

## Ergative Constructions in Yorùbá: A Minimalist Approach

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### Abstract

*Existing studies on Yorùbá syntax have shown that there are controversies among scholars on the motivation for DP movement in ergative construction in the language. Scholars have suggested theta theory and pragmatics as the explanation, while others lay credence to case or extended project principle. None of the existing works have address DP movement in ergative construction in Yorùbá with insight of the Minimalist Program. This present research dwells on Chomsky (1995, 1998 2000 &2001) Minimalist Program with Yorùbá internal language evidence to explain DP movement in the ergative construction. Findings in study show that the only DP in ergative construction performs dual functions. It is the subject based on the syntactic position and morphological marking, while it also functions as object because it bears theme theta role.*

### Keywords

Case; Yorùbá, ergative/ unaccusative; A- movement; EPP (extended projection principle); outcomes



## I. Introduction

Scholarly works on DP movement in Yorùbá include Awobuluyi (1978), Bamgbose (1990), Awoyale (1990), Ajiboye (2006) Yusuf (1998), Taiwo (2007) and Akanbi (2010) among others. The studies have shown that DP movements in Yorùbá are divided into A- movement and AI- movement. AI- movement presupposes a DP movement from a matrix clause to a position outside the matrix clause while A- movement entails the movement of a DP within a matrix clause. Ergative construction entails the movement of an object DP to subject position within a matrix clause. The thrust of this paper is the motivation for DP movement in Yorùbá ergative construction. The study provides language internal evidence with the Minimalist Program (henceforth MP) assumptions to show the rationale behind the DP movement observed in the construction.

The paper is divided into five sections. Section 1, forms the introduction. Section 2, discusses the previous works on ergative construction. Section 3, looks at the theoretical framework, section 4, provides explanation for DP movement via MP while section 5, is the conclusion.

## II. Review of Literature

### 2.1 Previous Works on Ergative Construction

Yusuf (1998) observes, among other things, that ergative construction involves A- movement. A-Movement has been described in the literature (Ndimele 1992, Lasnik and Uriagereka 1988, Yusuf 1998) as a syntactic process where a constituent moves within a sentence. Lasnik and Uriagereka (1988, p.20) capture A- movement as a situation where a category moves from a position that is potentially a recipient of a theta role to another such position (for example from object to subject position or from embedded subject position to a higher subject position).

It can be deduced from this definition that ergative construction is A-movement. Crystal (1980, p.134) defines ergative sentence as “one where there is a formal parallel between the objects of a transitive verb and all the subjects of an intransitive one”. Radford (1988:374) captures ergative construction as “one in which an expression which normally function as the object of a given transitive verb is used intransitively as the subject of the verb.”

Burzio (1986) makes two fundamental observations with respect to ergative construction. He notes that:

- (i) verbs which lack an external argument fail to assign case
- (ii) verbs which fail to assign accusative case fail to theta- mark an external argument

Robberts (1997) provided explanation with examples of ergative construction in Italian language as shown below and proposed un-accusative hypothesis (see also Perlmutter 1978, 1983 and Burzio 1986).

- |   |   |
|---|---|
| <p>1(a) <b>NE<sub>i</sub> sono arrivati molti t<sub>i</sub></b><br/>         Of –them are arrived many<br/>         Many of them have arrived</p> | <p>(b) <b>*NE<sub>i</sub> hanno telefonato molti t<sub>i</sub></b><br/>         Of- them have telephoned many<br/>         (Robberts, 1997, p.73)</p> |
|---|---|

In (1a) Robberts notes that the verb *arrivati* is unaccusative because it is a kind of intransitive verb whose subject emanated from the object position while the verb *telefonato* in (1b) is unergative since its object cannot be spell-out at the Spec-TP; hence its ill-formedness. The object DP in (1a) will have to locate its case elsewhere otherwise the derivation will be ungrammatical. In a nutshell, the accusative case of the verb is reduced so that the DP can check its nominative case at Spec-TP. Yusuf (1998) claims that theta theory in conjunction with pragmatics rather than case will offer full explanation on what motivates noun phrase (DP) movement in Yorùbá ergative constructions. He provides the examples below in Yorùbá and English to substantiate his claim:

