

AGREEMENT PATTERNS IN *IT*-CLEFTS: A MINIMALIST ACCOUNT

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Abstract

The paper proposes a structural analysis of English *it*-clefts which accounts for different agreement patterns with clefted personal pronouns corresponding to the subject gap in the cleft clause. The agreement patterns under investigation are patterns already reported in the literature (Akmajian 1970, Sornicola 1988) as well as those that were found in a questionnaire filled in by a group of native speakers in 2012. An attempt will be made to account for the agreement variations that appear in *it*-clefts within the theoretical framework of the Minimalist Program (e.g., Chomsky 2008) incorporating Kratzer's (2009) view on bound pronouns. Specifically, possessive pronouns will be argued to enter the derivation with valued ϕ -features. Reflexives, on the other hand, will require feature valuation. Case variations on the clefted pronoun will be accounted for with the three observations originally made by Quinn (2005).

1. Introduction

A significant part of the literature on *it*-clefts revolves around the accounts of their information structure and syntactic derivation. The former assign *it*-clefts a marked informative interpretation (e.g., Prince 1978). The latter have divided linguists between the so-called extraposition (e.g., Akmajian 1970) and expletive analysis (e.g., Chomsky 1977). Less attention, however, has been devoted to an explanation of the different agreement patterns *it*-clefts exhibit. Among *it*-clefts, the most interesting ones from the point of view of agreement are those with a clefted pronoun corresponding to the subject position in the cleft clause.¹ Example sentences showing the relevant variations are presented in (1), (2) and (3).

- (1) a. It is *me* who *is* responsible.
b. It is *I* who *am* responsible.

Akmajian (1970: 153)

- (2) It is *me* who has to protect *himself/myself*.

Akmajian (1970: 157)

- (3) It is *me* that hit *his/*my* own father.

Akmajian (1970: 160)

The apparent subject function of a clefted pronoun in each cleft clause above in (1-3) suggests agreement with the cleft verb as observed between subjects and verbs in other types of clauses in English. (1a), however, shows that a lack of such agreement has no bearing on the

¹ In the paper the following terms will be used to refer the relevant parts of an *it*-cleft sentence: a clefted pronoun (a focused element in the immediate postcopular position of the main clause, i.e., *me* in (i)), a cleft clause (a subordinate clause with a gap corresponding to the clefted phrase, i.e., *who [...] likes flowers* in (i)) and a cleft verb (the main verb in the cleft clause, i.e., *likes* in (i)).

(i) It is *me* who likes flowers.

grammaticality of the relevant sentence. Under Chomsky's (1981) binding Principle A, a reflexive pronoun as an anaphor has to be bound (c-commanded) by the antecedent located in the same minimal clause (CP). This, in turn, entails full agreement, i.e., in person and number, between the c-commanding phrase and the anaphor. Yet, the cleft clause in (2) seems to violate the well-known binding restriction. Another equally unexpected fact is the ungrammaticality of the first person possessive pronoun in (3). It could be that the father was hit by his own child. The following questions immediately arise: Are the violations just noted new pieces of evidence against well known linguistic generalizations? Is each pattern generated by a different syntactic structure or are some other explanations due?

The first part of the discussion below (section 2) is devoted to the presentation of agreement patterns observed in the literature from the 70s and 80s. The collected data will be supplemented with those provided by the questionnaire completed in 2012. Section 3 attempts to account for the reported agreement variations within the Minimalist framework.

2. Agreement patterns in *it*-clefts

This section juxtaposes the data on *it*-clefts from two works, namely, Akmajian (1970) and Sornicola (1988), with the data from the questionnaire.² The attention is given to the relations of the clefted pronoun to the cleft verb, a reflexive pronoun and a possessive pronoun. Akmajian (1970) examines the data from three dialects which he refers to as Dialect I, Dialect II and Dialect III. In Dialect I, the clefted pronoun always bears Accusative case and agrees with the cleft verb solely in number. The clefted pronoun in Dialect II bears Nominative case when it corresponds to the subject gap. The agreement with the cleft verb is the same as in Dialect I. Dialect III exhibits dependency between the case of the clefted pronoun and full/partial agreement between the clefted pronoun and the cleft verb. In particular, full agreement, i.e., in person and number, is judged to be grammatical only when the clefted pronoun bears Nominative case. Accusative case on the clefted pronoun is accompanied by partial agreement in number between the clefted pronoun and the cleft verb. The agreement variations just presented are exemplified below.³

(4) Dialect I

It is *me* who *is* responsible.

