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*What makes a noun “unmarked”? Thematic distribution of case in Niuean and Māori*

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*What makes a noun “unmarked”? Thematic distribution of case in  
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**Abstract**

This squib considers what it means for a noun to be “unmarked” in terms of its morphosyntactic case (e.g., nominative, absolutive, ergative, accusative). In typological literature, the “unmarked” argument of a language is the argument with nominative or absolutive case (Dixon, 1979). In syntactic literature, it is recognised as being the argument most accessible in terms of syntactic dependency operations, such as movement (i.e., it can undergo extraction; Otsuka, 2006; Deal, 2017) and verb agreement (i.e., its features can be indexed on the verb; Bobaljik, 2008). However, the term “unmarked” has thus far evaded a straightforward explanation in linguistics (Haspelmath, 2006), and often is adopted without definition. The goal of this squib is to develop such a definition, drawing on the patterning of ergative, absolutive, nominative and accusative cases, with a focus on Niuean (ERG-ABS) and Māori (NOM-ACC). I put forth the view that case markedness is best characterised as a distributional attribute of language, where “unmarked” corresponds to the case value consistent with the widest array of different thematic roles assigned by a verb or predicate to its core arguments (agent, experiencer, patient, goal).

**Keywords:** Unmarkedness, case, accessibility, distribution, Polynesian.

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## 1 Introduction

Both within individual languages and cross-linguistically, noun phrases (NPs) differ in terms of their saliency, or “accessibility”: Some types of nouns, particularly, grammatical subjects, are more accessible than others, such as objects and propositional complements. In formal syntax, accessibility refers to the visibility or opacity of any given noun for participating in syntactic dependency formations such as verb agreement and movement (e.g., in relative clauses). There has been a lot of discussion about what governs accessibility. Early

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generalizations posited that the primary predictor of this is grammatical function (e.g., Keenan & Comrie 1977; 1979; Moravcsik 1978), with subjects being most syntactically accessible, followed by objects. According to Keenan & Comrie's (1977) typology-based Accessibility Hierarchy (shown in 1), the most accessible noun is the grammatical subject, followed by the object: This means that, if the syntax of any language allows object relative clauses, then it predicted to also permit subject relative clauses, but not vice-versa.

- (1) The Accessibility Hierarchy (Keenan and Comrie, 1977: 66)  
*Subject > Direct object > Indirect object > [...]*

The implicational ranking in (1) was also adopted to account for cross-linguistic patterns of verb agreement: Moravcsik (1978) observed, in many languages the verb agrees only with the subject but not with the object (or any other noun) and, for languages in which the verb does or can agree with the object, subject agreement is also attested.

The generalization in (1) was later revisited. Otsuka (2006) proposed that accessibility should be framed in terms of morphosyntactic case instead of subjecthood. Otsuka's revised accessibility hierarchy, given in (2), posits that NPs bearing "unmarked" case (nominative or absolutive) are more accessible than those with "marked" case (ergative or accusative).

- (2) Morphological case hierarchy (Otsuka, 2006: 83)  
*unmarked case (NOM, ABS) > marked case (ERG, ACC) > oblique case*

"Case" refers to the form in which an NP appears given its grammatical role in a sentence. Generally, subjects in nominative-accusative (NOM-ACC) languages appear with nominative case, and objects, accusative case. In ergative-absolutive (ERG-ABS) languages, subjects of transitive verbs (i.e., verbs which take an object) get ergative case, whereas objects of transitive verbs and subjects of intransitive verbs appear with absolutive case. Māori is an example of a NOM-ACC language: Subjects of both transitive verbs like *hoko* in (3a) and intransitive verbs like *taemai* in (3b) have nominative case, and objects like *ngā tīkiti* in (3b) appear with accusative *i*. On the other hand, Niuean exhibits an ERG-ABS case alignment: objects of transitive verbs and subjects of intransitive verbs are absolutive like in (4b), and subjects of transitive verbs like *mui* are ergative (like in 4a).