2. (a) **Qsàni tà t<sub>i</sub> dáadáa l-ódún yì**  
 Orange sell good at year this  
 ‘Orange sold well this year’
- (b) The cloth washes well in **omo**
- (c) The door opened
- (d) The bottle broke
- (Yusuf 1998, p.83-84)

Based on the example in (2a), Yusuf (1998) insisted that case has nothing to do with the DP movements in ergative construction. He buttresses his point that Yorùbá is known to be a non-inflectional language and therefore cannot show *passive-type suffixes* that account for the forced movement of DP as obtained in Hausa as shown in 2(e & g) below.

2. (e) **àbinci yaa daf-u**  
 Food AGR be : thoroughly cooked  
 ‘Food is ready’
- (f) **lèmo yaa sà-y-u**  
 Orange AGR sell well  
 ‘Orange sell real good (in a particular season)’
- (Yusuf 1998)

The scholar (Yusuf 1998) claims that English that has the morphological apparatus did not utilized such in its ergative sentence. He explained further that the deep morphology of English language will explain the DP’s behavior in the language. He asserts that the verbs wash, broke and open in (2b-d) do not betray the potential of case absorption and asserts that nothing apparently motivates DP movement in (2b-d). He

concludes that may be theta-theory, in conjunction with pragmatics, rather than case theory will offer us a full explanation.

Akanbi (2010) offers no explanations about the case of DP but claims that the DP movement is triggered by extended projection principle (EPP). He cited the Yorùbá examples below:

- |                |                       |       |  |
|----------------|-----------------------|-------|--|
| 3. i (a) ----- | <b>dá igi ìdáná</b>   | ( b ) | <b>igi<sub>i</sub> ìdáná dá<sub>ti</sub></b>   |
| -----          | break wood fire       |       | wood fire break                                |
|                |                       |       | ‘The fire wood broke’.                         |
| ii (a) -----   | <b>ta ọsàn ní ọjà</b> | ( b ) | <b>Ọsàn<sub>i</sub> tà ní ọjà<sub>ti</sub></b> |
| -----          | sell orange in market |       | orange sell in market                          |
|                |                       |       | Orange sold in the market’. (Akanbi,2010,p.70) |

Akanbi (2010) relied on Burzio (1986) as explained in Radford (1988:374) that the superficial subject in ergative structure originates as the underlying object of a transitive verb with empty DP subject and that the underlying object is moved into superficial subject position by DP movement. On the rationale behind the DP movement, he argued that the Object DP in ergative construction is raised to the subject position to satisfy EPP.

## 2.2 Theoretical Framework

The Minimalist Program serves as the work's theoretical foundation (MP) adopted in this research. Chomsky (1993, 1995, 1998, and 2000) proposed the minimal program. The selection of lexical items from the lexicon is considered to be the first step in every clause derivation (*Operation Select*) Zwart (1993). Semantic, Syntactic, and Phonetic features (Sem, Syn, & Phon) are thought to be present in every word in the lexicon. Merge is a straightforward mathematical process that creates syntactic derivation. A merge operation combines pre-formed elements or syntactic objects chosen from the lexicon. Both internal and external operations can be combined, when an operation combines words taken from out of the lexicon with already formed elements or syntactic objects, it is referred to as a "**external merge**"; but, when it recombines elements within an already formed syntactic object, it is referred to as a "**internal merge**." Within MP, operations such as Merge, Attract and Select are based on the binary principle.