(5) Dialect II

- a. It is *me* who(m) John *is* after.
- b. It is *I* who *is* sick.

Akmajian (1970: 152)

² The questionnaire was distributed by the author of the paper to a group of five native speakers of English at the age range from the early 40's to the late 60's. Each speaker received a list of *it*-clefts, to which they were asked to assign one of the three judgements provided below.

- (i) ungrammatical (ungr)
- (ii) acceptable but non-standard (acc)
- (iii) grammatical and standard (gr)

It has to be admitted that no context introducing *it*-clefts was included in the questionnaire.

³ Sornicola (1988) reports the same three patterns as Akmajian (1970).

(6) Dialect III

- a. It is *I* who *am*/**is* responsible.
- b. It is *me* who **am*/*is* responsible.

What the questionnaire shows and what Akmajian (1970) and Sornicola (1988) fail to observe is the fact that *the clefted pronoun can appear in Accusative case and agree in a person and number with the cleft verb* (see (7) below). Interestingly, some speakers found the agreement pattern in (8) acceptable.⁴ This is the only pattern in which no number agreement is noted. The patterns not recorded by Akmajian (1970) and Sornicola (1988) constitute 31% of all agreement patterns found in the questionnaire.

(7) It is *me* who *like* flowers. 3-ungr, 1-acc, 1-gr

(8) It is *them* that *likes* flowers. 2-ungr, 2-acc, 1-gr

Additionally, Table 1 presents grammaticality judgements of individual speakers.

| Examples with particular agreement patterns | Central Wales (border with England) | Newcastle | London | Dublin | Norwich |
|--|-------------------------------------|-----------|----------|-------------|---------|
| | I | II | III | IV | V |
| a. It is <i>me</i> who <i>likes</i> flowers. | gr | acc/gr | acc/gr | acc | gr |
| b. It is <i>I</i> who <i>like</i> dogs. | ungr/acc | ungr/gr | ungr/acc | ungr/acc/gr | ungr |
| c. It is <i>I</i> who <i>likes</i> dogs. | acc | gr | ungr/acc | acc/gr | ungr |
| d. It is <i>me</i> who <i>like</i> flowers. | ungr/acc | ungr | ungr | ungr | ungr |

Table 1: Agreement patterns by speakers

It turns out that individual respondents show great disparities accepting almost all variations. Speaker V is the only one who consistently rejected constructions with Nominative case on the clefted pronoun. Almost all speakers judged pattern (d) in Table 1 as ungrammatical.

While describing the agreement on reflexives located in cleft clauses of *it*-clefts, Akmajian distinguishes three patterns. Under the most popular one, the reflexive exhibits an invariant 3rd person feature regardless of the person feature of the clefted pronoun. The agreement between the reflexive and the clefted pronoun is manifested only in number as in (9). In the second pattern, there is full agreement (see 10 below). Sornicola (1988) remarks that this pattern can be encountered in the most widespread variety of English.⁵ A variation within one dialect as in (11) is also possible as noticed by Akmajian (1970) but not Sornicola (1988).

⁴ Peter Sells (p.c.) has remarked that *them that likes flowers* could be interpreted as a relative clause in some English dialects. In Mokrosz (in prep) it is shown that the reported agreement variations in *it*-clefts can be observed also in relative clauses. Thus, the remark concerning relative clauses should not affect the analysis presented in this paper.

⁵ Sornicola (1988) does not explain what she means by the most widespread variety of English.