(3) Māori NOM-ACC cases

a. *Transitive*

Ka hoko [te matua] [i ngā tīkiti]  
 PRES buy the parent.NOM ACC the tickets  
 'The parent buys the tickets.'

b. *Intransitive*

Kua taemai [he ope]  
 PST arrive a party.NOM  
 'A (visiting) party has arrived.'

(Harlow, 2007: 119)

## (4) Niuean ERG-ABS cases

*a. Transitive*

Ne mui [he pusi] [e lapiti].

PST follow ERG cat ABS rabbit

‘The cat followed the rabbit.’

*b. Intransitive*

Ne mohe [e pusi].

PST sleep ABS cat

‘The cat slept.’

(author’s notes)

Relating this to (2), accusative and ergative are collectively called “marked” cases, whereas nominative and absolutive are the “unmarked” cases (Dixon, 1979). Towards the right end of the scale in (2), oblique case refers to case form which is determined by a specific lexical verb. For example, Niuean but has a subset of transitive verbs that assign oblique (a.k.a. dative or locative) case to their objects, like *fakaaue* in (5) Here, the object *tama* appears with oblique *ke he*.

## (5) Oblique case in Niuean

Ne fakaaue e matua taane **ke he** tama.

PST thank ABS father **OBL** child

‘The father thanked the child.’

(author’s notes)

Importantly for theories of accessibility, Bobaljik (2008) observed that verb agreement patterns across languages follow Otsuka’s hierarchy in (2), as opposed to Keenan & Comrie’s as in (1). Icelandic is a nominative-accusative language with configurations in which the subject exceptionally bears oblique case, and the object has nominative case. In these configurations, the verb agrees with the nominative object, as opposed to the oblique subject, as in (6a). This contrasts with configurations with nominative-cased subjects, which do trigger agreement, as in (6b).

## (6) Nominative agreement in Icelandic

*a. Nominative object agreement*

Jóni líkuðu þessir sokkar

Jon.DAT like.3PL these socks.PL.NOM

‘Jon likes these socks.’

(Jónsson, 1996: 143, via Bobaljik, 2008)

*b. Nominative subject agreement*

**Þeir** úthlutuðu okkur velli

they.NOM allocated.3PL us.DAT field.DAT

‘They allocated a field to us.’

(Sigurðsson & Wood, 2012: 277)

Likewise, in Niuean when verb agreement is present in a transitive clause, it targets absolutive objects as opposed to ergative subjects, as in (7).<sup>2</sup>

(7) Absolutive object agreement in Niuean

a. *Singular ABS: singular number agreement*

Kua hala e ia e lâ akau.

PERF cut ERG he ABS branch tree

‘He cut the branch.’

b. *Plural ABS (but singular ERG): plural number agreement*

Kua hahala e ia e tau lâ akau.

PERF cut.PL ERG he ABS PL branch tree

‘He cut the branches.’

(Haji-Abdolhosseini, Massam & Oda, 2002; cited in Tollan & Heller, 2022:163)

In sum, just as nominative arguments are targeted for agreement in Icelandic, so are absolutive arguments targeted for agreement in Niuean.

Turning next to look at syntactic movement, one finds a similar pattern (Otsuka, 2006; Deal, 2017). In Māori, only nominative subjects can be relativized with a gap, as in (8a). Accusative objects on the other hand, generally cannot, as in (8b): an alternative strategy much be used to express the meaning intended in (8b), such as insertion of a resumptive pronoun at the gap site or passivization of the verb along with relativization of the subject (Bauer, 1997). Thus, as noted by Douglas (2018), Māori behaves as predicted by Keenan & Comrie’s (1977) Accessibility Hierarchy, in that only the subject can be extracted. By contrast, in other nominative-accusative languages surveyed by Keenan & Comrie, *both* nominative subjects and accusative objects relativize freely (English is one example of such a language).