Consequently, the set of elements that x and y are a part of is the operation of type x, y. This implies that ternary branching is not an option because merging is binary in nature. MP ensures that a syntactic derivation's output is derived from the input labels and not some arbitrary collection. For instance, since  $\gamma$  is not part of the input to begin with, the result of merge ( $\alpha$ ,  $\beta$ ) can only be either an  $\alpha$ -phrase or a  $\beta$ -phrase (cf. Ilori and Oyeade 2012). It is also anticipated in MP that any operation merge product would eventually reach the Spell-Out interface level. Spell-Out, is the outcome of a derived clause at the level of pronunciation; i.e. Phonetic form (PF). The compatibility of the word characteristics used in the derivation, which must be tested against one another during the derivation process; otherwise, the derivation crashes, is other words MP ensures that every syntactic derivation converges at Spell-Out. The Split-IP Hypothesis of Pollock (1989) and the Split-CP Hypothesis of Rizzi (1997), which suggested that the splitting of the IP and CP projections into units inside them in order to encapsulate other elements that could move with the head in the Internal Merge operation, are MP presuppositions, which are drawn from Government and Binding Theory (Chomsky 1981, 1986).

### III. Results and Discussion

#### 3.1 Ergative Construction in Yorùbá

In Yorùbá, ergative construction is an A-movement which involves transitive verbs that have null spell-out for subject DP, as a result, the object DP acts intransitively as the subject DP. See the examples in (4) below:

- | A  | B   |
|--|---|
| 4 (i) ____ <b>sun omi</b><br>- spring water                                  | (i) <b>Omí sun</b> <omi><br>Water spring<br>'The water sprang'  |
| (ii) ____ <b>şàn àgbàrá</b><br>- flow flood                                  | (ii) <b>Àgbàrá şàn</b> <agbara><br>Flood flows<br>'The flood flew'  |
| (iii) ____ <b>tú ọjà</b><br>- disperse market                                | (iii) <b>Ọjà tú</b> <oja><br>Market disperse<br>'The market dispersed'  |
| (iv) ____ <b>gbẹ ilẹ</b><br>- dried soil                                     | (iv) <b>Ilẹgbẹ</b> <ile><br>Soil dried<br>'The soil dried'  |
| (v) ____ <b>yọ ìdín</b><br>- emerge maggot                                   | (v) <b>Ìdín yọ</b> <idin><br>Maggot emerge<br>'The maggot emerged'  |
| (vi) ____ <b>ran Òòrùn</b><br>- set sun                                      | (vi) <b>Òòrùn ràn</b> <oorun><br>Sun sets<br>'The sun sets'   |
| (vii) ____ <b>wó ọpó</b><br>- fall pillar                                    | (vii) <b>Ọpó wó</b> <opo><br>Pillar falls<br>'The pillar fell'  |
| (viii) ____ <b>já ọrún</b><br>- cut twine                                    | (viii) <b>Ọrún já</b> <orun><br>twine cut<br>'The twine cut'  |
| (xi) ____ <b>fọ ìgò sí ọwọ Ọjó</b><br>- break bottle P hand NP               | (xi) <b>Ìgò<sub>i</sub> fọ</b> <igo> <b>si owo Ọjó</b><br>bottle break P hand NP<br>'The bottle broke in Ojo's hand'                    |
| (x) ____ <b>jó ilé náà ní ojú gbogbo wa</b><br>- burn house det P eye all us | (x) <b>Ilé náà<sub>i</sub> jó</b> <ile naa> <b>ní ojú gbogbo wa</b><br>house det burn P eye all us<br>'The house burnt in our presence' |

The data (4) above, are divided into two sets. Set A represents the sentences before spell-out while Set B shows the spell-out. 4(A) indicates that there are agents that perform the purported actions of the verbs which are not spell-out at the subject position. In 4(B), the object DPs of the verbs are moved out of the object position to fill the gap of the

missing agents that performed the action. The verbs in (4B) become stranded when the object DPs are moved to subject position. It must be noted that before spell-out in 4(B), the object DPs have been theta marked. Based in the interaction of verbs and their objects in 4(B), one will observe that the verbs cannot assign case to their internal arguments and also theta mark their external arguments. This simple explanation for the inability of verbs to assign accusative case to their internal argument and theta role to their external can be linked to the absence of subject DP in the sentences before spell-out. As stated in the preceding sentence, the ability to delete the subject DP is the unique feature of this verb. Thus, the object DP is then moved to the subject position to salvage the grammaticality of the sentence. If we assume that (4A&B) is the output of an underlying clause, then examples (5) clearly demonstrate how (4A&B) are derived, one will observe that the two rules (subject DP deletion and object DP movement) are applied below:

	Subject DP deletion	Object DP movement
5(a) <i>Òjò wó ilé</i> Rain collapsed house 'The rain collapsed the house'	5 (b) ----- <i>wó ilé</i> collapsed house '----- collapsed house'	5(c) <i>Ilé wó</i> < <sup>ilé</sup> > House collapsed 'The house collapsed'

Note that 5(a) is the underlying representation; it undergoes subject DP deletion before spell-out in 5(b) while in 5(c), the object DP is moved to subject position after spell-out. It must be noted that, inchoative splitting verbs have a similar structure with ergative or un-accusative construction. See the examples below:

Cohative splitting verb	Inchoative splitting verb
6(a) <i>Olú ba àga Òjó jé</i> O. V chair Ojo V 'Olú spoilt Ojo's chair'	6(b) <i>Àga Òjó bàjé</i> Chair Òjó spilit 'Òjó chair spoilt'

In 6, the subject DP is deleted and object DP assumes the subject position through movement. One will notice that the verb that are separate units in (6a) become fused together in (6b). The only difference that one notices is that ergative construction has a single verb while the inchoative splitting has the fusion of two separate verbs which can function independently in most cases. Similarly, reporting verb share the same feature with ergative sentence with a slight difference. See the examples below:

7(a) <i>Ó dára pé Òjó lọ</i> O. good Comp NP go 'It is good that Òjó went'	7(b) <i>Pé Òjó lọ dára</i> Comp O. go good 'That Òjó went is good'.
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In 7, it is observed that expletive stands as the subject of the clause in (7a) as place holder to enhance grammaticality. In (7b) the CP is moved to subject position of the clause to trigger the nominalization of the sentence. The difference between ergative construction and reporting verb is that CP can only be theta marked but not case marked. Second, the CP is a truncated TP, that is, a nominalised sentence. Thus, the purpose of the CP movement in 7(b) to Spec-TP is to satisfy EPP. There are no inherent case features in the CP that makes it accessible to Spec-TP unlike the ergative construction where the case feature in the DP makes it accessible to the EPP at Spec-TP. It is also pertinent to note that un-accusative/ergative verbs are distinct from symmetrical and object selecting verbs. Consider the following examples:

8(a) <i>Olú bí inú</i> O. ? stomach 'Olú is annoyed'	(b) <i>Inú bí Olú</i> stomach ? O. 'Olú is annoyed'
--	---

9(a) *Olú jẹ ẹran*  
 O. eat meat  
 'Olu ate meat'

\* (b) *eran jẹ*  
 meat eat  
 'Meat ate'

Examples 8a&b are symmetrical verbs, the object DP can move to subject position while the subject DP can move to object position without meaning alteration. The two sentences bear the same meaning. However, one needs to observe that the subject DP bears experiencer theta role while the object DP is assigned theme theta role. The swap of the DPs to each other's position does not affect their theta roles. It is worthy to note that if any of the DP is deleted, the sentences in (8a&b) will be ungrammatical. In examples (9a&b), the verb is an un-ergative verb that must obligatorily assign theta roles to both the subject and object DPs just like (8) above. The deletion of the subject DP and the movement of object DP to subject resulted in the ungrammatical output as shown in (9b). It is important to note that ergative verbs are transitive verb that can sustain both subject and object DP just like (8&9) but the subject can be deleted to allow the object DP to be raise to Spec-TP as discussed earlier. This type of clause is not limited to Yorùbá. Lamidi (2000) reported similar examples in English. He explains that truncated passive structures undergo agent deletion and the object DP movement. See the examples below:

10(a) *The door broke*  
 (b) *The window opened*

(c) *The bell rang*  
 (d) *Olú was abused*

The English examples in (10a-d) have basically the same structure with the Yorùbá examples in 4 above. The processes of agent deletion and object movement aptly explain the spell-out of the sentences.