- (9) It is *me* that cut *himself* so badly.
 (10) It's *me* that cut *myself*.
 (11) It's *me* who has to protect *myself/himself*.

Akmajian (1970: 155-156)

Like Akmajian (1970), the questionnaire results show a slight preference for partial agreement, i.e., only in number, between the clefted pronoun and the reflexive in the cleft clause, though full agreement is still acceptable. Sornicola (1988: 352), however, maintains that only full agreement between the clefted pronoun and the cleft verb guarantees full agreement between the clefted pronoun and the reflexive. The grammatical examples presented by Akmajian (1970) and the corresponding ones in the questionnaire contradict Sornicola's generalisation. Specifically, they show that partial agreement between the clefted pronoun and the cleft verb may co-occur with full agreement between the clefted pronoun and the reflexive. The questionnaire also aimed to check whether the change of a case from Accusative to Nominative on the clefted pronoun would have any bearing on the grammaticality reports originally provided by Akmajian and Sornicola. The following results were collected.

- (12) It is *I* who *like myself*. 2-ungr, 3-gr
 (13) It is *I* who *likes myself*. 3 ungr, 2-gr
 (14) *It is *I* who *like himself*. 5-ungr

(12) and (13) show that Sornicola's assumption is not valid for Nominative clefted pronouns either. The ungrammaticality of (14) remains to be explained.

Surprisingly, the person feature of the reflexive does not always have to overlap with the value of the person feature of the clefted pronoun. The relevant sentence is presented below.

- (15) It is *me* who *likes yourself*. 1-ungr, 2-acc

Akmajian (1970) also draws attention to constructions with an obligatory identity between the subject and some possessive pronoun. These are as follows: constructions with certain idioms, reflexive possessives and certain verbs of perception. The relevant examples are presented in (16a, 17, 18). According to Akmajian (1970), possessive pronouns show 3rd person feature regardless of the person feature of the clefted pronoun. This observation concerns only Dialect I and no information is given on Dialect II and III.

- (16) a. Was it *you* that held *his/*your* breath for five minutes?
 b. *Or was it *John* that held *your* breath for five minutes.
 (17) It's *me* that hit *his/*my* own father.
 (18) It was *me* who felt a spider crawl up *his/*my* leg.

Akmajian (1970: 159-160)

According to Akmajian, *your* in (16a) would be judged anomalous in Dialect I as it entails a contrast presented in (16b). The explanation concerning contrast may seem unclear as clefts are inherently burdened with a contrastive focus. Importantly, Akmajian (1970) draws his conclusions only on the basis of constructions with certain idioms, reflexive possessives and some verbs of perception. The negation introduced by Akmajian in *it*-clefts with such phrases shows why only the 3rd person feature on the possessive is grammatical.

- (19) a. It was *me* who felt a spider crawl up *his* leg.
 b. It was *me* who felt a spider crawl up **my* leg.

- (20) a. *It wasn't *me* who felt a spider crawl up *my* leg.
 b. It wasn't *me* who felt a spider crawl up *his* leg.

Akmajian (1970: 160)

The ungrammaticality of (20a) supports Akmajian's (1970) assumption on the 3rd person feature. A different behaviour of possessives in cleft clauses can be noted in constructions other than those studied by Akmajian (1970).

- (21) a. It was *me* who lost *his* brush.
 b. It was *me* who lost *my* brush.
 (22) a. It wasn't *me* who lost *my* brush.
 b. It wasn't *me* who lost *his* brush.

In (21) the possessive pronouns point to the possessors of the brush. The test with negation presented in (22a) and (22b) shows that both of them, i.e., *his* and *my*, are grammatical. This observation does not overlap with the conclusion made by Akmajian (1970) about examples (16-18). Specifically, *his* in (21a) points only to an external referent while *his* in (16a, 17-18) refers to the same person as the personal pronoun preceding it. *Me* in (21b) as opposed to (19b) can be contrasted with the 3rd person pronoun *him* because it is possible that a person other than the owner of the brush could lose the brush. Thus, it is grammatical to have a possessive pronoun agreeing with the clefted pronoun in both person and number or only in number.