(8) Relative clauses in Māori

a. *Subject relative clause: NOM subjects freely extract*

te toka rangitoto [e tū ana \_\_\_<sub>NOM</sub> i te ara]

the rock scoria [TAM stand TAM at the path]

‘the scoria rock which was standing in the path’

b. *Object relative clause: ACC objects cannot freely extract*

\*te tangata [i kōhuru a Hone \_\_\_<sub>ACC</sub>]

the person [TAM murder PERS John]

*Intended:* ‘the person who John murdered’

<sup>2</sup>The label of “subject” has been the topic of much discussion in literature on Niuean (and Polynesian and Austronesian languages generally). For now, I use “subject” to refer to the first cased noun phrase following the verb, in accordance with its having been characterised as a VSO language (Seiter, 1980), following Tollan & Heller (2022). This matter is discussed in more detail in Section 3.

(Bauer, 1997; cited in Douglas, 2018: 23)

On the other hand, Tongan allows only absolutive arguments to freely extract, as in the object relative clause (9a). Ergative arguments on the other hand, do not: The Tongan ergative subject relative clause in (9b) requires an obligatory preverbal resumptive pronoun.

(9) Relative clauses in Tongan

a. *Object relative clause: ABS objects freely extract*

e kaiha'a [‘oku fakamolemole'i 'e Mele \_\_\_<sub>ABS</sub>]  
 DET thief PRS forgive ERG Mary  
 ‘The thief that Mary forgives.’

b. *Subject relative clause: ERG subjects cannot freely extract.*

e ta'ahine [‘oku \*(ne<sub>ERG</sub>) fakamolemole'i 'a e kaiha'a]  
 DET girl PRS RP forgive ABS DET thief  
 ‘The thief that Mary forgives.’ (Polinsky, 2016: 8)

The inaccessibility of ergative subjects for relativization in languages like Tongan – a cross-linguistic phenomenon known as “syntactic ergativity” (Dixon, 1994) – indicates that accessibility for movement syntactic movement operations is also governed by case markedness rather than grammatical function, just like verb agreement (Otsuka, 2006; Deal, 2017). Thus, accessibility of a noun in terms of agreement and movement is governed by something besides subjecthood; namely, case marking: the most accessible NP is the one with unmarked case (Otsuka, 2006). Niuean differs from Tongan in that both ergative and absolutive nouns can extract with gaps, and thus behaves similarly to normative languages like English, where both subject and object extract freely. However, a recent psycholinguistic study has found that a preference for an absolutive gap emerges in the processing of *wh* questions that are temporarily ambiguous between a subject gap and an object gap interpretation (Tollan, Massam & Heller, 2019): Speakers of Niuean showed a preference for subject gaps when the verb requires an absolutive subject, and for object gaps when the verb requires an absolutive object. Thus, Niuean exhibits an “absolutive advantage” in dependency formation contexts – which cements the view that absolutive indeed behaves as the unmarked NP in Niuean. This finding also parallels the well-attested (nominative) “subject advantage” found in psycholinguistic studies of English relative clauses (e.g., King & Just, 1991): An advantage for the argument with “unmarked case”.

Unmarked case is often used as an umbrella term to refer to NOM case and ABS case collectively, in contrast to “marked” case, which refers to ERG and ACC. But the definition of the term “unmarked” itself has a long history in linguistic literature and is far from being settled. Going back at least to Jacobsen (1932) and Trubetzkoy (1939), unmarkedness has taken on a wide range of meanings (Haspelmath, 2006; Weisser, 2019) and has thus far evaded a straightforward definition. The goal of this squib is to develop such a definition with respect to morphosyntactic case. In other words, what properties do nominative- and absolutive-marked NPs share – such as *ʔessir sokkar* in (3), *(tau) lâ akau* in (4), the subject position of *tū* in (5), and the object position of *fakamolemole'i* in (6) – which qualifies them

as the “unmarked” cases? Being an unmarked NP is goes beyond the matter of linguistic description: It is a determinant of syntactic accessibility in the original sense of Keenan & Comrie (1977). The question is, what is it?

