You can have the cake and eat it too: Reconciling UTAH and inherent ergative case
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A prominent approach to ergative case is to treat it as *inherent*, i.e. assigned in-situ with the agent θ-role (e.g. Woolford 2006; Aldridge 2008a; Legate 2008; Coon et al. 2021). Baker and Bobaljik (2017) suggest that this approach is incompatible with standard assumptions about thematic roles, such as the Uniformity of Theta Assignment Hypothesis (UTAH; Baker 1997): if transitive agents receive ergative case, unergative agents should receive it too, which is typologically uncommon. I argue that this claim is based on a simplistic view of UTAH: the degree of agentivity, and correspondingly, the type of agent-introducing head, is evaluated based on a combination of factors, including the presence and type of internal argument. These heads are distinguishable independently of case and can be observed beyond ergative languages, as confirmed by prior work on Samoan and Algonquian and novel observations from Jakarta Indonesian and West Circassian.

Different positions for agents. Tollan (2018); Tollan and Massam (2022) argue that external arguments in Samoan are introduced in two distinct positions depending on the degree of agentivity: high agents are in the specifier of Voice^0, which assigns inherent ergative case, whereas less agentive arguments, including unergative agents and experiencers, receive structural nominative case in the lower Spec,vP (3). This analysis is supported by an absolutive-oblique case frame for less agentive verbs—including transitivized unergatives (1,2a)—and some transitive verbs allowing for both absolutive and ergative subjects, with the latter expressing increased agentivity (2).

(1) Sā siva [le teine] ([i le siva]).
    PST dance the girl (OBL the dance)

    'The girl(ABS) danced (a/the dance(OBL)).'
    (*transitivized unergative*; Tollan 2018:2)

(2) a. Na va'ai [le fafine] [i le pulea'oga] (i le maketi).
        PST see the woman OBL the principal OBL the market

        'The woman(ABS) saw the principal(OBL) (at the market).'
        (~ *accidentally; the meeting was spontaneous*)

     b. Na va'ai [e le fafine] [le pulea'oga] (i lona ofisa)
        PST see ERG the woman the principal OBL her office

        'The woman(ERG) saw the principal(ABS) (in her office).'
        (~ *intentionally; the woman visited the principal*) (Mosel and Hovdhaugen 1992:424)

(3)
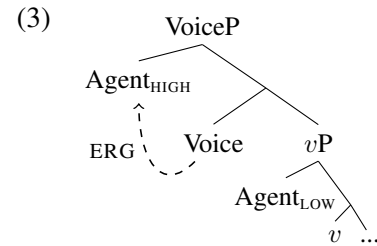
Tollan and Oxford (2018) similarly argue for the absence of the higher Voice^0 head in unergative clauses in Algonquian languages, which do not display ergative alignment, confirming that the distinction between two types of agent-introducing heads is not idiosyncratic to ergative languages.

The talk will argue that the existence of two distinct agent-introducing heads explains the typological rarity of so-called *active alignment* languages, where all agents receive ergative case. Building on Dowty (1991), Tollan (2018) attributes the semantics of the agent—and corresponding the choice of agent-introducing head—to multiple factors, including volitionality, effort, telicity, and *the degree of effect on the patient*. This correctly predicts that unergative verbs, which lack an affected patient, would be less likely to assign ergative case to their external arguments.

The syntactic distinction between inherent case-assigning Voice^0 and v^0 which does not assign ergative case is further supported by Jakarta Indonesian (JI), which lacks both case and agreement morphology, and West Circassian (WC), which primarily expresses argument alignment through agreement.

Distinguishing external arguments without case. While most transitive verbs in JI are compatible with both active (4) and passive morphology (5), a subset of bivalent verbs (e.g. *dapat* 'receive', *lupa* 'forget', *bicara* 'speak') are not (6-7; Stevens 1970; Chung 1975; Vamarasi 1999 on Standard Indonesian).

(4) Dia **n**ulis buku-nya ngebut.
    s/he ACT+write book-the rushed

    'S/he wrote the book really fast.'

(5) Buku-nya udah selesai **di-**tulis.
    book-the already finish PASS-write

    'The book has been written.'