3. A Minimalist account of agreement patterns in *it*-clefts

The following section starts with an outline of Kratzer's (2009) analysis. The explanation proposed in section 3.2 for the lack of uniformity in person feature to a large extent takes advantage of Kratzer's main assumptions. Subsequently, some doubts are voiced about Kratzer's proposals and a final analysis of *it*-clefts with clefted subject pronouns is outlined. The section ends with a possible answer to case variations observable on a clefted pronoun.

3.1. Kratzer (2009)

According to Kratzer (2009), bound pronouns such as reflexives, possessive pronouns and relative pronouns originate with a defective set of features complemented by a binder via a functional head such as *v* or *C*.⁶ Thus, in a sentence such as (23) the reflexive as a bound pronoun receives the value for a person and number feature from the nominal phrase *John* via *v*.

- (23) John likes *himself*/**myself*.

Bound reading depends on the ϕ -feature compatibility between a functional head and a bound pronoun guaranteed by Feature Transmission under Binding and Predication.

(24) Feature Transmission under Binding

The ϕ -feature set of a bound DP unifies with the ϕ -feature set of the verbal functional head that hosts its binder.

Kratzer (2009: 195)

⁶ According to Kratzer (2009: 187-188), bound pronouns are 'interpreted by assignment functions' while referential pronouns 'refer to salient individuals'.

(25) *Predication (Specifier-Head Agreement under Binding)*

When a DP occupies the specifier position of a head that carries a λ -operator, their ϕ -feature sets unify.

Kratzer (2009: 196)

The abovementioned feature compatibility is not as apparent in the case of possessive pronouns as it is in the case of reflexives. According to Kratzer (2009), the two possessive pronouns in the sentences below allow bound reading even though their person features differ from the person features of functional heads hosting their binders.

(26) a. We are *the only people* who take care of *our* children.

Kratzer (2009: 201)

b. I am *the only one* who is brushing *my* teeth.

Kratzer (2009: 208)

Under Kratzer's analysis, in the case of clauses headed by a relative pronoun as in (26), it is only the possessive pronoun that originates underspecified (unvalued person, unvalued number) while the verb is born with a valued person and number. Subsequent unification of features between the possessive pronoun and the verb guarantees the bound reading of the possessive pronoun. The possessive pronoun in (26a) bears the set [1st, pl] and in (26b) the set [1st, sg]. Relative pronouns as minimal pronouns enter the derivation with unspecified number and person features. As bound pronouns they have two sources of ϕ -features they eventually receive: (a) embedded little *v* which passes the features under *Predication* and (b) the head of a relative clause coreferential with a relative pronoun. As a result, a feature clash arises on the relative pronouns in (26a) and (26b) above. The particular feature sets ultimately making up the feature set on the relative are presented in (27) below.

(27) a. who = *the only people* [3rd, pl] + *v* [1st, pl]
 b. who = *the only one* [3rd, sg] + *v* [1st, sg]

The bound reading of a given item is possible only under feature compatibility between this item and a functional head carrying its binder. Yet, the examples in (27) show the opposite. Both verbs, namely *take care* and *is brushing* carry a 3rd person feature whereas it is the 1st person feature which is expected.⁷ In order to explain the deviation from the rule of the bound reading under feature compatibility, Kratzer (2009) refers to a language specific markedness of features obeyed by a morphophonological spell-out. Specifically, in English a person feature dominates a gender feature on nominal expressions. On verbs, on the other hand, a person feature is marked, which is why a gender feature is chosen more often. Importantly, Kratzer (2009) follows a view widely held in the linguistic literature on the 3rd person as a non-person (e.g., Benveniste 1966). In Kratzer's (2009) analysis, however, not only is the 3rd person considered a non-person but it also acquires a new status of a gender feature. As evidence for the feature markedness in English just outlined, Kratzer (2009) provides two examples, one in (28) and the other in (29). The ungrammaticality of (29) with the 3rd person on the possessive pronoun indicates that it is a 1st person and not a 3rd person that is unmarked on pronouns.