In MP, DP is assumed to have inherent case feature which must be checked during computation. Note that the object DPs in the sentences in (4B) still have unvalued case feature which must be valued before they can moved to LF and PF. Although this question has generated arguments among scholars, this present paper revisits their positions to provide convincing and adequate analysis. The positions of the scholars are revisited below:

(i) Robberts (1997), postulated case as the factor that motivated the DP movement. If truly case licensing is the motivation for the movement in ergative construction, it will be difficult to provide plausible explanation for DP complement of PP that checks its case feature without any movement. Second, the explanation for expletives that has no case feature at Spec-TP will also pose a challenge to Roberts (1997) arguments. Lastly, explanation for DP movement outside the matrix clause from a case position to a case-less position is another strong testimony that DP movements are not conditioned by case but EPP feature. Although, his data and analysis are based on Italian language but it has universal implication.

(ii) Yusuf's (1998) assertion that theta alongside pragmatics will offer explanation to DP movement in ergative construction lacks theoretical evidence in the sense that theta role are assigned to DP through merge operation. Second, pragmatics as speculated by Yusuf (1998) has nothing to do with A-movement cross-linguistically.

(iii) Akanbi's (2010) claim that EPP (extended projection principle) is the motivation for the DP movement in ergative construction is plausible, however, his inability to explain how the case feature of the DP is checked needs further clarification.

In this study, I explain the DP movement in ergative construction in line with Fadden (2003) who submits that there are at least three reasons to suggest that it is only functional head that drives DP movement. First, he submits that only DPs with 'structural' case are

allowed to undergo movement before they can be licensed. Thus, object DP of preposition and DPs with inherent or semantic case that does not have such prerequisite. He maintains further that if case-licensing is a universal prerequisite of DPs, the dichotomy of case licensing will not come up, if the general assumption is that these types of DPs (object DP of preposition and DPs with inherent or semantic case) are 'licensed in-situ', by the P head. In this case, it would be easier to assume that they are never licensed. The question that may likely come up is why is the complement of P licensed in-situ while the complement of V is licensed ex-situ? The simple answer to this is that the object of V's movement is to satisfy the EPP. He noted further that object of P cannot move to satisfy the EPP simply because A-movement out of PPs is not allowed. When this ban does not apply such as the case of preposition stranding, the DP undergoes A-bar movement to satisfy the EPP. It must be noted that object DP of P cannot undergo A-movement in Yorùbá, it can only undergo A-bar movement and the DP moves simply to satisfy EPP. Consider the Yorùbá example below:

- (11) **Akin fọ̀ ìgò sí ọ̀wọ́ Ọ̀jọ́**  
 A. break bottle P hand NP  
 'Akin broke bottle in the hand of Ọ̀jọ́'

In 11 above, it is obvious that DP complement (*ọ̀wọ́ Ọ̀jọ́*) of P is licensed in-situ. It checks its oblique case without movement. In the same vein, it is logical to argue that object DP of the verb *ìgò* 'bottle' is not moved to Spec-PredP to check its case but to satisfy the EPP feature. Although, the DP has inherent case which must be checked-off during computation, the accusative case only makes it accessible to EPP because all unvalued features must be valued before spell-out. This explanation lends credence to the fact that DP movements are not necessitated by case checking but by functional elements. Note that DP complement of P cannot undergo A-movement in Yorùbá, it can only undergo A<sup>1</sup>-movement, and when it does, it moves to satisfy the EPP feature and the preposition is always stranded. See the example below:

- (12) **Ọ̀wọ́ Ọ̀jọ́ ní ìgò fọ̀ sí <ọ̀wọ́ Ọ̀jọ́>**  
 Hand O. Foc bottle break P  
 'It was in Ojo's hand that the bottle broke'

The movement of the DP complement P is moved outside the TP to Spec-FocP to satisfy EPP feature.

