domain
around it (e.g., VP). If the former relationship is something like spec-head feature
checking, the latter is not obviously so. A treatment of non-case *ka* and *lul* in terms
of multiple specifiers (Chomsky 1995), for example, would have to acknowledge
that not all specifiers are created equal, and would thus offer no obvious bene-
fits. (But see the appendix with regard to a different set of facts.) In contrast, the
distinction between a specifier and an adjoined phrase (not available under Kayne
1994) captures the overarching intuition: heads such as *V* and *I* can participate in
two different kinds of relationship with nearby phrases: a very close connection to
a single argument, and a considerably looser connection with numerous additional
phrases, including nonarguments.

**Appendix: Other “multiple case” constructions**

In addition to the “multiple nominative” topic construction discussed in section
5.2, there are other “multiple case constructions” (MCCs) in Korean that might
appear to be candidates for a non-case treatment. These are not discussed in the
main text because they have less in common with case stacking, but the contrasts
prove instructive. In these MCCs, the NPs marked with the same case (of which
there may be more than two – see I.-J. Cho 1993 for examples) stand in a relation-
ship of inalienable possession (including part-whole or kinship relations), and all
but one of them are demonstrably not a sentential argument (subject or object) (J.
Yoon 1987; Hong 1991; J. M. Cho 1994; etc.).

(67)  

a. *Swunhi*-ka *apeci*-ka *pwucaisita.*

\[
\begin{array}{llll}
S-NOM & father-NOM & rich.be \\
\end{array}
\]

‘Swunhi’s father is rich.’

b. *Minswu*-ka *son-i* *khuta.*

\[
\begin{array}{llll}
M-NOM & hand-NOM & big \\
\end{array}
\]

‘Minswu’s hands are big.’
On Korean “Case Stacking”

(68) a. Mary-ka Inho-lul tung-ul ttaylessta.
    M-NOM I-ACC back-ACC hit
    ‘Mary hit Inho in the back.’

b. Chelswu-ka chayksang-ul tali-lul kochiessta.
    C-NOM table-ACC leg-ACC fixed
    ‘Chelswu fixed the table’s legs.’

The first thing to note is that case-assigning properties of the predicate are relevant to how the nonarguments are marked; with predicates that assign a complement case other than ACC, all the NPs in a multiple object construction take that case: NOM in (69a), DAT in (69b).

    I-TOP cat-NOM eye-NOM fear
    ‘I fear the cat’s eyes.’ (Sohn 1994: 237)

b. Nay-ka Yumi-eykey ima-ey olunccok-ey
    I-NOM Y-DAT forehead-DAT right.side-DAT
    kissed
    ‘I kissed Yumi on the right side of the forehead.’ (Y-j Kim 1990: 271)

Also, these NPs obligatorily change case when an ACC-assigning verb is passivized:

(70) a. Cengwensa-ka namwu-lul kaci-lul ccallassta.
    gardener-NOM tree-ACC branch-ACC cut
    ‘The gardener cut the tree’s branches.’

    tree-NOM branch-NOM/*ACC be.cut be
    ‘The tree’s branches were being cut.’ (Maling 1991: 303)

These preliminary facts could be accounted for in a way completely parallel to the proposals in the main text. (For related observations and proposals, see J. Yoon 1987; Choe 1987; J.-Y. Yoon 1990 and references cited there; I.-J. Cho 1993; Y.-B. Kim 1987; J.-M. Yoon 1989; Y-j Kim 1989; 1990; D.-I. Cho 1992; O’Grady 1991.) Consistent with this approach, when these MCCs occur in an “ECM” focus environment (cf. section 5.1), only the first NP can be ACC, even when this is not the head of the subject of the embedded clause (J.M. Yoon 1989; O’Grady 1991), cf. (52b).

(71) a. Na-nun Swunhi-lul sonkalak-/*ul kilta-ko
    I-TOP S-ACC finger-NOM/*ACC long-COMP
    sayngkakhanta.
    think
    ‘I consider Swunhi’s fingers to be long.’
Further intriguing evidence comes from Maling and Kim (1992), on the basis of facts such as those in (72b and d), where the NPs associated by inalienable possession do not agree in case. Maling and Kim show that this possibility arises precisely when the main predicate can assign two different cases: each NP can choose from between those cases independently (here, ACC and DAT).

However, these MCCs do not behave entirely the same as their counterparts in sections 2–5. First, in MCCs the “extra” case markers can be datives. This is especially telling if the speculations in section 5.2 are on the right track, viz. the fact that ka and lul are in the same morphological slot as nun is not a coincidence. Recall from (4) that none of the DAT morphemes appear in that slot. Second, MCCs do not necessarily involve special discourse status (e.g., focus or topic/aboutness) for the nonargument NPs. This points toward the obvious alternative analysis in a Minimalist framework, namely a multiple specifier approach in which each NP indeed checks case with the head. This would capture the two differences just noted: the particles in MCCs are true case, so DAT should be involved; on plausible assumptions, specifier positions of V and I lack any particular discourse properties, whereas adjoined positions often have such properties, for instance in the standard analysis of English-style “topicalization” (really focus fronting) as IP-adjunction.

We will need to ensure that only one of the multiple specifiers can show subjecthood (and likewise, direct objecthood) properties, but this is required in multiple specifier theories anyway (cf. Ura 1996).

It will obviously take a great deal more investigation to establish whether this analysis can be independently supported, but the facts line up promisingly well with the range of analytical options provided in the Minimalist Program.
References