(28) The teacher and I have done *our* best to fix the problem.

(29) *The teacher and I have done *their* best to fix the problem.

Kratzer (2009: 210)

⁷ Since Kratzer (2009) provides the two examples in (26) as cases in need of explanation, it will be assumed that the verb carries the 3rd person feature rather than the 1st person.

Thus, it should come as no surprise that the possessive pronouns in (26) bear the 1st person feature while it is the 3rd person under the markedness of features in English which is spelled out on the verb.

One of the most conspicuous problems in Kratzer's analysis concerns the features of the verb. Specifically, its valued/unvalued status depends on the type of a binder it hosts. In the presence of a nominal subject expression with valued features, it is born unvalued. The opposite is observed in the case of a relative pronoun in the binder position. Since both a nominal subject expression and a relative pronoun enter the derivation after the verb, the valued/unvalued status of the features on the verb faces a look-ahead problem.

The following two examples also require some explanation.

(30) It is *me* who likes *myself/himself*.

To explain the grammaticality of the reflexive *himself* in (30), it has to be assumed after Kratzer (2009) that the verb enters the derivation with a third person feature. The grammaticality of *myself* in the same sentence would have to be accounted for by a reference to the first person on the clefted pronoun. Let us consider a variety of English in which the person feature on the reflexive is always compatible with the person feature of the clefted pronoun while the verb shows the 3rd person.

(31) It is *me* who likes *myself*.

In this case, under Kratzer's analysis, the verb would have to be born with the 3rd person feature. The choice of the 3rd person feature on the verb would be incidental and unmotivated.

3.2. Derivation of *it*-clefts

After Kratzer (2009) it can be argued that reflexives, being born with an unvalued person and number, require feature valuation. There are some points, however, which mainly from the Minimalist standpoint require some modifications.

Firstly, it is likely that the relative pronoun originates with an unvalued number feature but with a valued person feature, namely the 3rd person feature. This conclusion is drawn on the basis of an analogy that can be made between relative pronouns and other *wh*-pronouns such as interrogative pronouns, which are assumed to carry the 3rd person feature. The 3rd person feature on the verb in the example below shows that the item it agrees with can carry the 3rd person feature.

(32) Who wants some ice-cream?

Secondly, in the Minimalist Program (e.g., Chomsky 2008) the verb is argued to enter the derivation with unvalued person and number features. No optionality with regard to the presence of features is permitted.

Finally, the nature of possessive pronouns is worth considering. According to Kratzer (2009), possessive pronouns can be analysed as either referential or bound pronouns. For example, *my* as a referential pronoun in example (33) refers to a prominent individual in a given communication. The reading of *my* in (33) as a bound pronoun indicates that nobody else around there can take care of his/her own children.

(33) I'm the only one around here who can take care of *my* children.

It also has to be checked whether the same interpretation, i.e., bound and/or referential, can be assigned to a possessive pronoun in the cleft clause. The bound and referential readings of *my* in (34) corresponding to (33) are presented in (35a) and (35b), respectively.

(34) It is only *me* around here who can take care of *my* children.

- (35) a. (?)The bound reading of *my* indicates that nobody else around here can take care of his/her own children; and
 b. Under the referential reading, *my* refers to a prominent individual in a given communication; thus, the person uttering (34) is the only who can take care of their children and not anybody else.

It appears that the referential reading sounds more acceptable than the bound reading. Thus, in (34), the phrase *my children* is better interpreted as a prominent individual in a context. The possible argument for the unique referential interpretation of *my* in (34) could be the semantic complexity represented by *it*-clefts. *It*-clefts are argued to carry a presupposition of existence and exhaustivity (e.g., Percus 1997). Thus, in the *it*-cleft in (34) it is presupposed that there is someone who can take care of *my children*, which already points to *my children* being a prominent individual. The exhaustivity that *it*-clefts carry indicates that *me* is the only person who can do that. Thus, possessive pronouns in cleft clauses will be analysed as referential items entering the derivation with already valued person and number features.