Second, I claim that expletives occurrence at subject position is not triggered by case licensing but EPP. Marantz (1991& 2000) also asserts that the occurrence of expletives such as: *it* & *there* at the subject position of in English sentences is not necessitated by case. Consider the Yorùbá examples below:

- (13) **Ó dùn mí gan**  
 Pro pain me seriously  
 'It pained me seriously'
- Ó dà mí láàmú**  
 Pro cause me trouble  
 'It caused me tribulations'
- Ó ẹ̀ mí ní wàhálà**  
 Pro do me P stress  
 'It stressed me'

In 13 above, the expletive is merged as the highest argument of a verb because they have no external arguments. Note that expletives are gap fillers; they have no case feature inherent in them. If the movements of DP are solely predicated on case, the expletive will not occupy the Spec-TP position. However, the EPP of feature of Spec-TP demands that the gap must be filled otherwise the sentence will crash. Fadden (2003) also claims that a DP that would have raised to subject position is not forced to when a substitution has already filled its gap. He explains further that the same thing is suitable for associative of a ‘*there-type expletive*’ and it is also pertinent for objects in passive double object constructions in Icelandic (from Freidin and Sprouse 1991):

14 (a) Ég syndi henna bílinn  
 I-NOM showed her DAT the car –ACC  
 ‘I showed her the car’

(b) Bílinn var syndur henna  
 The car NOM was shown her DAT  
 ‘The car was shown to her’

(c) Henni var syndur bílinn  
 Her DAT was shown the car-NOM  
 ‘She was shown the car’

14 (a) depicts an active double object sentence, which has changed to passive forms in 14b or 14c. It is worthy to note that one of the objects as a matter of necessity must be raised to the vacant subject position but it can only be one of them, while the other (DPs) remains inside the VP. This may not be necessary if movement is triggered by the demand for DP licensing. Thus, in the example 14(b), *bílinn* is raised to subject for purposed of licensing. However, the same not applicable to 14 (c) without movement? Of course, a number of reasons have been adduced for this type of behaviour, which includes either, mediated licensing via ‘*their-expletive*’ or things like long-distance, Agree. However, if DP-licensing has no cogent role in triggering movement, such temporary mechanisms adopted may not be necessary. The pattern of the movement stated above is what EPP predicted: that is one DP must occupy the relevant specifier position, and once it is done, all others can remain wherever they are in the sentence. Lastly, the only DPs that are often demanded to raise are basic subjects. It is important to that in infinite clauses where subject Case is not required; subject did not remain VP –internal:

15 a.\* ... to John eat beans  
 b. ... John to eat beans

On the other hand, objects always remain VP-internal, like beans in (15) above. If licensing is the rationale for a DP's movement out of the VP, there would be no need for the asymmetry between objects and subjects, since the two are equitably in need of licensing from Case. However, if the EPP is the rationale for movement, then the asymmetry is predictable. By relativized minimality, the topmost DP will be chosen to raise to satisfy the EPP, and this is often times the underlying subject if sentence has one. The only condition for the underlying object to raise is the null spell-out of the underlying subject which is the highest argument, in passive and unaccusative constructions. Marantz (1991& 2000) cites examples where expletives such as *it* & *there* occur at the subject position of a sentence, and concludes that EPP rather than case motivates DP movement in unaccusative constructions. The fact of the examples presented and explanations provided

proves that case does not motivate DP movement in un-accusative constructions and by extension unergative construction.