In the next section, I briefly discuss the history of the term “unmarked” in linguistic theory and consider some options for how it might be used to characterise the morphosyntactic cases NOM and ABS, ultimately adopting the view that unmarked case is a distributional attribute of a NP. Section 3 develops this concept further, asking what it means for a morphosyntactic case to have a wide or narrow distribution in a language. Building on Tollan’s (2020) hypothesis for what it means for an NP to be a syntactic “subject”, I hypothesize that unmarked case is the case associated with the greatest number of thematic roles that get assigned by the verb (agent, experiencer, patient, goal). I develop this hypothesis with reference to two languages: Niuean, for which the unmarked case is ABS (cf. 4), and Māori, for which the unmarked is NOM (cf. 3). Both widely studied in Polynesianist literature, these two languages collectively showcase the observation that syntactic accessibility operations such as agreement and/or movement target ABS (in Niuean) and NOM (in Māori).

## 2 Background on unmarkedness

As discussed at length by Haspelmath (2006), “markedness” has been used to refer to a range of linguistic phenomena. These include (i) overt coding (where an unmarked form is coded as null), (ii) phonetic, morphological, or conceptual difficulty (where an unmarked form is less difficult), (iii) phonological or semantic distinction (where an unmarked form is less distinguishable), (iv) rarity in texts (where an unmarked form is found more frequently in corpora), (v) typological rarity (where an unmarked form is found more frequently across languages), (vi) restricted distribution (where an unmarked form has the widest distribution), (vii) deviation from a default parameter setting (where an unmarked form may fail to trigger a morphological process), (viii) morphological unnaturalness (where an unmarked form is more natural), and (ix) multidimensional correlations such as frequency of occurrence (Haspelmath, 2006: 64-65). It has thus far resisted a single tangible definition, and Haspelmath consequently argued that the term be abandoned. As far as morphosyntactic case is concerned, (un)markedness is usually used descriptively, as a means of collectively referring to nominative and absolutive cases. In the forthcoming sections, I develop a view in which unmarkedness in the sense of morphosyntactic case is a distributional label, on the lines of Haspelmath’s point (vi). Before doing so, I briefly consider two alternatives. The first is perhaps the most commonplace usage of the term unmarkedness, noted by Haspelmath (2006): Reference to a null (versus overt) morphological coding form (§2.1). The second consideration is that the unmarked case is the case form that the subject of an intransitive verb takes (§2.2).

### 2.1 *Unmarked case and overt coding*

(Un)marked case does not appear to correspond directly to what Haspelmath calls “overt coding”, despite an obvious overlap. It is true that marked cases (ergative/accusative)

generally tend to be associated with overt morphology, whereas nominative/absolute cases are commonly null (Comrie, 2013). The reverse scenarios – in which nominative is overt while accusative is null, and absolute is overt while ergative is null – are extremely rare. Based on a *WALS* survey of 52 nominative languages (Comrie, 2013), one finds that only 6 have overt nominative and null accusative, and only one ergative language, Nias (Malayo-Polynesian), has overt absolute and null ergative. At the same time, however languages such as Tongan have overt ergative *and* absolute markers, as in Tongan in (11). We also find nominativeaccusative languages, such as Latvian, with and overt nominative and accusative markers (shown in 12). Accessibility, therefore, does not appear to be determined by morphological case exponence: As discussed in Section 1, ABS arguments are more accessible than ERG arguments in Tongan, yet both are coded overtly. Looking outside of the Polynesian family, we find that NOM arguments in Latvian – but not ACC arguments – are accessible for verb agreement (see Kalnača, 2014 for examples and discussion), despite both having overt morphological form.

(10) Tongan

- a. *Transitive: morphologically overt ERG and ABS*

Na'e fili     [‘e    Sione] [‘a    Mele].  
 PST choose ERG John   ABS Mary  
 ‘John chose Mary.’

- b. *Intransitive: morphologically overt ABS*

Na'e kata   [‘a    Sione].  
 PST laugh ABS John  
 ‘John laughed.’

(Otsuka, 2010: 318, 322)

(11) Latvian

- a. *Transitive: morphologically overt NOM and ACC*

[Bērn-s]     zīmē                     [sun-i].  
 child-NOM draw.PRES.3SG     dog-ACC  
 ‘The child is drawing a dog.’

- b. *Intransitive: morphologically overt NOM*

[Putn-s]     lidoja.  
 bird-NOM fly.PST.3SG  
 ‘The bird was flying.’