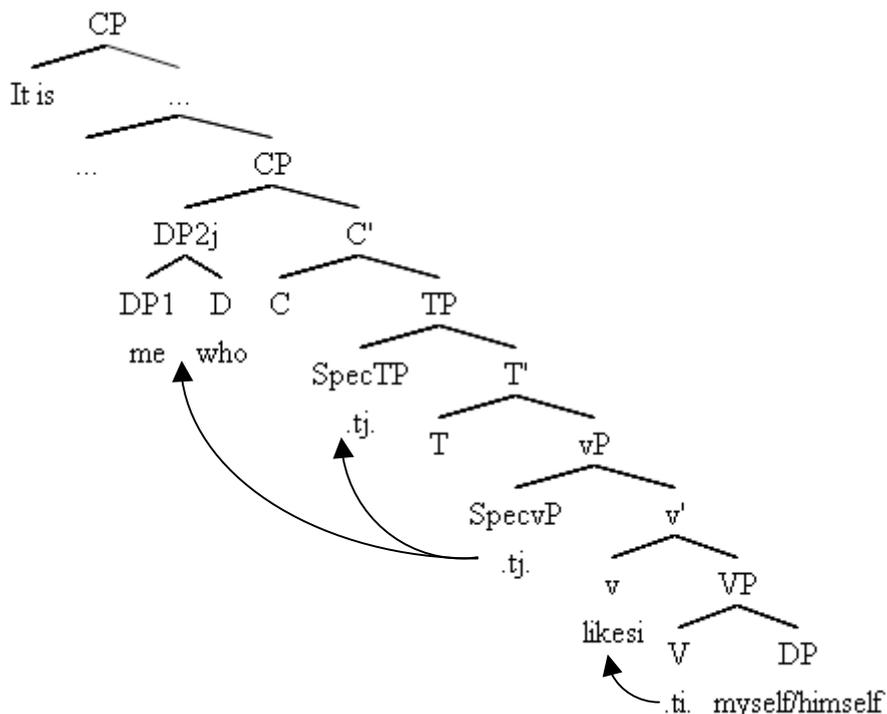
3.2.1. The origin of the clefted pronoun

The aim of this section is a structural account of *it*-clefts with a clefted subject pronoun and a co-referential reflexive in the cleft clause.

(37) is a structural analysis of an example sentence in (36).

(36) It is me who likes myself/himself.

(37)



The verb carries [uPers, uNum, Acc] while a reflexive is born unspecified for person and number features; thus, no valuation is possible. A relative pronoun and a personal pronoun originate in the same DP, i.e., DP2. As a result of their Merge, the *wh*-pronoun has its unvalued feature valued eventually carrying the following set [3rd/1st Pers, sg Num, uCase]. The same set is passed to the reflexive via Kratzer's (2009) operation of Transmission. Which person value will dominate on the reflexive as well as on the verb after Agree is resolved later in the derivation. The relative pronoun and the personal pronoun have an unvalued case which makes them still active in the derivation. C with the edge feature and T with an unvalued person and number *probe in parallel* triggering movement to Spec, CP and Spec, TP, respectively (Chomsky 2008: 147).

By following Kratzer's (2009) idea on bound pronouns, it is possible to explain the varied agreement patterns referring to the markedness of 1st and 2nd person feature on the verb and the markedness of the 3rd person feature on the reflexive. The ungrammaticality of the example repeated below can be connected with a semantic clash between the marked 1st person on the verb and the marked 3rd person on the pronoun.

(14) *It is *I* who *like himself*.

Another example that appears to be problematic for our analysis is reproduced below.

(8) It is *them* that *likes* flowers.