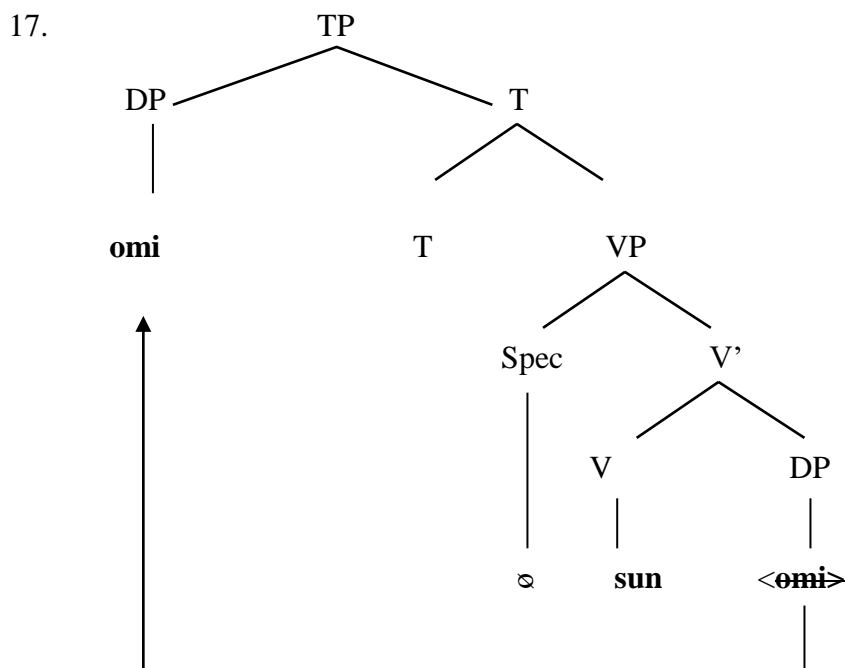
### 3.2 The Minimalist account of Ergative construction in Yorùbá

In minimalist, Chomsky (2000, 2001) explains that case features only appear on DPs not on T and they can be checked off without movement under Agree. The EPP feature on T actually drives raising to Spec-TP. However, once the DP has its features checked off it is no longer visible for attraction by EPP feature. In a nutshell, unchecked case allows for raising while EPP forced it. For examples in 4(A) above, it is logical to claim that the absence of the subjects before spell-out forced the objects to raise to Spec-TP after spell-out in 4(B) since it is the highest argument position in the construction. It is argued here that EPP forced the raising of the DPs to Spec-TP positions in 4(B) but their case that have not been checked-off make them accessible to EPP. To account for the projection of ergative construction in Yorùbá, I repeat example: (4a(i)& 4b(i)) in 16 below:

16 (a)          **sun omi**  
- **spring water**

b **Omí<sub>i</sub>** sun *t<sub>i</sub>*  
Water spring  
'The water sprang'

The derivation of the clause starts with operation select where the verb **sun** ‘spring’ is selected from the lexicon and merged with object DP **omi** ‘water’ to satisfy the C-selection principle to derive assigned VP. The theme theta role is assigned to object DP **omi** ‘water’ through the merge operation. It is logical to claim that verb and its direct object originated at the inner core VP because the causative agent that performs the action has null spell-out in the clauses. Thus, the inner core VP merges with T-head to project T<sup>l</sup> and TP respectively (Radford 2009). Thus, the object of the verb **omi** ‘water’ which is a non-causative agent assumes the subject position. The movement proposed is line with **attract closest condition** which stipulates that T-head normally attracts the closest nominal within the structure containing it, thus the case feature in the nominal expression that has not been checked makes it accessible to EPP at Spec-TP (Radford 2009, Sabel 2002 and Chomsky 1995). The explanation is represented diagrammatically below:



## IV. Conclusion

This study examines ergative construction in Yorùbá. It differentiates ergative verbs from other related verbs in Yorùbá. The study demonstrates through Minimalist program that the only DP in ergative construction performs dual functions. It is the subject based on the syntactic position and morphological marking, while it also functions as object because it bears theme theta role. The study shows that EPP is the motivation for the DP movement in ergative construction while the case features in the DP that has not been checked makes it accessible to EPP. The study concludes that it is position of occurrence of a DP in a clause that determines its case.

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