(6) a. Aku dapat buku ini kemarin.
I receive book this yesterday

b. * Buku ini **di-**dapat aku kemarin.
book this **PASS**-receive I yesterday

'I received this book yesterday.'

(7) a. Aku lupa istilah bahasa Inggris-nya.
I forget phrase language English-the

b. * Istilah-nya **di-**lupa aku.
phrase-the **PASS**-forget I

'I forgot the phrase in English.'

Similarly to Samoan, these predicates may be transitivized with the addition of the transitive suffix *-in*, resulting in a more agentive interpretation (8).

(8) Kejadian itu susah buat **di-**lupa***(-in)** Yuni.
incident that hard for **PASS**-forget-**TRANS** Yuni

'That incident was difficult for Yuni to erase from her memory.'

Following Aldridge (2008b); Cole et al. (2008); Erlewine et al. (2017), a.o. the voice prefixes expone the head which introduces the high agent—Voice^0. However, the data in (6-7) suggests that some external arguments are introduced without Voice^0—in Spec,vP. Adding Voice^0 to these verbs results in a change in interpretation and causes v^0 to be spelled out as *-in* (8). Unergative verbs such as *nyanyi* 'sing', *main* 'play', and *belajar* 'study' also fall into this latter category: they are incompatible with voice morphology even when combined with an internal argument (9-10).

(9) Yuni cepet belajar huruf-nya.
Yuni fast study alphabet-the

'Yuni is learning the alphabet quickly.'

(10) * Huruf-nya **di-**belajar Desi.
alphabet-the **PASS**-study Desi

Intended: 'The alphabet was studied by Desi.'

Indonesian thus confirms that high agents of transitive verbs are introduced in a position which is distinct from unergative agents, lending further credence to the idea that transitive agents may be associated with inherent case even if unergative (and other low) agents are not.

Voice-related operations only target high agents. West Circassian is polysynthetic, with free word order, pro-drop, and case marking frequently left unexpressed (e.g. Arkadiev et al. 2009; Lander and Testelets 2017; Ershova 2019). Like Samoan, it is uniformly ergative: subjects of unergative (and unaccusative) verbs are cross-referenced with the same leftmost agreement marker as objects of transitive verbs (11-12), whereas agents of transitive verbs trigger distinct ergative agreement (13). Similarly to Samoan, there are also bivalent verbs, including transitivized unergatives, which display absolutive-dative agreement (14).

(11) **Ø-**qeŝʷaʁ
3ABS-dance.PST

'S/he danced'

(12) **Ø-**s-ƛeʁʷəʁe
3ABS-1SG.ERG-see.PST

'I saw him/her'

(13) s-**jə-**ƛeʁʷəʁ
1SG.ABS-**3SG.ERG-**see.PST

'S/he saw me'

(14) **Ø-ja-**bewə
3ABS-3PL.DAT-kiss

'S/he kisses them'

Ergative agents may be demoted to an applied object position, rendering an abilitive or inadvertent interpretation (15), while absolutive external arguments cannot (16; Letuchiy 2009, 2010). This is explained by the association of ergative agents with the higher Voice^0: agent-demoting operations apply at the level of VoiceP, but are incompatible with a bare unergative vP.

(15) **Ø-a-fe-**ƛeʁʷəxerep
3ABS-**3PL.IO-**BEN-see.PRS.NEG

'They cannot see them'

(16) * Ø-**a-fe-**bewəxerep
3ABS-**3PL.IO-**BEN-kiss.PRS.NEG

Int. 'They cannot kiss them' (Letuchiy 2010:335)

Finally, the possibility of inherent case-marked external arguments is corroborated by the existence of experiencers which receive inherent dative case from Appl^0 (e.g. Sigurðsson 1992; Woolford 2006)—this is not contested even in dependent case theory (see e.g. Baker 2014:134-135).

Select references •Aldridge 2008b. *Lingua* 118. •Baker & Bobaljik 2017. In *Oxford Handbook of ergativity*. •Chung 1975. In *Subject and topic*. •Cole et al. 2008. *Lingua* 118. •Ershova 2019. UChicago diss. •Letuchiy 2010. In *Ergativity, valency and voice*. •Stevens 1970. *Indonesia* 9. •Tollan 2018. *Glossa* 3.