It is possible to argue that *them* in example (8) functions as a collective noun phrase like the noun *team*. Thus, depending on the context *them* may receive a singular or plural interpretation.⁸

Some explanation is due with regard to the nature of the complex DP2 proposed in (37). In our analysis the clefted pronoun originates in the specifier of DP2 analogously to possessive DPs in which, according to Abney (1987), a nominal phrase is born in the specifier while the possessive marker in the head D. With this assumption it is possible to explain why it is grammatical to cleft proper names and pronouns but ungrammatical to use them in relative clauses. A phrase such as a complex DP2 allows proper names and pronouns, argued to occupy D heads, to originate in the same phrase as the relative *who*. Finally, the analysis in (37) clearly shows why in the case of *it*-clefts with two subordinate clauses like the one in (38), it is always the last one which is interpreted as a cleft clause while the first as a relative clause.

(38) It is Mark who likes violence who hit John.

3.2.2. Case mismatch

As already noted, the choice of the case is not always dependent on the function the clefted pronoun corresponds to in the cleft clause. A similar study, yet, covering more structures and

⁸ The reviewer suggested considering the contrast between the two examples below.

(i) you who are/*is so beautiful

(ii) I who am/is? so grateful to be here...

The research of the Corpus of Global Web-Based English (Davies 2013) showed that the 3rd person feature on the copula in (i) can be grammatical.

(iii) it is you who is being patronising (and insulting) [...].

<http://www.bbc.co.uk/blogs/paulhudson/2012/01/will-we-see-the-northern-light.shtml>

interviewing more respondents was conducted by Quinn (2005). The results of her research to a great extent overlap with ours. Firstly, she notices that focus position of an *it*-cleft is basically an *Accusative* case position in subject and non-subject clefts. Secondly, Nominative case on the pronoun is less popular than Accusative but occurs in both subject and non-subject clefts. Out of all Nominative personal pronouns *he* is more popular than *she, they, I, we*. Quinn (2005) lists three factors that have an influence on the choice of a case on the clefted pronoun. One of them concerns competition between three types of cases, namely Argument, Positional and Default case.⁹ Quinn reports that in Present Day English Positional case takes precedence over Argument and Default case. Since the clefted pronoun corresponds to the subject position in the cleft clause, i.e., Spec, TP, it will be spelled out with Nominative case as this case is associated with the functional head T (Quinn 2005: 58). The second factor refers to a c-command relation; a pronoun in a c-commanding position will appear in its graceful form, namely *me, he, she, they, we*, as opposed to a c-commanded pronoun which features a robust form, i.e., *I, him, her, us, them* (Quinn 2006: 151-153). The third factor concerns a tendency observed by Quinn in the results from the questionnaires she distributed. Since many speakers interviewed by Quinn consistently chose the objective form of the pronoun in given structures including *it*-clefts, Quinn (2005: 171) concludes that there must be a general tendency towards invariant forms of pronouns, i.e., *me, him, her, us, them*, in all contexts. The three factors listed by Quinn appear to account for the case variations on the clefted pronoun in the most satisfactory way.

4. Conclusion

The unprecedented degree of reported variations in the agreement patterns in *it*-clefts constitutes a challenge for the assumptions made within the Minimalist Program. What has been proposed in fact derives the answers not only from the minimalist analysis but also from semantics. The former guided the derivational steps proposed in (37) while the latter provided answers in the spirit of Kratzer (2009) on the person variations on reflexive pronouns. Quinn's explanations of case on the clefted pronoun seemed to be well-founded as they relate not only to purely syntactic phenomena but also to some general observations on the form of pronouns in Present Day English. The acceptability of the following sentence still awaits its explanation.

(15) It is me who likes yourself.

⁹ Quinn (2005: 57-59) provides the following definitions of each type of case mentioned in the text.

(i) Argument Case (Arg-Case)

The overt case form of any structural argument of a predicate must comply with the structural linking between cases and arguments in the θ -structure.

(ii) Positional Case (Pos-Case)

The overt case form of an argument noun phrase appearing as the specifier of an agreement-related functional head at Spell-Out must match the case/agreement features of this functional head, iff the position of the noun phrase at Spell-Out differs from its θ -position.

(iii) (Positional) Default Case (Def-Case)

The overt case form of any noun phrase not influenced by Pos-Case must match the default case of a language. In Modern English, the default case is the objective case.

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