(Mathiassen, 1997, via Comrie, 2013)

## 2.2 Unmarked case and intransitivity

Second, unmarked case might be instead characterized as the case present on a noun in the absence of a second clause-mate NP argument (as argued by Falk, 1999): in short, the case present on the single argument of an intransitive verb. This definition is consistent with the Tongan and Latvian intransitive examples in (11b) and (12b) and captures the patterning of



NOM case in Māori and ABS case in Niuean. However, this view does not fit with case patterning in other languages, both within and outside of the Polynesian family. As discussed by Chung (1978), subjects of intransitive verbs in Tokelauan (Samoic-Outlier; ERG-ABS) do not pattern in a single consistent case form. Instead, immediate postverbal intransitive subjects like *kitā* in (12a) appear with no morphological marking, but if the subject is both pronominal and non-adjacent to the (intransitive) verb, then appears with the case marker *i* followed by pronominal *a*, as in (12b).

(12) Non-uniform case for intransitive subjects in Tokelauan (Chung, 1978: 295)

a. *Pronominal subject appears immediately after the verbal: No overt case*

Na fano kitā i te vaka.

PST go 1.DU in the canoe

‘We went in the canoe.’

b. *Prominimal subject is not adjacent to the verb: i-marking present*

Na fano i te vaka i a kitā.

PST go in the canoe *i* PRON 1.DU

‘We went in the canoe.’

Other languages outside of the Polynesian family are known to display a different type of “split intransitive” case pattern. One such language is Hindi-Urdu. In Hindi-Urdu, subjects of unergative verbs (namely, verbs like “smile” whose single argument is a thematic agent) usually bear ergative case (shown in 13a). On the other hand, subjects of unaccusative verbs (verbs like “arrive” whose single argument is a thematic patient) bear absolutive case (shown in 13b).<sup>3</sup> This means that absolutive case is in fact not present in *all* types of intransitive constructions.

(13) Hindi-Urdu Split-S alignment

a. *Subjects of unergative verbs: ERG case*

[Anya-ne] muskurahaa.

[Anya.FEM-ERG] smiled.PERF.3SG.MASC

‘Anya smiled.’

(Tollan, 2021: 10)

b. *Subjects of unaccusative verbs: ABS case*

[Siitaa] aayii.

[Sita.FEM.ABS] arrived.PERF.3SG.FEM

‘Sita arrived.’

(Mahajan, 1990: 78)

<sup>3</sup> One might wonder whether unergative verb constructions in Split-S languages such as in (13a) are truly intransitive or are concealed transitive constructions in which a covert cognate object is present (Hale & Keyser, 1993). At least for Hindi-Urdu, however, unergative constructions are demonstrably truly intransitive at a syntactic level: Tollan (2021) shows that Hindi-Urdu verb agreement patterns in constructions such as (13a) change when an overt cognate object is present, suggesting that no syntactically implicit object is present in the intransitive form.

Instead, the hypothesis I now develop is case (un)markedness amounts to what Haspelmath (2006: 26) refers to as “distributional markedness”, in that something that is considered as marked has a narrower distribution than something that is unmarked. Thus, unmarked case is the case that appears in the widest set of environments, with the term “environment” to be qualified shortly.<sup>4</sup> Taking the Hindi-Urdu examples discussed above as a jumping-off point, one finds here that ergative case marks the subject of an unergative verb like in (13a) or a transitive verb like in (14a below) – but in perfective aspect only. Meanwhile, absolutive case has a wider distribution than ergative case: objects of transitive verbs (see again 14a), subjects of accusative verbs (see earlier 13b), and subjects of transitive verbs with imperfective aspect (shown in 14b) are all absolutive. Absolutive in Hindi-Urdu is ultimately the “unmarked case”, being the only case that allows for an NP to trigger verb agreement (cf. the Niuean examples in 7).

(14) Hindi-Urdu transitive constructions

a. *Perfective aspect: ERG-ABS*

Raam-ne          roTii          khayii.  
 Ram.MASC-ERG bread.FEM.ABS eat.PERF.FEM.3SG  
 ‘Ram ate bread.’

b. *Imperfective aspect: ABS-ABS*

[Siitaa]          [kelaa]          khaatii          thii.  
 Sita.FEM.ABS banana.MASC.ABS eat.IMP.FEM.3SG be.PST.FEM.3SG  
 ‘Sita (habitually) ate bananas.’ (Mahajan, 1990: 72–74)

An important question in developing a hypothesis about distribution is how “(widest distribution)” should be quantified. One option is to say that the case with the widest distribution is the case that occurs in the largest number of argument positions (e.g., transitive subject position, unaccusative subject position, object position, etc.). But in this type of characterization, it is unclear how one should delimit a single “argument position”. What counts as an “argument”? The next section focuses on this matter.

### 3 Unmarked case as the case with the widest thematic distribution: Niuean and Māori

As a foreword to the matter of argument-hood and case distribution, I begin by consider a related notion that has generated a lot of debate both Polynesianist, syntactic, and typological

<sup>4</sup> Distribution is also widely connected with frequency, because an element (e.g., a certain type of syntactic case) which has a wider distributional profile naturally tends to occur more frequently in natural language use (and would, for instance, be more prevalent in language corpora). Distribution and frequency are not fundamentally the same, however: Frequency refers to *usage*, whereas distribution is an underlying property of how a grammar is organised. Although the literature on markedness has indeed found unmarked form to be correlated with highest usage frequency, recent works have concluded that frequency alone can predict markedness (Austin, 2013; Ingram, Hand, & Maciejewski, 2016; Sprouse, Messick & Bobaljik, 2022). This at the very least calls for a determination of markedness as being about something besides frequency; namely, some deeper organisational principle.

literature: What counts as being the “subject” of a sentence? Debate about how one should define the notion of “subject” spans decades (Keenan, 1976; Manning, 1996; Sperlich, 1997; Massam, 2000; Massam, 2001; Johns, 2006; Tollan & Heller, 2022; Ershova, 2023; a.o.). It is a critical consideration because subjecthood and unmarkedness have been argued to be akin, in the sense that unmarked argument *is* (or should be) considered as being the subject. For NOM-ACC languages like Māori and English, this has been relatively uncontroversial, but for ERG-ABS languages like Niuean and Tongan, approaches are mixed regarding whether ERG or ABS is the subject of a sentence. Indeed, like with Haspelmath’s (2006) stance on the ineffectiveness of the term “unmarkedness”, some have argued that the label of subject be abandoned (e.g., Tollan & Heller, 2022; Ershova, 2023). Yet at the same time, one cannot escape the fact that it is a commonplace term in linguistics (and in related fields of research outside of linguistics). It has proven especially influential, for example, in Keenan & Comrie’s (1977) “Accessibility Hierarchy” discussed in the Introduction, in Greenberg’s (1966) seminal survey of cross-linguistic word order patterns, subsequent work (e.g., Hawkins, 1988; Nichols, 1992), and in much other literature besides. The definition of subject that I adopt for the present purposes is that offered in Tollan (2020) based on the syntax of Niuean, given in (15). Here, subjecthood is characterized in terms of thematic role (Gruber, 1965, Fillmore, 1968, and multiple subsequent works) and how this correlates with phrasal syntactic structure.

- (15) [A subject is] “*the most agentive verbal argument of a clause [...], the structurally highest core argument in the verbal domain of the syntax.*”  
(Tollan, 2020: 230).

Note that the definition in (15) applies only to the core arguments of the verbal domain of a clause (i.e., VP, vP, and VoiceP, following Grohmann, 2003) – their required or so-called “nuclear” arguments (following discussion in Hooper, 1984). This contrasts with adjuncts or “non-nuclear” arguments, such as agent NPs introduced by oblique prepositions in passive constructions. In Niuean, the subject is therefore the ergative argument in an ERG-ABS clause like (4a) and an ABS argument in clauses like (4b) and (5). Recent experimental work supports this approach: Tollan & Heller (2022) found that ergatives in Niuean behave akin to nominatives in English with respect to pronoun resolution in a language comprehension task. In Māori, the subject is consistently the NOM-cased argument, as the examples in (3).

The distributional hypothesis of case unmarkedness I put forth here, given in (16), dovetails with Tollan’s (2020) definition of what counts as a subject: It appeals to thematic roles assigned to core arguments in the verbal domain of the syntax.

- (16) Hypothesis of unmarkedness as a distributional attribute of a case  
*Unmarked case is the case associated with the largest number of core thematic roles assigned by the verb (or core nonverbal predicate).*

These core verbal thematic roles include “agent” (the doer of an action), “experiencer” (the entity that holds or experiences a certain mental or perceptive state), “patient” (one who undergoes an action), and “goal” (the endpoint of an action and typically the recipient

argument in a ditransitive). If one considers the distribution of unmarked cases (absolute and nominative) in the Polynesian languages Niuean and Māori as an empirical case-in-point, we find that absolute and nominative mark NPs across a wider spectrum of thematic roles compared with other cases like ergative, accusative, or oblique.

Let us firstly consider Niuean absolute case. Absolute marks agents, like in the examples in (17). It also marks experiencers, as in (18), patients as in (19), as well the single argument of a nonverbal predicates like in (20).

(17) Niuean ABS marking thematic agents

a. Ne inu kofe kono **a Mele**.

PST drink coffee bitter ABS **Mele**

‘Mele drank bitter coffee.’

(Massam, 2001: 158)

b. Ne fifitaki **e ika** ke he magō.

PST copy ABS **fish** OBL shark

‘The fish copied the shark.’

(authors’ notes)

c. Ne poi **e nua**.

PST run ABS **horse**

‘The horse ran.’

(authors’ notes)

(18) Niuean ABS marking thematic experiencers

a. Ne ono **e ika** ke he feke.

PST see ABS **fish** OBL octopus

‘The fish saw the octopus.’

b. Ne fakaalofa **a Mele** ki a Sione

PST love ABS **Mele** DAT Sione

‘Mele loved Sione.’

(authors’ notes)

(19) Niuean ABS marking thematic patients

a. Ne kitia he ika **e feke**.

PST see ERG fish ABS **octopus**

‘The fish saw the octopus.’

b. Ne tutuli he kulī **e pusi**.

PST chase ERG dog ABS **cat**

‘The dog chased the cat.’

(author’s notes)

(20) Niuean ABS marking the single argument of a nonverbal predicate

a. Ko e faiaoga **a Mele**.

PRED teacher ABS **Mele**

‘Mele is a teacher.’

(Massam, 2000: 227)

- b. Hā he fale a ia.  
 PRED in house ABS she  
 ‘She is in the house.’ (Massam, 2000: 230)

Additionally, an NP with the thematic role of “instrument” (i.e., the entity used to carry out an action) may also count as a core thematic role in Niuean, in constructions such as in (21). Here, the relevant applicative marker *aki* appears immediately after the verb and the instrument (*tipiti haana* in 21) appears in direct object position and functions as a core verbal argument with respect to operations such as quantifier float (Seiter, 1980). What is important for present purposes is that this instrument, too, is absolutive-cased.

- (21) Niuean ABS marking thematic instruments  
 Kua hele aki tuai e Sione e tipiti haana e falaoa.  
 PERF cut with PERF ERG Sione ABS knife his ABS bread  
 ‘Sione has cut the bread with his knife.’ (Seiter, 1980: 244)

The thematic distribution of ergative case, on the other hand, is more restricted: ergative usually only marks experiencers or sentient agents. A pair of examples are given in (22).

- (22) Niuean ERG  
 a. *Marking an agent*  
 Ne tutuli he kuli e pusi.  
 PST chase ERG dog ABS cat  
 ‘The dog chased the cat.’  
 b. *Marking an experiencer*  
 Ne kitia he ika e feke.  
 PST see ERG fish ABS octopus  
 ‘The fish saw the octopus.’

The only core arguments marked by Niuean oblique case (also referred to as locative or oblique) are patients, as in (23a) and goals as in (23b) (although oblique case also marks noncore arguments, such as locative adjuncts, as in (23c)).

- (23) Niuean OBL  
 a. *Marking a patient*  
 Ne fakaaue e matua taane ke he tama. [= (5), repeated]  
 PST thank ABS father OBL child  
 ‘The father thanked the child.’ (author’s notes)  
 b. *Marking a goal*  
 Kua fakafano e ia e fekau ke he kapitiga.  
 PRF send ERG he ABS message OBL friend

- ‘He sent a message to his friend.’ (Sperlich, 1997: 69)
- c. *Marking a non-core adjunct*  
 Ne fano e fífine **ki Toga.**  
 PST go ABS woman **OBL Tonga**  
 ‘The woman went to Tonga.’ (Longenbaugh & Polinsky 2016: 107)

In sum, absolutive case in Niuean marks NPs with a broader range of thematic roles compared with the more restricted marking of ergative and oblique cases.

Turning to look at nominative case in Māori, a similar picture emerges. Māori nominative marks agents, as in (24a), experiencers, as in (24b) and patients, as in (24c).

(24) Māori NOM and ACC

- a. *Marking an agent*  
 Ka hoko **te matua** i ngā tīkiti.  
 PRES buy **the parent.NOM** ACC the tickets  
 ‘The parent buys the tickets.’ (Harlow, 2007: 119)
- b. *Marking an experiencer*  
 I kite a **Hone** i te tāhae.  
 TAM see PERS **John.NOM** ACC the tickets  
 ‘John saw the thief.’ (Bauer, 1997: 665)
- c. *Marking a patient*  
 Ka hoko-na **ngā tīkiti** e te matua.  
 AOR buy-PASS **the tickets.NOM** AGT the parent  
 ‘The tickets are bought by the parent.’ (Chung, 1977: 355)

By contrast, accusative case generally marks thematic patients, such as “ngā tīkiti” in (22a) and “te tāhae” in (22b), and not agents or experiencers. It should be noted that Māori *i*-case - the spell-out form of accusative case – *does* mark also NPs with a variety of other thematic roles (Harlow, 2007)<sup>5</sup>, although these are generally considered as non-nuclear or non-core NPs (Hooper, 1984). Goal arguments such as “a au” in (25), are generally marked the oblique case marker *ki*.

(25) Māori OBL marking a goal

- Ka hoki mai a Hone i te kurī **ki a au.**  
 TAM return hither PERS Hone ACC the dog **OBL PERS 1SG**  
 ‘Hone returned the dog to me.’ (de Lacy, 2003: 63, 66, via Pearce, 2014: 43)

Importantly, both and Māori nominative and Niuean absolutive are not just designated as the “unmarked cases” in a sense of labelling: They exhibit the empirical *behaviour* of

<sup>5</sup> I thank a reviewer for bringing this observation to my attention.

unmarked cases, syntactically. Recall that only nominative arguments are relativizable in Māori, and only absolutive arguments can trigger agreement in Niuean. By comparison, cases such as ergative and accusative – which a narrower array of core thematic roles – are less accessible in the syntax.

#### 4 Conclusion and open questions

This squib has considered what it takes for a case like nominative or absolutive to be designated as the unmarked case of a language, insofar as being what one typically labels as “unmarked” makes an NP more accessible for syntactic operations like movement and/or agreement than other types of cased NPs in any given language. I have put forth a hypothesis in which this amounts to thematic distribution: The “unmarked” case is the case associated with the largest number of core thematic roles that can be assigned by the verb or core predicate of a sentence. This corresponds to the case that is most accessible for syntactic dependency operations such as movement and verb agreement.

From a formal standpoint, one might ask *why* such a connection between syntactic accessibility and thematic distribution might transpire; thus, how should a wide thematic distribution of an NP be formalized in terms of syntactic operations like movement and agreement, if at all? If a correlation between thematic distribution on accessibility reflects a causal relationship, then this might pattern in one of two ways. On the one hand, syntactic accessibility might inform distribution: Cases that are more accessible (ABS and NOM) may come to be more widely distributed across the syntax of a language, diachronically. On the other hand, distribution might inform syntactic accessibility: Cases that are more widely distributed across a language might be more easily visible for syntactic operations like verb agreement and movement. These considerations are a matter for future research.

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